

May 2, 2025



BY ELECTRONIC SUBMISSION ONLY

Hon. Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

**RE: Hospital for Sick Children, and St. Michael's Hospital Heliports - CNW8/CTM4
MZO Technical Summary Report and Aeronautical Impact Assessment**

**Response to "Request for an Amendment to Minister's Zoning Order, O.Reg. 10/24, City of
Toronto" ERO No. 025-0347 and ERO No. 025-0348**

COPIES Kyle Robinson, Mike Keen, Randy Wiken, Armiss Kerman, Jonathan Nehmetallah, Melanie De Wit,
Martin Putyra, Isaac Tang, Pitman Patterson, Michael Foderick, Brett Davis

Project NO. 22-0018-02 / 22-0039-03-02

Dear Minister Flack,

Avia NG has been consulting with the Hospital for Sick Children, and the St. Michael's Hospital to assist in an aeronautical capacity for operation of their respective heliports. Through several years of experience our team has been involved in the certified operations of the heliports, the first iteration of aeronautical zoning regulations (Bylaw 1432-2017) and the development of MZO O. Reg. 10/24 which was published by the Honourable Paul Calendra during his tenure as the Minister of Municipal Affairs and Housing.

On behalf of the Hospital for Sick Children ("SickKids") and St. Michael's Hospital (the "Hospitals"), Avia NG has prepared submissions in response to two ERO postings, as follows:

One submission is in response to:

- **No. 025-0347** – in respect of a request from the Minister of Health to amend O. Reg. 10/24 to remove section 5 of the order that requires O. Reg. 10/24 to be revoked on May 30, 2025; and
- **No. 025-0348** – in respect of a request by the two Hospitals to amend O. Reg. 10/24 to incorporate a number of minor technical changes to Map Nos. 345 and 346 that form part of the regulation;

A separate submission has been filed in response to:

- **No. 025-0348** – in respect of requests from landowners to make site-specific amendments to Map No. 345 in respect of 15-17 Elm Street and 595 Bay Street, 304-316 Yonge Street, and 14-80 Dundas Street West (Atrium on Bay).

The MZO has a revocation clause which will come into force May 30, 2025 without your intervention, which would remove the flight path restrictions for the Hospitals. **The Hospitals request that the MZO become permanent**, with the removal of the revocation clause, to preserve the airspace that is necessary for ORNGE Air Ambulance to continue flight operations into these Hospitals.

For us to continue to support the endeavour to protect what is necessary for flight operations from St. Michael's Hospital and the Hospital For Sick Children, in response to ERO 025-0347, and ERO 025-0348, we have provided significant technical justification to support the continued preservation of the airspace in MZO O. Reg. 10/24, and to detail the extent to which the proposed development at 15-17 Elm Street, and 595 Bay Street/304-316 Yonge Street/14-80 Dundas Street would impact these surfaces if given permission to develop as proposed.

Our office has provided detailed technical responses to assist the Ministry in understanding the due diligence and technical analyses that were conducted during the development of the O. Reg. 10/24 flight path surfaces. We have enclosed a Planning Justification Report regarding the Expanded Justification and Associated Technical Explanation Of O. Reg. 10/24 Airspace Protections for the Hospital for Sick Children Heliport and the St. Michael's Hospital Heliport. This document provides a high-level overview of the importance of flight path protections, and describes the history of previous protection (By-law 1432-2017) and its inadequacy to continue supporting flight operations. We provide a narrative within the document as to regulatory interpretations of One-Engine Inoperative scenarios that necessitated the development of enhanced flight path protections and describe the process for iteration of the flight path area design. Utilization of the heliports has diminished following intensification of urban development up to the previous flight path protections. We also provide a description of the requested minor technical amendments to Maps 345 and 346, and **the Hospitals request that the Minister amend O. Reg. 10/24 to include the revised Maps 345 and 346** attached to the submission on ERO No. 025-0348.

Furthermore, given the understanding that there has been an effort by private developers to question the integrity of the flight path protections, and following specific requests for removal of the block bounded by Elm Street to the North, Yonge Street to the East, Dundas Street to the South and Bay Street to the West, we have provided an Aeronautical Impact Assessment that clearly demonstrates the impact of the developments at 15-17 Elm Street, and 595 Bay Street/304-316 Yonge Street/14-80 Dundas Street. These proposed developments, if allowed to intrude the surfaces described in O. Reg. 10/24 would eliminate the ability for Ornge to authorize departures from the Hospital for Sick Children to the East. Accordingly, **SickKids requests that the requests to remove these properties from Map 345 be declined** in order that the east flight path can remain fully functional.

Sincerely,
AVIA NG INC.



Dan Fox MAVnMgt, AAP
Senior Aviation Regulatory and Compliance Specialist



Joshua Horst, MAVnMgt, AvMP
Senior Manager, Planning and Advisory Practice Lead

Enclosures:

Hospital for Sick Children, and St. Michael's Hospital Heliports - CNW8/CTM4
MZO O. Reg. 10/24 Technical Summary Report and Aeronautical Impact Assessment
May 2, 2025

- **Technical Summary Report Dated May 2, 2025**
- **Aeronautical Impact Assessment 15-17 Elm Street & 595 Bay Street/304-316 Yonge Street/14-80 Dundas Street Dated May 2, 2025**