

Planning and Housing Committee  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
via email: phc@toronto.ca

November 28, 2023

**Subject: PH8.14 Comprehensive Consideration of Bill 97, OPA 668, and OPA 680 in Relation to Employment Areas**

Dear Chair and Members of the Planning and Housing Committee:

Gladki Planning Associates Inc. (GPA) represents the DUKE Heights Business Improvement Area (BIA), alongside Emery Village and LIKE BIA, in addressing the substantial implications of Bill 97, the recently adopted Official Plan Amendment 668 (OPA 668), and the proposed Official Plan Amendment 680 (OPA 680) regarding the City's employment areas.

DUKE Heights BIA, located in the former City of North York, encompasses over 1,646 acres, housing more than 2,500 businesses and employing over 32,000 individuals. DUKE Heights BIA promotes the area's potential, supporting local businesses, and fostering community growth. Similarly, Emery Village and LIKE BIA represent a significant portion of the city's economic and employment landscape.

These BIAs are deeply concerned about the narrowed scope of permissible uses in employment areas as outlined in Bill 97 and its impact, coupled with the directions set by OPA 668 and the proposed OPA 680. These legislative and policy changes significantly redefine what constitutes an 'employment area' and, by extension, affect a substantial portion of the city's workforce and economic activities. Our most recent analysis (which has been shared with City Planning and which is distributed along with this letter) shows that between 28% (111,629 jobs) and 37% (148,170 number of jobs) of existing jobs in these areas would be adversely impacted, significantly disrupting the employment and vitality of the Employment Areas across the City of Toronto.

**Given the scale of these impacts, we advocate for a comprehensive approach in your review and decision-making process. The interconnectedness of Bill 97, OPA 668, and OPA 680 necessitates a holistic analysis and evaluation, considering their combined effect on the city's employment and economic landscape.**

In light of the recent adoption of OPA 668, we recommend a cautious approach towards the implementation of OPA 680. Rushing this process will overlook the broader economic and social implications, particularly in the current uncertain economic climate. It is vital to allow sufficient time for a detailed study and understanding of the potential impacts, ensuring that any policy directions and changes are in the best interest of Toronto's diverse economy and its workforce.

Therefore, we urge the Committee to defer the implementation of OPA 680 for one year so as to permit further discussions with the Provincial Government as to the negative impacts on businesses and jobs with the hope that the Provincial Government will reconsider its approach. This deferral would allow provide the necessary time for City Planning, businesses, stakeholders, and the community at large to fully understand the options available, leading to a more appropriate set of possible changes.

Thank you for your attention to this matter. We look forward to a continued dialogue and collaboration in shaping policies that support the sustainable growth and prosperity of Toronto's economic landscape.

Regards,

A handwritten signature in black ink, appearing to read 'RWJ', with a long horizontal flourish extending to the right.

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Attachment (1):

- Letter to Community Planning

Kyle Pakeman  
Strategic Initiatives, Policy & Analysis  
Metro Hall  
22<sup>nd</sup> fl., 55 John St.  
Toronto, ON  
M5V 3C6

November 23, 2023

Subject: Analysis of Employment Within Designated Employment Areas  
Potentially Impacted by Official Plan Employment Area Policies in  
Following to Bill 97

Dear Kyle:

This letter presents the findings from our preliminary analysis of the potential impact of proposed policy amendments by the City of Toronto following the enactment of Bill 97. It focuses on how these changes may affect the employment landscape within the City of Toronto's designated employment areas, potentially creating additional hurdles and operational challenges for businesses within these areas.

The analysis reveals that between 28% and 37% of existing jobs in these areas could be adversely impacted. Furthermore, any discrepancies in executing the policy framework, due to misalignments between Provincial and Local directives, will result in widespread uncertainty. This could affect a significant portion of jobs within the City's Employment Areas and potentially lead to unintended consequences.

For your review and consideration, these numbers contained herein have been derived from the 2022 City of Toronto Employment Survey. This survey, using the North American Industrial Classification System (NAICS), provides a view of existing business and employment activities. It reports a total employment of 1,484,600 jobs across the entire City of Toronto. Of that total employment across Toronto, 398,080 jobs are located in designated Employment Areas across 21,690 establishments.

## ANALYSIS

**Based on this data, we find that approximately 111,629 jobs (representing 28% of employment in designated Employment Areas) and up to 148,170 jobs (or 37% of employment in designated Employment Areas) are potentially negatively impacted.**

## METHOD

The Employment Survey is publicly reported using the following broad and aggregated NAICS 2022 classifications:

- Manufacturing;
- Wholesale + Retail Trade;

- Transportation + Warehousing;
- Professional, Scientific + Technical;
- Construction;
- Administrative, Waste + Remediation;
- Other Services;
- Public Administration;
- Finance and Insurance;
- Information + Cultural;
- Health Care and Social Assistance;
- Accommodation + Food;
- Real Estate, Rental + Leasing;
- Arts, Entertainment + Recreation;
- Management;
- Educational Services;
- Utilities;
- Agricultural et al.; and,
- Mining et al.

As industrial classifications are reported at an aggregate level through the Employment Survey, a best estimate of industries impacted through changes in the Planning Framework is provided in this analysis. The following impacted industries are included in our calculation:

- The retail portion of the **Wholesale + Retail Trade** classification (Based on 2020 figures in Provincially Significant Employment Zones, retail trade comprised 43.74% of the total combined Wholesale + Retail Trade class);
- Information + Cultural (including publishing, motion pictures, broadcasting, data processing and telecoms);
- Real Estate, Rental + Leasing;
- Accommodation + Food;
- Finance and Insurance;
- Arts, Entertainment + Recreation; and,
- Health Care + Social Assistance.

## RECOMMENDATIONS

- That City Planning review and confirm the above analysis prior to the November 30 Planning and Housing Committee Meeting so as to permit a more informed discussion at the Committee Meeting.

Regards,



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c. Gregg Lintern, Chief Planner

Romas Juknevičius, Project Manager, Strategic Initiatives, Policy & Analysis, City  
Planning Division  
Paul Johnson, City Manager