

Leaside Residents Association Incorporated

**1601 Bayview Avenue
P.O. Box 43582, Toronto, Ontario M4G 3B0**

November 30, 2023

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

RE: PH8.14 Directions to Amend Official Plan Employment Area Policies: Proposals Report

Dear Councillor Gord Perks, Chair, and Members of the Planning and Housing Committee,

We support the City Planning report recommendation that “the Planning and Housing Committee direct the Chief Planner and Executive Director, City Planning Division, to continue consultation on the draft policy directions with Councillors, industry, other stakeholders, and the general public, and report back with recommended Official Plan amendments before the Province proclaims the amended Planning Act definition of “area of employment””.

First, what is the issue?

On April 6, 2023, the Province introduced new policy and legislative changes which include two key components: (1) Bill 97, which amends the *Planning Act* definition for an “area of employment” to narrow the scope of uses that are deemed business and economic uses, and which received Royal Assent on June 8, 2023, and (2) the proposed Provincial Planning Statement (“PPS”) which consolidates two major Ontario planning documents: A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan), 2020 and the Provincial Policy Statement, 2020. No date has been set for the PPS to come into effect.

The amendment to the provincial definition of “area of employment” narrows the scope of uses from what is currently permitted in areas of employment. In particular, it expressly excludes from the definition institutional uses and commercial uses, including retail and office uses that are not associated with manufacturing, warehousing, and research and development in connection with manufacturing.

City Council adopted OPA 668 in July 2023 to authorize the continuation of institutional and commercial uses expressly excluded by the amended definition of “area of employment” that were lawfully established the daybefore the relevant Planning Act

changes come into effect. The necessary bills for OPA 668 will only be introduced upon receiving provincial confirmation that they will proclaim the Planning Act definition changes made in Bill 97.

The City Planning report presents draft policy direction to amend various employment area related policies to bring the Official Plan into alignment with the definition of "area of employment" in the Planning Act, as amended by Bill 97.

City Planning states that: "For the City's Employment Areas to continue to benefit from the current employment protection policies, land use permissions for these areas must align with the amended definition of "area of employment". Doing so will mean that the City will need to limit some of the broader Official Plan employment permissions in General Employment Areas and Core Employment Areas."

As such the City is proposing various amendments (OPA 680) to Official Plan Employment Areas policies. These amendments are intended to align the land use permissions within the City's Employment Areas with the proposed definition of "area of employment" in the Planning Act as amended by Bill 97. The general approach is to only make Official Plan policy amendments to align them with the Planning Act to ensure that the City's Employment Areas continue to benefit from the current employment protection policies

Second, why is this issue relevant to Leaside?

Leaside is a residential and industrial/business community in Toronto. Over the past 110 years, the Leaside Business Park has been a major employer in the medium to heavy industry sectors. From the production of munitions in WW1, to auto production in the 1920's and 30's, to radar and optical instruments in WW2, and from adhesive and chemical production, cement and concrete making to hardwood flooring and electrical engineering, the Park has endured. The juxtaposition of business park and residential communities has been of great public benefit. It is important to maintain highly skilled jobs that are also closer to home, reducing traffic, and the need for even more private vehicles pumping out more CO2. This plays to the environmental challenges we face.

Up to now the Leaside and other Business Parks has been protected though Official Plan policies and zoning bylaws, and Ontario Municipal Board decisions that have respected the Employment Lands boundaries and policies therein. The most recent Municipal Comprehensive Review wound up at City Council in July of this year, with 45 Employment Area conversion requests City-wide, of which five of the 45 involved lands within or adjacent to the Leaside Business Park: Of the five Leaside requests, following

staff advice, City Council refused four, and just one was approved. In so doing, City Council maintained its support for protection of its employment lands¹.

However under Bill 97, Municipal Comprehensive Reviews would no longer be required, creating open season on employment area conversions, creating uncertainty for employers, and reducing future opportunities for Ontario businesses to grow within their markets.

What do we conclude?

We feel that the City's planned approach is essential given the Provincial moves. If (when) the employment areas definition, such that retail and commercial uses are no longer allowed in (General) Employment Areas, takes legal effect, without the City approved OPA 668 their land use designation would likely be in jeopardy, and in dispute. Redesignation to Mixed Use would be likely to happen, ultimately resulting in a land use change to Residential use, and further threatening the viability of remaining Employment Areas.

Respectfully submitted,

Geoff Kettel

Geoff Kettel
Co-President (with Carol Burtin Fripp)

CC. Leslie Kellen, President, Leaside Business Park Association
Councillor Jaye Robinson,
Stephanie Bowman, MPP Don Valley West
Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Kerri Voumvakis, Director, Strategic Initiatives, Policy & Analysis, City Planning Division
Romas Juknevicus, Project Manager, Strategic Initiatives, Policy & Analysis, City Planning Division

¹ City protects Leaside Business Park. End of story?
<https://leaselife.com/city-protects-leaside-business-park-end-of-story/>