



September 13th, 2024

Delivered via email

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Attention: Paul Calandra, Minister of Municipal Affairs and Housing

Re: Minister's Zoning Order Request – 65 Rexdale Boulevard

The Greater Toronto Airports Authority ("GTAA"), operator of Lester B. Pearson International Airport ("Toronto Pearson"), has recently been notified of the City of Toronto's request posted to the Environmental Registry of Ontario (019-9080) to enact a Minister's Zoning Order ("MZO") to permit residential uses in the form of a 220-unit rental apartment building at 65 Rexdale Boulevard in Toronto.

There has been no formal application made under the Ontario Planning Act in support of this proposed development. It has not been through the statutory consultation process. We are also not aware of any noise or land use compatibility studies that have been completed to support this proposal as required by the City of Toronto's Official Plan.

The lack of noise studies is particularly concerning as this location is within the Toronto Pearson Airport Operating Area ("AOA"). The AOA identifies a zone around the airport that is affected by high levels of aircraft noise based upon Transport Canada guidelines and is informed by the 30NEF/NEP contour.

The use of an MZO to approve the proposed development's conversion of Employment Lands to Mixed-Use (residential) will put the Province in contradiction with its own land use policies, including the Provincial Planning Statement (PPS), which reads under 3.4 Airports, Rail and Marine Facilities:

1. Planning for land uses in the vicinity of airports, rail facilities and marine facilities shall be undertaken so that:

a) their long-term operation and economic role is protected; and

b) airports, rail facilities and marine facilities and sensitive land uses are appropriately designed, buffered and/or separated from each other, in accordance with policy 1.2.6.



This development will also undermine the purpose of the AOA in providing a critical barrier for noise-sensitive land uses. In fact, City of Toronto Official Plan, Chapter 7: Site and Area Specific Policies, recognizes the AOA's important role, reading under item 29:

Within the Lester B. Pearson International Airport (L.B.P.I.A.) Operating Area, new development for residential and other sensitive land uses is prohibited, unless permitted by existing zoning.

Toronto Pearson supports the goal of building much-needed housing, including affordable housing. However, housing should be in locations where consideration is given to the impact of noise from the operation of an international airport, especially for sensitive uses like a residential development at 65 Rexdale Boulevard.

The new PPS and City of Toronto Official Plan policies for the AOA have been designed to provide an important buffer between the airport's operation and residents, and to protect airports from encroachment of incompatible land uses, defined as noise sensitive. These policies are also critical in ensuring the long-term operation and economic viability of Toronto Pearson and its surrounding employment lands.

The employment lands around Toronto Pearson are a regional and national economic driver. Over 400,000 people are employed in manufacturing, transportation and support sectors around Toronto Pearson, making it Canada's second-largest employment area by number of jobs and largest by land area.

These lands feature a diversity of economic sectors and the largest concentration of manufacturing jobs in the country. Residential conversions, like the one proposed by the City of Toronto, put pressure on the land economics of remaining employment lands – pushing up values, making them uncompetitive for re-investment and expansion, and threatening the long-term viability of this employment area.

The new PPS recognizes the importance of preserving the viability of employment lands and includes a clause in the Employment section (2.8.1.3) that states:

In addition to policy 3.5, on lands within 300 metres of employment areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of employment uses within existing or planned employment areas, in accordance with provincial guidelines.

We believe that the proposed MZO to convert the employment lands at 65 Rexdale threaten the airport's operations and growth, as well as the long-term economic viability of the employment uses surrounding the airport, while putting potential future residents in heavily noise impacted

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area. For these reasons, Toronto Pearson opposes the proposed MZO application at 65 Rexdale Boulevard.

Yours truly,

A handwritten signature in black ink, appearing to read 'CRH'.

Chris Rickett, Executive Director, Stakeholder Relations & Social Impact