



January 20, 2026

**PH27.13 -- 350, 360, 364 Evans Avenue and 14 - 16 Arnold Street- Official Plan Amendment-  
Appeal Report (Ward 3)**

Planning and Housing Committee  
City of Toronto  
100 Queen St. W.  
Toronto, Ontario

To Members of the Planning and Housing Committee,

The Toronto & York Region Labour Council has always been clear about the need to protect Employment Areas within the City of Toronto. As representatives of 150 unions and locals in this region with more than 220,000 working people across all sectors of the economy, we recognize the importance of ensuring there is land available for future industrial uses. Along with several other key City stakeholders such as the Board of Trade, Cinespace, and unions representing specific sectors, we oppose the conversion of these lands and the appeal by the developers, and support the recommendations by City staff as laid out in the Staff Report.

While employment lands represent less than 12% of Toronto's land area, they house approximately 25% of Toronto's jobs. Many of these are good, unionized jobs that are essential to the economic success of our city. The Toronto & York Region Labour Council opposes conversion of employment areas because when we lose employment areas they are gone forever. This means moving or eliminating what are often considered to be good industrial and other jobs. It also means there is no employment land available as other employers and jobs want to move in, whether it be to support construction, green jobs, film, or other sectors. And the conversion of one employment area, especially but not exclusively to residential, can result in threats and elimination of employment in other bordering lands.

At the site of 340-364 Evans Avenue and 12-16 Arnold Street, since these lands are midpoint in a stretch of employment lands, it makes little sense to break into them, especially given their proximity to major transportation options. In addition to wanting to keep these lands ready for coming industries, we have serious concerns about the impact on surrounding industry and jobs, in this case the burgeoning film sector.

Some of the Labour Council's affiliates – unions in the film industry – are part of FilmOntario, which is on record with the City of Toronto as being opposed to converting any employment lands. In this case, the nearby employment areas act as a buffer for each other. If residential or other human service uses shift into the area being considered for conversion, it may not be long before residents complain about big trucks, traffic day and night, and other concerns they may have about this sector that brings so much to the City's economy. Instead of opportunities to grow in Toronto, the film sector would be squeezed, and consider moving to other jurisdictions where employment land is more readily available. In 2021, the film sector spent more than \$2.5 Billion directly in Toronto. With the multiplier effects of this direct spending, the financial implications are huge and growing.

If this sector has to move elsewhere, their employees will need to decide whether to take longer commutes, or quit their jobs and find something close by, likely with a pay cut. Neither option is a good one. We are currently striving to reduce people's commute times, both for mental health reasons and to reduce the impact on our environment.

Conversion of employment areas to mixed use often happens because there is speculating on these lands or there is a sense that something positive can be undertaken at a location without an understanding of the negative consequences. Toronto clearly needs housing, community benefits, community services, schools, etc., but there is land available for housing and services without converting employment areas.

We note that if housing is built, but there are not the appropriate services nearby or built into the planning, there is pressure on the city and partners to find ways to provide these services even if the land and planning are not yet available to support them.

In addition, when we start down the slippery slope, one conversion or partial conversion can propel other conversions because when housing is the result of the conversion, residents are likely to complain about the dirty, noisy, or intensive transportation conditions generated by nearby employers whose lands have not been converted. The same can happen if other kinds of human services (e.g., day care) are newly provided in converted lands. Complaints by users of these services can then lead to pressure to shut down these additional industries. Employment lands act as buffers for each other to a certain extent.

Let us return briefly to the issue of housing. Mayor Chow is already the housing crisis in our City. Experts all indicate that this can be done with lands that are already available, whether already in the control of developers, coming to market, or owned by different levels of government. We do not need to dig into employment areas to find more land. Instead, we need to find a process that leads to development of truly and deeply affordable housing, with the full range of housing options that includes non-market housing. And where this truly affordable housing allows people to work near where they live.

When this request first came before the City, we appreciated the careful analysis of staff in laying out reasons why conversion should be avoided. With the current appeal which bypasses

the City, staff have also laid out good reasons for opposing the appeal at the Ontario Land Tribunal.

We urge Toronto City Council to follow City staff advice:

- send Solicitor/staff to attend the Ontario Land Tribunal (OLT) and oppose the current application.
- empower staff to continue discussions with the applicant in an attempt to resolve outstanding issues.
- authorize Solicitor/staff to take any necessary steps to implement Council's decision, including requesting any conditions of approval that would be in the City's interest, in the event the OLT allows the appeal, in whole or in part.

We also urge Council to take steps, including requesting that Ontario's Minister of Municipal Affairs and Housing approve OPA 804, to reduce or eliminate any further one-off conversion requests or appeals.

Yours truly,



*Andria Babbington*  
President

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