



July 6, 2023

Anna MacDonald  
Director - Provincial Land Use Plans Branch  
Ministry of Municipal Affairs and Housing  
777 Bay Street  
Toronto, ON  
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[growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)

**Re: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument (ERO number 019-6813)**

Dear Anna MacDonald,

I am writing to express strong opposition to proposed changes to the Provincial Policy Statement, 2022 (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow) 2019 on behalf of IATSE Local 873. The proposed policies are detrimental to the film production industry and could drive investment out of Ontario.

IATSE 873 represents the thousands of skilled technicians behind motion picture productions in Toronto. IATSE 873 is a part of IATSE International, the largest union in the entertainment industry, representing more than 360 film Locals across the United States and Canada. Of these Locals, 873 is the second largest in Canada and works hard every day to continue to make Toronto one of the top production destinations in the world. Our members are celebrated internationally for their skills and expertise and have won, or have been nominated for, awards including; Academy Awards, Primetime Emmy Awards, Canadian Screen Awards, British Academy Film Awards, and many more.

The film industry makes a direct production spend of **\$2.5 billion annually** in the City of Toronto, and as a major global jurisdiction, draws international production to the region more broadly. The film industry employs **35,000 Torontonians** in largely unionized, remunerative work.

It is deeply concerning to IATSE Local 873 that the proposed changes to the provincial land use planning system do not consider the significant economic impact that the film industry has for the province, as many of the proposed changes weaken protections for employment areas and those who work within the sector.

More specifically, it is currently unclear if film production and studio space will be considered “manufacturing” and/or “industrial” under the proposed revised definition for “area of employment.” Ensuring there is sufficient studio space within Toronto, and in other popular filming destinations like Hamilton, is of utmost importance to our Local and our members. The success of made-in-Ontario film and television productions, and the continued prestige our industry has tirelessly created for ourselves on the international stage, is deeply contingent on the continued long-term protection of our studio spaces and our talented workforce.



We are recommending that the current provisions for employment area conversions on a 5-year cycle as part of a comprehensive review are maintained. The industry requires certainty and long-term protection to continue to compete internationally for film and television productions. Global film production is a highly mobile business that rapidly moves to those jurisdictions that best meet its needs. Across North America and Europe, jurisdictions are competing to attract new studios and the long-term economic impact they bring. Toronto is a leader in this highly competitive environment, but the uncertainty and potential barriers the proposed policies could impose on our industry would negatively impact Ontario's reputation, motivating investment to seek friendlier jurisdictions.

However, regardless of whether film production is defined as “manufacturing” and/or “industrial”, we strongly agree with the City of Toronto's assessment that the proposed changes would cause unintentional negative impact to the industry for the following reasons:

1. Conversion or removal of employment areas destabilizes the film industry as production volume may decrease if studio space is limited.
2. Proposed policy changes could weaken the film industry's preferred “clustering” – i.e., studios should be as close as possible to areas where locations shoot outside the studio and Toronto is the most attractive area for location shoots.
3. Compatibility to adjacent land uses is necessary as studios needs to be carefully considered to avoid inappropriate areas that would result in complaints and friction between the industry and local residents and business.
4. Proposed policy changes risks recent investments into the film industry and our reputation as an industry world leader, as Toronto has recently benefitted from substantial domestic and international investment in studio space.

Furthermore, for the film industry in this province to continue to thrive, there needs to be significantly more affordable housing to house our workers. Proposed changes that limit or augment the provision of affordable housing are not supported. It is imperative that we not only protect our studio space for the long-term within Toronto and other areas of the province, but that we also ensure that there is affordable housing for our members – without whom the industry would cease to be as profitable and world renown.

We have been in conversation with the City of Toronto and have expressed our support for their recent report from the Chief Planner and Executive Director, City Planning presented to the Planning and Housing Committee on June 1, 2023. We specifically support and would like to reiterate the following recommendations:

- Revise the Employment Area definition to explicitly include film production, cluster of office uses, stand-alone convenience retail and services to serve businesses and workers within Employment Areas and enable municipalities to define components of Employment Areas to serve local economies;



- Maintain the current timeframe for when a conversion of employment lands can be considered – i.e., only when municipalities are undertaking their 5-year Official Plan review;
- Strengthen land use policy protections for all Employment Areas across the Province to ensure that these lands support the economy and are viable over the long-term;
- Maintain the current definitions of “affordable” housing and “low and moderate-income households” OR provide explicit direction for municipalities to set their own definition;
- Maintain the requirement for municipalities to establish targets for housing affordable to low- and moderate-income households (Provincial Policy Statement 1.4.3(a)) and for affordable ownership and affordable rental housing (Growth Plan 2.2.6.1(a)(ii)); and
- Revise the definition of “housing options” to include consideration for affordable housing, tenure, and unit types to accommodate a range of household sizes.

The IATSE Local 873 and the film industry cannot support any land use planning changes that weaken our economic future and reduce our competitiveness on the global stage. Without studio spaces to attract productions and adequate housing to provide stability to our workforce we cannot be expected to continue to prosper. The province should recognize the importance our industry has not only for Toronto, but the province as a whole, and ensure that the provincial land use planning regime protects this industry now and for the future.

I thank you for your time and consideration.

Regards,

A handwritten signature in black ink, appearing to read 'Angela Mastronardi'.

Angela Mastronardi  
President IATSE Local 873

Cc.

Premier Doug Ford  
Minister Steve Clark - Municipal Affairs and Housing  
Minister Vic Fedeli - Economic Development, Job Creation and Trade  
Minister Neil Lumsden - Tourism, Culture and Sport  
MPP Marit Stiles - Leader of the Official Opposition and Leader of Ontario NDP  
City of Toronto Councillor Jennifer McKelvie - Deputy Mayor  
City of Toronto Councillor Brad Bradford - Chair of Planning and Housing Committee