



June 10, 2026

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

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

Dear Chair Gord Perks and Planning and Housing Committee Members,

The Federation of North Toronto Residents' Associations (FoNTRA) is writing to express our concerns regarding the implications of Bill 98, the *Building Homes and Improving Transportation Infrastructure Act, 2026*. While we acknowledge the City's legal obligation to comply with Provincial mandates, we believe it is the duty of the City Council to formally recognize and advocate against the significant adverse impacts that this legislation will have on Toronto's long-term city-building objectives. Bill 98 will make the city less green, less ecologically resilient, and less democratic.

Where the building industry operates on a 5-to-10-year profitability horizon, residents live with the results of these planning decisions for 25 to 50 years. Bill 98 prioritizes short-term developer expediency at the direct expense of the environmental, social, and democratic health of our city.

The major concerns with Bill 98 are the following:

- **Dismantling Climate Resilience:** By removing "sustainable design" from Site Plan Control, Bill 98 effectively guts the Toronto Green Standard (TGS), converting mandatory requirements for energy performance and GHG reductions into voluntary measures that the market has historically failed to adopt without regulation.

- **Degradation of Public Assets:** The new Parkland Dedication rules permit the delivery of “suboptimal,” encumbered, and stratified park spaces, while allowing developers to delay dedication until the building permit stage, leaving new residents without essential social infrastructure for years.
- **Erosion of Local Democracy:** The standardization of Official Plans and the narrowing of municipal review authority represent a centralization of power that ignores the unique local contexts of Toronto’s neighbourhoods and replaces professional planning expertise with provincial templates and Ontario Land Tribunal (OLT) adjudication.

Residents and the City share a fundamental goal of building a livable, resilient, and vibrant city for all. While Bill 98 is currently the “law of the land”, we must not accept the degradation of our planning standards as the “new normal.”

We urge the Committee to acknowledge that these changes represent a significant adverse effect on Toronto’s future and to continue to advocate for the restoration of municipal authority over our own urban fabric.

We recommend that:

- **PHC recommend to City Council that Toronto actively work with other Ontario municipalities to attempt to reverse the provisions that adversely impact Toronto’s city building and environmental goals**

Sincerely,

Geoff Kettel

Geoff Kettel

Co-Chair

c.c. Jason Thorne, Chief Planner and Executive Director, City Planning
 Corwin Cambray, Director, Strategic Initiatives, Policy and Analysis, City Planning
 Kyle Knoeck, Director, Zoning, City Planning
 Allyson Power, Director, Policy and Secretary-Treasurer, Committee of Adjustment, Development Review

Appendix: Triple Bottom Line Analysis & Discussion

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.

Appendix: Triple Bottom Line Analysis & Discussion

Environmental Health and Integrity

The most alarming impact of Bill 98 is the forced retreat from the Toronto Green Standard (TGS). Since 2010, the TGS has removed the equivalent of 297,800 cars from the road. By shifting GHG emission limits, building energy performance, and electric vehicle infrastructure to “voluntary” status, the Province is compromising Toronto’s 2040 Net Zero target. Environmental integrity cannot be a voluntary “add-on”; it must be baked into the site plan.

- **Opportunity for Improvement:** The City must lead by example by applying the highest Tier of TGS to all City-led projects and aggressively promoting the Development Charge Refund Program to incentivize private developers to maintain these high standards voluntarily.

Social Equity and Cultural Wellbeing

Complete communities require high-quality, functional public spaces. Bill 98’s allowance for “encumbered” parkland—such as parks built over parking garages—threatens the long-term viability of our urban forest and soil health. Furthermore, allowing developers to identify parkland dedication late in the process disrupts the City’s ability to plan for well-connected, strategic park networks. This results in fragmented, low-quality open spaces that fail to support the physical and mental well-being of residents over a 25-year horizon.

- **Opportunity for Improvement:** The City should develop stringent “prescribed criteria” for parkland eligibility to present to the Province, ensuring that even under new rules, the land conveyed provides genuine ecological and recreational value.

Economic Prosperity and Fiscal Responsibility

While the building industry claims that reducing “red tape” improves affordability, the TBL analysis suggests a shift in the cost burden. The TGS has saved residents \$407.6 million in utility costs. By lowering building standards, Bill 98 potentially saddles future condo owners and tenants with higher long-term energy costs. Additionally, the move to arbitration for site plans that exceed 60 days will likely increase municipal legal costs and administrative complexity, creating a “false efficiency” that benefits the short-term bottom line of projects but drains public resources.

- **Opportunity for Improvement:** The City should document the long-term fiscal impacts of these changes—specifically the projected increase in utility costs for residents—to demonstrate the true “cost of doing business” under Bill 98.

Good Governance

FoNTRA believes that good governance is oriented toward long-term outcomes and meaningful civic participation. Bill 98 undermines this by mandating a "one-size-fits-all" menu for Official Plans and narrowing the scope of Site Plan Control to a checklist of health and safety. This centralization ignores the complexity of Toronto's neighborhoods and reduces the City's ability to coordinate infrastructure and public realm improvements. Shifting final decision-making power to the Ontario Land Tribunal (OLT) on matters like parkland dedication is an undemocratic bypass of local planning expertise.

- **Opportunity for Improvement:** The City must remain transparent with the public about which planning tools are being lost. We urge staff to maintain a public "Impact Registry" that tracks the quality and timing of infrastructure and green standards lost as a result of Bill 98 compliance.