

November 21, 2025

RE: Comments on *Enhanced Development Standards – Lot Level (outside of buildings)* (ERO 025-110)

On behalf of WR Community Energy, I am writing to express concern about the proposed *Enhanced Development Standards – Lot Level (outside of buildings)* and their potential to limit local authority over land use planning, infrastructure, and energy systems. We believe that the proposed approach could weaken municipalities' ability to manage growth in ways that support local affordability, energy security, and long-term resilience.

WR Community Energy is a non-profit partnership between the municipalities in the Region of Waterloo and local utilities. We exist to ensure energy planning facilitates sustainable growth and aligns new development with economic priorities, environmental aspirations, and long-term cost control. By keeping energy dollars local, investing in efficient infrastructure and aligning land use with utility planning, we help communities grow in ways that are affordable, strengthens the economy, and reduces household operating costs. Local energy planning is not about adding barriers, it is about enabling smarter and more efficient growth that serves both current and future residents.

Shared Provincial and Local Objectives

We share the Province's desire to accelerate housing and infrastructure delivery, reduce complexity, and promote consistent standards across Ontario. Waterloo Region is already advancing a harmonized regional approach through the High-Performance Development Standards (HPDS). Development standards streamline approvals for new developments related to energy, natural systems, transportation, and built environment objectives. This inter-regional collaboration reduces complexity for industry by providing a consistent and predictable framework for the seven municipalities.

The proposed legislation would weaken the ability for area municipalities in Waterloo Region to streamline lot level approvals for elements such as landscaping, vegetation, and stormwater management. It removes the ability of municipalities to align growth with existing infrastructure and energy capacity, which undermines the ability to deliver services in a way that is affordable, efficient, and streamlines the development and construction of new homes.

The Value of Local Energy and Infrastructure Planning

In Waterloo Region, we own our local energy and water utilities and manage finite natural resources, including a limited local groundwater supply. These realities demand that we plan growth carefully and predictably.

Predictable energy and water demand helps keep property taxes and utility rates low by allowing municipalities to plan and finance infrastructure responsibly. Efficient and well-designed communities reduce long-term costs for both residents and the public sector by avoiding expensive upgrades and unnecessary expansion of energy and water systems.

Supporting Affordable and Efficient Housing

Rising energy costs are increasingly linked to housing affordability. In Waterloo Region, nearly one third of households are renters, and many face rising operating costs due to inefficient buildings and outdated infrastructure.

Building homes that are efficient and well connected to local energy systems is far more cost effective than retrofitting them later. Planning for these efficiencies at the start helps residents avoid the financial pressures that lead to housing insecurity, supports stable utility rates, and makes housing more affordable long term.

Risks of Limiting Local Authority

Together with restrictions introduced under *Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025*, the proposed *Enhanced Development Standards – Lot Level (outside of buildings)* would significantly narrow municipal authority both inside and outside buildings. Limiting local flexibility over lot level planning and design contradicts the province’s own *Provincial Planning Statement, 2024*, which emphasizes complete, climate ready, and resilient communities.

Municipalities are being asked to deliver affordable, sustainable, and efficient communities that reflect local community character, while potentially losing the authority to use the planning and design tools that make them achievable. This would place additional pressure on local utilities, reduce coordination between energy and land use planning, and increase long term costs for taxpayers and ratepayers.

The Need for Predictable, Efficient Growth

We have finite land and limited access to fresh water. These realities demand that we grow carefully in a predictable manner that reflects local conditions.

Predictable energy and water demand helps keep property taxes low and ensures we can finance and maintain critical infrastructure responsibly. As of 2024, the Region of Waterloo had a population of 706,875 and is projected to reach 1 million by 2050.

As a landlocked region, we rely on conservation, efficiency, and integrated planning to avoid expensive long-term options like importing water from the Great Lakes. The HPDS will increase efficiency and conservation in new developments, allowing Waterloo Region to sustainably use its own water resources for longer.

A harmonized regional approach to HPDS reduces planning complexity for industry by aligning expectations across the seven municipalities. We have heard from many developers who welcome this consistent and predictable approach to development standards, making it easier to build across the region.

Closing

We appreciate the province's challenge in balancing urgent housing needs with the long-term stability of Ontario's communities. From our perspective, maintaining municipal authority over lot level standards is not at odds with faster housing delivery. It is a practical and proven way to ensure that new homes are affordable to build, affordable to live in, and supported by efficient, reliable infrastructure.

We urge the Ontario Government to reconsider the proposed limitations in *Enhanced Development Standards – Lot Level (outside of buildings)* so it strengthens, rather than weakens, the ability of municipalities to deliver affordable, energy secure, and resilient communities for future generations.

Sincerely,



Matthew Day
Executive Director, WR Community Energy