



May 13, 2026

Environmental Registry of Ontario

Re: Bill 98 – Building Homes and Improving Transportation Infrastructure Act, 2026

The Municipality of Arran-Elderslie generally supports the Province's objective to accelerate housing delivery, reduce unnecessary regulatory burden, and improve infrastructure planning and transit integration across Ontario. As a small, rural municipality experiencing growing development pressure, Arran-Elderslie recognizes the importance of regulatory clarity, certainty, and efficiency in supporting much-needed housing supply.

At the same time, the Municipality respectfully submits the following comments and recommendations to ensure that Bill 98 is implemented in a manner that recognizes local context, protects municipal discretion where appropriate, and supports long-term infrastructure sustainability.

1. Planning Authority and Official Plan Standardization

The Municipality acknowledges that standardized Official Plan templates and prescribed land use designations may improve consistency and reduce duplication across municipalities. However, Arran-Elderslie strongly recommends that the Province:

- Provide clear transition provisions, implementation timelines, and grandfathering protections for municipalities that have recently updated, or are in the process of updating, their Official Plans and Zoning By-laws; and
- Maintain sufficient flexibility for rural and small municipalities, whose settlement patterns, servicing constraints, and growth dynamics differ significantly from large urban centres.

2. Minimum Residential Lot Size Consultation

The Province's consultation on a minimum serviced residential lot size of approximately 175 m² represents a substantial reduction from existing standards in many communities.

While the Municipality supports gentle intensification and efficient land use, Arran-Elderslie encourages the Province to ensure that any minimum lot size regulations:

- Recognize local servicing capacity, stormwater management limitations, snow storage needs, and on-site parking requirements; and
 - Avoid the application of a single urban standard across municipalities with very different built forms and infrastructure characteristics.
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- Flexibility to respond to local conditions is essential to avoid unintended infrastructure and compatibility issues.

3. Building Code Review

Arran-Elderslie strongly supports the Province's comprehensive review of the Ontario Building Code. The increasing complexity and duplication within the Code has created challenges for builders, developers, and municipal staff alike.

Modernizing and streamlining the Code while maintaining Ontario's high health and safety standards would be a positive and beneficial reform that supports housing delivery and administrative efficiency.

4. Parkland Dedication and Encumbered Lands

Proposed changes related to parkland dedication, including the treatment of encumbered lands and privately-owned public spaces (POPS), raise concern in a rural and small-community context. The Municipality recommends that:

- Municipal discretion be preserved to determine whether conveyed lands are suitable for park or recreational purposes;
- Cash-in-lieu options remain available to support planned park acquisition and upgrades; and
- The Ontario Land Tribunal not be empowered to compel acceptance of lands that do not align with municipal park planning objectives.

These tools are critical to maintaining functional, accessible, and well-distributed park systems.

5. Site Plan Control and Essential Development Standards

While Arran-Elderslie's current Site Plan Control requirements are limited in scope, the Municipality is concerned that proposed restrictions may inadvertently remove the ability to require basic site elements that support health, safety, infrastructure performance, and land-use compatibility. The Municipality recommends that provincial regulations clearly distinguish between:

- Decorative or enhanced design standards, and
- Essential site features, such as landscaping, buffering, tree preservation, and soil management, which contribute to stormwater control, environmental resilience, and neighbourhood compatibility.

6. Communal Water and Wastewater Systems

The Municipality acknowledges that expanded use of communal water and wastewater systems may help facilitate development in unserved areas. However, experience across Ontario demonstrates that such systems can pose significant long-term financial, operational, and governance risks to municipalities.

Arran-Elderslie strongly recommends that any expansion of communal systems be accompanied by:

- Clear rules respecting ownership, governance, and accountability;
- Secure long-term funding mechanisms;
- Explicit safeguards to prevent future risk transfer to municipalities; and
- Protection against mandatory municipal assumption of communal systems without full funding and provincial backing.

7. Public Water and Wastewater Corporation Model

Bill 98's continued advancement of a public water and wastewater corporation model raises broader implications beyond Peel Region.

Consistent with Council's previously adopted resolution, Arran-Elderslie emphasizes that:

- Municipal autonomy and local decision-making must be preserved;
- Any future expansion of this model must be voluntary, locally supported, and fully funded; and
- Employee protections, continuity of service, and public ownership of water must remain paramount.

8. Development Charges and Municipal Sustainability

The Municipality supports exemptions for non-profit retirement homes and alignment with broader affordability objectives. However, clarity is required regarding:

- Funding offsets and transition periods; and
- The long-term implications for municipal infrastructure financing.
- Clear provincial guidance is essential to ensure infrastructure sustainability while meeting housing targets.

9. Transit, Rural Context, and Indigenous Considerations

Arran-Elderslie encourages the Province to:

- Explicitly recognize rural and specialized transit models, including door-to-door services; and
- Apply both a rural lens and an Indigenous lens to implementation and regulation development.
- Provincial standards designed for large urban centres may have unintended consequences in rural communities and must be adapted accordingly through meaningful consultation.

In summary, the Municipality of Arran-Elderslie supports the intent of Bill 98 but respectfully requests that implementation prioritize flexibility, clear transition provisions, and long-term infrastructure sustainability. Locally informed decision-making remains essential to achieving the Province's housing objectives in a way that is equitable, practical, and sustainable for communities of all sizes.

Sincerely,

Emily Dance, CAO