



EMAILED

May 7, 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

Attention: Nancy Martins, Committee Administrator

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

The Toronto Industry Network (TIN) has reviewed the “Official Plan Amendments to align with Provincial Legislative and Policy changes related to Employment Areas - Decision Report” dated April 23, 2025 (Staff Report) and Official Plan Amendment 804 (OPA 804).

TIN is concerned that the proposed OPA 804 conversions of Employment Areas to Regeneration Areas will leave a good number of existing manufacturing, processing, warehousing, distribution, storage, research and development and allied businesses without any protections against the encroachment of sensitive land uses.

The proposed Regeneration Areas designation will set the stage for further redesignation to Mixed-Use Areas adjacent to existing warehousing and industry, while proposed Site and Area Specific Policies may not adequately protect the ability of existing warehousing and industry to expand and they will lose that ability once residential uses are established.

OPA 804 does not address how the proposed redesignation to Regeneration Areas in the Site and Area Specific Policies will strip such industries of their third-party appeal rights as a “specified person” under the Planning Act by no longer being within an “area of employment”, or how the land use compatibility requirements of Sections 2.2.4.5 through 10 of the Official Plan will cease to apply to such industries as they will no longer be within a designated Employment Area.

OPA 804 will have an effect on investment in industry, in that the further conversion of Employment Areas could be a catalyst for disinvestment across the City. Given the growing trade dispute between Canada and the United States, now is the time to create certainty for industry wherever such industries may occur or are permitted to occur in the City. Each and every industry is important to Canada’s self-determination.

www.torontoindustrynetwork.com

TIN asks the Committee to undertake the following actions:

Planning and Housing Committee direct the Chief Planner and Executive Director, City Planning, in consultation with the General Manager, Economic Development and Culture, to carry out additional stakeholder consultation with TIN and major facilities and industrial uses/facilities in the Employment Areas proposed for removal in OPA 804.

Planning and Housing Committee direct the Chief Planner and Executive Director, City Planning, in consultation with the General Manager, Economic Development and Culture, to undertake City-led land use compatibility studies (having regard to Official Plan Policies 2.2.4.5 to 2.2.4.10 to lead and inform the determination of land uses in the required local area studies to ensure the protection of the long-term economic viability of major facilities, industries, and supportive businesses in the proposed Regeneration Areas of OPA 804, which may include redesignated lands back to Employment Areas.

Additional Concerns with OPA 804

The Staff Report justifies the conversions in OPA 804 because these are office parks with allegedly no/few existing major facilities and “therefore can accommodate residential uses”. However, City Staff have not conducted a detailed inventory and land use studies of the industries and related businesses in these current Employment Areas. There has also been no indication of communication between the City and the affected industries about the conversion initiatives proposed in OPA 804.

Thus far, the lack of concerns raised about the impacts of the OPA 804 conversions on industry is not because there are no industries that will be impacted, but because the industries are not aware of these conversion initiatives. Further consultation is required.

The Staff Report minimizes the significance of the OPA 804 conversions by stating that only 3% of the Employment Area land base will be lost through these conversions and that this represents a “managed approach to growth”.

The Our Plan Toronto: Land Needs Assessment, Report for Action, dated April 13, 2023, states that there is more than sufficient potential housing in areas designated in the Official Plan for residential development to accommodate population forecasts for 2051. But the Land Needs Assessment also states, as Toronto is unable to expand its settlement area to accommodate projected employment growth in Employment Areas, all existing designated lands will need to be retained and intensified to accommodate growth to 2051.

City Staff have not demonstrated that projected employment growth has slowed such that all Employment Areas designated lands are not needed to accommodate growth to 2051 or that the conversions are necessary for residential development. Unless the conversions are justified with a land needs assessment, statistics intended to convey a trivial impact on the Employment Areas land base are not meaningful.

The Staff Report implies that should the four Employment Areas be converted to Regeneration areas, this will allow “employment lands across the City to thrive and support economic growth to maintain a healthy economy”. Alleging that the conversion of these four Employment Areas will somehow remove or reduce future conversion pressure on the remaining Employment Areas is not a credible justification.

Conclusion

Employment lands and major facilities must be protected in the City of Toronto. All Employment Areas should be retained. But if there is a demonstrated need to convert some Employment Areas then industry's loss of land use compatibility protections and rights of appeal must be offset by additional land use studies and policy protections so that such industries in those areas have the certainty to thrive and be successful.

We hope that TIN and the industries in the proposed conversion areas of OPA 804 have the opportunity to meet with City Staff to seek a workable solution with respect to OPA 804. Thank you for your attention.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Craig McLuckie', written in a cursive style.

Craig McLuckie,
President
416-219-3512

Cc: Councillor Shelley Carroll
Calvin Lantz, Stikeman Elliott LLP
Christian Chan, C2 Planning