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Ministry of Municipal Affairs and Housing  
Planning and Housing Policy Branch  
13th Flr, 777 Bay St  
Toronto, ON  
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May 14, 2026

Re: Bill 98, the Building Homes and Improving Transportation Infrastructure Act Comments, ERO #026-0300.

The Region of Waterloo has reviewed the legislative and regulatory changes proposed by Bill 98, the Building Homes and Improving Transportation Infrastructure Act.

Overall, the Region supports the Province of Ontario in efforts to build housing-enabling infrastructure and new homes quickly.

At the Region of Waterloo, we share the Province of Ontario's goals in creating an environment that allows new homes to be built quickly, while also bolstering housing-enabling infrastructure, creating major transit station areas, building connected communities and, most importantly, maintaining affordability for both current and future residents.

The Region has reviewed the proposed Bill 98 and below is a summary of our comments, as submitted to ERO #026-0300.

We look forward to working together on solutions to help build new housing and transportation networks, ensuring affordability and economic prosperity in Waterloo Region and across Ontario.

As we grow to a community of more than one-million people by 2050, we need to ensure we have the right tools on the path to becoming one-million ready.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod Reiger".

Rod Reiger,  
Commissioner, Planning, Development and Legislative Services  
Region of Waterloo

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)**

**Schedule 7 of Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026**

### **Streamlining and Standardizing Official Plans**

**Proposed Change:** The Bill proposes a standardized development environment by limiting the variation of Official Plans between Ontario Municipalities.

If passed, municipalities must transition to a provincial standardized 11-chapter structure for Official Plans. The proposed structure includes a standardized set of land-use designations to be used in Official Plans, with an ability for the Minister to set out further direction on implementation and add additional designations as required. Without specific minister direction, the listed designations are the only designations permitted within Official Plans. These changes would impact the City of Cambridge, City of Kitchener and City of Waterloo first as they have been identified in the proposed changes as municipalities needing to conform by January 1, 2028. The Townships of North Dumfries, Wellesley, Wilmot and Woolwich would have an additional year to align with Official Plans.

The proposed amendments would also build on previous changes that elements of sustainable design such as enhanced development standards and green building standards cannot be included as part of site plan control. The changes would remove municipal authority from requiring certain building standards that are not required for health or safety, making green building standards voluntary for builders.

Schedule 7 provides further authority to the Minister of Municipal Affairs and Housing to establish minimum lot sizes. The province is currently consulting on a mandatory minimum lot size of 175 m<sup>2</sup> for all urban residential land that is fully serviced

### **Potential Implications:**

**Standardized Official Plans:** The proposed changes would create a standardized format for Official Plans including common land-use designations across the Region of Waterloo's seven Area Municipalities. While the intent is to provide a predictable and uniform set of rules for developers, the proposed standardization of Official Plans must provide sufficient flexibility to address local municipal concerns. Accelerated timelines, while very much welcomed, may not align with municipal budget cycles or financial planning processes.

As Official Plans are updated, policies in the Regional Official Plan related to climate change mitigation, designations such as the Protected Countryside, and some source water protection policies are not proposed to be carried forward into updated Official Plans. The Region of Waterloo, as a groundwater-dependent community, requires Source Water Protection policies and associated land-use categories to supplement the activity-based policies in Source Protection Plans. Ensuring land-use compatibility at the earliest development stages reduces uncertainty and helps avoid delays through the application of Source Protection Plan policies at subsequent approval stages. The Region also advocates for maintaining municipal authority to establish enhanced development standards, particularly for stormwater management, which is essential for safeguarding the long-term availability of high-quality municipal drinking water. Limiting this authority could adversely affect the Region's ability to protect its drinking water supply in the present and to facilitate growth into the future.

Finally, Source Protection Plans, developed under the Clean Water Act, include binding land use planning policies that municipal Official Plans are required to conform with. As such, municipalities must retain sufficient flexibility within their Official Plans to ensure conformity with these policies and to meet legislative obligations.

Therefore, it is recommended that any proposed standardization framework explicitly preserve the required municipal flexibility to address local environmental and source water protection needs.

**Removal of enhanced green standards:** The proposed changes further restrict municipalities from requiring enhanced development standards or green building standards beyond what is contained within the existing Building Code. Restricting the ability for municipalities to mandate efficient building practices which aim to improve air quality, and increase both energy efficiency and water conservation can impede efforts to reduce green house gas emissions and water consumption. While having the potential to decrease initial purchase price, operating costs of home ownership could increase as a result and impact long-term affordability for residents, with increased future retrofit cost, a potential infrastructure impact and transition costs to both utilities and municipalities.

**Mandatory minimum lot size:** The set minimum lot size would permit further density across urban areas within the Region. Areas which have traditionally restricted higher density building forms will now be required to permit more units per hectare. While beneficial to the creation of housing, the Region will require enhanced tracking and monitoring of these developments to ensure the essential Regional services are provided in tandem. For example, the ability to build higher density construction in more places could lead to higher demand for transit in areas not currently serviced by frequent transit. Projected growth forecasts will need to be re-assessed to determine the validity and assess potential changes to growth over the forecast period.

Additional growth beyond what has already been contemplated will result in necessary updates to various master plans to ensure alignment with higher growth.

[ERO #026-0302](#)

**Proposed Changes to the Municipal Act - Communal drinking water and wastewater system municipal consent requirements**

Comments from the Region of Waterloo on this ERO posting were submitted separately on April 28, 2026.