

May 14, 2026

## **ELECTRONIC SUBMISSION**

Ministry of Municipal Affairs and Housing  
777 Bay Street  
17th Floor, College Park  
Toronto, ON M7A 2J3

Re: **ERO No. 026-0300 – Bill 98 Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes**

Dear Minister Flack,

DiamondCorp is pleased to provide comments on the proposed amendment to Ontario Regulation 232/18, which would see a temporary pause to the implementation of Inclusionary Zoning in Toronto, Mississauga, and Kitchener.

We thank the Province for initiating these legislative changes through Bill 98, *Building Homes and Improving Transportation Infrastructure Act, 2026*, and the continued efforts to address housing affordability, supply challenges, approval timelines, and increasing costs in Toronto and across Ontario. Our comments are offered in the spirit of collaboration to help ensure that the proposed changes effectively support these goals.

### **1. STANDARDIZED OFFICIAL PLANS**

We support efforts to improve consistency and clarity in planning documents across Ontario; however, any initiative to standardize Official Plans must preserve their fundamental role as strategic, policy-based documents. Official Plans are intended to set out long-term vision, growth management direction, and broad land use policy. We therefore recommend that any standardization framework explicitly reinforce the distinction between Official Plans and zoning by-laws, and ensure that Official Plans are not used to impose overly prescriptive, site-specific, or regulatory requirements that are more appropriately addressed through zoning.

### **2. GREEN DEVELOPMENT STANDARDS**

We support the Province's objective of improving consistency, predictability, and affordability in the application of development standards across Ontario. In relation to proposed changes affecting green development standards, we recommend the Province clarify which Enhanced Development Standards would meet the test as being "required for health and safety". While stormwater management measures are referenced as an example, greater certainty around other plans, reports, or standards that might also be required to meet health and safety criteria will ensure both the municipality and the applicant have consistent interpretations, and therefore expectations, of submission and approval criteria.

We further recommend the Province clarify and seek comment on any proposed transitional language. We recommend that language ensure any forthcoming changes that reduce the current green requirements apply to all applications currently under review, as well as applications submitted after the effective date. Extending the application of revised requirements to in-stream applications would ensure fair and consistent treatment across projects currently in

the approval process, reduce unnecessary redesign and resubmission cycles, and better support timely housing delivery objectives.

**3. PARKLAND DEDICATION REQUIREMENTS**

We support efforts to improve clarity and consistency in the parkland dedication framework under the Planning Act. We recommend clearer, more objective criteria for parkland size, configuration, and location to reduce subjectivity and improve consistency in municipal decisions. We also support extending and standardizing appeal timeframes to improve procedural fairness and allow adequate time for responses and, where needed, appeals to the Ontario Land Tribunal. In addition, we encourage clear provincial guidance on the valuation and crediting of encumbered parkland, including POPS arrangements, to reduce uncertainty and ensure consistent treatment across municipalities. Finally, we suggest language that confirms these changes apply to parkland conveyed under both Sections 42 and 51 of the Planning Act.

Thank you for considering our comments and for your continued efforts to support housing delivery across Ontario.

Yours truly,

*Kate Hatoum*

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