

February 28, 2019

Mr. Charles O'Hara
Ontario Growth Secretariat, Ministry of Municipal Affairs and Housing
777 Bay Street
c/o Business Management Division, 17th floor
Toronto, Ontario M5G 2E5

Via e-mail: charles.o'hara@ontario.ca

RE: Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe

Dear Mr. O'Hara,

On behalf of Canadian Manufacturers & Exporters (CME), we are pleased to provide comments in response to the consultations focused on the proposed amendments to the Growth Plan for the Greater Golden Horseshoe.

Manufacturing is the most critical business sector in Ontario. It directly accounts for over 12 per cent of GDP and 80 per cent of exports. Manufacturers generate significant economic spinoffs throughout the economy and Ontario's communities, including in natural resources, technology, and every service sector from banking to logistics. Factoring in these economic spin-offs, manufacturers drive nearly 30 per cent of all economic activity, 25 per cent of all jobs, and one-third of all government revenues.

The sector in Ontario is one that comprised of companies and their employees that is at the forefront of global competition, innovation and technological change. However, it is facing intense global competition, decreasing investment, and stagnant output and exports. These companies are competing with the world's best. To prosper, however, companies need to be protected from the development of incompatible land uses in proximity to employment areas. Inadequate protection can destabilize the operating environment of industries and sterilize employment lands.

With this premise in mind, our response to the consultation is focused on three key areas: provincially significant employment zones, erosion of employment lands and buffer zones. These areas are addressed below.

Provincially Significant Employment Zones (PSEZ's):

CME's position is that industrial employment zoned lands must be protected, and we support all efforts underway to protect these industrial employment zoned lands. That said, we want to particularly stress that these industrial employment zoned lands be considered a 'provincial interest' for the purpose of public safety and to retain the competitiveness of Ontario's manufacturing sector.

CME believes that the following principles to protect PSEZ's:

- Ontario's manufacturing heritage is a cornerstone of its future, and public safety must be of paramount consideration in municipal planning decisions; and,
- The viability of existing industrial manufacturing heritage areas must be maintained as the entire sector in Ontario can or will relocate to prime employment areas in other jurisdictions.

Based on the above-mentioned principles, we believe that clarity is required to identify minimum density targets to determine which areas require precedence. There are companies that are located on lands that are not municipally designated as employment areas and the protections that the growth plan formerly afforded such industries in terms of land use compatibility have been reduced or removed entirely.

Erosion of Employment Lands:

CME continues to be very concerned with the erosion of employment lands within municipalities, resulting from the conversion to sensitive uses, such as residential, day cares, places of worship, etc. as well as operational impacts from expanded or increased commuter rail/transit service.

Due to residential encroachment on traditional industrial lands, companies are reporting being required to comply with noise and odour abatement regulations, often at extraordinary costs, and with minimal success to appeasing residents. In some cases, rezoning and residential encroachment has led to the shuttering of industrial facilities and all the jobs along with it. Industrial lands must be better protected for current and future growth. Furthermore, due to the expansion of commuter rail/transit service, some manufacturing plants are forced to manage their rail shipments and related shunting activities in short windows late at night or early in the morning which causes additional aggravations to the local community and additional cost for companies. This undermines the economic viability of the industrial operations and puts at risk the well-paying jobs direct industrial jobs, spin off related jobs, and any potential new investments at manufacturing plants.

In almost all cases the "encroachment" has occurred because municipalities have rezoned industrial land to residential lands. It has become more and more difficult for manufacturers to operate in their traditional areas as municipalities rezone to increase residential density and tax rates. This is especially true in the Greater Golden Horseshoe Area. And as land values increase due to residential demands, companies are being pushed out of the area, or are looking to sell out as the land they are on is worth more than the operational investment. In some cases, rezoning and residential encroachment has led to the shuttering of industrial facilities and all the jobs along with it.

Employment land areas frequently include industrial uses, and this is incompatible with adjacent residential or other sensitive uses due to possible adverse effects on sensitive land uses from the industrial operations. Given this, CME reinforces the Ministry's Environmental Land Use Planning Guide, Section D-6: "Compatibility between Industrial Facilities" as the instructional reference tool for planning decisions by Municipalities.

<https://www.ontario.ca/page/d-6-compatibility-between-industrial-facilities>
<https://dr6j45jk9xcmk.cloudfront.net/documents/3048/d-6-3-separation-distances.pdf>



CANADIAN
MANUFACTURERS
& EXPORTERS



MANUFACTURIERS
& EXPORTATEURS
DU CANADA

Based on consultation with our members, CME submits that the following addresses must be included in designated PSEZ's as they reflect the employment zones that are most vulnerable to encroachment:

Address	City	Prov	Postal Code
New Tecumseh	Alliston	ON	L9R 1V4
1800 Clark Boulevard	Brampton	ON	L6T 4M7
8 Tilbury Court	Brampton	ON	L6T 3T4
2000 Williams Parkway	Brampton	ON	L6S 5R7
1055 Fountain Street East	Cambridge	ON	N3H 5K2
425 Front Road	Kingston	ON	K7L 4Z6
461 Front Road	Kingston	ON	K7L 5A1
1255 Western Road	London	ON	N6G 0N1
100 Milverton Drive, 5th Floor	Mississauga	ON	L5R 4H1
2323 Royal Windsor Drive	Mississauga	ON	L5J 1K5
2233 Argentia Road	Mississauga	ON	L5N 2X7
6925 Century Avenue	Mississauga	ON	L5N 7K2
5960 Shawson Drive	Mississauga	ON	L4W 3W5
12695 County Rd. 2	Morrisburg	ON	K0C 1X0
901 Simcoe Street South	Oshawa	ON	L1H 4L2
1155 Squires Beach Road	Pickering	ON	L1W 3T9
1555 Elm Street	Port Colborne	ON	L3K 5V5
1265 Vidal Street South	Sarnia	ON	N7T 7M2
480 Christina St S	Sarnia	ON	N7T 7H8
872 Tashmoo Ave	Sarnia	ON	N7T 7H5
510 Moore Line Rd	Sarnia	ON	N7T 8C9
1726 Mills Street	Sarnia	ON	N7V 4E5
285 Ranleigh Avenue	Scarborough	ON	M1K 1A5
11 Progress Avenue	Scarborough	ON	M1P 2MP
51 Nantucket Boulevard	Scarborough	ON	M1P 2N5
95 Commander Boulevard	Scarborough	ON	M1S 3S9
200 Yorkland Boulevard	Scarborough	ON	M2J 5C1
1960 Eglington Avenue	Scarborough	ON	M1L 2M5
10 Constellation Court	Toronto	ON	M9W 1K1
155 Gordon Baker Road, Suite 300	Toronto	ON	M2H 3N5
1755 Steeles Avenue	Toronto	ON	M2R 3T4
1 Riverside Drive	Windsor	ON	N9A 5K3
275 Eugenie Street	Windsor	ON	N8X 2X9

Buffer Zones:

CME believes that a buffer zone regulation would ensure that inappropriate, potentially unsafe land uses would not be approved for construction within close proximity of existing manufacturing plants,

simultaneously protecting public safety and the ongoing viability of major industrial manufacturing operations in the province. For new, greenfield industrial plants, an appropriate buffer zone, with distances to be defined in the regulation, would be established prior to construction of such plants.

Thank you for the opportunity to comment. We appreciate your commitment to Ontario's manufacturing sector. I would be pleased to discuss our consultation response at any time with you and your staff.

Sincerely,



Alex Greco
Director, Manufacturing Policy