



June 10, 2026

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

RE: PH31.5 - Billy Bishop Airport Proposed Expansion: Response to Council Request for Information on Housing and Transportation Impacts

Dear Chair Gord Perks and Planning and Housing Committee Members,

The Federation of North Toronto Residents' Associations (FoNTRA) wishes to express its strong opposition to the proposed expansion of the Billy Bishop Toronto City Airport (BBTCA) and the accompanying Provincial legislation, Bill 110.

The proposal represents a fundamental contradiction in Provincial policy: The Province of Ontario is simultaneously demanding that Toronto meet aggressive housing targets while proposing an airport expansion that will effectively sterilize significant portions of the Waterfront from high-density residential development. For a city-building horizon of 25 years, this proposal is a regressive step that prioritizes short-term aviation interests over the long-term need for a livable, residential urban core.

The major concerns with the proposal and Bill 110 are the following:

- **Direct Conflict with Housing Targets:** The expansion's "impact zone" threatens the viability of over 86,000 planned residential units. By significantly extending the runway and flight paths, the Province is creating a regulatory environment where NAV CANADA height restrictions and noise contours will prevent the very high-rise density the Province has elsewhere mandated.
- **Irreversible Environmental Degradation:** The proposed landmass expansion will reduce Inner Harbour water flushing by 50%, doubling the "residence time" of

pollutants. This move will permanently compromise decades of public investment in Great Lakes water quality and Waterfront ecology.

- **Democratic and Governance Bypass:** The use of "Special Economic Zones" to exempt the airport from municipal oversight and the unilateral dismantling of the Tripartite Agreement represents a total failure of Good Governance, removing local residents' voices from the future of their own waterfront.

We all share the goal of building a livable city for all residents. However, a livable city requires a functional waterfront, high-density housing, and preserved green spaces. The BBTCA expansion as proposed is in direct conflict with these goals. We urge the Committee to reject the Province's unilateral approach and to prioritize the housing and health of Torontonians over the short-term expansion of aviation capacity that could be better served by regional rail.

The Federal government has recently announced a consultation regarding the Provincial plans. We recommend:

- **That the Planning and Housing Committee recommend to City Council that the City express to the Federal Government its clear opposition to the proposed expansion of Billy Bishop Airport, and publicly encourage residents of Toronto to support this position in the Transport Canada consultation.**

Sincerely,

Geoff Kettel

Geoff Kettel
Co-Chair

c.c. Jason Thorne, Chief Planner and Executive Director, City Planning Division,
Annely Zonena, Director, Waterfront Secretariat, City Planning Division,
James Perttula, Director, Transportation Planning, City Planning Division

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 35 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.

Attachment: Triple Bottom Line Analysis & Discussion

Economic Prosperity and Fiscal Responsibility (Housing Impact)

The most significant contradiction of the BBTCA expansion is its impact on Toronto's housing supply. The City's report confirms that **86,277 residential units** are currently planned within areas influenced by existing flight procedures. A westward runway extension would expand this impact zone to include an additional **8,200 units** in the development pipeline.

NAV CANADA has already issued objections to 25% of recent tall-building proposals in the flight path. Expanding the airport to accommodate jets will necessitate even more restrictive Airport Zoning Regulations (AZR), effectively capping building heights in South Etobicoke, Liberty Village, and the Port Lands. This creates a "sterilization zone" for the high-rise development required to solve the housing crisis. Furthermore, the increased noise, vibration, and emissions from 10 million annual passengers will significantly reduce the attractiveness and market viability of waterfront lands for residential use.

- **Opportunity for Improvement:** The Province must conduct a "Housing Impact Audit" to quantify exactly how many units will be lost to height restrictions before any aviation expansion is considered. The City should advocate for High-Speed Rail (Quebec-Windsor corridor) as a fiscally responsible alternative that serves regional travel without stifling Toronto's housing growth.

Environmental Health and Integrity

The environmental cost of the proposal is catastrophic. The 2017 Environmental Assessment (EA) indicates that a westward landmass extension will fundamentally alter the hydrodynamics of the Inner Harbour. By reducing the inflow of water, the harbour's ability to flush out pollutants from the Don River and storm sewers will be cut in half.

Furthermore, the introduction of jet aircraft in a dense urban setting introduces intense new sources of noise and ultra-fine particulate matter. These stressors are linked to significant public health issues, including cardiovascular and respiratory diseases. A 25-year planning horizon should prioritize the restoration of our "Blue Park" (the Inner Harbour) rather than its conversion into a primary industrial/aviation corridor.

- **Opportunity for Improvement:** The City must demand a new, comprehensive Federal Impact Assessment that accounts for the cumulative effects of 10 million passengers and the resulting degradation of the Inner Harbour's water quality.

Social Equity and Cultural Wellbeing

The expansion disproportionately affects the 4,000 residents of the Bathurst Quay neighborhood, for whom **Little Norway Park** is the primary recreational "backyard." Bill 110 identifies the entire park for potential provincial vesting. Taking parkland from a densely populated area to support an airport is a direct violation of social equity. Additionally, the proposal ignores the sacred status of the Toronto Islands (Minising) to Indigenous communities, particularly the Mississaugas of the Credit First Nation, who were not consulted on this provincial "Special Economic Zone" push.

- **Opportunity for Improvement:** The City should insist that Little Norway Park be legally protected from any "takings" and that a formal Reconciliation Impact Study be conducted in partnership with First Nations rights-holders.

Good Governance

The Province's approach to Bill 110 represents a total erosion of the "Ethical and Democratic Governance" indicator. The BBTCA has been governed by a Tripartite Agreement designed to ensure that the City, the Federal government, and the Port Authority make unanimous, evidence-based decisions. By legislatively seizing City-owned land and roles, the Province is bypassing established democratic safeguards. Furthermore, the lack of a transparent business case or comprehensive plan for the 10-million-passenger target leaves the City unable to plan for the necessary land-side transportation infrastructure.

- **Opportunity for Improvement:** The Planning and Housing Committee should request that the Province immediately release the full "Special Economic Zone" regulations for public scrutiny and confirm that no City land will be seized without fair market value compensation that reflects its "highest and best use" as residential/mixed-use land.