



June 13, 2025

EMAILED

The Honourable Rob Flack,
Minister of Municipal Affairs & Housing,
17th floor, 777 Bay Street,
Toronto, Ontario
M7A 2J3

Re: Protection of Employment Lands and OPA 804

Dear Minister:

The Toronto Industry Network (TIN) is an incorporated organization of manufacturers and industry associations with operations in the City of Toronto. 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. As mature industries, our ongoing investment in Toronto is vital to the Province.

TIN is writing to express support for and request your approval of OPA 804 from the City of Toronto, and secondly, to ask that the Province restore and strengthen protections for employment lands that were removed in last years' amendments to the Planning Act.

We believe that the protection of employment lands has taken a back seat to the government's drive to build more housing. This erosion of Toronto's employment lands -- which provide 25% of the city's jobs and are an economic engine for Ontario -- is a threat to the city's ability to preserve and protect manufacturing jobs. Given global uncertainties and the new-found drive to strengthen Canada's economy, making products here at home should be of strategic importance to the provincial government! A vibrant manufacturing base provides important revenues to and strengthens supply chain networks across the Province.

Support for OPA 804 – City of Toronto

The City of Toronto has just submitted OPA 804 for the Minister's approval. TIN endorses the City's request and recommends its swift approval. First, some background would be appropriate.

Late last year, the City responded to Bill 97 and the new PPS by introducing OPA 680, which aligned the City definitions with the new provincial definition, and OPA 668, which transitioned 'lawfully established' employment lands which the Province allows for. However, your Ministry did not agree with this approach, and asked the City to bring in a new OPA [804] which would reinstate the intent of the earlier OPA's but that would also show MMAH examples of lands which don't meet the new definition. These lands have now been identified by the City in OPA 804 and they will result in the loss of 255 hectares of formerly protected employment lands.

As a result of the passage of Bill 97, applications to convert employment lands for residential use are coming in much faster and have become much easier for developers to commence, exposing once well-protected employment lands to a potentially much faster conversion to residential or mixed use. If 804 were to be approved, these lands will become better protected by your government's employment land policies. **While we are not happy with the significant loss of employment lands and the employment protections represented by the lands identified in OPA 804, we are even more concerned that a delay in approving the City's OPA 804 would open the door to more conversion applications,** and further erode the supply of land set aside for employment purposes only. It is critical that this 'gap' in protection be closed, and for this we see the passage of OPA 804 as an important 'fix' until the larger problem is addressed.

The Bigger Issue – Stronger Protection of Employment Lands

TIN and its members understand that more housing in Ontario should be the top objective at this time. But through the land needs assessment study - [Our Plan: Toronto \(2022\)](#) - we learned that in the City of Toronto at least, and we suspect other municipalities, there is adequate land already identified for residential development and that conversions of previously-zoned employment lands are not necessary. The [Development Pipeline 2024](#) report only confirms this assertion. As a result, we concur with the recommendations of both the Ontario Chamber of Commerce (OCC) [letter of May 20th](#) and the Toronto and Region Board of Trade [Race for Space](#) (December '24) that made recommendations aimed at restoring protections for employment lands.

It is important to note that most of the employment lands conversions approved in Toronto have not been converted to housing but, in our opinion, demonstrate the weakness of current policies that allow developers to speculate with industrial land. Employment lands for industrial development in Toronto continue to be in short supply, with pricing being driven up by speculation.

A number of TIN members report they have had to expend considerable resources to protect their facilities against conversion requests. This is an ongoing chronic issue that does not show favourably when compared to jurisdictions elsewhere that cherish their manufacturing base.

Specifically, TIN recommends that:

- Approval of employment land conversion requests be suspended, pending a full review of policies which ensure the viability of employment lands (OCC);
- Identify and formalize buffers and transition zones for industrial lands with criteria and planning Guidelines (*Race for Space*);
- Create a regional inventory of employment lands and related policies as a first step to an overall policy that provides adequate protection to employment and industrial lands (OCC/*Race for Space*);
- Clarify the meaning of “lawfully established” in the Planning Act transition provision to ensure that permitted uses in employment areas can continue (OCC).

Minister, we all want Ontario and the City of Toronto to meet the very serious economic challenges we are facing. We need housing, but we need jobs too. Manufacturing provides the good jobs that allow people to afford to live in Toronto. We are looking for a restoration of the balance between these two objectives that existed prior to last year’s amendments to the Planning Act that changed how we define employment areas, and have put forth ideas that we and others submit will help us get there.

We respectfully request the opportunity to meet and discuss these issues further with you. I have copied the Honourable Ministers Vic Fedeli, Peter Bethlenfalvy, David Piccini and Graydon Smith.

Sincerely,



Craig Mcluckie

President, Toronto Industry Network

c.c The Honourable Vic Fedeli

The Honourable Peter Bethlenfalvy

The Honourable David Piccini

The Honourable Graydon Smith