

May 12, 2026

The Honourable Rob Flack  
Minister of Municipal Affairs and Housing  
College Park, 17th Floor  
777 Bay Street  
Toronto, ON M7A 2J3

**\*\*SUBMITTED ELECTRONICALLY\*\***

Dear Minister:

RE: ERO Posting # 026-0300  
Proposed *Planning Act*, *City of Toronto Act*, *Building Code Act* and *Municipal Act* Changes

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On behalf of the City of Barrie, this correspondence is to provide municipal comments on ERO Posting # 026-0300, proposal changes to the *Planning Act*, *City of Toronto Act*, *Building Code Act* and *Municipal Act*.

The City shares the Province's goal of enabling faster delivery of housing and employment. With respect to the proposed changes to the Acts referenced above, we provide the following comments for ERO Posting # 026-300, as well as ERO Posting # 026-0310, # 026-0312 and # 026-0313 under separate cover.

1. Streamlining and Standardizing Official Plans, and Complementary Changes

As a single-tier municipality, the next version of the Official Plan for the City would be impacted by the proposed changes to standardize the format, structure, and land use categories. The City is not opposed to the premise of standardizing how the document is organized. The City generally supports removing duplication of policy if guidance is clear and the methods of implementation are easily accessible for the public.

2. Site Plan: Prohibit Mandatory Municipal Enhanced Development Standards and Green Building Standards

While it is appreciated that the intent is to restrict the municipality from requiring enhanced development standards at the lot level of buildings unless required for health and safety measures, the ability to voluntarily include these measures will remain. These attributes could continue to be promoted, in terms of encouraging applicants to consider these elements as part of good community building.

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Additional comment on Site Plan Control is provided by separate correspondence related to ERO Posting # 026-0310.

### 3. Minimum Lot Sizes

The City supports the initiative for a minimum lot size to ensure a variety of housing types can still be provided.

### 4. Minister's Zoning Orders (MZOs)

The City has no comment on the provision of formal notice for MZOs. The City would encourage notification to still be provided to the municipality that could be impacted by the change or revocation of a development proposal.

### 5. Upper-tier Planning Responsibilities in Simcoe County

As a single-tier municipality, the City of Barrie is not directly impacted by this proposed change.

### 6. Encumbered Parkland and Privately Owned Public Spaces (POPS)

The City recognizes and supports the Province's objective of accelerating housing delivery. As communities intensify, ready access to municipal parks and public open spaces becomes increasingly important for residents of all ages, particularly children. These spaces are essential community infrastructure that supports physical and mental well-being, active living, social connection, and a shared sense of place.

Ensuring municipalities can plan, deliver, and sustain high-quality public spaces is essential to provide healthy and economically resilient communities. In considering the proposed changes to the parkland dedication requirements, the City requests that the Province provide clear criteria and implementation direction for the developer-led process so municipalities and residents are not left significantly under-resourced with a strained public parks system, and ongoing costs that have to be downloaded to residential taxpayers.

Additional comment on parkland dedication criteria is provided by separate correspondence related to ERO Posting # 026-0312.

We appreciate the Province's continued work to modernize development approvals. The City of Barrie is committed to partnering with the Province, industry, and others to improve predictability and speed while maintaining the essential site-specific tools needed to deliver safe, functional, and complete communities.

Thank you for considering these comments. We would welcome continued discussion as the Acts, regulations and policies under Bill 98 are refined and implemented.

Yours sincerely,



Michelle Banfield, RPP  
Executive Director of Development Services

cc: Michael Prowse, CAO, City of Barrie  
Wendy Cooke, Director of Legislative & Court Services, City of Barrie