



Submission from the Masonry Council of Ontario

Re: ERO Notice 026-0300 — Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes under Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026

The Masonry Council of Ontario appreciates the opportunity to provide comments on ERO Notice 026-0300 regarding proposed legislative changes under Bill 98, the *Building Homes and Improving Transportation Infrastructure Act, 2026*. The notice seeks feedback on proposed changes to the *Planning Act, City of Toronto Act, 2006, Building Code Act, 1992, and Municipal Act, 2001*, with the objective of supporting housing, economic, and infrastructure development while creating greater certainty in the approvals process.

The masonry industry supports the Province's overall objective of streamlining government processes, reducing unnecessary duplication, and accelerating the construction of new homes across Ontario. Ontario urgently needs more housing, and improvements that make planning and approvals systems more predictable, consistent, and efficient can help deliver homes faster and at lower cost. MCO supports efforts to standardize processes where municipal variation has created unnecessary delay, uncertainty, and expense for builders, trades, suppliers, and ultimately homebuyers.

At the same time, MCO urges the Province to ensure that streamlining does not unintentionally result in a lower standard of construction, reduced durability, or the use of inferior building materials in new homes. Housing affordability must be understood not only as the upfront purchase price of a home, but also as the long-term cost of ownership, maintenance, repair, energy use, resilience, and replacement. A home that is built with less durable materials can impose higher costs on homeowners, municipalities, insurers, and future generations.

MCO is particularly concerned that reducing municipal authority over certain design and development standards may encourage a race to the bottom in material selection. The ERO notice states that Bill 98 would remove references to "sustainable design" from site plan control, clarify that zoning cannot be used to require sustainable elements, and provide that mandatory green building and construction standards cannot be imposed by municipalities, including through site plan control. While MCO understands the Province's intention to reduce jurisdictional variation and remove overlapping local requirements, these changes must be accompanied by a clear provincial framework that maintains high-quality, durable, and sustainable building outcomes.

MCO can be part of the solution by working with the Province and industry partners to help inform practical, performance-based standards that prioritize durability, resilience and long-term value in Ontario's housing stock.

MCO agrees that the patchwork of municipal green standards across Ontario has created challenges. Different municipal requirements can increase design costs, complicate approvals, and make it harder for builders to apply consistent practices across jurisdictions. In that respect, provincial action to standardize expectations is necessary and appropriate. However, MCO does not believe that the removal of municipal green standards should mean that green building standards are abandoned altogether.



Instead, MCO encourages the Province to uphold its commitment to establishing standardized, province-wide green building standards that are clear, predictable, practical, and consistently applied. These standards should be developed in consultation with industry and should recognize the full life-cycle performance of building materials, including durability, service life, maintenance requirements, resilience, reuse potential, recyclability, and end-of-life impacts. A “cradle-to-cradle” approach would allow Ontario to promote sustainability without relying on a fragmented municipal-by-municipal system.

MCO also recommends that any provincial green building framework be performance-based and material-neutral. Standards should not favour short-term cost savings over long-term building performance. Durable materials that can contribute to long service life, lower maintenance, resilience, and reduced replacement over time should be appropriately recognized. In MCO’s view, masonry products and systems can play a significant role in supporting high-performing, resilient, and sustainable communities when evaluated on a full life-cycle basis.

Durable solutions such as masonry, concrete block, brick, and stone are manufactured in Ontario, supporting the objectives of the Buy Ontario Act and contributing directly to the provincial economy. In contrast, the origin and manufacturing standards of some less durable alternative materials are not always clear, which can limit their economic and supply chain benefits to Ontario.

The Province should also consider the broader public interest in the quality of Ontario’s future housing stock. New homes built today will shape communities for decades. Decisions that reduce construction quality or shorten building life will not only affect individual homeowners; they will also affect neighbourhood character, climate resilience, infrastructure demand, waste generation, and long-term affordability. The objective should be to build more homes faster, but also to ensure that those homes are durable, sustainable, and capable of serving Ontarians over the long term.

MCO recommends that the Province:

1. Proceed with planning and approvals streamlining where it improves predictability, consistency, and speed in housing delivery.
2. Avoid regulatory changes that could unintentionally lower the quality, durability, or long-term performance of new homes.
3. Establish a clear provincial green building standard to replace fragmented municipal requirements, rather than eliminating sustainability expectations altogether.
4. Ensure that provincial standards assess materials on a full life-cycle, cradle-to-cradle basis, including durability, maintenance, reuse, recyclability, resilience, and end-of-life impacts.
5. Consult with material suppliers, trades, builders, designers, municipalities, and technical experts, including the masonry industry, before finalizing any province-wide standards.
6. Ensure that efforts to reduce cost and delay do not undermine consumer protection, housing quality, or Ontario’s long-term climate and infrastructure objectives.

In conclusion, the Masonry Council of Ontario supports the Province’s goal of building more homes faster and creating a more predictable development approvals system. However, speed must not come at the expense of quality, durability, or sustainability. MCO urges the Province to pair planning reform with a strong, standardized provincial approach to green building that eliminates unnecessary municipal



variation while preserving high-performance outcomes for Ontario's housing stock. By doing so, Ontario can advance housing affordability, reduce red tape, and ensure that the homes built today remain strong, resilient, and sustainable for generations to come.