



February 19, 2026

Councillor Chris Moise  
Ward 13 Toronto Centre  
Chair of Toronto and East York Community Council  
City of Toronto  
100 Queen St. W  
Toronto, ON M5H 2N2

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

Dear Councillor Moise,

The Toronto Region Board of Trade (the Board), the voice of business for Canada's largest regional economy, **supports the City in maintaining the integrity and future economic viability of employment areas** by protecting critical sites like 402 and 440 Unwin Avenue (the Hearn) from conversion to residential uses.

Applications continue to proceed to the Ontario Land Tribunal (OLT) before the province has finalized the policy framework necessary to assess them. With Official Plan Amendment (OPA) 804 remaining before the Minister, and *provincial guidance* for the *economic viability* test under the *Provincial Planning Statement (PPS)* yet to be developed, the Board continues to be concerned that conversions are proceeding to the OLT without this assessment framework. Evaluating conversion requests on an application-by-application basis leaves municipalities and the OLT without clear provincial direction, risking irreversible erosion of employment lands.

The Board has called for a pause on conversions until the province has established a comprehensive approach that considers cumulative and future impacts on regional competitiveness, and the Port Lands application underscores this necessity. The southern district in this employment area contains regionally significant marine operations, industrial uses, and energy facilities that serve both the city and the wider region. The province's recent approval of a new underwater electricity transmission line into Toronto highlights the strategic importance of this area. As we build more homes, we must also preserve the land base required to attract investment, drive productivity and support the growth of export-orientated jobs.



Employment lands are finite and strategically located. Once converted, they cannot be recovered. The recommendations in *Race for Space Securing the Future of Ontario's Employment Lands*, released by the Board in November 2023, remain directly applicable.

The Board calls on the province to strengthen and build on existing employment land protections, including the foundational work undertaken through *Provincially Significant Employment Zones (PSEZs)*, by creating a detailed regional employment lands inventory. Formalizing buffers and transition zones for industrial lands with clear planning criteria as well as establishing a comprehensive process to assess the cumulative economic impacts of conversion proposals is required. Together, these actions would establish the policy foundation needed to guide conversion decisions consistently across the region.

We look forward to continued collaboration to ensure land use planning advances both housing and economic priorities that are critical to our region's success.

A handwritten signature in blue ink, appearing to read 'Roselle Martino'. The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Roselle Martino  
Executive Vice President, Policy and Strategic Affairs  
Toronto Region Board of Trade