



November 30, 2023

Chair Perks and Members of the Planning and Housing Committee
Toronto City Council
City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Sent via email to: phc@toronto.ca

RE: Planning and Housing Committee Meeting 8 - November 30, 2023
Item PH8.14 - Directions to Amend Official Plan: Proposals Report
Employment Area Policies

Dear Chair and Committee,

The Building Industry and Land Development has reviewed the report of the Chief Planner and Executive Director, City Planning, dated November 14, 2023, and is writing to express our members' significant concerns with the proposed approach to responding to provincial direction and pending changes to areas of employment. BILD's prior correspondence on the City's proposed approach is attached hereto.

On June 13, 2023, Bill 97, the Helping Homebuyers, Protecting Tenants Act, 2023, received Royal Assent. Among other matters, Bill 97 scoped the definition of "area of employment" to traditional manufacturing, warehousing or related uses, and confirmed that office, retail and institutional uses are not business and economic uses for the purposes of the new definition, unless tied to manufacturing, warehousing or related uses. This change is to support the draft new Provincial Planning Statement, 2023, which similarly limits what areas are to be considered areas of employment. The clear provincial purpose of these changes is to limit those areas subject to employment protection policies to traditional industrial uses, and to encourage mixed use development, including residential, outside of these areas to support complete communities.

In the midst of a generational housing crisis and challenging economic times, we need all levels of Government to do their part in making positive and succinct changes to get homes built as quickly as possible. But, contrary to the Province's direction, rather than consider what lands within the City should truly be considered areas of employment, the proposed approach is to remove existing land use permissions from all of the City's employment areas to maintain the status quo and prevent further consideration of expanded development opportunities to meet provincial and municipal goals, including providing for a broad range of employment activities, increasing housing supply, and planning for complete communities.

We request that Council consider the numerous objections raised to date by a broad range of stakeholders, and direct staff to consider the appropriate boundaries for areas of employment, and the appropriate land use permissions therein, as directed by the Province.

We thank you for the opportunity to submit these comments. Please feel free to contact the undersigned with any questions.

Sincerely,



Danielle Binder, RPP MCIP

Director, Policy and Advocacy, BILD

July 18, 2023

Mayor Chow and members of Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Sent via email to: councilmeeting@toronto.ca

RE: PH5.2 - Official Plan Amendment for Bill 97 Transition - Authorizing the Continuation of Institutional and Commercial Uses in Employment Areas - Final Report

Dear Mayor Chow and members of Council,

The Building Industry and Land Development is in receipt of the July 5TH Planning and Housing Committee minutes and we submit the following comments on agenda item *PH5.2 Official Plan Amendment for Bill 97 Transition - Authorizing the Continuation of Institutional and Commercial Uses in Employment Areas - Final Report* in advance of the July 19-21 Toronto City Council meetings.

On June 13, 2023, Bill 97, the *Helping Homebuyers, Protecting Tenants Act, 2023*, received Royal Assent. Among other matters, Bill 97 scoped the definition of “area of employment” to traditional manufacturing, warehousing or related uses, and confirmed that office, retail and institutional uses are not business and economic uses for the purposes of the new definition, unless tied to manufacturing, warehousing or related uses. This change is to support the draft new *Provincial Planning Statement, 2023*, which similarly limits what areas are to be considered areas of employment, and encourages mixed use development, including residential, outside of these areas to support complete communities. The draft *Provincial Planning Statement, 2023* confirms that municipal official plans shall not contain provisions that are more restrictive on the use of such lands. Transition provisions were added to confirm that an area of employment may include existing legally established uses, but that areas of employment may not otherwise permit this broader category of uses.

The City’s staff report recommends official plan amendments coming forth now and broader amendments in the fall which purport to protect all core and general employment lands in the City as areas of employment, despite their current, broader mix of uses, contrary to the provincial direction to genuinely limit areas of employment to heavy industrial uses, particularly close to goods movement corridors, while making more land available for development.

Based on this information, BILD has heard from its members (as they also directly expressed through various correspondences to the Committee meeting) that this report is premature and should be paused for the time being to align this work with the release of the new PPS and the more comprehensive official plan amendment anticipated in the fall. As such, we request that Council defer this decision.

We thank you for the opportunity to submit these comments. Please feel free to contact the undersigned with any questions.

Sincerely,



Danielle Binder, RPP MCIP

Director, Policy and Advocacy, BILD