



January 21, 2026

Councillor Gord Perks
Ward 4 Parkdale-High Park
Chair of the Planning and Housing Committee
City of Toronto
100 Queen St. W
Toronto, ON M5H 2N2

Re: PH27.20 Preserving Employment Lands and Protecting Local Jobs

Dear Councillor Perks,

The Toronto Region Board of Trade (the Board), the voice of business for Canada's largest regional economy, **supports the recommendation** of the Chair to request the Minister of Municipal Affairs and Housing approve Official Plan Amendment (OPA) 804 and to engage with stakeholders to protect Toronto's employment lands.

The Board's mission is to make Toronto one of the most competitive and sought-after business regions in the world. Ensuring a long-term supply of protected employment lands is critical to enabling businesses to locate, grow, and invest in the region- which in turn creates jobs stimulates local economies.

In May of 2025, via a submission to the Planning and Housing Committee, the Board acknowledged that OPA 804 was 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.

The Board remains concerned that conversion applications are continuing to proceed while OPA 804 remains before the Minister, reinforcing the need for clear and timely provincial direction on employment land conversions.

This pattern risks weakening the stability and long-term role of employment lands by increasing the likelihood of land use conflicts. These conflicts can limit how businesses can operate and grow, increasing risks that reduce the confidence needed for future employment investments to occur.



Employment land conversions are not only about whether people can live in a healthy and safe environment. It is also about whether businesses can continue to function without additional costs being imposed through restrictions on commercial and industrial activity, increased compliance requirements, and other pressures to modify existing operations over time.

The Board continues to advocate for a region-wide pause to all conversions until the provincial government has developed an employment lands planning framework that assesses conversion requests from a comprehensive perspective. Impacts to economic viability cannot easily be determined on a site-by-site basis because mitigation measures included in individual conversion applications do not account for long-term constraints on business operations across an employment area.

The recommendations from *Race for Space: Securing the Future of Ontario's Employment Lands* released by the Board in November 2023 remain relevant today. This report provides the building blocks to develop a robust framework to permanently protect critical employment lands, evaluate the cumulative impact of conversions and create a regional employment lands inventory to underpin policy and business investment decisions.

We look forward to continued collaboration to ensure land use planning advances both housing and economic priorities critical to our region's success.

A handwritten signature in blue ink, appearing to read "Roselle Martino". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

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