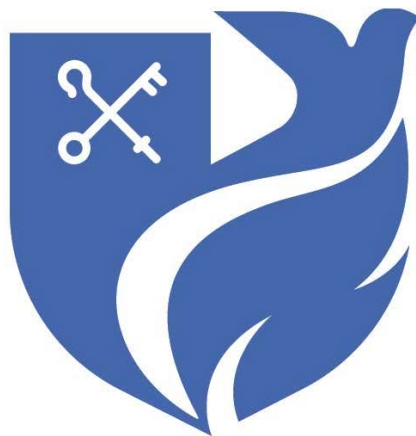




Diocese of Toronto

Anglican Church of Canada

Submission to the Standing Committee on Heritage, Infrastructure and Cultural Policy

On Bill 110, “Building Billy Bishop Airport Act, 2026”

Elin Goulden,

Social Justice & Advocacy Consultant

on behalf of the Social Justice & Advocacy Committee,

Anglican Diocese of Toronto

May 19, 2026

The Anglican Diocese of Toronto consists of some 200 parishes and ministries located within 26,000 square kilometres of south-central Ontario, including but not limited to the City of Toronto. The values of our faith call us to respond to human need, to pursue justice, and to safeguard the integrity of creation, being especially concerned for the most vulnerable in our communities. Our Diocesan social justice priorities include reducing poverty, working to end homelessness by creating affordable housing, and safeguarding the integrity of the natural environment.

Bill 110, the *Building Billy Bishop Airport Act, 2026*, transfers the ownership of certain prescribed lands belonging to the City of Toronto to the Crown in right of Ontario. The prescribed lands include almost the entire landmass of the Toronto Islands, as well as a portion of the mainland surrounding the link to the Billy Bishop Airport. The aim of the legislation, according to the preamble, is to “modernize Billy Bishop Toronto City Airport and unlock its economic potential” and to “support more choice and convenience for passenger air traffic.” While not explicitly stated in the legislation, these purposes, along with announcements from the provincial government, strongly suggest that the Billy Bishop Airport will be redeveloped to allow for jet traffic into the Billy Bishop Airport.

We wish to raise our concerns regarding the potential negative impacts of such a development on both the local environment and affordable housing.

Environmental Concerns:

The proposed expansion of Billy Bishop Airport would have negative impacts on the health of the aquatic environment and local residents.

To allow for jet traffic at Billy Bishop Airport, the runways would have to be lengthened, extending into Lake Ontario. A 2015 study by AECOM on the potential for accommodating jet traffic at Billy Bishop Airport found that extending the runway would reduce water circulation through the Western Channel, raising water pollution levels and harming aquatic life. The addition of fill to Lake Ontario to support the runway extension would destroy fish habitat, spawning beds, and the nutrients on which fish feed.

The same study found that allowing jet traffic would increase air pollution, leading to a higher risk of heart disease, lung cancer and respiratory tract tumours for residents near the airport. The increased noise of jet traffic would also negatively impact residents’ sleep, and chronic poor sleep is associated with poor mental health as well as increased risk of heart disease, dementia, type-2 diabetes and certain cancers.

As well, expanding services at Billy Bishop Airport would require increased capacity for ground traffic, both for travellers and for emergency vehicles in case of accidents. This

would lead to greater traffic disruption and pollution in the already congested downtown core.

The change to the built environment of the island and waterfront, the increased noise and pollution associated with jet traffic, and the increased ground traffic near the terminal would all have a negative impact on people's enjoyment of Toronto's waterfront and the Toronto Islands as a place to live and play. Increased noise and pollution would devalue properties near the waterfront, while extension of the runways would inhibit navigation for small and medium watercraft that currently use the Inner Harbour and Western Channel for recreation.

Housing Concerns:

To accommodate jet traffic at Billy Bishop Airport, the height of apartment towers along the approach would need to be capped at 30 storeys or lower, perhaps even as low as 15 storeys. This severely limits the planned height and density of proposed housing developments in Toronto's Portlands, which originally included towers of up to 40 and 50 storeys. The increased density provided by these high apartment towers were essential to making the inclusion of thousands of affordable homes within the planned development economically viable. To limit the density of the Portlands development deprives Ontario thousands of units of much-needed housing, including affordable housing. It also undermines the investments that all levels of government, including the province, have already made in developing housing and transportation for the Portlands. This is a waste of taxpayers' money and a clear conflict with this government's plans to create more housing.

The height restrictions would not only affect the proposed Portlands development but also other future housing developments along the flight path, limiting the potential for creating densities viable enough to support affordable housing. There is a further concern that existing housing located within the lands to be taken over by the province could be demolished to accommodate the expansion of the airport. At a time when housing needs across the province are greater than ever, undercutting the potential to create housing in Ontario's largest city is a shortsighted policy.

Further Considerations and Conclusion:

The proposed Island Airport Expansion is in fundamental conflict with decades of vision, planning and investment by all levels of government and the private sector in building a Toronto waterfront which is a beautiful place to live and visit. Toronto residents have rejected the expansion of Billy Bishop Airport to accommodate jet traffic in the past, and many remain strongly opposed to it for a number of reasons, including those outlined above. This legislation would remove the local municipal government from the Tripartite

Agreement which currently governs the operations of the Billy Bishop Airport, making it harder for local residents' voices to be heard, despite them bearing the burden of the negative impacts of the proposed airport expansion.

We urge this government to consider the potential negative impacts of this proposed legislation and the proposed airport expansion it facilitates on the health of the local environment and local residents, as well as on existing and potential affordable housing in the vicinity. Bill 110 should be withdrawn.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Elin Goulden', written in a cursive style.

Ms. Elin Goulden,
Social Justice & Advocacy Consultant,
On behalf of the Social Justice & Advocacy Committee,
Anglican Diocese of Toronto