

July 5, 2023

BY E-MAIL

phc@toronto.ca

Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Nancy Martins, Committee Administrator, Planning and Housing Committee

To: Chair Bradford and Committee Members

Re: PH5.3 - Our Plan Toronto: Recommendations on Seventy Employment Area Conversion Requests and Chapter 7 Site and Area Specific Policy Review - Final Report

Conversion Request #103: 340-364 Evans Avenue and 12-16 Arnold Street
Conversion Request #124: 12-50 Drummond Street & 1, 1A and 1B Harold Street

The South Etobicoke Industrial Employers' Association (SEIEA) represents a group of manufacturers and industrial businesses, across several industry sectors with operations and facilities in the South Etobicoke Employment Area.

While we are focused on our Employment Area, we note that employment lands city-wide are an important, finite resource that the City must maintain. The staff report states that the Land Needs Assessment determined that "there is more than sufficient potential housing in areas designated in the Official Plan for residential development to accommodate Growth Plan population forecasts at 2051." Conversion of employment lands is not required. Employment land must be considered in terms of the benefits it brings to Toronto residents: local jobs for Toronto residents. A steady erosion of employment lands will limit and reduce jobs which are an important element of housing affordability. Toronto has a rich heritage of employers who built and operated facilities all over the City and provided jobs for generations of residents. It is imperative that these jobs and the lands that support these jobs are maintained.

The South Etobicoke Employment Area is among the largest in the City, providing approximately 40,000 jobs, many for South Etobicoke and Toronto residents. It is strategically located near major transportation networks, is a good location for many firms in Toronto's film industry and is close to the Ontario Food Terminal with many food distributors having facilities here. Many other manufacturers and industrial employers are also located here. The Province has recognized the importance of this area when it designated it as a Provincially Significant Employment Zone (PSEZ).

We have reviewed the June 16/23 Final Report on employment area conversion requests, in particular, for the South Etobicoke Employment Area. We support the staff recommendations which recommend against conversion, and specifically for the following locations:

- #103: 340-364 Evans Avenue and 12-16 Arnold Street
- #124: 12-50 Drummond Street & 1, 1A and 1B Harold Street.

These are important employment lands which, if converted to mixed use (including sensitive uses), would impact the broader South Etobicoke Employment Area.

#103: 340-364 Evans Avenue and 12-16 Arnold Street conversion request

This site is centrally located in the South Etobicoke Employment Area which ranges from Browns Line in the West to just west of Royal York Rd in the East. These lands are located approximately halfway and are adjacent to the Gardiner Expressway on the north side and bounded by Evans Avenue on the south side. To the immediate west is Kipling Ave which is a major truck route to and from the employment area and to the east is the on and off ramp to Gardiner Expressway which provides access to Evans Avenue and Horner Avenue. This is an excellent transportation network for trucks, with direct highway access from the employment area without driving through other non-employment areas. This highway access then provides access east into the City (including the Ontario Food Terminal), and west and north to freight distribution networks through the province. Excellent highway access is a feature of this employment area. The Province recognizes the importance of transportation networks through the current (and proposed future) PPS: "1.3.2.6 Planning authorities shall protect employment areas in proximity to major goods movement facilities and corridors for employment uses that require those locations."

Since these lands are centrally located, a conversion to a sensitive use would impact existing and future businesses' operations. Many manufacturers operate 24 hours x 7 days per week, including shipping and receiving operations which generate truck traffic and noise, including audible back-up alarms and lights and general truck traffic in their yards. Other noise sources include equipment that must be located outdoors or on rooftops. The introduction of a sensitive use may create a 70 meter separation distance and 300 meter influence area requirement under MECP D1-6 Guidelines which can impact their operations and existing ECA's (Environmental Compliance Approval). This proposed conversion would be the only sensitive use within a 300-meter radius of the site and would impact a large portion of the employment area.

Introducing a mixed use (i.e., a sensitive use) at this location would impact businesses in the immediate vicinity and lead to more conversions, destabilizing the employment area as a whole. We support staff's recommendation to continue to designate these lands as Core Employment Areas.

#124: 12-50 Drummond Street & 1, 1A and 1B Harold Street conversion request

This property is currently zoned core employment. Immediately to the north is the CN rail yard and other railway facilities. To the southwest, on Dwight Ave. is Gambles Produce Inc., a produce distribution company, who built one of their two South Etobicoke refrigerated distribution facilities here several years ago; the other one being at the Ontario Food Terminal. There are shipping and receiving operations 24 hours x 7 days per week. Next to this site are other manufacturers and food distributors. The introduction of a sensitive use on these lands

would impact the operations of these companies as the noise and vehicle traffic from around-the-clock distribution operations is not compatible with a sensitive use.

Further, a conversion would move the industrial / residential boundary further west from its existing location. If this conversion were to proceed, it would surely lead to additional conversions nearby and this would in turn destabilize the eastern portion of the South Etobicoke Employment Area. The existing industrial uses are situated in a manner that buffers the residential subdivision to the east, between Dwight Ave and Royal York Rd. Maintaining these existing buffer uses is an important way to limit any noise and traffic impacts on this neighbourhood. We support staff's recommendation to continue the designation of these lands as Core Employment Areas.

Employment lands are a valuable and finite resource for City residents. They provide good, local jobs. We request that the Committee adopt staff's recommendation to maintain the lands in conversion requests #103 and #124 as Core Employment Areas, and further, to retain and protect employment lands across the City.

Thank you for your consideration of this matter.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Al Brezina', is centered on the page.

Al Brezina

Executive Director
South Etobicoke Industrial Employers' Association (SEIEA)
abrezina@seiea.ca
www.seiea.ca

cc: Councillor A. Morley