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February 18, 2026

Chair Chris Moise and Members of Toronto and East York Community Council
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of Toronto and East York Community Council:

Re: TE29.14 - 402 and 440 Unwin Avenue - Official Plan Amendment - Appeal Report

The Toronto Port Authority is writing to provide comments on the proposed redevelopment of the Hearn Generating Station lands at 402 and 440 Unwin Avenue, which is scheduled to be considered by Toronto and East York Community Council on February 19, 2026, in the context of Council direction on the associated Ontario Land Tribunal appeal.

The Toronto Port Authority owns and operates Billy Bishop Toronto City Airport and manages the Port of Toronto. We have a statutory responsibility to protect aviation safety and airspace, as well as a mandate to support the long-term viability of port operations, marine shipping, goods movement, and employment uses within the Port Lands.

Based on the information submitted to date, the Toronto Port Authority continues to have significant unresolved concerns with the proposed Official Plan Amendment.

Aviation Safety and Building Height Uncertainty

The application proposes many new buildings, including tower elements, while deferring the determination of building heights to a future precinct planning and rezoning stage. This approach does not provide sufficient information for the Toronto Port Authority to complete an aviation safety review.

The subject lands are located beneath aircraft approach paths serving Billy Bishop Toronto City Airport and are subject to aviation height limitations. In addition, construction equipment, including cranes, may pose temporary but critical risks to protecting airspace.

Absent defined building heights, crane strategies, and construction methodologies; aviation impacts cannot be adequately assessed. Establishing development permissions in principle through an Official Plan Amendment before resolving these issues introduces risk to airport operations and aviation safety.

The Toronto Port Authority owns and operates:
L'Administration portuaire de Toronto possède et exploite :

AÉROPORT DE TORONTO
**BILLY
BISHOP**
TORONTO CITY AIRPORT

PORT OF
TORONTO

OUTER HARBOUR
MARINA
DE L'AVANT-PORT

Canada



Inconsistency with Port Lands Employment Policy Framework

Beyond aviation considerations, the proposed Official Plan Amendment raises broader concerns regarding employment land protection and port viability.

The subject lands are governed by the Port Lands Area Specific Policies of the Central Waterfront Secondary Plan, which identify the Port Lands as a strategic employment, industrial, logistics, and port district of city- and region-wide importance. While the Hearn Generating Station is recognized as a destination and catalytic site, the policy framework does not identify residential use as a primary or desired function of the district.

The proposal contemplates the introduction of up to approximately 8,400 residential units, supporting a population of roughly 17,000 to 19,000 residents. This scale of residential development represents a material shift in land-use direction and exceeds the intent of the Hearn's policy exception, which was intended to support destination and catalytic uses within the adaptive reuse of the historic building, not the creation of a new residential neighbourhood within the Port Lands surrounded by employment uses.

Long-Term Displacement Risk to Port and Employment Uses

While the application is framed as a coexistence model supported by technical mitigation measures, the Toronto Port Authority is concerned that the introduction of residential permissions at this scale functions, in practice, as a managed transition away from employment and port uses.

Introduction of a significant residential population in this location could have a destabilizing impact on the ability of the employment lands in the area to operate and expand. This will, in turn, ultimately impact the ability for the Port to operate effectively, and have economic and social consequences throughout the city.

The impact of introducing sensitive land uses close to industry is not only an issue with technical compliance but also raises concerns as it relates to risk of complaints. Warning clauses and even building design measures do not effectively prevent complaints or long-term conflicts once the residential population is established near port and industrial uses.

Goods Movement and Operational Impacts

Port operations depend on reliable, predictable access for trucks, marine shipping, and supporting logistics. The Transportation Impact Study accompanying the application focuses on peak-hour intersection performance but does not adequately address reliability of goods movement, cumulative congestion impacts, or the long-term interaction between residential travel patterns and port operations.



Even incremental reductions in access reliability can materially affect port competitiveness and operational viability.

Conclusion and Requested Council Direction

While the Toronto Port Authority supports the adaptive reuse of the Hearn Generating Station as a destination and cultural asset consistent with established policy, the scale and nature of the proposed residential development raise unresolved aviation safety concerns and pose long-term risks to port operations and employment lands.

In this context, the Toronto Port Authority respectfully encourages Toronto and East York Community Council to:

- Recognize aviation safety and airspace protection as material and unresolved planning considerations;
- Acknowledge the inconsistency of the proposed residential permissions with the Port Lands Area Specific Policy framework;
- Recognize the long-term displacement risks posed to port and employment uses; and
- Support City staff's recommendation to oppose the proposed Official Plan Amendment at the Ontario Land Tribunal.

The Toronto Port Authority remains committed to working collaboratively with the City, the applicant, and other stakeholders to support appropriate adaptive reuse of the Hearn that aligns with Port Lands policy objectives and protects critical transportation and employment infrastructure.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to be "RJ Steenstra", with a long horizontal line extending to the right.

Roelof-Jan (RJ) Steenstra
President and CEO
The Toronto Port Authority