

May 13, 2026

**Subject: Comments on Bill 98 – Building Homes & Improving Transportation
Infrastructure Act, 2026 – ERO 026-0300**

To Whom it May Concern:

On behalf of **Perth County**, we thank the Ministry for the opportunity to provide comments on the proposed legislative and regulatory changes under Bill 98. The County has reviewed the proposed changes and is offering the following feedback for the Province’s consideration. We acknowledge the importance of improving efficiency and supporting housing and economic growth and we share the goal of ensuring that planning review processes are effective, transparent, and responsive. As such, we urge the Province to continue to support municipalities to maintain local policy frameworks and processes that address area specific contexts and encourage local autonomy.

Based on our review, the County has identified several areas of concern related to the proposed legislative changes and is open to further discussion with the Province to provide more clarification.

1. Official Plan Reform

Bill 98 proposes to standardize municipal Official Plans by requiring all municipalities to use the same provincially prescribed structure, including a uniform table of contents, chapters, schedules, and land use designations. It will also remove the requirement for municipalities to include climate change policies or green development standards, with the intention of avoiding duplication with the Provincial Planning Statement.

While these changes aim to streamline Official Plans, they raise concerns for Perth County, where a flexible, locally tailored policy framework is essential to reflect the County’s unique landscape, resources, and land use patterns. Standardization may limit the County’s ability to address area-specific planning contexts and could result in an increased number of Official Plan Amendments to manage site specific planning considerations.

2. Site Plan Control Reform

The Province is seeking additional feedback on proposed changes to site plan control intended to create a faster, more predictable, and cost-effective approval process. Bill 98 is proposing changes that include removal of site plan control from the Planning Act, limiting municipalities to three circulations before requiring a mandatory resolution meeting, restricting the review process to a standardized checklist focused only on public health and safety, establishing an arbitration process for applications that exceed the 60-day deadline, and requiring municipalities to create different review streams based on development

complexity. These changes represent a significant restructuring of how site design matters are reviewed and approved.

The County does not support the removal of site plan control, as it is an essential tool for ensuring safe, functional, and compatible development in Perth County. Without it, municipalities have limited ability to address key design considerations such as access, drainage, stormwater management, building placement, parking, and storage needs. County staff have noted that delays are not caused by municipal processes but often by incomplete submissions, which could be mitigated if municipalities regained the authority to require pre-consultation. The proposed standardized checklist is overly prescriptive and does not account for area-specific needs. The County recommends that the Province establish provincial regulations for developing site plan control guidelines to promote consistency while preserving professional judgment.

3. Minimum Lot Size Regulation

Bill 98 proposes giving the Minister authority to regulate minimum lot sizes in fully serviced settlement areas, setting a province-wide minimum of 175 m², which would override any larger municipal zoning requirements until local by-laws are updated. While the County supports exploring reduced lot sizes, the proposed minimum is significantly smaller than existing standards in Perth County and raises concerns relating to stormwater management, reduced permeable area, limited parking opportunities, and the inability to accommodate additional residential units. The proposal also appears to apply equally to interior and corner lots, which could compromise sightlines and traffic safety, as corner lots typically require larger dimensions to maintain proper visibility and setbacks.

Given these implications, the County is concerned that lots of this size may not be able to support desired building types, functional site design, or safe access, particularly in rural and small-town contexts. The County recommends that the Province reconsider the proposed minimum lot area and allow municipalities to establish standards that reflect local infrastructure capacity, safety requirements, and community character.

4. Minister's Zoning Orders (MZOs) Consultation

The proposed changes will remove the requirement for the Minister to provide notice when amending or revoking a Minister's Zoning Order. This shift reflects a broader pattern in recent legislative reforms that reduces opportunities for public input and limits the role of municipal councils in major land-use decisions. Given the significant impact MZOs can have on local planning frameworks, the County is concerned that eliminating notice requirements would further erode transparency and accountability.

The County recommends that any changes to an existing MZO occur only after meaningful public consultation and with the explicit consent of the host municipality. Maintaining these safeguards is essential to ensuring that local communities remain informed and involved in decisions that directly affect their land use, infrastructure, and long-term planning objectives.

5. Standardizing Parkland Requirements

The proposed regulatory changes are intended to implement Bill 23 by allowing developer-identified lands, including encumbered lands and privately owned public spaces, to count toward municipal parkland dedication requirements. Developers will also gain the ability to appeal a municipality's refusal of proposed parkland to the Ontario Land Tribunal, and municipalities will be required to make decisions within tight timelines, including issuing a decision within 20 days and forwarding appeal materials within 15 days.

These changes mean municipalities may be required to accept a broader range of lands that may not align with local Parks and Trails Master Plans or provide meaningful recreational value. Encumbered lands and privately owned public spaces may limit how parkland can be used and may require more complex legal arrangements. The County is concerned that these requirements will result in fragmented, impractical, or low-quality parkland that does not meet community needs, placing additional burdens on municipalities and reducing their ability to plan for cohesive, functional public spaces.

6. Changes to Complete Application Requirements

The Province is proposing several changes to how planning applications are submitted, reviewed, and deemed complete, with the goal of creating a more standardized and streamlined process. These changes include fully enabling electronic submission of applications and notices, eliminating the need for original hard copies, and introducing a provincially prescribed list of core and contingent studies that municipalities may require as part of a complete application. While intended to simplify and modernize the process, these reforms will significantly shift authority from municipalities to the Province by limiting the discretion local governments currently have to determine what information is necessary to properly evaluate development proposals.

Perth County staff have already invested considerable effort in creating digital platforms that effectively track applications and provide transparent information to the area municipalities and the public. A mandatory provincial submission portal may not improve efficiency and could create barriers for rural residents with limited internet access and for traditional communities that do not use modern technology. The County is also concerned that standardized study lists may not adequately address rural, agricultural, or environmental contexts and may not keep pace with evolving development trends. Municipalities require flexibility to identify appropriate studies and establish terms of reference that reflect local conditions. It is therefore recommended that the Province allow municipalities to continue using their own digital systems, retain discretion in determining required studies, and focus on providing guidelines for establishing terms of reference for commonly required studies to support consistency in study requirements and update the D-Series Guidelines to help municipalities and developers with preventing conflicts between uses.

7. Prescribed Professionals

Bill 17 created new regulation-making authority, allowing the Minister to determine which certified professionals municipalities must accept studies from when evaluating whether a planning application is complete. Professional engineers were designated in January 2026, and the Province is now considering adding other certified professionals, such as registered landscape architects, with the goal of accelerating approvals and reducing costs. This approach is intended to streamline the submission process by standardizing who is qualified to prepare required technical studies.

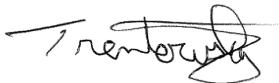
The County is generally supportive of expanding the list of prescribed professionals, including Registered Professional Planners and Landscape Architects, as long as municipalities retain the ability to set appropriate terms of reference and require peer reviews. These safeguards are essential to ensure that technical studies are accurate, context-specific, and aligned with local planning needs, particularly in rural and agricultural communities where development considerations can be more complex.

In conclusion, Perth County appreciates the Province's efforts to improve efficiency in the planning system; however, the proposed reforms collectively raise concerns about reduced municipal autonomy, diminished public engagement, and the loss of flexibility needed to address rural and agricultural contexts. Many of the changes shift decision-making authority away from municipalities and the public, while introducing standardized requirements that may not align with local infrastructure, community needs, or established planning practices.

While the County supports measures that enhance clarity and consistency, these benefits must be balanced with the need for responsive, context-specific planning tools and processes. Perth County therefore respectfully requests that the Province revise the proposed reforms to preserve meaningful municipal discretion, maintain transparent and community-based decision-making, and ensure that planning policies remain adaptable to the diverse needs of Ontario's rural, agricultural and small-town communities.

It is the desire of Perth County to work in harmony with the Province on all planning matters to find solutions together so that we can achieve growth in housing and economic development, which benefits all.

Sincerely,

W Dean 

Dean Trentowsky, Warden



Lori Wolfe, Chief Administrative Officer