



January 21, 2026

Chair Gord Perks and Members of the
Planning & Housing Committee
City Hall, 100 Queen Street West
Toronto, Ontario M5H 2N2
Att: Nancy Martins, phc@toronto.ca

By Email

Dear Councillor Perks and Committee Members:

RE: Agenda Items PH 27.10,11,12 & 13

I am writing as President of the Toronto Industry Network (TIN). TIN was established in 2002 to provide a voice for Toronto's manufacturers at City Hall and Queen's Park.

Our members produce paper and food products, silicone, chemicals, welding equipment, vaccines, concrete, petroleum products, plastic pipe, fibreglass insulation, road building materials, gelatin, etc. Many of these products are used directly by Torontonians, or are exported, creating wealth and jobs for the city and for Canada. We strive to create a competitive and sustainable business environment that fosters investment and growth to strengthen Toronto, an objective which has become increasingly important in light of the trade challenges and other ongoing uncertainties.

TIN supports the staff recommendation that the City attend the Ontario Land Tribunal (OLT) proceedings in opposition to each of the above applications and to continue discussions with the applicant in an attempt to resolve outstanding issues.

Our main concern is the significant erosion of protections for Employment Lands, which were previously secured under the former Planning Act and Provincial Policy Statement (PPS) frameworks. Manufacturers are being forced to spend resources 'fighting' to protect their operations and the buffers that are appropriate for existing, expanding and potentially future new manufacturing activity. As a result of changes to the Planning Act and the Provincial Planning Statement ("PPS"), a developer can bring an application forward at any time to convert land designated as Employment Area to a designation that allows for significant development involving residential uses. It is our understanding there are another 30+ such "conversion" applications in the pipeline which are similar in this respect: the City has lost its ability to shape/modify or turn

down a “conversion” application even where the conversion is not in the public interest. Some measure of this control may be restored with the approval of OPA 804 which is awaiting a decision by the Minister of Municipal Affairs and Housing (MMAH).

TIN expressed strong support for OPA 804 at PHC 21 last spring, and has expressed similar support for its approval in meetings with staff in the Minister’s Office. Without such approval, we understand that conversion applications such as these will continue to come forward on an ad-hoc basis, and upon a short processing timeframe may by-pass the City Council decision process through a direct appeal to the Ontario Land Tribunal (OLT). When the City is spending time opposing appeals they do not believe are in the public interest, they cannot devote time or resources to consider the long-term effects that these conversion requests are having on the integrity of Employment Areas and the ability of these areas to sustain existing industries and to attract new ones. This does not bode well for keeping manufacturing jobs in Toronto or Canada.

According to the City of Toronto’s most recent Land Needs Assessment (2023), the City has already approved the equivalent of a 40-year supply of land for housing construction, and much of that land continues to be undeveloped. When a manufacturer does not have confidence that it will have access to land for present and future operations, or that it may continue to operate without an increased risk of complaint, uncertainty is the result, which can slow or dry up investment.

Over the longer term, changes to how the Planning Act and the PPS define Employment Areas is critical, but we can’t wait for that. The only tool at the City’s disposal to stop these applications at this time is the Tribunal, and failing a favourable decision or a substantial change to each application, we will see more erosion of protections for Employment Areas and the loss of employment land available to create jobs and wealth.

Thank you for the opportunity to present our views.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Craig McLuckie', with a stylized, cursive script.

Craig McLuckie
President, Toronto Industry Network
416-219-3512