

COVERING BRIEF

Model Municipal By-law

Noise from Outdoor Pickleball Courts

September 2026 | By-law version 3.4.2

Where this comes from. *This brief accompanies the Model Municipal By-law — Noise from Outdoor Pickleball Courts. The By-law itself, this brief, and the version history are at quietstandard.ca, free to download and free to use.*

What this is, and what I am asking

I am a Toronto resident. I have written a model municipal by-law regulating noise from outdoor pickleball courts, together with the technical schedules and drafting notes that go with it. It is offered to the City free of charge, under a Creative Commons Attribution 4.0 International licence, to adopt, adapt, rewrite or ignore.

It is non-commercial in the fullest sense. I have no company, no product and no service connected with it. I hold no interest in any equipment, barrier, assessment or monitoring product named or described in it, and I would receive nothing if any part of it were used.

The ask is small and it is not a request for a decision. I would value a named contact in the relevant divisions, thirty minutes to walk through the document, and your division's view on what it gets wrong.

How it was prepared

Method. *The document was drafted independently and then tested against multiple independent AI systems and public sources, with each round of criticism incorporated. Claims that could not be verified against a primary source are flagged as unverified in the text rather than left to be discovered. The governing acoustic criteria and the setback tables are deliberately reserved for a licensed Ontario professional engineer, and the final drafting for the City Solicitor. You are invited to challenge any part of it.*

That is stated at the front rather than the back because it is the first thing a reader is entitled to know, and because the method is a strength rather than a caveat. Three separate rounds of adversarial review corrected four errors of fact in earlier drafts, including a widely repeated equipment threshold that turns out never to have been published, and an overstatement of what the provincial noise guideline says about parkland. Those corrections are recorded in the version history at the back of the document.

Why this is worth thirty minutes now

Toronto's public inventory lists nearly 300 courts available for outdoor pickleball. Much of that growth came from converting and lining existing tennis courts rather than from new construction, which matters, because conversion is where the acoustic arithmetic changed and nobody re-ran it.

Chapter 591 is not a crude instrument. It defines A-weighted and C-weighted sound levels and points of reception, and adopts provincial methodology for certain sources. What it has no limit and no method for is impulsive recreational sound. A pickleball complaint therefore falls back on the general prohibition against sound likely to disturb,

which is the kind of provision that has already failed once in an Ontario court.

There is also an open direction. On 9 October 2025 Council adopted Member Motion MM33.26, moved by Deputy Mayor Malik and seconded by Councillor Fletcher, nineteen votes to one, referral to committee waived. It requests the General Manager, Parks and Recreation to review other jurisdictions and to bring forward best practices on setback distances, noise barriers and court surfacing through the Facilities Plan Implementation Strategy. As at this date no report back has appeared on a committee agenda. This document is offered as an input to that direction, not as a proposal arriving from outside it.

In June 2022 a resident of Niagara-on-the-Lake privately prosecuted her own town under its noise by-law, and won. Both the Town and the local pickleball club were convicted. The justice of the peace observed that it had been open to the Town to enact an objective and quantifiable standard rather than rely on a subjective one. Subsequent proceedings imposed a two-year probation period, during which the courts remained closed.

Three features of that case bear directly on Toronto. The prosecution was private, so a municipality's own enforcement discretion offers no protection. It was brought by a single household, not a group. And the deficiency identified was the absence of an objective standard, which is the deficiency Toronto currently shares.

There is a second reason of timing. The conversion of one tennis court into multiple pickleball surfaces is the most common origin of complaint and the least examined. One tennis court carries two to four players striking a soft ball intermittently. The same rectangle repainted carries up to four pickleball courts and up to sixteen players striking a hard ball against a hard face several times a second, beside houses that were planned around the tennis court. The sound did not grow gradually; it multiplied in place, and in most municipalities nobody re-ran the acoustic arithmetic when the lines were repainted.

How this relates to existing work

The leading Canadian work on this subject is the City of Ottawa’s 2025 Outdoor Tennis and Pickleball Strategy and the report prepared for it by BAP Acoustics Ltd. in October 2024. Ottawa commissioned original acoustic research, consulted its residents — 1,215 survey responses and three public consultations — and published setback distances by court count and ground type against a 50 dBA design target.

The acoustic foundation in this document is theirs, and is identified as theirs throughout. The 50 dBA criterion, the distinction between acoustically hard and soft ground, the barrier specifications and the comparator table all originate in that work. None of it is claimed here, and a municipality that wants those figures should obtain the report and put it before its own practitioner.

What Ottawa produced is a service-delivery guideline for its own drop-in and club-operated courts. Its setbacks are best-practice distances used in consultation, with reductions expressly open for consideration. Noise barriers are stated not to form part of the City’s base level of service. Hours are managed through signage and remedial planning under delegated authority.

It does not extend to private, commercial or condominium courts. It contains no measurement protocol, no compliance test, no complaint trigger, no remediation deadline, no equipment requirement, no offence and no transition provision for existing facilities. The strategy operates alongside Ottawa’s own noise by-law, which it does not amend.

Drafting note. *That is the gap this document addresses, and it is worth stating plainly because it is the first question a well-briefed*

staff member will ask.

Ottawa produced excellent guidance on where to put courts. The regulatory layer — how compliance is measured, what triggers an assessment, what an operator must then do, and what follows if they do not — is the layer the Niagara-on-the-Lake court identified as missing, and the layer this model supplies. A resident dissatisfied with a court in a municipality with siting guidance but no objective standard is in the same position as the complainant in that case.

Six Canadian municipalities have published work that can be checked against the source document, and they are set out at Appendix 5 with page references. Ottawa sets 45 to 175 metres depending on court count and ground type. Vaughan's February 2025 strategy sets a default of 50 metres. A Burlington staff memorandum of July 2022 mentions 500 feet as a suggestion. Halton Hills addresses buffers without prescribing a distance, and Victoria, Saanich, Oak Bay and Esquimalt published a joint strategy in 2024.

For comparable situations those figures differ by a factor of three. That is not evidence that any of them is wrong — it reflects different assumptions about court count, ground type, mitigation and the reference point measured to. It is, however, the clearest argument for a common framework, since a club or a consultant working across Ontario faces a different rule in every municipality and no enforcement layer behind any of them.

It also follows that adoption need not be all or nothing. The document is modular. Part VIII is a permit-conditions package requiring no by-law at all. Parts V, VI and X can be adopted as a facility design standard under staff authority. Part IX is a complaint and remediation process on its own. The appendices are planning and procurement guidance. Taking one Part is a legitimate outcome and, for a municipality that already holds technical work of its own, may be the sensible one.

What the document contains

Thirteen parts and five schedules, drafted as a complete instrument so that its content is visible in one place. For Toronto it would ultimately be enacted as amendments to Chapter 591 and Chapter 608 rather than as a standalone by-law, and the document says so.

- A sound level standard, with a community limit for all courts and a separate impulse criterion confined to new and reconstructed courts.
- Hours of play, confined to municipal, commercial and multi-surface courts so that casual residential play stays under the general noise by-law.
- Screening tiers, siting rules and a setback schedule for new courts, with commissioning verification before opening.
- Barrier specifications expressed as performance requirements, including snow, ice and wind loading, accessibility, and the absorptive facing that prevents a barrier from simply redirecting sound at the neighbours it was not built for.
- An equipment requirement that operates only at designated courts, by reference to an open register with an equivalency route, and never by naming a product.
- A transition and remediation pathway for existing courts, so that the by-law does not create offences on its first day at facilities nobody has yet assessed — including the City's own.
- Monitoring, records and privacy provisions, because continuous acoustic monitoring at a residential property line captures speech and creates records subject to freedom of information.

- Enforcement with written orders, reasons and a review of any decision that adversely affects a person.
- Five appendices that form no part of the by-law: an order of mitigation, procurement acceptance criteria, planning guidance for recreation master plans and new communities, an evidence register recording for every material proposition whether the primary source was inspected directly, corroborated indirectly, or remains open, and a survey of published municipal practice elsewhere.

What it deliberately does not supply

Two elements are reserved, and the reservation is the reason the rest can be relied upon.

The first is the governing sound metric with its averaging interval, assumed duty cycle, treatment of simultaneous court use and measurement uncertainty. The document states a criterion and explains its derivation; the protocol that makes it enforceable is a professional decision.

The second is the completed setback schedule. Acoustic modelling and the conclusions drawn from it are the practice of professional engineering in Ontario. A municipality relying on distances derived by an unlicensed author is relying on nothing, and the first competent consultant to review the file would say so. The schedule is therefore left blank, with a published comparator from another Ontario municipality set out separately for reference and clearly marked as that municipality's figures rather than proposed values.

Both are bounded pieces of work. A scoped request for quotation, dividing the assignment into a desktop phase and an optional field validation phase so the City can price the decision before committing to it, is available on request.

The invitation

The document is offered for challenge, not for endorsement. It is a developed starting point for staff review, not enactment-ready legislation, and the most useful thing any division can do with it is identify what an external draft could not know.

Each division holds knowledge that no amount of outside research substitutes for:

Division	The question only you can answer
Parks & Recreation	Which of the hours, signage, equipment, permit, maintenance and remediation requirements would be impossible or disproportionately expensive to administer at real facilities?
Municipal Licensing & Standards	Can an officer investigate, measure, document, charge and testify under these provisions using existing training, instruments, access powers and evidence procedures?
City Planning	At which approval stage can siting, orientation and setback requirements lawfully be imposed, and which court conversions escape those controls altogether?
City Solicitor	Which clauses exceed authority, delegate improperly, lack procedural fairness, create evidentiary difficulty, or fail to translate into Chapter 591?

Division	The question only you can answer
Capital projects and facility design	Where would the barrier and siting requirements collide with how courts are actually designed, tendered and built, and what would they add to a project budget?
Purchasing and materials management	Do the procurement criteria in Appendix 2 fit the City's tendering process, and can the declaration of interest be required in a bid rather than discovered later?
Accessibility	Do the barrier, gate, route and signage provisions meet the City's accessibility design standards, and where would they need to be strengthened?
Indigenous Affairs	Do the ground-disturbance provisions align with the City's engagement processes and the commitments in the Reconciliation Action Plan?
311 and service planning	How would a pickleball complaint be classified, triaged and routed under these provisions, and what would change for the people taking the call?

Corrections are recorded in the version history and credited unless anonymity is preferred. Every material change is traceable to the reason for it.

Contact and licence

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I worked in policy development for the Government of Ontario. My responsibilities included regulatory work under the Police Services Act following its amendment, and later emergency management, where I developed protocols for emergency planning, including pandemic and animal-disease response. That work is the reason this document looks the way it does: writing a rule is the easy part, and most of these pages are given over to what a requirement means, who carries it out, how compliance is assessed, and what happens when the situation does not fit the plan.

I have run for municipal office twice, in 2022 and 2024. I am not a candidate now, and this is not a campaign.

Before contacting any City official I sought guidance from the Office of the Lobbyist Registrar. The Registrar advised on 1 September 2026 that, on the facts described, I do not qualify as a lobbyist under the Lobbying By-law and am not required to register.

The full document. *The full By-law — eighty-seven pages, thirteen Parts, five Schedules and five appendices — is at quietstandard.ca, together with this brief in PDF and Word, the version history, the sources, and the licence. Everything is free to download, adopt, adapt or rewrite.*

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