

November 22, 2025

Minister Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay Street, 14th Floor
Toronto, ON M7A 2J3

Re: OPPI Feedback on ERO 025-1097: Proposed Changes to the Planning Act (Schedule 10 of Bill 60 - the Fighting Delays, Building Faster Act, 2025)

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Municipal Affairs and Housing (MMAH)'s proposed changes to the *Planning Act* (Schedule 10 of Bill 60), intended to streamline construction of new homes and infrastructure, reduce gridlock, and enhance community safety. **This letter offers OPPI's input specifically on Minor Variances.**

OPPI is the recognized voice of the planning profession in Ontario. With more than 5,000 members, OPPI serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the entire planning spectrum for developers, consulting firms, municipal governments and within the Ontario Public Service, other community agencies and academic institutions. Our members work across a geographically diverse cross section of Ontario communities of all sizes.

The *Planning Act* provides the legislative foundation for the work of professional planners in Ontario, guiding how RPPs apply their expertise to support orderly growth and sustainable development in service to the public interest. OPPI supports the government's goal to streamline the construction of new homes and infrastructure, reduce gridlock, and enhance community safety. In doing so, OPPI encourages careful consideration of how proposed changes may influence local autonomy in land use decisions that reflect distinct community character and needs. The implications for local decision-making remain unclear.

We are pleased to share input, specifically on Minor Variances (As-of-right Variations from Performance Standards), as proposed:


1. The proposed changes would allow certain zoning by-law standards, such as minimums and maximums, to be adjusted by a prescribed percentage "as-of-right," with the specific percentage to be set by regulation. Building on previous amendments under Bill 17, Bill 60 would extend these provisions beyond setbacks to include other zoning standards. While these changes could improve efficiency by reducing approval timelines and costs, careful implementation will be essential to preserve local planning objectives and avoid conflicts with existing policies.
2. OPPI recommends that legislation clearly define the limits of "as-of-right" permissions to ensure compatibility with existing and planned uses, maintain effective public communication and oversight, and exclude cultural heritage landscapes and heritage

conservation districts. In addition, these “as-of-right” variances should apply to the original zoning standards and not be used where previous variances have been approved and/or applied to the property. These measures would help balance efficiency with the need for appropriate, well-planned growth.

3. OPPI also cautions that permitting prescribed “as-of-right” variances may obscure the original intent of a variance; to provide flexibility in applying the zoning by-law based on context and professional judgment. Standardizing such variances risks conflating a legal provision with a policy instrument intended to be interpretive and adaptable.

Thank you for the opportunity to provide feedback on the ERO 025-1097. We would value the opportunity to meet with you to discuss our recommendations and how they may be useful to your important work in this area. If you have any questions or would like to schedule a meeting, please do not hesitate to contact us at (416)-483-1873 x2313 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Andria Leigh".

Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI

A handwritten signature in black ink, appearing to read "Susan Wiggins".

Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI