



Thursday, May 14, 2026

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RE: ERO 026-0300 - Bill 98: Building Homes and Improving Transportation Infrastructure Act, 2026

The Western Ontario Wardens' Caucus (WOWC) appreciates the opportunity to provide comments on ERO 026-0300 and associated postings related to Bill 98, the *Building Homes and Improving Transportation Infrastructure Act, 2026*.

The WOWC represents 15 upper- and single-tier municipalities across Western Ontario, encompassing 117 municipalities, more than 1.6 million residents, and over 250,000 businesses. Western Ontario municipalities play a critical role in supporting Ontario's economic growth through agriculture, manufacturing, energy, transportation, and housing development. As communities continue to grow, municipalities remain committed to working collaboratively with the Province to increase housing supply, streamline approvals, and deliver the infrastructure needed to support sustainable growth.

WOWC recognizes and supports the Province's objective of accelerating housing development and improving infrastructure coordination. Bill 98 and the associated Environmental Registry of Ontario postings represent a significant restructuring of Ontario's planning and infrastructure framework. Given the breadth of proposed changes, it is important that implementation maintain sufficient municipal flexibility, recognize the realities of rural and regional municipalities, and ensure long-term financial and infrastructure sustainability.

General Comments

Municipalities across Western Ontario continue to experience ongoing and substantial legislative and regulatory change within Ontario's planning framework. While the Province's focus on housing supply is understood and supported, the pace and volume of reforms have created increasing uncertainty for municipalities responsible for implementing these changes on the ground.

The cumulative effect of the many changes to the *Planning Act*, *Development Charges Act*, *Municipal Act*, *Building Code Act*, and related regulations has resulted in significant administrative pressures for municipal planning, engineering, finance, and infrastructure departments.

Municipalities require greater implementation clarity, realistic transition timelines, and sufficient flexibility to adapt provincial policy direction to local conditions.

Western Ontario municipalities operate within diverse rural, agricultural, small urban, and regional contexts that differ significantly from large metropolitan municipalities. Provincial reforms should continue to recognize these differences and preserve municipalities' ability to plan comprehensively for growth, infrastructure, environmental protection, and financial sustainability.

Official Plans and Upper-Tier Planning

WOWC recognizes the Province's interest in improving consistency and readability within Official Plans. The proposed standardized Official Plan framework raises concerns regarding the loss of flexibility necessary to effectively address varied local and regional planning contexts across Ontario.

Upper-tier municipalities play an important role in coordinating growth management, infrastructure planning, servicing strategies, agricultural protection, natural heritage systems, and intermunicipal planning matters. Existing county-wide planning frameworks in Western Ontario already provide an extremely effective policy structure for coordinated, efficient, and streamlined approaches that reduce duplication between upper- and lower-tier municipalities while supporting provincial objectives.

WOWC is concerned that overly prescriptive requirements related to standardized chapters, schedules, and land use designations may unintentionally undermine effective regional planning systems that are already functioning efficiently.

WOWC recommends that the Province:

- Maintain flexibility for upper-tier and integrated county-wide Official Plan models;
- Recognize the distinct role of upper-tier municipalities in coordinating regional growth and infrastructure;
- Avoid overly rigid limitations on land use designations that do not reflect rural and small urban settlement patterns;
- Allow municipalities flexibility in how planning policies are organized and implemented, such as through issuance of provincial guidance versus regulations; and
- Provide sufficient implementation timelines and funding support for required Official Plan updates.

Site Plan Control and Enhanced Development Standards

WOWC is concerned with proposals that would significantly limit or eliminate Site Plan Control as a municipal planning tool.

Site Plan Control remains an important mechanism for municipalities to review and address matters such as drainage, stormwater management, servicing, access, parking, landscaping, compatibility, and public safety. In many rural and small urban municipalities, Site Plan Control represents one of the primary tools available to ensure development proceeds in a safe, coordinated, and sustainable manner.

Municipalities across Western Ontario have already implemented efficient review processes, including delegated approvals, tiered review streams, digital submissions, and coordinated pre-consultation practices. Further limiting municipal authority in this area risks reducing municipalities' ability to address site-specific issues while offering limited potential gains - and even result in potential reductions - to approval efficiency and certainty.

WOWC is also concerned that proposed restrictions on "enhanced development standards" may unintentionally limit municipalities' ability to implement important environmental protection and climate resilience measures, including tree preservation, erosion and sediment control, stormwater management practices, and agricultural mitigation measures.

WOWC recommends that the Province:

- Retain Site Plan Control as a municipal planning tool;
- Clarify that municipalities may continue to require environmental protection and stormwater management measures necessary to implement Provincial Planning Statement requirements and address site specific and surrounding influences;
- Avoid establishing a standardized checklist and allow professional staff to determine what requirements are appropriate for development review;
- Clearly distinguish between purely aesthetic design requirements and functional environmental protection measures;
- Restore municipal authority to require pre-consultation processes where appropriate; and
- Continue allowing municipalities flexibility to structure approval processes in a manner appropriate to local conditions.

Complete Application Requirements and Prescribed Professionals

WOWC supports efforts to improve consistency and predictability regarding complete application requirements. However, municipalities must retain the ability to request information necessary to evaluate local infrastructure, environmental, agricultural, servicing, and compatibility considerations.

Municipalities are concerned that overly prescriptive provincial requirements may reduce opportunities to identify technical issues early in the process, potentially increasing delays, refusals, and appeals later in the approvals process.

Similarly, while recognizing the important role of qualified professionals, municipalities should retain the ability to review and assess the adequacy of submitted studies and supporting materials.

WOWC recommends that the Province:

- Maintain municipal flexibility to request site-specific technical information where warranted;
- Allow municipalities to establish terms of reference for technical studies;
- Ensure municipalities retain authority to identify deficiencies in submitted materials; and
- Work collaboratively with municipalities to modernize and standardize pre-consultation and submission processes, while ensuring consideration for residents with limited internet access and communities that do not use modern technology.

Minimum Lot Sizes

WOWC is concerned with the proposed province-wide minimum residential lot size framework. Municipalities across Western Ontario vary significantly in terms of settlement structure, infrastructure capacity, servicing availability, transportation systems, and growth patterns. A uniform minimum lot size standard does not appropriately reflect these differences and may create unintended consequences in smaller rural and fully serviced communities.

Lot size standards are closely connected to servicing capacity, drainage, parking, built form, infrastructure requirements, and long-term community planning objectives. Municipalities require flexibility to establish standards appropriate to their local context.

WOWC recommends that the Province:

- Avoid implementing a single province-wide minimum lot size standard;
- Allow municipalities flexibility to establish standards appropriate to local servicing and infrastructure conditions;
- Consider density-based approaches rather than rigid lot size thresholds; and
- Recognize the differences between large urban centres and smaller rural communities.

Water and Wastewater Servicing

WOWC recognizes the Province's objective of facilitating housing development through alternative servicing approaches. However, municipalities remain concerned with proposals that would require approval of communal water and wastewater systems where prescribed criteria are met.

Servicing decisions are fundamentally tied to long-term growth management, infrastructure planning, environmental protection, source water protection, asset management, and municipal financial sustainability. Municipalities must retain the ability to align servicing decisions with planned growth areas and long-term infrastructure investments.

There are also concerns regarding:

- Long-term operational and financial liability;
- Future municipal assumption of failing systems;
- Groundwater and environmental protection;
- Increased administrative oversight requirements; and
- Potential conflicts with planned municipal infrastructure systems and growth planning.

WOWC recommends that the Province:

- Maintain municipal discretion regarding approval of communal servicing systems;
- Consider an "opt-in" framework for municipalities willing to permit communal servicing;
- Ensure strong lifecycle funding and financial assurance requirements;
- Maintain municipal authority to coordinate servicing decisions with growth management objectives; and
- Continue prioritizing municipal servicing as the preferred servicing model (i.e. not mandate the use of communal servicing systems in municipalities with existing or planned municipal systems that can accommodate their forecasted growth).

Development Charges and Infrastructure Funding

WOWC continues to advocate for sustainable and predictable municipal infrastructure funding tools. Municipalities recognize the Province's interest in reducing barriers to housing development. However, reductions or exemptions to Development Charges create significant implications for municipal infrastructure financing and long-term asset management.

Municipalities require certainty that provincially mandated exemptions or reductions will be fully offset through sustainable provincial and federal funding programs. Housing growth must be accompanied by the infrastructure necessary to support that growth, including roads, bridges, water, wastewater, transit, emergency services, recreation, and community infrastructure.

WOWC recommends that the Province:

- Ensure municipalities are fully compensated for provincially mandated Development Charge exemptions or reductions;
- Maintain predictable and sustainable infrastructure funding tools;
- Recognize the importance of municipal asset management plans (AMPs) for ensuring the long-term fiscal sustainability of infrastructure investments and support municipalities that have put achievable and well funded AMPs place;
- Recognize the infrastructure financing realities facing rural and regional municipalities; and
- Align housing growth objectives with long-term infrastructure investment planning.

Conclusion

WOWC and its member municipalities remain committed to working collaboratively with the Province to support housing growth, infrastructure investment, and economic development across Ontario.

As the Province advances housing and infrastructure reforms, it is essential that implementation maintain an appropriate balance between streamlining approvals and preserving municipalities' ability to responsibly plan for growth, infrastructure, environmental protection, and long-term financial sustainability.

There are numerous best municipal practices already being implemented in many WOWC municipalities to streamline development approvals and support the creation of housing, while also ensuring fiscal, environmental and social sustainability. As such, the WOWC is very concerned that a number of the Provincial changes, as currently proposed, would unintentionally undermine or limit some of these current best practices.

We would therefore strongly encourage the Province work with the WOWC and its members to further review and consider these various best practices as potential preferred models/approaches for broader implementation across the Province, and ensure they will continue to be supported by any proposed changes.

Western Ontario municipalities are prepared to continue partnering with the Province to deliver housing and infrastructure solutions that are practical, sustainable, and reflective of the diverse realities of communities across Ontario.