

Friday, May 2, 2025

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

Dear Chair Perks and Committee Members:

Re: May 8, 2025 Planning and Housing Committee – Meeting 21
PH21.1 Official Plan Amendments to align with Provincial Legislative and Policy Changes
Related to Employment Areas – Decision Report

Toronto Pearson has reviewed the "Official Plan Amendments to Align with Provincial Legislative and Policy Changes Related to Employment Areas – Decision Report" dated April 23, 2025 (the Staff Report), along with Official Plan Amendment 804 (OPA 804). We appreciate the City's continued commitment to protecting employment lands as a cornerstone of Toronto's economic foundation.

In a time of growing geopolitical and economic uncertainty, the imperative to safeguard critical economic assets—particularly finite employment lands—is more urgent than ever, not only for Toronto but for the country as a whole. Toronto Pearson is actively advancing the economic potential of the airport and the surrounding employment lands, collectively known as the Pearson Economic Zone (PEZ).

At 200 square kilometres, the PEZ is Canada's largest employment zone. It encompasses North Etobicoke's employment lands and includes some of the country's most valuable industrial and commercial real estate. Proximity to Toronto Pearson is essential for manufacturers and logistics firms that rely on direct access to global markets. With mounting trade and tariff pressures, protecting and expanding Canada's manufacturing base is of national importance.

The PEZ is home to more than 500,000 workers—representing 1 in 7 jobs in the Greater Toronto Area—and contains North America's highest concentration of manufacturing businesses. It facilitates billions in international trade, contributing \$70.6 billion in GDP annually, or 7% of Ontario's total economic output.

As Toronto Pearson advances its Long-Term Investment in Facilities and Terminals (LIFT) program to meet growing demand for air travel and cargo services, the surrounding employment lands serve a dual purpose: supporting industrial and business growth while maintaining an essential buffer between the airport and residential communities. We view OPA 804 as an important measure to further protect these lands in North Etobicoke.

Over the past several years, Toronto Pearson has seen a growing number of requests to convert employment lands within this buffer zone to residential uses—some of which have been approved



by Council. Our hope is that with the adoption of OPA 804, Council will reaffirm its commitment to safeguarding the PEZ and employment lands city-wide.

While we understand that OPA 804 reflects the province's direction as articulated in the new Provincial Planning Statement (2024), we remain concerned about the broader implications of the province's revised definition of "employment areas." These changes may unintentionally create a blueprint for future conversions elsewhere.

By mandating the conversion of four existing employment areas—each of which still hosts manufacturing operations—OPA 804 sets a precedent by signaling that employment areas are weakened over time by non-compatible uses, including residential developments, and can more easily be reclassified for non-employment purposes.

This is precisely the dynamic we are witnessing in North Etobicoke. Incremental residential encroachment, justified on a site-by-site basis, cumulatively undermining the viability of key industrial lands, the functionality of the airport, and the stability of Canada's largest employment zone.

Toronto Pearson fully supports the ongoing protection of the city's job belt—especially in and around the airport—and we urge Council to maintain a strong stance in preserving the integrity of Toronto's employment lands.

Sincerely,

Karen Mazurkewich

Vice-President, Stakeholder Relations and Communications

**Toronto Pearson**