

Requests for Conversions of Employment Areas in the City of Toronto Due by August 3, 2021

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If you own lands within the City of Toronto's employment areas, you have four months remaining in which to have your request for conversion considered by City Planning as part of the City's Municipal Comprehensive Review (MCR).

On August 4, 2020, City of Toronto Council authorized the commencement of the City's next MCR. The City is required to undertake an MCR to bring its Official Plan into conformity with the Province's *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (the Growth Plan) by July 1, 2022, with the result being City adopted Official Plan amendments. (See our previous comment on the City of Toronto's Growth Plan Conformity & Municipal Comprehensive Review.)

One key aspect of a MCR is the opportunity for municipalities to re-designate (convert) employment areas to non-employment uses. As part of its adopted MCR work plan, the City will be considering written requests (accompanied by a newly established fee) to convert lands designated *Core Employment Areas* or *General Employment Areas* to non-employment uses until August 3, 2021.

Note that while conversions of employment areas may now occur outside the MCR in certain cases, conversions of lands that are within a provincially-identified "Provincially Significant Employment Zone" (PSEZ) and not within a City-identified Major Transit Station Area (MTSA), must occur during an MCR. As the City will also be identifying its MTSA's as part of the current MCR, landowners within PSEZs considering development will need to wait for the City's next MCR to apply for conversion if their lands are not included in one of the City's MTSA's.

To support an application for conversion, landowners will need to demonstrate conformity with the applicable Growth Plan criteria as well as consider the Conversion and Removal Policies for Employment Areas within the City Official Plan. To best position a conversion application, one or more consultants should be retained to prepare the detailed reports required to demonstrate conformity with the applicable policies. It is also recommended that owners consult with the appropriate City Planning staff.

City Staff were directed to revisit the expected timing for completion of the MCR in Q1 of 2021; however, no report has been made to Council as of the date of this comment. As such, the timing of the MCR remains as stated.

Cassels

This publication is a general summary of the law. It does not replace legal advice tailored to your specific circumstances.