



July 9th, 2024

Via Email

To: Chair, Members of Planning and Housing Committee

Re: Item PH14.1 – Employment Area Land Use Permissions- Decision Report for Approval,  
Planning and Housing Committee, Thursday, July 11, 2024

On behalf of the following Business Improvement Areas:

DUKE Heights Business Improvement Area

Emery Village Business Improvement Area

Lawrence Ingram Keele Business Improvement Area

We respectfully submit that consideration be given to the concerns expressed by the above-noted Business Improvement Areas whose employment lands and memberships would be seriously impacted by the implementation and enactment of Bill 7 as it pertains to employment land permissions and definitions, and further, that Official Plan Amendment 680 combined with OPA 668, provides limited assurances that do not fully address the uncertainty and continued viability of employment lands as they now exist.

In October 2023, in a joint submission to the Chair and Members of the Planning and Housing Committee, the three Business Improvement Areas requested an in-depth study and consideration of alternative options that included language “As of Right” usage in General Employment Zones to strengthen continuity during the transition under Bill 7.

We are of the view that the Staff Report with recommendations, including the transition provision “lawfully established” in reference to commercial uses, does not extend adequate protection for the continuity of use for businesses under the General Employment definition, nor sufficient flexibility to encompass growth and changes to meet prevailing market conditions.

Moreover, the update and analysis (April 12<sup>th</sup>, 2024) highlighted the city's concerns for the removal of Office and Institutional uses from the Area of Employment definition. The study also identified the potential impact for 54% of all establishments in EAs representing 16% of all establishments (11,000) and 196,838 jobs in all Employment Areas. We are of the opinion that the establishments are facing uncertainty as to their legal land use status and are at potential future risk. These numbers, compiled from the 2023 Toronto Employment Survey, reinforces our reasons for concern to be well-founded.

We believe that our BIAs share common characteristics that include both Core Employment and General Employment Designations within our respective catchment areas. Our success in having both types of land use has contributed to more diversified local economies, providing amenities and services to both employers and employees. In contrast, removing the General Employment permissions- especially along Main Streets and Avenues- create conditions with potential sensitive use implications and little prospect for employment growth.

Based on the supported conclusion that Bill 97 has the potential to destabilize the integrity and viability of the City's Employment Areas, we respectfully urge the Committee to include provision in OPA 680 that 'lawfully established" business establishment locations be deemed "As of Right" rather than "legal non-conforming".

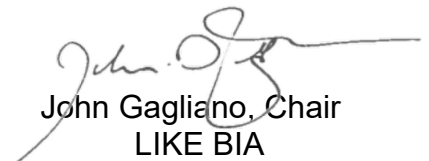
Sincerely,



Dr. Lew Pliamm, Chair  
DUKE Heights BIA

*Carmela Serebryany*

Carmela Serebryany, Vice-Chair  
Emery Village BIA



John Gagliano, Chair  
LIKE BIA