

Ministry of Municipal Affairs and Housing
 Provincial Planning Branch
 777 Bay Street
 Toronto, ON M7A 2JA

April 27, 2026

Re: [ERO 026-0300](#) - Proposed 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 City of Mississauga has reviewed the proposed legislative changes shared through the above listed registry posting and would like to provide the following comments and suggestions for your consideration.

Description of Changes and Comments to the Province

Summary of Proposed Provincial Changes	Staff Comments on Potential City Impacts / Comment to Province
<i>Schedule 1 – Building Code Act, 1992</i>	
<p>Proposed changes include:</p> <ol style="list-style-type: none"> 1. Clarify the standards for the protection or conservation of the environment including the meaning of municipal by-laws respecting the construction or demolition of buildings; 2. Clarify the standards for the protection or conservation of the environment in relation to the meaning of manner of construction and standards for construction for the purposes of matters not subject to site plan control; 3. Repealing sections of the Municipal Act related to by-laws respecting the protection and conservation of the environment. <p>Building Code Review</p> <ul style="list-style-type: none"> - A section-by-section review of the Building Code and the creation of an expert review panel of industry professions to identify areas where the current Building Code can be modernized and streamlined. 	<p>We encourage the Province consider including more stringent resource requirements in the Building Code in lieu of green development standards.</p> <p>Council supports this review and requests that the Province include municipalities as representatives on the expert review panel.</p>

Schedule 3 – Development Charges Act, 1997	
<p>Proposed changes include:</p> <ol style="list-style-type: none"> 1. New section that non-profit retirement homes are exempt from development charges. 	<p>A separate submission was made to respond to the Regulatory Registry of Ontario posting ORR 26-MMAH009 to provide feedback on this change.</p>
Schedule 4 – Fare Alignment and Seamless Transit Act, 2026	
<p>Proposed changes include:</p> <ol style="list-style-type: none"> 1. Fare Harmonization and Zone-Based Travel <ul style="list-style-type: none"> • Authorizes the MTO to: establish transit fares, to establish geographic fare zones, and to require revenue-sharing amongst transit agencies within the zones. 2. Fare Collection and Data Reporting and Compliance Powers <ul style="list-style-type: none"> • Establishes the requirement for the specified transit agencies to use the same fare collection system. 3. Priority Routes and Service Integration <ul style="list-style-type: none"> • Authorizes the Province to define priority routes which may cross municipal boundaries for the purpose of service integration. This may include establishing minimum service standards and requiring municipalities to travel outside of its jurisdiction. 	<ol style="list-style-type: none"> 1. Council supports fare harmonization to simplify the user experience and requests that Mississauga: <ul style="list-style-type: none"> • Be involved in consultation regarding all aspects of fare concessions, including price. • Consulted on the development of any geographic zones and an agreed-upon cost-sharing formula which may be established given its inherent impact on scheduling, planning, operating and capital costs. • Be made whole in the event that any changes to fare structures, including those which may be zone-based, invoked by the province negatively impact transit revenues. 2. Mississauga already uses PRESTO as required by the Province and has borne both capital and operating costs associated with this use. Council supports the continued consultation and involvement between Mississauga and the province via Metrolinx on PRESTO functionality. In the event that the province determines material changes to PRESTO in terms of software or hardware to meet these new data or fare collection requirements, these costs should be borne by the province. 3. Council supports the principle of service integration, however, it recognizes the local impact on current and future operations and therefore requests: <ul style="list-style-type: none"> • Full participation in all aspects of determining priority routes and plans for service integration which may alter current or future MiWay operations; • An agreed-upon cost-sharing formula for both capital and operating costs associated

<p>4. Specialized Transit (Trans-Help)</p> <ul style="list-style-type: none"> Require municipalities to participate in a unified trip booking system and provide cross-boundary trips without transfers to a prescribed distance outside of the current municipal service area. 	<p>with travelling outside of Mississauga's current jurisdiction; and,</p> <ul style="list-style-type: none"> That Mississauga be made whole by the province in the event that other funding programs are negatively impacted by changes arising from this legislation. <p>In Peel Region, specialized transit is provided by TransHelp. However, residents of Mississauga pay into the regional tax base and will be subject to the associated cost escalations.</p> <p>Given the potential impact on Region of Peel's costs associated with the provision of Trans-Help service, Council requests to participate in consultations regarding changes to specialized transit that will have cost impacts to TransHelp.</p>
<p>Schedule 7 – Planning Act</p>	
<p><i>Complementary Changes to Support the Implementation of Streamlining and Standardizing Official Plans</i></p> <p>Proposed changes include:</p> <ol style="list-style-type: none"> Eliminating redundant requirements for municipalities to include climate change policies in their Official Plans (OP); Amendments to existing Protected Major Transit Station Area (PMTSA) policies no longer require Ministerial approval except when an amendment is made to minimum density targets and/or boundaries; Allowing Ministerial exemption for lower-tier municipalities to conform with upper-tier official plans; and, Removing the legislative requirement for the Minister to give public notice when amending or revoking a Minister's Zoning Order (MZO). 	<p>The new Official Plan framework should include a Section/Chapter/Volume for Secondary Plans and Special Site and Area-specific Policies. These should form part of an Official Plan.</p> <p>We appreciate that additional land use designations have been added but continue to have concerns with the proposed "Mixed Use Areas" designation. By including, industrial, manufacturing and small-scale warehousing in this designation they would be considered to be permitted outright and compatible.</p> <p>Further clarity is required on how a municipality would assess land use compatibility in implementing this new designation. If it is expected that the City would undertake land use compatibility prior to designating lands under this designation, this would be extremely costly and Provincial funding will be necessary to align with this new framework.</p> <p>Further consideration needs to be given to how industrial, manufacturing and small-scale warehousing is described in this category (i.e. consider "light" and "small-scale" industrial and manufacturing).</p>
<p><i>Site Plan: Prohibit Mandatory Municipal Enhanced Development Standards and Green Building Standards</i></p> <p>Proposed changes include:</p> <ol style="list-style-type: none"> Removing authority to require "Enhanced Development Standards" (i.e Green Development Standards) at the lot level 	<p>In response to Bill 60, the City pivoted the Green Development Standards to be voluntary and are currently working on developing an incentive-based model to encourage the inclusion of these standards in development proposals. This approach is intended to continue advancing the City's climate change objectives and align with provincial direction set</p>

<p>outside of what is required for health and safety.</p> <p>2. To do this, the legislation removes references to “sustainable design” in site plan control by-law and includes clarifying language so that zoning is not utilized to mandate green development standards, in addition to removing existing zoning standards that require green building standards</p>	<p>out in applicable Provincial Planning Statement (PPS) policies.</p> <p>The City’s Site Plan Control By-law contains the reference to “Sustainable Design” as it relates the authoritative powers under Section 41 of the <i>Planning Act</i>. The Site Plan Control By-law will need to be amended to remove the term “Sustainable Design” and insert the amended criteria “e” of Section 41(4) of the <i>Planning Act</i>.</p>
<p>Schedule 9 – Water and Wastewater Public Corporations Act, 2025</p>	
<p>Proposed changes include:</p> <ol style="list-style-type: none"> 1. New corporations will be entirely public owned and the creation of frameworks for the expansion of municipal services corporations across the Province; 2. Proposal to prohibit the transfer of water/wastewater debt from the Region of Peel to the new water/wastewater municipal services corporation (MSC); and, 3. The new MSC is responsible for future utility rate decisions and any new issuance of debt after the transfer date, and where the existing debt continues to remain as a joint and several liability of the three lower-tier municipalities. 	<p>Council requests that the Province ensures that any regulations made under the Water and Wastewater Public Corporations Act, 2025, establish a clear, transparent and equitable funding framework for the retirement of existing water and wastewater debt, including debt incurred to front-end DC-funded infrastructure, so that legacy debt obligations are addressed in a manner that aligns with the beneficiaries of past growth-related investments, that no municipality is disproportionately burdened with debt costs for assets or infrastructure that it does not own, and that the framework supports long-term rate stability for ratepayers across the affected municipalities.</p>

If you have any questions or require additional information, please contact Shaesta Hussen, Planner at (905) 615-3200 ext. 5532.

Sincerely,



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cc. Leadership Team
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