



**MORE NEIGHBOURS
TORONTO**

Dear Planning & Housing Committee,

**Re: ERO 025-0461: Proposed Planning Act and City of Toronto Act, 2006 Changes
(Schedules 3 and 7 of Bill 17)**

About More Neighbours Toronto

More Neighbours Toronto is a volunteer-only organization of housing advocates that believe in building more multi-family homes for those who dream of building their lives in Toronto. We advocate for reforms to increase the ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that dominates Toronto's politics, and has created increased costs and environmental burden for a new generation of aspiring residents.

Position

More Neighbours Toronto has concerns with the proposed changes to the Planning Act and the City of Toronto Act under Bill 17. Despite the province's efforts to streamline the process, the benefits of these changes may not be applied consistently across municipalities. Regarding Protected Major Transit Station Areas (PMTSAs) and the Official Plan Amendment 19 (City of Toronto), the preferred approach would be similar to the model used in British Columbia, where a transparent framework is applied based on distance from transit stations. In this model, Minister's Zoning Orders (MZOs) are used primarily when traditional planning processes become overly burdensome, rather than when they are issued for projects that have garnered political attention. This reduces the risk of preferential treatment. A more effective and equitable path forward would involve pursuing reforms that are broad in scope and consistently applied, rather than relying on arbitrary ministerial discretion.

We support the following recommendations:

- **Addresses limitations on official plans and zoning by-laws** by restricting their ability to prohibit the use of urban residential land for schools, including elementary, secondary, and ancillary educational uses
- **Amendments to the Planning Act and the City of Toronto Act, 2006** would limit the requirements for a complete application, such as studies and reports, to those already identified in municipal official plans, unless the Ministry of Municipal Affairs and Housing approves additional requirements. In response to Bill 109, [many municipalities had significantly increased these requirements](#), resulting in longer

pre-application periods that helped them avoid financial penalties under the Bill, but did not lead to an increase in housing development.

- **Streamlining minor variances** by proposing the establishment of a regulation-making authority empowered to reduce the need for planning applications for minor variances, particularly concerning certain types of residential development (Schedule 7). However, many of the proposed changes give discretion to the Minister to make exceptions rather than fixing the underlying problems in the housing system. Adding discretionary Ministerial power through regulation rather than through legislation that spells out rules and timelines will increase uncertainty for builders at a time when the housing market is already highly uncertain. The proposed changes also preserve much of the variation between municipalities rather than streamlining the system.

To enable appropriate intensification to become a reality, we recommend the following:

1. Adopt a Corridor-Based, Distance-Sensitive Planning Framework for PMTSAs

Ontario should implement a standardized, evidence-based framework for land use planning near transit, similar to the corridor approach used in British Columbia and described in recent transit-oriented development (TOD) research. This model defines zones based on walking distance from transit stations (e.g., 400–800 m), with clear guidance on appropriate land use, density, and infrastructure requirements. A consistent, walkability-based system improves predictability, equity, and public trust across municipalities.

2. Reduce the Use of Minister's Zoning Orders (MZOs) by allowing more types of housing as-of-right and setting province-wide minimum zoning standards, as recommended in the Housing Affordability Task Force report

While MZOs have helped advance provincial priorities, including affordable and supportive housing, in cases where municipal processes would have added time and cost, their use has been inconsistent and lacked transparency. For example, an MZO was granted for supportive housing at 540 Cedarvale Avenue but not granted for a similar project at 175 Cummer Avenue, with no explanation provided.

As a result, the Cummer project faced a lengthy approval and appeals process, undermining public confidence in the planning system. The province should apply clear, consistent rules instead of relying on MZOs with project-specific conditions. Environmental and design standards should be implemented through the Building Code and other broadly applicable regulations, rather than imposed through individual MZOs. Similarly, minimum zoning standards (HATF recommendation 12c) and expanded as-of-right permissions (recommendations 3–6, 8–9, and our recommendation 1) would enable the types of development the province supports, without resorting to ad hoc exceptions. This approach would strengthen trust in planning institutions and reduce the risk of preferential treatment or corruption.

3. Ensure Uniform Application of Bill 17 Reforms Across Municipalities

To prevent regional disparities in housing development, the province must mandate consistent implementation of Bill 17's streamlined approval processes and zoning flexibility across all municipalities, regardless of local political dynamics or administrative capacity. Inconsistent local interpretations of provincial reforms contribute to delays, confusion, and unequal development outcomes. While the proposed legislation limits studies required for complete applications, evidence from post-Bill 109 implementation reveals that some municipalities responded by front-loading extensive pre-application requirements or introducing unofficial checklists, effectively undermining the intent of provincial streamlining. A standardized, enforceable framework would ensure that reforms are not selectively applied or diluted, particularly in municipalities that are politically resistant to intensification or lack the resources to modernize planning processes.

4. Establish Monitoring and Public Reporting Mechanisms

To evaluate the effectiveness and fairness of housing policy implementation, the province should establish clear, province-wide standards for monitoring and reporting. This includes tracking how municipalities apply planning policies, how many units are approved or built, the alignment of new development with infrastructure capacity (e.g., water, transit, schools), and the extent of meaningful community engagement. Currently, this data is unavailable or inconsistently reported, limiting the province's ability to assess outcomes or intervene when needed. British Columbia and Quebec examples demonstrate that robust provincial monitoring frameworks can lead to more accountable, transparent housing delivery. Public dashboards and annual reporting would support evidence-based policymaking and build public trust in the planning system.

5. Prioritize Transparency and Predictability in Planning Tools

Planning reforms must prioritize transparency, predictability, and accessibility to build and maintain public trust. When rules are clear, codified, and consistently applied, residents and developers can navigate the system more effectively, reducing conflict and uncertainty. By contrast, reliance on opaque tools, such as Minister's Zoning Orders (MZOs) or discretionary approvals, has created perceptions of unfairness and opened the door to accusations of favouritism. Codifying planning rules, standardizing interpretations across municipalities, and ensuring access to plain-language explanations would improve efficiency and public confidence.

6. Pursue Broad-Based Legislative Reforms Over Ad Hoc Tools

Rather than relying on episodic, case-by-case interventions such as MZOs, the province should focus on long-term legislative reforms that enhance systemic capacity. Building a more effective and equitable planning system requires strengthening institutions, improving staff training, updating zoning bylaws, and fostering stronger provincial-municipal collaboration. A legislative approach that aligns local implementation with provincial goals, while supporting municipalities with funding and technical assistance, will produce more durable, equitable outcomes.

The province is falling far short of its housing targets. Although Bill 17 recognizes that current rules and processes are barriers to housing, it leaves many of the issues that are limiting homebuilding unaddressed. [As the Premier recently noted](#), there is a significant variation in outcomes between municipalities. This follows from the variability in rules and processes between municipalities, many of which remain unaddressed by Bill 17. As observed with the province's three-unit permissions, a province-wide standard does not necessarily mean that every area of the province builds the same things. Instead, it means that some minimum standards and rules apply equally, and the housing market works within those to provide homes. By setting province-wide standards, like the as-of-right permissions and zoning standards recommended in the Housing Affordability Task Force report, the province can give those permissions and that certainty.

Regards,
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More Neighbours Toronto