



TO: Ministry of Municipal Affairs and Housing
FROM: The Corporation of the Township of Wellington North
DATE: May 14, 2026
RE: 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)

The Township of Wellington North is located in the north-western part of the County of Wellington and offers rural and urban communities throughout the municipality. Development is primarily focused on the Townships two urban centres, Arthur and Mount Forest which are each serviced by municipally operated water and wastewater systems.

The Township is committed to steady and orderly growth while protecting Prime Agricultural lands. In support of this, the Township developed a Community Growth Plan in 2018 with a follow up Growth Management Action Plan in 2024. The key implementations from these plans directly lead to strong housing development activity over the 2021 to 2023 period, averaging 194 new units annually. During that three-year period, the Township issued building permits for the construction of over 580 housing units, which was more than the total building permits issued for new housing units over the previous 15 years (2006 to 2020).

Township Staff have reviewed Bill 98 – Building Homes and Improving Transportation Infrastructure Act, 2026 as well as comments provided by municipal consultants, neighbouring municipalities and the County of Wellington.

The Township endorses the comments provided in County of Wellington Planning Committee Report dated May 14, 2026, regarding Bill 98 – Building Homes and Improving Transportation Infrastructure Act, 2026 (attached), with special emphases on:

Key Areas	Comment
Consultation on Upper-Tier Official Plans, Secondary and Area Specific Policies ERO No.: 026-0300	Should the Province pursue new official plan standardization, the County supports creating a more flexible structure for upper-tier municipalities with planning responsibilities, like Wellington. Flexibility is necessary, particularly when the upper-tier official plan functions as a lower-tier official plan. It is noted that the County will require the ability to use both broader 'community area' designations and specific land use designations to effectively implement land uses in our Member Municipalities which rely on the County plan.

	<p>The County maintains numerous site-specific local policy areas across its seven Member Municipalities. While partly a result of historic land use decisions, this approach has effectively addressed the unique needs of Member Municipalities within the County's Official Plan framework. These policies are navigated through specific municipal chapters and are a flexible model that should be preserved in the new official plan framework. A recent example is County OPA 123, which established a local policy area applying to several greenfield sites in Mount Forest designated as "Future Development". This policy identified a land amount that aligned with the County's Land Needs Assessment (LNA) for the Township and removed the need for a site-specific OPA. As a result, these lands could be brought online through a municipally initiated rezoning process once local infrastructure studies were complete. This approach addressed LNA requirements while enabling the municipality to identify the most appropriate areas for growth.</p> <p>The proposed official plan framework lacks a 'Future Development' or equivalent holding designation for urban lands awaiting servicing or a demonstrated need. Many rural communities require such a designation to protect the development integrity of these lands. The Province should maintain this type of land use designation as part of the new official plan framework.</p>
<p>Municipal Consent Requirements for Communal Services</p> <p>ERO No.: 026-0302</p>	<p>The proposed amendments to Section 93 of the Municipal Act establish a broad framework and regulation-making authority to encourage greater adoption of non-municipal communal water and wastewater systems.</p> <p>The County has concerns regarding the lack of detail in this proposal, which establishes a framework to compel municipal consent for communal services if certain conditions are met. This is a concern because municipalities are typically required to enter into Municipal Responsibility Agreements, which dictate financial, and ownership requirements should these systems default. Details regarding the 'criteria and conditions' required to compel municipal consent should be provided as part of consultation related to legislative changes enabling these private communal servicing arrangements.</p>
<p>Prescribe Minimum Lot size</p>	<p>Through the legislation and accompanying regulations, the Province proposes to establish a prescribed minimum lot area</p>

<p>ERO No.: 026-0311</p>	<p>of 175 sq.m (approximately 1,900 sq.ft) for all parcels of serviced urban residential land outside of the Greenbelt. Changes would also render zoning regulations for lot frontage and depth inapplicable if they result in a requirement for a larger lot area.</p> <p>The proposed minimum lot area is very small and is not associated with a specific building type. As a comparison, the Township of Centre Wellington's R3 zone permits a minimum lot area of 190 sq m associated with a street townhouse. Based on our understanding the remaining provisions of the zoning by-law, such as permitted uses and building setbacks, would continue to apply. This would result in smaller homes on smaller lots, which the County views as a positive outcome. However, what is more likely to result are requests to vary other zoning regulations. The County supports lot areas associated with a specific building type and appropriate setback regulations.</p> <p>The County also cautions that the standardization of urban lot sizes may not be appropriate in all contexts. Communities of the County have established a different built form than urban areas of the GTA and the proposed lot area would be a significant departure from existing established neighbourhoods in Wellington.</p>
<p>Impacts on Source Water Protection</p> <p>ERO No.: 026-0300 ERO No.: 026-0310 ERO No.: 026-0313</p>	<p>The proposed changes raise various concerns related to source water protection in Ontario.</p> <p>The suite of changes proposed to the Planning Act, including Official Plan (OP) standardization, the removal of municipal authority to require sustainable design through site plan control, and the streamlining of study requirement, is removing essential implementation pathways for source water protection. It is recommended that the Province consult with Source Protection Authorities and affected municipalities to ensure Source Protection Plan policies, as currently approved, remain in legal effect.</p> <p>Regarding non-municipal communal water systems, it remains unclear if the Province has fully evaluated the source water protection requirements for these new systems. As these communal systems will serve the public, it is recommended they be held to the same rigorous standards as municipal drinking water systems.</p>

	As noted earlier, to ensure comprehensive risk management, Drinking Water Threat Disclosure reports and water balance assessments should be included in the list of approved reports and studies permitted under municipal Official Plans.
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Respectfully submitted,


Darren Jones, CBCO
Chief Building Official

cc. Council of the Corporation of the Township of Wellington North