



July 23, 2024

**Re: PH14.14 Medical - Office Facilities/Affordable-Seniors Residential Project in Continuum of Care Setting**

To Toronto City Council: Mayor Chow and Councillors, through the Office of the City Clerk,

During this week's City Council session there will be discussion about the City making a request for the Province to issue a Minister's Zoning Order to quickly convert the site of some employment lands in our city to housing, specifically to create supportive seniors housing and care. While the Toronto & York Region Labour Council agrees that housing is desperately needed in the City, we believe Councillors should vote down the request for an MZO at this site.

One of the most urgent crises being face by our city today is the housing crisis. For years, working people in Toronto have been pushed further and further away from the City, and into housing which increasingly does not meet their needs while prices continue to go up. The impacts of the housing crisis are often felt even more acutely by seniors living on a fixed income, who are increasingly being forced into more and more precarious forms of housing, or, shamefully, onto the street.

For these reasons and more, the Labour Council is and has been firmly in support of housing which meets working people's urgent needs. Importantly, we support housing which is based on need and people's ability to pay, rather than being based in the search for further profits for landlords and property developers. In particular, we believe rental housing which has rent geared-to-income, social housing which is publicly owned, and co-op housing to be the best way to address the housing crisis, and ensure all working people, including seniors, live in dignity.

One thing we do not support however, is the construction of that housing on land which already provides a vital function in our society and economy. The Labour Council has consistently opposed the rezoning of employment lands for the purpose of retail, office uses or housing. Other land is available in the City for such purposes.

Rezoning employment lands for housing development takes away land for industrial uses which likely has no other place in the city. The work conducted on these sites is often noisy, smelly, with lots of traffic, and can at times carry on late into the night, or start early in the morning. This is the reason it is zoned separately from housing - these are not uses that sit nicely next to each other. This poses a particular threat to seniors, who are more likely to travel as pedestrians, and will have to negotiate industrial and large scale uses around them, and the associated dangers.

Furthermore, rezoning employment lands for the purposes of housing development tends to have a domino effect. Once some employment lands are lost to housing, the new residents of these housing projects voice complaints about the nearby unconverted employment lands, for reasons mentioned above, and more land is converted. In last year's Committee hearings about requested employment area conversions, we repeatedly heard that a tiny number of complaints can lead to shut down of various sectors whose work is offputting to residents or shoppers.

This process has repeated itself over the decades in Toronto. In the 1990s, approximately 14 % of land in the city was classified as employment lands. This declined to about 13 % by around 2020. The last round of conversions has reduced employment lands further, to somewhere between 10 and 12%. This number never increases, which means industry and related jobs are permanently lost to the City. These jobs are typically good unionized jobs, with benefits, fair wages, and which are often filled by those living in the local community who will now have to travel further for that work, thus increasing road congestion.

Even if employment lands are not currently being utilized as they might be, it is wise to hold on to them for future uses such as manufacturing and other uses which would, for example, help to re-localize our supply chains (think about lessons learned from COVID as well as how best to fight climate change through green manufacturing.) It would be shortsighted to eliminate more employment areas from Toronto's shrinking supply.

The reasons listed above should be enough for members of Council to vote against requesting an MZO, and to preserve employment lands on this site. Further, we have some additional concerns that should give additional pause to reflect on this decision.

On the basis of brief analysis, there is not much information about what is proposed for the site. The communication is with an unknown, numbered company. What is to prevent numerous changes in the plans, once an MZO is granted and the employment area protection is lifted? Ministers can choose not to make specific or stringent requirements in the pre-plans and can make minor variances afterwards.

A 2023 City of Toronto analysis has shown that conversion does not always lead to immediate construction of housing. The study found that of the 79 sites in employment areas that had been converted since 2013, only 20 had residential units built on them, and 52% of the remaining sites have already been sold by the owner who requested the conversion.

There is a reason we have developed a robust consultation process for rezoning, one which is democratic, and ensures that changes which could fundamentally alter the make-up of our city and the lives of its residents are duly considered. The employment land conversion process wrapped up recently, and using an MZO for this vague proposal seems irresponsible.

Further, there appears to be a connection with owners of Fiera Foods on this project. As an employer, Fiera Foods has a bad reputation for skirting health and safety laws for its employees, which has led to several deaths at their businesses and associated businesses over the years. Detailed reporting from The Star has revealed a business which does not provide required training to numerous "temporary employees", exploits their workers, and has not been accountable when its workers are killed on the job. A vague proposal from people connected with such a company should be viewed with skepticism.

For these reasons, we call on Councillors to vote against requesting the MZO for this site, to protect jobs and the working people who do them. We recognize the urgency of building housing in the City, and believe there is much more that can be done to deliver this fundamental need to working people, but not in this way.

Yours truly,



**Andria Babbington**

*President*

**Toronto & York Region Labour Council**

COPE 343

---

**Toronto & York Region Labour Council**

895 Don Mills Road  
Tower Two, Ste. 730  
Don Mills, ON  
M3C 1W3



(416) 441-3663



(416) 445-8405



labourcouncil.ca



@labourcouncil

