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Ministry of Transportation 5th Floor, 777 Bay Street Toronto, ON, M7A 1Z8 November 22, 2025

Subject: ERO 025-1140 | Bill 60 - Municipal Construction Road Standards

Mattamy Homes Canada is pleased to provide comments as they relate to the consultation on Municipal Construction Road Standards.

Mattamy Homes has a long and proud history in the homebuilding sector. Founded in 1978, we are Canada's largest residential real estate developer, building master-planned communities and homes of every type, including single-detached, townhomes, mid-rise, and high-rise units. In Canada, our communities stretch across the Greater Golden Horseshoe Area, as well as Ottawa, Calgary, and Edmonton. Each year, Mattamy helps more than 5,000 families across Canada achieve the dream of homeownership.

Comments:

We appreciate the province's continued efforts to modernize municipal infrastructure processes and introduce standards that improve efficiency, safety and long-term planning outcomes in Ontario.

To ensure future regulations effectively support the homebuilding industry, we recommend the following measures for the ministry's consideration. While we are supportive of opportunities to create harmonization, we caution against the advancement of standardized municipal rights-of-way (ROW) that could result in a "one size fits all" approach that may not work in all jurisdictions. While the intent is to create more efficiency in municipalities, there is a risk that overly prescriptive requirements may unintentionally introduce added steps that delay municipal road projects and ultimately, development applications. With this in mind, we suggest a maximum ROW width of 16 metres for local roads and performance standards such as limiting sidewalks to one side only.

Early Consultation with Developers:

There is significant value in ensuring that residential growth and municipal road
construction are connected. We support opportunities that strengthen
requirements for municipalities to consult with local developers in the early design
stages of the project cycle. This will help ensure that there is an integrated approach
for infrastructure projects such as future roads, servicing connections and active
transportation corridors that are fully integrated with proposed development
applications.

- Builders and developers are often advised during municipal road project consultations that the adjacent development is not advanced enough in the planning process to be considered for integration in the road design (e.g. a service stub or a water chamber left at a future intersection location to be extended into the adjacent development later). This results in the developer submitting plans through an application to install a connection to a recently constructed municipal road project. This connection could have been installed prior with proper coordination and ultimately, this leads to project delays and added costs as the connections typically require installation first to service the development (e.g. outlet or site-connection typically the starting point for underground servicing program).
- Undertaking the connection after the municipal road project is completed increases costs significantly more than installing during construction.

Funding Agreements and Infrastructure Cost-Sharing:

- Most municipalities do not service the lateral connections to trunk wastewater sewer or watermains, which triggers the need for developers to install a local watermain and wastewater sewers in boundary roads.
- If municipalities would complete funding agreements with adjacent developers to install the local services on their behalf while the municipality is completing the boundary road projects, rather than cutting them in after to install, it would reduce costs for both the developer and the municipality, as well as accelerate project timing.
- Coordinating local infrastructure within the rights-of-way during municipal road projects through funding agreements with adjacent developers would help to lower costs and speed up development timelines.

Additionally, while considering changes to future mandatory common municipal road standards, we encourage the Ministry to review the requirements for multi-use trails and bike lane designs and develop performance-based criteria to determine when they are warranted. We have encountered instances where some municipalities enforce 6 metres widths which result in unnecessarily wide rights-of-way.

We support the government's proposal to enhance municipal road construction standards and recommend that the final regulations include clear requirements for early consultation and coordination of development projects across each municipality to ensure municipal road infrastructure supports residential growth and contributes to well-planned communities.

We appreciate the opportunity to provide feedback and look forward to continued collaboration on measures that enhance transparency, efficiency, and timely housing delivery across Ontario.

For additional information:

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