



Ministry of Municipal Affairs and Housing
Planningconsultation@ontario.ca

Date Nov. 21, 2025

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

The Municipality of Middlesex Centre would like to submit the following in response to the above referenced ERO Posting:

- We understand the province’s interest in improving consistency and predictability in the planning and development process.
- Lot level controls, including zoning provisions, site plan guidelines, and infrastructure design standards are all important in ensuring development is not only sustainable for the future, but also that it does not pose undue financial or other burdens on future owners, tax payers, and the municipality.
- Based on the information within the ERO posting, there is a very significant range in what the province is considering “green building standards” or “enhanced development standards” – we would like more information on specifically what the province is considering, to further refine these concepts in order to engage in more meaningful technical consultation.
- We note the specifics of the implementation of any proposed legislation would be crucial – for example, in some cases, what may be considered an “enhanced development standard” is in fact *required* in order to meet certain requirements (i.e. bio swales that may be identified through development conditions in order to meet stormwater runoff guidelines to protect areas from flooding). This is why more technical consultation is required in order to fully consider the impacts.
- It is important to remember that Municipalities are already feeling the impacts of a changing climate. Limiting the ability to use more innovative forms of site development may negatively impact the municipality’s ability to address these impacts. Instead of limiting their use, more provincial support and guidance for municipalities would also meet the same objective of ensuring consistency, transparency, and predictability through the development approval process.



We would be happy to participate in more technical consultation with ministry staff to explore opportunities for more consistency and predictability in the development process with respect to green infrastructure standards, in a way that we can still ensure development is sustainable, and protects future generations.

Sincerely,

Stephanie Bergman, RPP
Manager of Planning and Development
Municipality of Middlesex Centre