



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

PH31.12 - Overview of Bill 98 Implications with Respect to Planning Matters

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-led organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's 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 has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Position

More Neighbours Toronto thanks staff for their work in evaluating the impact of Bill 98 on Toronto's Planning Process. We would like to draw the attention of the Planning and Housing Committee to some features of Bill 98 that we think require more emphasis so that the committee can begin preparing.

Bill 98 requires that the Official Plan be revised by August 2030 to use a new standardized format that is completely different from the current Official Plan. It requires new standardized land use categories, which do not include several of Toronto's current land use categories like Apartment Neighbourhoods, Institutional Areas, and Regeneration Areas. It may significantly alter the relationship of Secondary Plans and Site and Area Specific Policies to the main body of the Official Plan. This will require significant revisions to the land use designation maps.

The proposed changes to Site Plan Control, and the proposed list of studies necessary for a complete application will effectively remove many of the current policies in the Official Plan. And the combination of the cap on minimum lot size and the requirements added by the Ministry of Municipal Affairs and Housing for Major Transit Station Areas in 2025 will render many of the Neighbourhoods policies unenforceable and therefore obsolete.

Taken together these changes will in essence require a new Official Plan to be written from scratch. We suggest that the Planning and Housing Committee instruct staff to begin preparing a process for the writing of the new Official Plan. This process will be a critically important part of the work for the Planning Housing Committee in the next municipal term and preparation should begin as soon as possible.

Regards,
Damien Moule,
More Neighbours Toronto