Employment areas conversion requests underway in the City of Toronto

December 17, 2020

This article provides background on how employment lands are categorized and dealt with in the City of Toronto, including recent changes to designate certain areas as Provincially Significant Employment Zones. It will summarize the City of Toronto's Municipal Comprehensive Review process and related opportunity to make an employment land conversion request.

The Growth Plan for the Greater Golden Horseshoe came into effect on May 16, 2019 (amended August 2020). The Ministry of Municipal Affairs and Housing established July 1, 2022 as the deadline for municipalities to update their Official Plans to achieve conformity.

Municipal Comprehensive Review commencement

On June 29, 2020, Toronto City Council approved a work plan to manage its Growth Plan conformity exercise through a Municipal Comprehensive Review (MCR) of the Toronto Official Plan. The City officially commenced its MCR process on August 4, 2020. Once complete, the updated Official Plan will go to the Ministry of Municipal Affairs and Housing for final approval, from which there is no appeal.

General vs Core Employment Designation

During the City's last MCR, the City refined all employment-designated lands to either 'General' or 'Core' Employment Areas. Employment Area policy matters were dealt with and brought forward into the City's Official Plan through Official Plan Amendment 231 (OPA 231). The difference between 'General' and 'Core' Employment Areas is centred on the intensity of employment uses and issues of compatibility. For the most part, Core Employment Areas are geographically located within the interior of employment areas and are mainly used for industrial activities. General Employment Areas are typically located on the periphery of employment areas, on major roads where retail stores, service shops and restaurants can serve workers in the employment area and would benefit from visibility and transit access to draw the broader public.

Provincially Significant Employment Zones

On January 15, 2019, the Ministry of Municipal Affairs and Housing announced changes to the Growth Plan that identified a new approach for protecting key employment areas, through the introduction of 'Provincially Significant Employment Zones' (PSEZ). The Province states that, "As areas of high economic output, provincially significant employment zones are strategically located to provide stable, reliable employment across the region. They provide opportunities to improve coordination between land use planning, economic development, and infrastructure investments to support investment and job creation over the longer-term." Ultimately, the PSEZ designation on certain lands established protection that is more rigorous, and consequently the likeliness of their conversion to permit non-employment uses is much lower unless in a major transit station area.

OPA 231, previous round of employment conversion requests and new criteria

As part of the City's last MCR and resultant OPA 231 process, over 140 requests for employment conversion were received by the City, all with varying background, detail and timing. In an attempt to manage the process more effectively, the City has moved to formalize requests for conversion, as part of the current MCR. Council authorized a set of 'Conversion and Removal Policies for Employment Areas' to standardize the policy consideration requirements that will be utilized as the tests to be satisfied in order for an employment conversion to occur.

Employment conversion requests will be assessed, both cumulatively and individually, by considering a number of conversion criteria. These tests can be categorized into the following general themes:

- Demonstrating a need for a conversion in order to meet the City's allocated population forecast;
- If the City will be able to meet their allocated employment forecast;
- Whether or not the conversion would adversely affect the employment area related to:
  - Land use compatibility, size of employment area, ability to provide opportunities for similar or related employment; and
- Whether there is sufficient hard and soft infrastructure to accommodate the proposed use(s).

These criteria generally track the Growth Plan tests for conversion.

Conversion request process and associated fee

While not officially required, it may be advisable that proponents seek a meeting with the Strategic Initiatives Policy and Analysis section of the City, in a pre-consultative manner to discuss the proposal. It is important to note, however, that an application will not be "deemed complete" as with other planning applications, and the City will not provide a list of reports or studies to be prepared for a conversion request submission. It is advisable however, that professional consultant reports and studies be prepared in order to provide the appropriate rationale for any particular conversion request. The City has also recommended the introduction of a fee associated with reviewing conversion

requests, citing that staff resources required to review each conversion request entail a level of effort almost equivalent to that required to review an amendment to the Official Plan. As such, City staff are now prepared to recommend a new Employment Areas Conversion Request User Fee of $20,000 per request. The fee would apply to requests received between December 18, 2020 and August 3, 2021. An exemption would be granted if the request forms part of a complete application for an Official Plan Amendment.

The final date for submission of an employment area conversion request is August 3, 2021.

How BLG can help

The Environmental, Municipal, Expropriation and Regulatory group (EMER) at BLG has the resources, knowledge and background to advise you about Employment Area lands and potential conversion requests. Contact one of the below key contacts for more information.

By

Adam Shipowick

Expertise

Municipal & Land Use Planning, Land Use Planning, Environmental

---

BLG | Canada's Law Firm

As the largest, truly full-service Canadian law firm, Borden Ladner Gervais LLP (BLG) delivers practical legal advice for domestic and international clients across more practices and industries than any Canadian firm. With over 800 lawyers, intellectual property agents and other professionals, BLG serves the legal needs of businesses and institutions across Canada and beyond – from M&A and capital markets, to disputes, financing, and trademark & patent registration.

blg.com

BLG Offices

Calgary
Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa
World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver
1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

The information contained herein is of a general nature and is not intended to constitute legal advice, a complete statement of the law, or an opinion on any subject. No one should act upon it or refrain from acting without a thorough examination of the law after the facts of a specific situation are considered. You are urged to consult your legal adviser in cases of specific questions or concerns. BLG does not warrant or guarantee the accuracy, currency or completeness of this publication. No part of this publication may be reproduced without prior written permission of Borden Ladner Gervais LLP. If this publication was sent to you by BLG and you do not wish to receive further publications from BLG, you may ask to remove your contact information from our mailing lists by emailing unsubscribe@blg.com or manage your subscription preferences at blg.com/MyPreferences. If you feel you have received this message in error please contact communications@blg.com. BLG's privacy policy for publications may be found at blg.com/en/privacy.

© 2026 Borden Ladner Gervais LLP. Borden Ladner Gervais LLP is an Ontario Limited Liability Partnership.