



Toronto Industry Network

July 5, 2023

EMAILED

Councillor Brad Bradford and Members of the
Planning and Housing Committee,
100 Queen Street West,
Toronto, Ontario,
M5H 2N2

Attention: Ms. Nancy Martins

Dear Councillor Bradford and Committee Members:

Re: PH 5.3 - Our Plan Toronto: Recommendations on Seventy Employment Area Conversion Requests and Chapter 7 Site and Area Specific Policy Review - Final Report

We are the Toronto Industry Network, the largest city-wide organization representing manufacturers and other businesses in Employment Areas. Our concern for the preservation of these lands is well known. We have a wealth of experience gained through a long history of participating in land conversion matters and observing the purported versus actual outcomes of conversion applications. As this Committee is set to make critical decisions affecting the long-term economic prosperity of this City, our purpose for writing today is to dispel some of those misconceived notions put forth by certain conversion proponents, as well as to express our concerns on a number of specific sites having particular significance/impact.

Reaffirmation of the Facts:

- 1 There is no need for conversions. The Chief Planner has said this many times at this Committee and elsewhere. According to the City's own Land Needs Assessment, there is more than sufficient land in Toronto to meet required housing targets without converting employment lands for that purpose.
- 2 Employment Lands are a rare, highly sought after and prized commodity. At a vacancy rate of less than 1%, there is a record demand for employment lands – there are more buyers than sellers which means there is no difficulty in selling or finding tenants on employment lands. Under these conditions, there is no difficulty in selling or finding tenants for industrial lands, even at record-breaking prices. Under these conditions, the retention of employment lands does not impose a financial hardship on landowners.

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- 3 Employment Areas are not low value, single, or very narrow purpose areas - the diversity and range of uses and business types found is astounding. The economic, social and environmental value of employment lands is well documented in the background staff reports, and the breadth of opportunities in Employment Areas is infinitely beyond the narrow characterization of just 'noxious/heavy' manufacturing or self-storage/warehouse as others may have suggested. The manufacturing sector itself has been greening. There are well over 50 very broad general categories of employment uses permitted in the City of Toronto Zoning By-law alone, followed by hundreds of potentially more specific business types listed under the North American Industry Classification System. Employment Areas provide essential jobs, and jobs of the future including those in life sciences/pharmaceuticals; information technology; green/renewable energy; advanced manufacturing; artificial intelligence; robotics; research and development; e-commerce; film; media; and other creative industries. Due to spatial and operational needs, many of these uses are simply not suitable anywhere else, including Mixed Use Areas.
- 4 Land conversions are not an effective or certain affordable housing strategy, particularly when it comes to the issue of tackling 'deep affordability'. The City Planning staff report before you tracked conversions since 2013 and found that only 20% of those sites contained any built housing units. However, during that same time frame, over 50% of the remaining sites were turned over ownership, or 'flipped'. Moreover, it is not yet certain that the Province will actually maintain the same level of affordable housing secured through certain conversions approved so far. On the other hand, especially under today's market conditions, the outcome of jobs and economic activity on lands retained as Employment Areas is far more certain.
- 5 Conversions beget more conversions. At least 2 of the sites now before you (1001 Ellesmere Road and 20 Brentcliffe Road) were the subject of a previous conversion approvals and in each case the remaining Employment Area portions are now proposed to be eliminated. These parcels were intended to provide space exclusively for employment purposes and to act as an important buffer protecting the remaining Employment Area from further encroachment. This is the 'thin edge of the wedge' effect - once a conversion is granted, there is no certainty that this is where the destabilization will stop. It is easier for an applicant to justify a conversion where one has already been granted.

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Site Specific Comments

In the case of Kennedy Commons, we agree with staff's careful recommendation to refuse this conversion request. Due to its adjacency to Hwy 401, this site fits perfectly under **Provincial Planning Statement** policies directing Planning authorities to protect Employment Areas in proximity to major goods movement facilities and corridors. Under current unprecedentedly strong market conditions and the extreme rarity of large sites, these lands could easily be repurposed, intensified and almost immediately be filled for a wide range of employment users. As an employment hub, the new Kennedy Commons would not negatively impact its neighbours such as Atlantic Packaging, that provides an essential service to the City through its Blue Bin cardboard recycling and supply of boxboard to other Toronto companies, and could provide strong employment opportunities to strengthen the viability of the local business eco-system. A conversion here would signal more conversions are possible and would serve to destabilize the remaining Employment Area.

In the case of the Woodbine Racetrack proposal, we reservedly agree with staff's recommendation to convert to develop the northerly portion of some surplus lands, recognizing the existing permissions for potential residential development. However, given the overall need to preserve high-demand employment lands as mentioned above and the proximity of the remainder of these lands to a large employment area to the south including very heavy and/or essential industry, we would object to any further conversion boundary expansions. These lands are viable and attractive for employment purposes and just because this land is beside a proposed Major Transit Station Area (MTSA) does not dictate that it be converted to non-employment uses. Under these market conditions, employment space does not need to be subsidized by residential development to make it viable. As well, having an MTSA nearby would help workers get to their jobs more easily.

Conclusion:

Toronto cannot afford to lose more employment land. We need to manufacture in the City products that are essential for our citizens given ongoing supply chain issues and the current world unrest. It has been proven conversions do not ensure delivery of all originally promised outcomes. We need the certainty of strong, pro-manufacturing land use policies to re-invest in our operations.

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While much of Toronto was shut down during COVID, the manufacturing community was mandated to stay open to help keep the City and the province functioning. With considerable difficulty, this is what we did.

We ask for your continuing support in not allowing further conversion of our industrial land supply.

To approve more conversions of employment lands and islanded industrial facilities is to condemn Toronto's manufacturing to a death by a thousand cuts.

Thank you for your attention.

Sincerely,

A handwritten signature in dark ink, appearing to read 'C. McLuckie', written in a cursive style.

Craig McLuckie,
President