

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

May 7, 2025

Dear Councillor Perks,

Re: Item 2025.PH21.1 – Official Plan Amendment 804

On behalf of the Toronto Region Board of Trade and our 11,500 members, the Board welcomes the opportunity to make a submission on proposed OPA 804, which seeks to align the City of Toronto's employment lands policies with provincial legislation and regulations introduced through Bill 97 and the Provincial Planning Statement (PPS).

As we indicated almost two years ago, when the Board first deputed on this matter, securing the future of employment lands in the Toronto region amid increasing numbers of conversion requests remains a Board priority, as does the equally pressing need to build more housing.

Our 2023 report, ***Race for Space***, raised concerns that proposed provincial policy and regulatory changes, which have since come into effect, could create more land use conflicts, uncertainty and unintentionally undermine the confidence needed for businesses to make investment decisions about whether to locate or expand in our region. Worse, it risked prompting existing businesses to relocate, including across the border.

The report identified more than 700 conversion requests on employment lands across the region, a number that has likely grown. This is a significant concern because **employment lands across the region support 1.5 million jobs, including 88% of the region's high-paying manufacturing jobs**. When those lands are gone, the jobs go with them, something we are even more acutely aware of in these uncertain economic times as Canada undertakes a broader reset of its economic strategy and international trade relationships.

The Board acknowledges that OPA 804 is being brought forward by the City to conform to provincial planning policies and regulations, particularly provisions that redefined employment areas to exclude commercial office and institutional uses. However, the process by which this is unfolding is far from optimal. Transitioning 255 hectares of employment land, on which about 41,000 jobs, or 10% of the City's jobs on employment lands, are located, is no small matter.

Many questions remain, including whether current business operations can remain on these lands, whether future land uses will be compatible, and what precedent this sets for future conversion requests elsewhere in the city and across the region.

That is why the Board continues to call for a **pause on conversion requests** until clearer guardrails are in place, and a thorough review and analysis of policy and regulatory changes is undertaken. There is still time for the province and municipalities in the region to work together to provide the long-term certainty for business investment and economic growth.

The Board's recommendations from *Race for Space* remain relevant today. Fragmented approaches will not provide the consistency and certainty businesses need to invest or expand. Minister's Zoning Orders to protect certain lands are unpredictable and not a substitute for a robust regional employment and industrial lands strategy, which must reflect policy, infrastructure, and economic considerations across the region. They include:

- Reinstating a regional framework, such as the Provincially Significant Employment Zones (PSEZs), to permanently protect critical employment lands,
- Introducing a process to evaluate the cumulative economic impact of conversion proposals through a consolidated, region-wide review process that balances the need for housing with economic goals,
- Establishing common criteria and a consistent regional process for assessing the cross-municipal impact of employment land conversions,
- Creating a regional employment lands inventory, with clear and consistent criteria to identify which lands must be protected and where flexibility — including for housing — may be appropriate.

What is unfolding today with OPA 804 reinforces the urgent need for a region-wide planning approach, led by the province and implemented in partnership with municipalities.

This is about balance - we need to build more housing, but we also need to protect the jobs, businesses, and industries that make our region work and prosper.

Sincerely,



Roselle Martino
Executive Vice President, Policy and Strategic Affairs
Toronto Region Board of Trade