

NAV CANADA
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June 25, 2024

City Clerk's Office
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

SENT BY EMAIL

Subject: Letter of Support for PortsToronto Submission - PH13.2 - Villiers Island Precinct - City-Initiated Official Plan and Zoning By-law Amendment - Decision Report - Approval

Dear Mayor Chow and Members of Council,

I am writing to you today to bring to your attention an issue which has the potential to impact the safe and efficient movement of people and goods through Billy Bishop Toronto City Airport. In doing so, NAV CANADA wishes to add its voice to a request raised by PortsToronto to refer the report regarding the Villier's Island Precinct Plan back to staff for a minimum 90-day period. Our objective is to ensure that NAV CANADA, PortsToronto, and other planning authorities on the waterfront and in the City can work together to establish both the impact of the current proposal, as well as identify further opportunities to create housing density without impacting the airport.

Airport accessibility and air navigation safety rely on the publishing of approach and departure routes by NAV CANADA that meet strict Transport Canada design criteria. These instrument flight procedures safely guide pilots and their aircraft in and out of airports across the country. Transport Canada's design criteria require that all procedures be built with specific protection areas, or buffer space, from any structures to ensure aircraft stay safely clear of obstacles.

Land Use Program

NAV CANADA currently has in place a Land Use Program that allows developers and municipalities to submit an application to ensure that their development plans do not impact aviation safety. This application process is particularly important for communication towers, mid-to-high rise buildings, wind farms and cranes in the region of an airport or near navigation systems.

This process allows NAV CANADA technical experts to evaluate the proposed structure(s) in relation to instrument procedures, and to ensure protection areas are not infringed upon.

There are a growing number of cases where NAV CANADA learns about significant developments that impact safety and accessibility well after plans have been approved by regional/municipal governments and, in some cases, after shovels are in the ground. These instances require NAV CANADA to rapidly put in place mitigations to maintain aviation safety at a significant expense to the Air Navigation Service or may require developers to alter engineering plans at a great expense. In some cases, mitigations from aviation may not be possible.

As a result, NAV CANADA believes that action is required to both protect airport accessibility of Billy Bishop Toronto Airport and support much needed development.

Increasing risk to aviation

When the viability of instrument flight procedures and supporting infrastructure is compromised, the accessibility of an airport can be permanently impacted. To ensure incoming or departing flights have the necessary space they require to safely navigate, instrument flight procedures can extend 10 to 15 miles from an airport, and it is not uncommon for a developer to be unaware of the impacts to levels of service to an airport. With municipalities adopting intensification policies to meet the unprecedented demand for housing, a greater prevalence of high-rise buildings is expected. Indeed, there are multiple current developments across the region that risk impacting airport accessibility if appropriate measures are not followed.

While we understand that subject matter expertise has been retained by developers of the Villiers Island Precinct Plan, we must stress that reviews by third parties do not replace the aviation safety assessments conducted by NAV CANADA. At this time, NAV CANADA has received only limited or inconsistent technical information on development plans and believes that undertaking additional consultations is critical to ensuring the continued safety and accessibility of Billy Bishop Toronto City Airport. As such, **we formally request access to preliminary technical plans related to the project, and that the report be referred back to staff for a minimum 90-day period.** This will provide an opportunity to conduct further analysis to ensure airport accessibility while supporting the City's goal to bring housing supply forward, prior to the City of Toronto approving the Villier's Island Precinct Plan.

Further to our joint request for additional time to conduct necessary analysis, we would be happy to meet with you or members of your team to discuss this risk to aviation safety and housing development, as well as potential solutions, at the first available opportunity.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'JD', with a long horizontal stroke extending to the right.

Jeff Dawson
Assistant Vice President, Operational Support
NAV CANADA

C.C.
RJ Steenstra, President & CEO, PortsToronto
Serge Bijimine, Assistant Deputy Minister at Transport Canada