

Transport Canada Consultation – Future of Billy Bishop Toronto City Airport

Diocese of Toronto – Anglican Church of Canada

The Anglican Diocese of Toronto consists of some 200 parishes and ministries located within 26,000 square kilometres of south-central Ontario, centered around the City of Toronto. Our faith commitments call us to respond to human need, to pursue justice, and to safeguard the integrity of God's creation, being especially concerned for the most vulnerable in our communities. Accordingly, our Diocesan social justice priorities include reducing poverty, working to end homelessness by creating affordable housing, and safeguarding the integrity of the natural environment on which all lives depend.

In furtherance of these priorities, we wish to raise our concerns regarding the potential negative impacts of the expansion of the Billy Bishop Toronto City Airport (BBTCA) to allow jet traffic, particularly as these will affect the local environment, the well-being of local residents, and affordable housing in Toronto. We have raised these concerns with the provincial government and Toronto-area MPs.

Environmental Concerns:

The proposed expansion of the BBTCA would have negative impacts on the health and well-being of both 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 2017 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 Toronto Islands provide a natural recreational amenity to millions of visitors annually. Importantly, it offers equitable access to waterfront public space for urban residents,

especially for lower-income residents who do not have the luxury of accessing alternate natural waterfront spaces. 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 waterfront housing developments, in particular the Ookwemin Minising housing development in Toronto's Port Lands, which was originally planned to include towers of up to 40 and 50 storeys. The increased density provided by these high apartment towers are essential to making economically viable the inclusion of approximately 3,000 affordable housing units within the planned development. To limit the density of the Port Lands development deprives Toronto of thousands of units of much-needed housing, including affordable housing for lower-income households and equity-deserving groups. It also undermines the investments that all levels of government, including the federal government, have already made toward housing and transportation for the Port Lands development. This is a waste of taxpayers' money and a clear conflict with the federal government's vision to create much-needed housing.

The height restrictions required to accommodate jet traffic would not only affect the Port Lands development but housing developments in other parts of Toronto along the flight path which are planned for significant residential density, including south Etobicoke, Liberty Village, and the Central Waterfront. Again, constraints on building height in these areas, which are among the fastest-growing in the city, would limit the potential for creating sufficient densities to support affordable housing. There is a further concern that existing housing located within the Bathurst Quay area, now under provincial control, 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 more housing in Ontario's largest city is a shortsighted policy.

Further Considerations and Conclusion:

On May 28, 2026, the Province of Ontario passed Bill 110, the *Building Billy Bishop Airport Act, 2026*, under which the Province assumes the City of Toronto's role in the Tripartite Agreement governing the operations of the BBTCA, and takes ownership of City-owned lands in the Bathurst Quay and Toronto Islands. The Province has further proposed declaring the BBTCA a Special Economic Zone which would exempt the expansion of the airport from various municipal approvals.

No comprehensive plan, rationale, or business case has been put forward by the Province to date in support of the expansion of the BBTCA. Due to the current geopolitical climate, the decline in passenger travel to the US, and the cost of high fuel prices, the BBTCA is operating below pre-pandemic levels. The planned high-speed rail corridor from Toronto to Quebec City and the planned expansion of Pearson airport could also reduce the potential increase in passengers using the BBTCA.

The proposed Billy Bishop Toronto City 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.

Respectfully submitted,

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Works consulted:

AECOM: [Environmental Assessment of Proposed Runway Extension and Introduction of Jets at Billy Bishop Toronto City Airport Environmental Study Report \(2017\)](https://assets.nationbuilder.com/waterfrontforall/pages/89/attachments/original/1773500367/AECOM_EA_re_jets_at_BBTCA_2017_without_appendices_Part1.pdf?1773500367)
https://assets.nationbuilder.com/waterfrontforall/pages/89/attachments/original/1773500367/AECOM_EA_re_jets_at_BBTCA_2017_without_appendices_Part1.pdf?1773500367

City of Toronto: Billy Bishop Airport Proposed Expansion: Response to Council Request for Information on Housing and Transportation Impacts (May 28, 2026)
<https://www.toronto.ca/legdocs/mmis/2026/ph/bgrd/backgroundfile-287461.pdf>