



EMAILED

June 13, 2024

Planning and Housing Committee
10W – City Hall,
100 Queen Street West,
Toronto, Ontario,
M4H 2N2.

Dear Councillor Gord Perks and Members of the Planning & Housing Committee,

Re: PH13.2 Our Plan Toronto: Recommendations on the East Harbour Employment Area Conversion Request - Final Report

We are writing concerning the re-affirmation of the cultural heritage landscape designation of the Ship Channel as well as allowing public access to extensive lengths of the Ship Channel (Attachment 10). The OLT-approved Official Plan Modification Map 3D identifies the Ship Channel as a "cultural heritage landscape" recognizing the dockwall legacy.

Great Lakes shipping has been in a renaissance for quite some time as more and more cities take advantage of the huge opportunities provided by green and economical marine transportation. Great lakes ports provide a window on the world for imports and exports that reduce supply chains and make manufacturers more competitive.

While vitally important to every Ward in our City, Toronto's Port shipping volumes have only increased modestly and the Port does not offer opportunities to export our goods to American or overseas destinations. We must ship overseas through either East Coast Ports or Vancouver which is expensive and time-consuming.

The planning and other policies, including heritage landscape policies for the Ship Channel that regulate development of the Port do not encourage its growth but are restrictive and even hostile to industrial operations. For example, the Port is run by several agencies – not the way to run a business. Parks are being located adjacent to heavy industry and the rail service was allowed to deteriorate which led to its closure. The Port is not deemed important enough to be designated solely as an Employment Area.

The policies and maps in the Port Lands Official Plan Modification, as approved by OLT in 2021, consider the Ship Channel as a "Cultural Heritage Landscape". That means per provincial policy any and all future development must consider, via a Heritage Assessment, impacts to the Ship Channel. This would include future and expanded industrial operations that use the Ship Channel. An industrial operator would now need to expend more resources to address potential heritage impacts, should they wish to expand their operations, adding another layer of regulatory burden to proceed with economic development.

The Ship Channel is in dire need of repair and refurbishment, and as a Cultural Heritage Landscape, there has been no movement on restoring this vital piece of City infrastructure. The dockwall simply cannot contribute to a cultural heritage landscape and retain its cultural heritage value and attributes if it is simply left in a state of disrepair. Its legacy and continued use cannot be recognized if it is falling apart.

The Ship Channel is a unique waterfront amenity and transportation spine. Official Plan Modification Policy 6.2 says that the Ship Channel will be "appropriately conserved." The PPS, in Policy 2.6.1, states that "significant built heritage resources and significant cultural heritage landscapes shall be conserved." This is simply not occurring without funding for repair of the dockwall as part of a larger revitalization strategy in the Port.

The Port needs a planning and economic framework that will allow it to grow and serve the Toronto region better. Designating the Ship Channel (Cultural Heritage Landscape) or allowing public access along stretches of the active dock wall (Waters Edge Animation) which could be a federal security issue, diminish any effort to grow the Port.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Craig McLuckie', with a stylized, cursive script.

Craig McLuckie,
President