

June 11, 2026

**RE: PH31.5 – Billy Bishop Airport Proposed Expansion:
Response to Council Request for Information on Housing and
Transportation Impacts (Ward All)**

The Federation of Metro Tenants' Associations ("FMTA") opposes the proposed expansion of the Billy Bishop Toronto City Airport and any associated land expropriations, runway extensions, or policy changes that would undermine housing development, housing affordability, and the health of other rights of Toronto tenants.

At a time when Toronto faces an unprecedented housing affordability and homelessness crisis, scarce urban land and public resources must be directed toward housing people, not increasing aviation capacity. The importance of this is underscored by the Ontario Superior Court of Justice's recent statements in *The Regional Municipality of Waterloo v. Named Respondents and Persons Unknown*, affirming housing as a human right.

The proposed airport expansion raises profound concerns regarding environmental impacts and democratic accountability, housing justice, displacement, affordability, and the City's ability to meet its housing obligations to current and future residents.

The FMTA wishes to draw the City's attention to the following concerns:

1. *Housing infrastructure.* Tens of thousands of households remain on affordable housing waitlists, and homelessness continues to rise while increasing numbers of renters are facing displacement due to unaffordable rents and redevelopment pressures. City-owned lands ought to be used towards the housing supply and housing affordability policy initiatives that the City of Toronto has rightly identified as priorities. Waterfront land also serves a vital function as extended backyards for many tenants. There remains insufficient information regarding the full implications of provincial acquisition of City-owned lands for the airport expansion, as per the legislation advanced by the Ford government.

2. *Unequal distribution of housing harms.* Low-income tenants, newcomers, racialized tenants, seniors, disabled tenants, and women and non-binary people already experience the most severe consequences of Toronto's housing shortage. Tenants of these groups are unable to absorb additional housing cost pressures arising from land scarcity, redevelopment pressures, or public investments that prioritize economic development over housing needs.
3. *Air quality concerns.* For many tenants, particularly those living in apartment towers, indoor environmental conditions are not within the realm of their personal control. Low-income tenants, newcomers, racialized tenants, seniors, disabled tenants, and women and non-binary people are the most vulnerable to the impacts of high heat temperatures and other air quality concerns related to climate change and poor ventilation in older buildings. We expect existing, heat- and ventilation-related air quality concerns will be exacerbated if the airport is expanded, because aircraft operations generate ultrafine particles that can infiltrate indoor environments through building ventilation systems and other pathways

The FMTA is especially concerned about the interaction between air pollution and extreme heat. During heat events, tenants are frequently advised to keep windows closed and remain indoors to maintain safe temperatures. However, where outdoor air quality deteriorates, tenants without access to adequate ventilation will be forced into an impossible position: Opening windows to address overheating and thereby increasing exposure to outdoor pollution, or keeping windows closed in inadequately cooled units. Again, the most marginalized tenant groups will be most impacted by this double bind.

The data on the air quality implications of ultrafine particle emissions resultant from the proposed airport expansion remains insufficient. Before any airport expansion is considered, we urge the City of Toronto to commission and publicly release additional research on this matter. This research should include comprehensive and independent assessments on the impacts of indoor air quality, ventilation systems, tenant health, and cumulative climate-related effects.

4. *The City's duty to defend democratic planning.* The FMTA urges the City of Toronto to ensure that Toronto tenants are consulted in the decision-making process surrounding the proposed airport expansion, especially as such infrastructure implementation will be life altering to tenants in the areas of health and community cohesion at inter-generational scales.

The economic gains associated with increased aviation activity, higher land values, and intensified development opportunities almost wholly services the private interests of developers, wealth-holding institutions, and landlords. Tenants are excluded from the economic benefits associated with the proposed airport expansion. Moreover, tenants will subsidize these economic gains through bearing the costs of housing pressures, diminished public land availability, environmental impacts, and the prioritization of growth-oriented infrastructure over affordable housing needs.

Meaningful participation of tenants is a cornerstone of housing justice. This is because the relationship between those who profit from land and those who depend upon housing is already characterized by inequitable distribution of wealth, bargaining power, and economic-based political influence. Therefore, the City must be cautious to ensure the policies advanced are not exacerbating existing inequitable concentrations of social, economic, and political resources. For this, tenant participation in the decision-making process is vital.

5. *The City has a duty to consult the Mississaugas of the New Credit First Nation.*

The lands and waters affected by the proposed airport expansion exist on sacred lands of the Mississaugas of New Credit First Nation. This relationship between the lands and waters predates both the City of Toronto and the airport itself. Any decision concerning the future use of these lands must respect Indigenous rights. The FMTA stands in solidarity with the Nation's right to participation meaningfully in decisions that may affect their interests, lands, and waters.

Conclusion

The FMTA urges the City of Toronto to reject any proposal that advances airport expansion at the expense of housing equity and affordability, public health, tenants' rights to safe and accessible housing, tenants' democratic rights, and Indigenous. We are living in a housing and homelessness crisis. In this context, public land and public resources must be directed towards meeting the basic needs of residents rather than increasing aviation capacity and for servicing private economic interests.

The City should not permit an airport expansion project which primarily benefits developers, investors, and landlords. Tenants should not be required to bear the costs of the expansion and subsidize the wealthy's economic gains. Any decision concerning the future of Toronto's waterfront must be guided by principles of housing justice, environmental sustainability, reconciliation, and meaningful public participation.

Toronto's waterfront should remain a public asset that serves the housing, health, and community needs of current and future generations.

For these reasons, the FMTA respectfully urges Council to oppose the proposed expansion of the Billy Bishop Airport and to prioritize democratic process in all deliberations concerning the same.

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