



Via Online Submission
<https://ero.ontario.ca/>

November 21, 2025

Ministry of Municipal Affairs and Housing
777 Bay St, 17th Fl
Toronto, ON M7A 2J3

RE: Comments on Bill 60, Fighting Delays, Building Faster Act, 2025, and Associated Notices

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

ERO 025-1100: Consultation on Minimum Lot Sizes

ERO 025-1101: Consultation on Enhanced Development Standards – Lot Level (outside of buildings)

ERO 025-1099: Consultation on simplifying and standardizing official plans

ERO 025-1098: Proposed amendments to the Municipal Act, 2001 to transfer jurisdiction over water and wastewater to the lower-tier municipalities in Peel Region and a standalone statute to authorize the establishment of water and wastewater public corporations

Thank you for the opportunity to comment on the proposed legislative and policy changes proposed by *Bill 60, Fighting Delays, Building Faster Act, 2025*. The Town of Renfrew is providing these technical comments at the staff level due to the short window of time available to submit comments, and the large volume of proposals being issued simultaneously. Council for the Town has not had an opportunity to review these comments, however staff are providing them in order to represent the interests of the Town, as well as to comment on the potential impact of the proposals more broadly.

The Town offers the following comments for consideration in finalizing the proposals under Bill 60 and associated ERO postings:



1. ERO 025-1097: Proposed Changes to the Planning Act (Schedule 10 of Bill 60 - the Fighting Delays, Building Faster Act, 2025)
 - a. Flexibility in the provision of as-of-right minor variances (e.g., 10% of an applicable setback) would be development-supportive in theory, however limitations will be necessary to ensure that new development does not build-in the as-of-right variances into the design of new buildings and structures, except on infill/existing lots with physical constraints/space limitations.
 - b. The highest value in permitting as-of-right variances for greenfield/new subdivision development would be in flexibility for as-built setbacks which may vary somewhat from the required/planned setback due to limitations on the accuracy of foundation forming, etc., but this benefit would be neutralized if site/subdivision/building plans were designed with the setback flexibility already incorporated.
 - c. The proposed amendments to allow all upper-tier municipalities to establish regional Community Improvement Plans and allow funding to lower-tier municipalities are supported. The County of Renfrew currently has a CIP in effect.
2. ERO 025-1100: Consultation on Minimum Lot Sizes
 - a. Minimum lot sizes as a function of built area/lot coverage serve to bring consistency to development patterns, and provide for permeable lot area (stormwater infiltration/runoff), snow storage areas, suitable amenity areas, parking, and opportunities for future construction of accessory structures on the property.
 - b. Reductions in minimum lot area will increase the density of service connections per metre of water and sewer main. Existing water and wastewater infrastructure pipe capacities may be exceeded when combined with the relatively recent permission for up to 3 units per urban lot, which municipalities are already working to rationalize as part of water and wastewater supply and capacity.



3. ERO 025-1101: Consultation on Enhanced Development Standards – Lot Level (outside of buildings)
 - a. The Town of Renfrew does not currently have enhanced/green development standards (lot level), and there are no current plans to establish them.
4. ERO 025-1099: Consultation on simplifying and standardizing official plans
 - a. Efforts to simplify and streamline the development process are welcome, however consideration must be given to the impacts of broad-based restrictions on local policy instruments.
 - b. Maximum page limits should not include Secondary Plans, Schedules, and Appendices.
 - c. Any consideration for uniform designations will likely encounter difficulty adapting to local contexts. It is recommended that existing flexibility in designations be retained, however some broadening of permitted uses within individual designations may make sense.
 - d. Prohibiting the use of secondary plans makes little sense. Provided a secondary plan is concise and practical, the establishment of a more detailed vision and set of policies for growth and revitalization areas provides developers with additional clarity and a basis for project and asset planning.
5. ERO 025-1098: Proposed amendments to the Municipal Act, 2001 to transfer jurisdiction over water and wastewater to the lower-tier municipalities in Peel Region and a standalone statute to authorize the establishment of water and wastewater public corporations
 - a. Staff have reviewed the submission by Watson & Economists in regards to the proposal to establish Water and Wastewater Public Corporations (WWPC), and agree with the need for the following items to be addressed:
 - i. Need for consultation with affected municipalities and the public to understand impacts to municipal operations and finances, prior to any WWPC being created.
 - ii. Needed clarity regarding how growth-related water and wastewater infrastructure projects will continue to be funded,



- and whether Development Charges or a similar revenue tool will continue to apply.
- iii. Impacts to municipal debt capacity and Annual Repayment Limit as a result of likely reductions to own-source revenues (water and wastewater rates).
 - iv. Needed clarity on governance and financing of WWPCs.
 - v. Clarity on the operations of water and wastewater services, including impacts to contract operators (e.g., OCWA), responsibility for licensing, annual reporting, financial reporting, and other compliances items
 - vi. Whether it is intended or possible that WWPCs could be privately owned, which is likely to lead to profit-seeking behaviour and increased costs to water and wastewater users.
 - vii. Whether municipalities will be appropriately compensated for the transfer of capital assets, land, and other resources that may be transferred to the WWPC.
 - viii. Impacts to grant availability for water/wastewater/stormwater projects and initiatives.
 - ix. Coordination and timing of growth-related infrastructure projects (e.g., new trunk infrastructure, sewage pumping stations, etc.)
 - x. Coordination of infrastructure projects with a water/wastewater component (i.e., road reconstruction with co-located water/wastewater linear assets).

6. Other Proposals

- a. The Town offers the following comments in relation to other miscellaneous proposals being advanced as part of, or in concert with Bill 60:
 - i. Building Code Review: While a comprehensive review of the Building Code can be positive and reduce outdated/ineffective requirements, the Province is encouraged to consult directly with municipal Chief Building Officials through channels such as the Ontario Building Officials Association and local chapters.



- ii. Standardize/Streamline Development Charges – The Province has made several changes to the Development Charges framework and legislation in recent years, and municipalities across the Province are already working on necessary adjustments to these changes. It is recommended that additional DC revisions be limited at this time to allow municipalities an opportunity to understand and implement the by-law, policy, and procedural changes required by the amended legislation to date.
- iii. Streamline land use planning including leveraging IT solutions / AI solutions to enhance automation of land use planning and building code review – Municipalities are moving towards greater efficiency in development approvals that are appropriate to their context, including implementation of software and digital tools to expedite review and processing times. It is suggested that the province make resources available to support municipal efforts rather than imposing a system that may not be suitable to local contexts. Close consultation and collaboration on such an initiative is critical, beyond ERO posting and comment.

If you have any questions in respect of the above comments, please contact the undersigned at your convenience.

Yours sincerely,



Renfrew

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