

June 12, 2024

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

Re: PH13.2 - Villiers Island Precinct - City-Initiated Official Plan and Zoning By-law Amendment - Decision Report - Approval

As a City Builder, PortsToronto welcomes housing development across the waterfront and the City of Toronto. In particular, PortsToronto supports the efforts for significant housing and increased density in the Villiers Island precinct. Indeed, our support of housing is evidenced through continued collaboration between the City and PortsToronto in the review of development applications that have enabled more than 56,000 new units of housing on the waterfront near Billy Bishop Toronto City Airport (the Airport) over the last ten years. We remain committed to working with City Council on achieving its housing targets.

Villiers Island represents a unique opportunity to create housing, economic activity, and a unique place in which to live. It is incumbent both on the City and PortsToronto, amongst others, to ensure that the long-term development of this area remains compatible with existing and future uses of land and infrastructure, and not to create conflict with such uses. It is in this spirit of collaboration that PortsToronto submits this letter to the Planning and Housing Committee today.

PortsToronto respectfully submits this written deputation for the purpose of requesting that the Planning and Housing Committee refers the Villiers Island Precinct Plan back to planning staff for more in-depth consultation and analysis, as the building data sets have just recently been refined and provided. We believe that a 90-day timeframe would allow us to do the necessary engineering and operational analysis in consultation with planning staff, NAVCANADA, Transport Canada, Waterfront Toronto, Create TO, and others.

Staff could then reasonably be expected to report back to the committee at the September 26, 2024, meeting with more complete information as there are a number of inconsistencies and questions remaining regarding the data that the City is currently relying upon. It is critical to get the information and parameters correct at the start of this important process as opposed to waiting for individual projects to come forward. We know that time spent in the next 90 days in creating a fuller understanding and shared understanding will ultimately lead to a more efficient building process that will get the thousands of new residents in the precinct into homes faster.

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PortsToronto continues to be actively engaged with the City in these assessments and a path forward. We have recently shared the results of our preliminary assessment with the City, Waterfront Toronto, CreateTO, and Airport stakeholders. This includes sharing the assessments with NAVCANADA, which assesses and authorizes the instrument flight procedures around the Airport.

While initial results are encouraging, it is clear that further assessment work is required, including ensuring that Villiers Island is maximized to the greatest degree possible whilst maintaining the safe and efficient access into and out of the Airport.

PortsToronto appreciates the jurisdictional complexity that land use planning in the vicinity of the Airport presents given that the Airport is also layered with federal and provincial policies as well as the Tripartite Agreement which is the governing agreement regarding the Airport. Each of these layers are designed to protect the long-term operation of airports and to protect against incompatible land uses including excessive building heights.

In order to be assured that the safe and efficient operation of the Airport will be maintained, as well as ensuring that the required density for Villiers Island can be achieved or exceeded, PortsToronto is requesting the next 90 days to complete the assessment work, and to share the data with the City in a comprehensive manner, whilst identifying risks in planning assumptions. Moreover, there remain outstanding inconsistencies and questions within the various assessment work undertaken by various parties. It is in the best interests of the City, Transport Canada, PortsToronto, and users of the Airport to take this modest delay to align on the best precinct plan possible.

As well, PortsToronto would like to take the opportunity to ensure that any changes to port-zoned properties along areas such as the Ship Channel in the Port lands will not have ancillary impacts for future commercial marine operations. The impact this could have on the future development of the Port has not been discussed with property owners, businesses which lease dock wall space and properties which support the City from a marine access perspective. For example, walkways proposed along the Ship Channel have the potential to become a safety and security risk if not managed at the precinct planning level. If there are any changes being planned in this area of the revitalization work, consultation and engagement must be undertaken with all property owners in order to properly engage and consider any direct impact to the future of the Port, which is an integral part of commercial shipping and the only access point to the St. Lawrence Seaway in the City of Toronto.

In 2017 during consultations for the Port lands, PortsToronto was engaged as a landowner and stakeholder, and held technical committee meetings with all agencies where we shared information and contributed to the vision of floodproofing and naturalizing the Don River. As part of that long-term vision, our previous written submission and those of other property owners and users was to ensure that industrial port uses were protected to support and sustain the marine transportation sector. We believe that these changes to land use as currently proposed will negatively impact the viability of the Port, and this vital transportation link to the City of Toronto.

Lastly, this 90-day assessment period will ensure adequate multi-agency consultation takes place with a consistent data set. PortsToronto therefore recommends that prior to City Council adopting the Villiers Island Precinct Plan, and during the 90-day period being requested, that the Chief Planner and Executive Director, City Planning, together with Waterfront Toronto, CreateTO and relevant divisions, agencies and corporations, consult with NAVCANADA, Transport Canada and PortsToronto, which operates Billy Bishop Toronto City Airport. This would be consistent with the approach that was undertaken as part of the 2017 Villiers Island Precinct planning process. During that previous process, all relevant City staff and management worked with the airspace regulatory agencies to understand the requirements to ensure the safety and security of airspace into the future.

We appreciate your continued interest in these incredible transportation assets, and request City Council refer this report and delay consideration of the draft Official Plan Amendment, draft Zoning By-law Amendment and draft Municipal Code amendment.

Sincerely,

A handwritten signature in black ink, appearing to read "RJ Steenstra", with a long horizontal line extending from the end of the signature.

RJ Steenstra
President & CEO