



Thursday May 14, 2026

SENT VIA EMAIL AND TO ERO

Ministry of Municipal Affairs & Housing
777 Bay Street, 17th Floor
Toronto, ON
M7A 2J3

Re: Bill 98 Building Homes and Improving Transportation Infrastructure Act,
2026, (Bill 98) Township of Oro-Medonte

To Whom this may concern,

The Township of Oro-Medonte values the opportunity to provide comment with respect to Bill 98, Building Homes and Improving Transportation. Township of Oro-Medonte Council endorsed the comments contained within Staff Report DS2026-049 along with the comments included within this letter.

Please accept the following comments and recommendations contained within this letter as the Township of Oro-Medonte's formal submission.

Environmental Registry of Ontario #: 026-0300

Township of Oro-Medonte Comment

It is unclear how the proposed revisions will remove barriers to home construction when many of the terms utilized within Official Plans across the Province are currently standardized. Updates to Official Plans are required to conform to the PPS, which establish a set of terms for land uses. Such legislation is not required as the planning process already requires Provincial terms to be utilized within Official Plans.

Standardization of Official Plans may not be representative of local municipal needs.

Financial impacts are anticipated for municipalities that have recently updated or prepared new Official Plans to conform to the PPS resulting in the need to re-due Official Plans that have been recently updated.

Removal of the requirement to address green house gas emissions in official plans will significantly reduce the Township's ability to address climate considerations through planning decisions.

Changes to Parkland requirements along with the process represents a developer centric framework having the ability to force municipalities to accept certain lands despite Master Parks Recreation Plans that define municipal needs. The process will also require enhanced legal consideration resulting in expense to municipalities as various legal agreements and OLT proceedings will result. These lands may have encumbrances which may limit functionality and future parkland development.

It is unclear how the proposed changes will result in expedited home construction when the process appears to be moving towards a legal, litigious framework which typically leads to delayed land use decisions. Moreover, longer term community considerations will be impacted without measurable benefits.

Environmental Registry of Ontario #: 026-0302

Township of Oro-Medonte Comment

The Township understands that the purpose and intent of the amendments is to expedite home construction through private servicing infrastructure through a developer driven process. This approach is not a sustainable long-term model for critical wastewater infrastructure and can shift significant risk to municipalities, residents, and the environment. It represents significant risk to the Township as generally follows:

- Multiple servicing technologies across the municipality would be unsustainable if the municipality was required to take over responsibility for operation and replacement of non-municipal communal drinking water and wastewater systems.
- Unplanned residential densities serviced by non-municipal communal drinking water and wastewater systems would have an impact on municipal service levels and require additional resources.

- Financial risk associated with the need for municipalities to take over non-municipal communal drinking water and wastewater systems represents a significant tax implication to residents.
- Private communal systems often lack the lifecycle planning, capital reserves, and preventative maintenance required for multi-decade critical infrastructure. As these types of systems age, operators frequently face unplanned capital costs for major repairs or full system replacement, emergency operational spending to restore or simply maintain compliance and environmental remediation costs after system failures. Furthermore, when private operators become insolvent or systems fail, municipalities inherit the liability without adequate financial protections.
- Homeowners connected to communal systems often experience higher servicing fees due to limited economies of scale, large, unpredictable cost increases when systems deteriorate and special assessments to cover emergency repairs. These systems can create long-term affordability challenges for residents and can leave users paying more for less reliable service.
- Private communal systems create a fragmented network of small facilities that lack economies of scale, standardized technology, coordinated asset management and integrated monitoring. This results in higher per-unit treatment costs and reduced long-term efficiency compared to centralized municipal systems.

This approach is not recommended due to the above noted concerns as emphasis needs to be placed on municipal-wide servicing approaches to support growth in a co-ordinated manner rather than scattered growth supported by various communal systems. The amendments appear to have the effect of requiring municipalities to “consent” to such arrangements and accept the associated risks.

These types of systems require consistent and strong technical capacity, adequate funding, and robust compliance practices, which many small operators and municipalities already struggle with. Industry organizations such as AWWA note that small water and wastewater systems often face significant challenges related to funding, staffing, technical capacity, and regulatory compliance. Likewise, OMWA consistently emphasizes the need

for strong municipal oversight, sustainable funding, and long-term asset management for water and wastewater systems. These principles highlight the inherent risks of private small communal wastewater systems, which often lack the financial stability, technical capacity, and compliance frameworks required for long-term sustainability.

Environmental Registry of Ontario #: 026-0304

Township of Oro-Medonte Comment

The Township of Oro-Medonte is undertaking a Growth Management Strategy to provide local information related to the growth needs/forecasts for the Township. The strategy will need to consider the new guidelines which are intended to implement Provincial Planning Statement 2024.

Environmental Registry of Ontario #: 026-0305

Township of Oro-Medonte Comment

Proposed changes are supported by the Township as the amendments are in-line with the Township's modernization processes utilizing digital platforms for digital circulations, application submissions, plans submissions and notices.

Environmental Registry of Ontario #: 026-0309

Township of Oro-Medonte Comment

The proposed amendments represent a shift to a voluntary developer approach for enhanced measures for standards such as Low Impact Development (LID). These types of engineering standards are often required to provide alternative environmentally sound and sustainable solutions.

The proposed amendment will reduce the Township's ability to require such environmental solutions to expedite home construction. Approaches for enhanced standards reflect the local environment and should be left to the discretion of the municipality to ensure that service levels are maintained and costs reduced.



Environmental Registry of Ontario #: 026-0310

Township of Oro-Medonte Comment

The site plan approval process is an important instrument for municipalities to ensure that site development is completed in a manner that considers on-site design and mitigates impacts to neighbours.

Streamlining through a municipal process could result in more timely approvals if there is a suitable stage during the development process to incorporate site development considerations.

However, legislating a standard checklist of studies may not be representative of local/neighbourhood situations/site conditions requiring attention. The Township of Oro-Medonte has regular communications with developers and their consultants as part of the development process. An arbitration process may be a useful tool to move matters forward but would require additional resources and funding. Such a process should be facilitated by the Township and funded by the developer to ensure that it is a last resort and that disputes are resolved through regular communications and the municipal process, which does not require legislative changes.

Environmental Registry of Ontario #: 026-0311

Township of Oro-Medonte Comment

A proposed legislative minimum lot size might present an opportunity to expedite the creation of residential lots within urban areas. However, consideration needs to be given to servicing capacity (water/sanitary), community-built form and the soft services to support smaller lots on Urban Lands, which may not represent immediate concerns in bigger cities and towns, but is of paramount consideration within smaller municipalities such as Oro-Medonte that do not have abundant municipal infrastructure to support high density development.

Prescribed smaller lot sizes may also limit accessory uses for ARUs or create service level and functional issues related to snow storage for northern climates.

Environmental Registry of Ontario #: 026-0312

Township of Oro-Medonte Comment

The Township understand and recognize the value of partnerships in the provision of public/private spaces to serve the park and recreation needs of a community. Oro-Medonte consists of many examples of public/private partnerships in the provision of parkland/recreation.

The concept of Privately Owned Public Spaces raises questions surrounding service levels, acceptance of liability and maintenance which requires considerable legal review.

The proposed legislation appears to be administratively difficult and has the potential to lead towards litigation through OLT appeals. Therefore, it is unclear how the proposed legislation will “speed up approvals”.

Environmental Registry of Ontario #: 026-0313

Township of Oro-Medonte Comment

The Township of Oro-Medonte is supportive of providing clear study requirements to ensure predictability and consistency to assist the developer and residents through the planning process. Pre-consultation has been a useful process to clearly articulate requirements for a complete application and correspondence to this effect provides documentation confirming application requirements.

A standardized list might be useful as a guiding document, but a “one size fits all” approach can be problematic when dealing with unique situations.

Therefore, the Township is receptive to reviewing and commenting on the standardized lists once made available.

Environmental Registry of Ontario #: 026-0314

Township of Oro-Medonte Comment

The proposed legislation may speed up application submissions and obtain completion requirements quickly. However, submission materials would still require review and comment to ensure accepted standards are met, which may not lead to expedited approvals.

Environmental Registry of Ontario #: 026-0315

Township of Oro-Medonte Comment

Secondary Plans are instrumental to community planning and the process to coordinate multiple disciplines into community planning should not be altered by a differing framework. Flexibility should be provided to municipalities to determine whether a separate Secondary Plan is beneficial and such flexibility should be facilitated within the guiding policies of local Official Plans.

Sincerely,



Brent Spagnol, Director of Development Services
Township of Oro-Medonte

