



Waterloo Region
HOME Builder's
Association
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[Via electronic submission](#)

To: PlanningConsultation@ontario.ca
Ministry of Municipal Affairs and Housing
Intergovernmental Relations and Partnership Branch
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

Re: ERO 026-0300
Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes
(Schedules 1, 2 and 7 of Bill 98, the Building Homes and Improving Transportation Infrastructure Act,
2026)

The Waterloo Region Home Builders' Association (WRHBA) appreciates the opportunity to provide comments on ERO 026-0300. WRHBA supports legislative and regulatory reforms that meaningfully increase housing supply, reduce costs, and create a more efficient and predictable planning system. In our view, the proposed Planning Act reforms that streamline, simplify, and standardize municipal official plans are very effective tools to achieve these objectives.

Despite recent infrastructure challenges, Waterloo Region is expected to continue to experience strong population and employment growth, driven by immigration, post-secondary institutions, and a growing regional economy. Growth management planning and housing supply however are not keeping pace with demand. One of the key challenges identified by our members is the growing complexity, length, and variability of municipal official plans and resulting policy frameworks. Overly detailed and prescriptive official plans unintentionally slow housing delivery, increase approval costs, and introduce uncertainty for development projects of all sizes.

WRHBA supports any reforms that simplify official plans by reinforcing high-level, permissive land use policy rather than predetermining matters that are better addressed through zoning and site plan control. In Waterloo Region, municipal official plans have expanded significantly in scope over time. Proponents are often required to navigate overlapping and subjective policies to justify proposals that clearly align with growth objectives but do not fit neatly into the policy detail. This situation results in lengthier approval timelines and increased housing cost.

Greater standardization of official plan structure, content, and policy language across municipalities is welcome. Builders operating across multiple planning jurisdictions in Waterloo Region routinely encounter different policy interpretations for similar uses, development forms, parking regulations, etc. These inconsistencies add cost to

development projects and undermine the Province’s broader housing goals. A more standardized, provincially consistent approach to official plan policy would improve clarity for all parties, including municipalities, agencies, and the public, while still maintaining local flexibility to deliver much needed housing supply.

Based on the past experiences of WRHBA members, requiring clear and simplified official plans will improve housing delivery. Concise local policy which is clearly aligned with provincial policy statements, will allow development application to move more efficiently through the approvals process. Conversely, when official plans delve into detailed design, servicing and design matters, the result will continue to be a lengthy approvals process. This impacts all forms of new housing, including “missing middle” housing, intensification projects, and redevelopment within existing urban areas, which are precisely the forms of housing that Waterloo Region municipalities rely on to meet Provincial growth targets.

The proposed reforms also support better alignment between provincial planning priorities and municipal implementation. Streamlined and standardized official plans provide a clear mechanism to implement provincial housing objectives consistently and reduce divergence between policy intent and local approvals.

WRHBA feels that these reforms will assist in delivering appropriate planning and environmental oversight. For example, while Waterloo Region municipalities have long supported compact, transit-supportive growth within the existing urban area, enabling this form of development requires official plans that are clear and predictable. Simplified official plans can will avoid unnecessary repetition across multiple planning documents and allow housing to be delivered more quickly.

In conclusion, WRHBA strongly supports the Planning Act reforms proposed through ERO 026-0300. Based on past experience, we expect that a clear and consistent policy framework across all local municipalities will lead to faster approvals, lower costs, and increased housing delivery.

Sincerely,

WATERLOO REGION HOME BUILDERS’ ASSOCIATION



Marie Schroeder
Chief Executive Officer

c: WRHBA Board of Directors
WRHBA Member Companies
Ontario Home Builders’ Association

WATERLOO REGION HOME BUILDERS’ ASSOCIATION

For eighty years, the Waterloo Region Home Builders’ Association (WRHBA) has been the recognized leader and the official voice of the new residential home construction, land development, and professional renovation industries in the Regional Municipality of Waterloo, ON. We are an association of knowledgeable, trusted, resourceful, and local professionals, and together we create vibrant, thriving, and sustainable communities across our regional area, comprising three municipalities and four townships. WRHBA member companies construct over 90% of all new residential construction, making it one of the most significant economic engines driving the Region’s economy, creating over 22,000 jobs, 1.5 billion in wages, and three billion in investment value. As an Association, we are invested in providing insight to public policy decision-makers at all levels of government on matters affecting the residential development and construction industry, with a focus on housing affordability and consumer choice.