

Jan 21, 2026

BY E-MAIL  
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Planning and Housing Committee  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Attention: Nancy Martins, Committee Administrator, Planning and Housing Committee

To: Chair Perks and Committee Members

Re: PH 27.11, 27.12, PH 27.13 OPA Appeal Reports

The South Etobicoke Industrial Employers' Association (SEIEA) represents a group of manufacturers and industrial businesses, across several industry sectors with operations and facilities in the South Etobicoke Employment Area.

We support staff's recommendation for the City Solicitor and appropriate City staff to attend the Ontario Land Tribunal (OLT) in opposition to the current applications regarding the Official Plan Amendments for these lands and ask that Committee approve this staff recommendation.

The matter of conversion of these lands has previously been considered by this Committee and by Council in Oct 2023. Having heard from planning staff and numerous stakeholders – industries, residents associations, and industry associations including ourselves at that time, Council made the decision that these lands are not suitable for mixed use development and refused the conversion.

More recently, the challenges with US tariffs amplify the importance of preserving employment areas in the City so that manufacturers and businesses can operate their facilities unencumbered and that sufficient employment lands are available for businesses to operate, expand, and for new businesses to locate here.

The Official Plan Amendments should be opposed at the OLT for the following reasons:

- Employment Lands city-wide are an important, finite resource and conversions are not reversible. These lands are required for current and future employment. The City's Land Needs Assessment found that "Toronto's total employment is projected to grow from 1,607,800 in 2016 to between 1,938,800 and 2,101,200 jobs in 2051, while jobs in Employment Areas are projected to grow from 410,700 to between 456,600 and 498,600."

- Conversion of Employment Lands is not required. The City's latest Land Needs Assessment determined that "there is more than sufficient potential housing in areas designated in the Official Plan for residential development to accommodate Growth Plan population forecasts in 2051."
- Employment Lands sustain the jobs that are an important part of the solution to housing challenges. Manufacturing jobs provide good wages and benefits, which provide the means for Toronto's residents to pay rents, save for downpayments and afford mortgages.

The South Etobicoke Employment Area is among the largest in the City, providing over 44,000 jobs. It is strategically located near major transportation networks, is a good location for many firms in Toronto's film industry and includes the Ontario Food Terminal with many food distributors having facilities here. Many other manufacturers and industrial employers are also located here. The Province has previously recognized the importance of this area when it designated it as a Provincially Significant Employment Zone (PSEZ) when that designation was still in use.

All four of the proposed OPA Amendments for conversions should be opposed by the City at the OLT. We wish to offer additional comments on several of these in the South Etobicoke Employment Area:

#### 340-364 Evans Avenue and 12-16 Arnold Street

This site is centrally located in the South Etobicoke Employment Area and is adjacent to the Gardiner Expressway on the north side, bounded by truck routes on the south and west sides and immediately to the east is the Gardiner Expressway on/off ramp. This is an excellent transportation network for trucks, with direct highway access from the employment area.

Since these lands are centrally located, a conversion to a sensitive use would impact existing and future businesses' operations. Many manufacturers operate 24 hours x 7 days per week, including shipping and receiving operations which generate truck traffic and noise, including audible back-up alarms and lights and general truck traffic in their yards. Other noise sources include equipment that must be located outdoors or on rooftops. The introduction of a sensitive use may create a 70-meter separation distance and 300-meter influence area requirement under MECP D1-6 Guidelines which can impact their operations and existing ECA's (Environmental Compliance Approval). This proposed conversion would be the only sensitive use within 300 meters, impacting a large portion of the employment area.

Introducing a mixed use (i.e., a sensitive use) at this location would impact businesses in the immediate vicinity and lead to more conversions, destabilizing the employment area as a whole.

#### 125 The Queensway

This site is surrounded by industrial uses including: the Humber Wastewater Treatment Plant, the Gardiner Expressway and the Ontario Food Terminal. The Ontario Food Terminal is an important regional asset in the food supply chain and is a key distribution point for produce in the Toronto

Area. Many OFT members have additional distribution facilities or plants in the South Etobicoke Employment Area. The introduction of sensitive uses through a mixed-use designation would create land use conflicts from noise, odor and traffic which would severely encumber operations at the Food Terminal and negatively impact employment in the SE Employment Area.

1543 - 1551 The Queensway and 66 and 76 Fordhouse Boulevard

As noted in the staff report, these lands are surrounded by industrial uses, major arterial road and the Gardiner Expressway. The surrounding uses are not compatible with a sensitive use and introducing sensitive uses through a mixed-use designation would impact the surrounding businesses. Further it represents one more loss of valuable, finite employment land and jobs and adds to the destabilization of the South Etobicoke Employment Area.

Employment lands are a valuable and finite resource for City residents. They provide good, local jobs. We request that the Committee adopt staff's recommendation for the City Solicitor and appropriate City staff to attend the Ontario Land Tribunal (OLT) in opposition to the current applications regarding the Official Plan Amendment for these lands.

Thank you for your consideration of this matter.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Al Brezina', is positioned above the printed name.

Al Brezina

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*cc: Councillor A. Morley*