



Deborah Flint
President & Chief Executive Officer

May 10, 2024

Ms. Hannah Evans, Assistant Deputy Minister
Mr. Sean Fraser, Assistant Deputy Minister
Mr. Caspar Hall, Assistant Deputy Minister
Ontario Ministry of Municipal Affairs and Housing
777 Bay Street
Toronto, ON M5G 2C8

Re: Response to Bill 185 and Related Issues (ERO Posting Numbers 019-8369, 019-8370, 019-8462, and related Provincial initiatives/proposals)

Dear Colleagues:

Please accept this submission from the Greater Toronto Airports Authority (GTAA) to the above-noted ERO Postings and any associated Provincial directions and decisions.

Ontario has seen more than 500,000 people settle in the province in 2023 and nearly 6 million additional residents are expected by 2046. Housing is important for the GTAA as the 50,000 people who work at the airport, and the over 400,000 that work around it in Canada's second largest employment area, also require access to affordable housing within the communities surrounding their place of work.

It is in our collective best interest to pre-empt and minimize planning of developments proposed in noise-sensitive areas and/or where planned residential towers become obstacles to flight paths, raising safety matters, or limiting operations of the airport. The good news is that this represents a small fraction of the available land for residential growth in the region.

Protecting the air space around the airport is especially important given the expected passenger growth over the next 10 years, and the business imperative for the airport to provide domestic and global connectivity for important economic sectors, such as automotive, life sciences and food processing manufacturers. We need to ensure that the land and airspace around the airport is preserved as the basis for employment growth, productivity improvements, and the economic growth of the Province.

With the Government of Ontario's recent introduction of Bill 185, Cutting Red Tape to Build More Homes Act, 2024, a proposed Provincial Planning Statement (PPS), and an updated framework for



issuing MZOs, GTAA would like to highlight its support for specific changes being introduced and offer some further insights for consideration.

Achieving the objective of developing more homes in Ontario must be done in a balanced way that provides housing for Ontarians, allows the government to accelerate the approval of housing developments, and preserves Toronto Pearson's role as a key economic driver by protecting the land and airspace around the airport.

We offer the following comments for your consideration:

- **Adding Protection for Airports in the PPS** – GTAA thanks the government for enshrining protections for airports in the PPS. However, the PPS also states the Minister may make decisions that consider other issues to balance government priorities, such as housing and transit hubs. GTAA asks for assurances that airport airspace and noise-sensitive lands continue to be protected, given that these lands represent a small fraction of available land for residential development in the region.
- **Bill 185 Removes GTAA's Right to Appeal** – Airports are not defined as “specified persons” under the Planning Act, thus have had their third-party right to appeal Official Plan and Zoning Bylaws eliminated as part of Bill 185. Given the government's updated PPS that provides protection for airports, it is important that airports have the ability to appeal the small number of potential applications that may arise and conflict with the government's intent under the PPS.
- **Revised Employment Land Definition in the PPS** – Bill 97 introduced a new, narrower definition of employment lands that excludes commercial, office, and institutional uses. GTAA is concerned by this change, as it could upend the strategically important employment lands that surround the airport, allowing the conversion of office and commercial uses for residential development contrary to the airport's new protections in the PPS. Retaining a more inclusive definition of employment lands, specifically in the airport employment area, that recognizes the interdependency of manufacturing, logistics, office, commercial, institutional and retail uses, to the economic diversity and success of the area is recommended by GTAA.
- **Removal of Provincial Protections of Employment Lands in the PPS** – The ending of the Provincially Significant Employment Zone (PSEZ) policy designation removes a higher order of protection against ad hoc conversions for strategically important employment lands that have high concentrations of industry and jobs, such as those around Toronto Pearson. This combined with the removal of the provincially mandated Municipal Comprehensive Review process, can increase the pressure and frequency of employment land conversion. GTAA recommends pausing the end to the PSEZ and working with the



airport and other stakeholders to develop an employment land protection policy that is underpin by a regional economic development strategy.

- **Updated Framework for MZOs** – The GTAA supports the government’s plan to introduce more transparency and consultation to the MZO process. We also request that proposed MZOs that impact airport operations or involve development in noise-impacted areas be required to be sent to the affected airport for consultation.

In conclusion, GTAA thanks the government for enshrining airport operations and noise impacted area protections in the PPS. However, not having the right to appeal as proposed in Bill 185 makes it difficult to ensure that the protections are being abided by. There are also areas where the PPS could be improved to provide further protection for the employment lands critical to the airport’s operation and Ontario’s economy, and simultaneously reduce the administrative processes associated with housing development.

I would be happy to discuss these issues with you in greater detail at your convenience.

Sincerely yours,

GREATER TORONTO AIRPORTS AUTHORITY

A handwritten signature in black ink, appearing to read 'Deborah Flint', with a long horizontal flourish extending to the right.

Deborah Flint
President & CEO