



May 7, 2025

Re: PH21.1 - Official Plan Amendments to align with Provincial Legislative and Policy changes related to Employment Areas - Decision Report

To members of the Planning and Housing Committee,

The Toronto & York Region Labour Council has long been a proponent of retaining as much of Toronto's employment areas as possible, for reasons which will be outlined below. We support the proposed alignment of Toronto's Official Plan with the new provincial definitions of employment areas.

Over time, the amount of land in Toronto dedicated to employment has shrunk. In the 1990s, approximately 14% of land in the city was classified as employment lands. This declined to about 13% by the beginning of this decade. The last round of conversions reduced employment lands further, to somewhere around 11.6% of land in Toronto. To be clear, this number never increases. The staff report indicates, "Employment areas are finite, and do not revert back to their economic function once residential uses are permitted." As a result, with any conversion (sometimes called "removal" or "redesignation") industry and related jobs are permanently lost to the City.

These jobs are typically good unionized jobs, with benefits, fair wages, and are often filled by those living in the local community. They contribute to Toronto's vibrant economy. If the employer leaves the area, some workers will never have as good a job again, while others who keep their jobs will now have to travel further for that work, thus increasing road congestion and other negative effects of commuting. Toronto's economy will suffer. This is not the kind of city we want to live and work in.

You are being asked to approve two things at your meeting this week:

- Alignment of Toronto's Official Plan with the new provincial definitions of employment areas
- "Redesignation" of 255 hectares within four employment areas in Toronto

The Labour Council supports the proposed alignment of Toronto's Plan with the provincial definitions. Narrowing what is included in the scope of uses is in line with what the Labour Council has advocated for on prior occasions. Excluding new commercial and institutional uses while allowing for the continuation of existing lawfully established uses no longer covered by the definition of "employment areas" ensures that existing businesses or organizations are not forced to move or shut down. At the same time, it appears to envision a future where if the existing business or organizations closes or moves the land's use can revert to one of the narrower uses covered by the new definition.

As such, the Labour Council opposes the conversion (“redesignation”) of 255 hectares from employment areas to regeneration/institutional lands. The various existing uses of these lands should be permitted to continue as they are (i.e. not redeveloped or repurposed) and when and if those uses should be discontinued, the lands would remain within the “employment areas” category.

It is interesting that the Ministry of Municipal Affairs and Housing has requested that the City identify employment lands to be removed. There are many who clearly want to remove employment lands from that category because those lands become much more valuable for the seller and then allow for redevelopment with large profits to be made (although perhaps a little less at the moment with Toronto’s numerous speculative condo projects).

To be clear, and pointing once again to the staff report: “Employment areas are finite, and do not revert back to their economic function once residential uses are permitted.” Yet one section in the staff report is titled “Managed Approach to Employment Area Removals and Conversions.” This suggests that we simply need a better process for reducing employment areas.

The Toronto & York Region Labour Council firmly believes that now is the time to draw a line in the sand: no more conversions, no more removals, no more redesignations. We must protect our existing employment areas on an ongoing basis.

While employment lands represent less than 12% of Toronto's land area, they house about 25% of Toronto's jobs. Employment areas are essential to the economic success of our city, and as pointed out earlier, many of these are good, unionized jobs.

In situations where employment lands are not currently being utilized as they might be, it is wise to hold on to them for future uses such as manufacturing, green jobs, construction, film (once we address Trump’s current threats) and other uses which would, for example, help to re-localize our supply chains. In the mid- and longer-term, we must think about lessons learned from the pandemic, how best to fight climate change, and Trump’s trade war. It would be shortsighted to eliminate more employment areas from Toronto’s shrinking supply.

Some will point to the need for housing as a rationale for converting employment areas. One of the most urgent crises being face by our city today is the housing crisis. For years, working people in Toronto have been pushed further and further away from the City, and into housing which increasingly does not meet their needs while prices continue to go up. The impacts of the housing crisis are often felt even more acutely by seniors living on a fixed income, who are increasingly being forced into more and more precarious forms of housing, or, shamefully, onto the street.

For these reasons and more, the Labour Council is and has been firmly in support of housing which meets working people’s urgent needs. Importantly, we support housing which is based on need and people’s ability to pay, rather than being based in the search for further profits for landlords and property developers. In particular, we believe rental housing which has rent geared-to-income, social housing which is publicly owned, and co-op housing (with no profit margins for REITs or big corporate investors) to be the best way to address the housing crisis, and ensure all working people, including seniors, live in dignity.

One thing we do not support however, is the construction of that housing on land which already provides a vital function in our society and economy. The Labour Council has consistently opposed the rezoning of employment lands for the purpose of retail, office uses or housing. Other land is available in the City for such purposes.

A 2023 City of Toronto analysis has shown that conversion does not always lead to immediate construction of housing. The study found that of the 79 sites in employment areas that had been converted since 2013, only 20 had residential units built on them, and 52% of the remaining sites had already been sold by the owner who requested the conversion.

Rezoning employment lands for housing development takes away land for industrial uses which likely has no other place in the city. The work conducted on these sites is often noisy, smelly, with lots of traffic, and can at times carry on late into the night, or start early in the morning. This is the reason it is zoned separately from housing - these are not uses that sit well next to each other.

Furthermore, rezoning employment lands for the purposes of housing development tends to have a domino effect. Once some employment lands are converted to housing, the new residents of these housing projects voice complaints about the nearby unconverted employment lands, because it is noisy, smelly or has intensive transportation conditions, and more land is converted as a result. This includes hazards for seniors, who are more likely to travel as pedestrians, and will have to negotiate industrial and large scale uses around them, and the associated dangers. In previous Committee hearings about requested employment area conversions, we repeatedly heard that a tiny number of complaints can lead to shut down of various sectors whose work processes are off-putting to residents or shoppers.

The same can happen if other kinds of human services (e.g., day care) are newly provided in converted lands. Complaints by users of these services can then lead to pressure to shut down these additional industries. Employment lands act as buffers for each other to a certain extent.

Toronto clearly needs housing, community benefits, community services, schools, etc., but there is land available for housing and services (and, in fact, there are plots of land approved for housing that are currently at a standstill) without converting employment areas and losing future opportunities for a strong and resilient Toronto economy.

The Toronto & York Region Labour Council supports the proposed alignment of Toronto's Official Plan with the new provincial definitions of employment areas and opposes "redesignation" of 255 hectares within four employment areas in Toronto.

Thank you.

Susan McMurray
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Toronto & York Region Labour Council