

From: [Andrea Carmona](#)
To: [Planning and Housing](#)
Cc: [Ester Gerassime](#)
Subject: [External Sender] Ontario Chamber of Commerce - Comments to item 2025.PH21.1.
Date: May 20, 2025 3:50:20 PM
Attachments: [Outlook-ywqzst5h.png](#)
[Outlook-Image.png](#)
[Outlook-Image.png](#)

Good afternoon,

I hope you are well! I am writing to you to submit a comment on behalf of the Ontario Chamber of Commerce's comments for section 2025.PH21.1:

As our nation grapples with trade uncertainty, government and business leaders have demonstrated alignment and shared focus on protecting Canada's sovereignty and economic future.

This is a critical time to collaborate on charting new economic growth paths for businesses. As outlined in the Ontario Chamber of Commerce's (OCC) letter last month, the first priority must be protecting our current business and manufacturing capacity while ensuring space for future expansion, starting with the protection and intensification of Ontario's employment lands.

Ontario's employment lands – designated for industrial, commercial, and office uses – generate wealth and support over 1.5 million jobs, contributing more than 25 percent of Canada's GDP.[1] They are also vital to major transportation and logistics hubs that enable domestic and international trade, drive regional employment, and support high-value sectors like advanced manufacturing.

These economic engines are increasingly under threat. The housing crisis and changes introduced through the Provincial Planning Statement, 2024, have removed prior protections and made it easier to convert employment lands to residential, mixed-use, and sensitive land uses, resulting in a concerning increase in land conversion requests. Such conversions reduce available employment lands, destabilize surrounding economic activity, and deter long-term business investment. They also risk additional strain on local infrastructure systems, such as roads, energy, water, and wastewater, potentially exceeding their current capacity and undermining service efficiency, safety, and environmental protections, including emissions and stormwater management.

For example, proposals to build over 27,000 housing units near the Woodbine Racetrack and directly adjacent to major industrial zones and aviation corridors increase land use conflicts, jeopardize safety, and compromise the viability of high-value employment zones.[2]

While addressing the housing crisis must remain a top priority, it is important to account

for the significant lands already designated by municipalities to accommodate residential growth through the Municipal Comprehensive Review (MCR) process and recent Official Plan amendments. These lands should be prioritized and effectively utilized before further employment land conversions are considered.

We also acknowledge the need for flexibility. In select contexts – such as lands within or adjacent to existing mixed-use communities and high-order transit – integrating a balanced mix of residential, commercial, and employment uses may better support provincial housing objectives while maintaining the viability of employment zones. This should complement efforts to support gentle densification, ‘15-minute’ community principles, and the optimal use of existing settlement areas that advance sustainable, economically productive growth.

To protect Ontario’s employment lands to host the jobs and economic opportunities we need, the Ontario Chamber urges the Government of Ontario to:

- 1. Enact interim protections for employment lands – Pause all employment land conversion requests currently before municipal councils in the Greater Toronto Area until a comprehensive review process can be reinstituted.*
- 2. Develop a comprehensive Ontario employment lands strategy – Undertake a provincewide economic development and land strategy to ensure existing businesses can continue to thrive and grow in Ontario’s employment lands, while identifying ways to intensify existing employment areas and create new ones to meet future job needs. As part of this strategy, the government should:*
 - a. Issue clear guidance on applying clause 3.5.2 of the PPS, 2024, including a more robust and consistent definition of what constitutes “economic viability” when assessing employment land conversions. This definition should also consider the evolving industrial landscape, technical feasibility, infrastructure lifecycle costs, and long-term environmental sustainability to support decisions aligned with Ontario’s broader economic and climate goals.*
 - b. Provide incentives and, where necessary, facilitate cross-municipal collaboration to support the establishment of new employment lands, particularly where jurisdictional boundaries limit expansion and economic growth opportunities.*
- 3. Conduct provincial inventory and assessment of residential, agricultural, and employment and commercial lands – Undertake a comprehensive review of designated residential, agricultural, employment and commercial lands across Ontario, in consultation with relevant stakeholders:*

- a. *For residential lands, assess alignment with projected housing needs by location, quantity, and mix, and prioritize intensification, transit-oriented development and the effective use of existing supply before approving new designations.*
 - b. *For agricultural lands, aggregate prime agricultural areas and agricultural land-use designation mapping. Assess planning changes that would help protect farmland from redesignation, redevelopment, and encroachment by non-agricultural uses and areas.*
 - c. *For employment and commercial lands, ensure land use planning accounts for evolving economic and employment realities, including the rise of remote and hybrid work patterns. Prioritize the effective utilization of lands designated for residential growth through the MCR process and Official Plan amendments before considering additional employment land conversions.*
4. *Ensure long-term protection of employment lands in planning decisions – Ensure provincial and municipal planning policies provide long-term certainty for employment areas, especially those supporting major industrial and logistics uses. This includes Toronto’s [Official Plan Amendment 804](#), which the Province requires to bring Toronto’s Official Plan into conformity with the Planning Act and PPS, 2024. While the policy acknowledges the importance of protecting employment areas, there are concerns about the lack of a clear and enforceable framework to prevent encroachment by incompatible land uses within the proposed Regeneration Areas, creating uncertainty for many major facilities and industries.^[3] The government should:*
- a. *Require municipalities to consult with impacted stakeholders before approving employment land conversions and ensure planning decisions support the long-term economic viability of key employment zones across Ontario.*
 - b. *Consult with municipalities to determine and implement key protections they require in legislation and otherwise to provide certainty for Ontario’s employment lands.*
 - c. *Clarify the meaning of “lawfully established” in the Planning Act transition provision to ensure permitted uses in employment areas can continue.*

- d. *Ensure decisions regarding the protection, intensification, or conversion of employment lands are guided by evidence-based planning, informed by engineering and technical analysis to ensure long-term infrastructure viability, safety, and sustainability.*

Thank you,

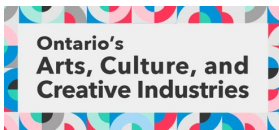
Andrea Carmona (she | her | elle)

Senior Manager of Public Affairs

Ontario Chamber of Commerce

2105-180 Dundas Street West, Toronto ON M5G 1Z8

andreacarmona@occ.ca | Cell: 647-234-0255 | occ.ca | @OntarioCofC



[Read Ontario's Arts, Culture, and Creative Industries: Strengthening Competitiveness and Communities for insights on the sector's impact, challenges, and policy recommendations!](#)

[Read the 2025 Ontario Economic Report for insights on the economy, business confidence, and policy recommendations!](#)