



Date: May 14, 2026

The Honourable Rob Flack  
Minister of Municipal Affairs and Housing  
777 Bay Street, 2nd Floor  
Toronto, ON M7A 2J3

Dear Minister Flack:

**Re: ERO 026-0300 Submission – Rural and Municipal Impacts of Proposed Planning Act Amendments under Bill 98**

On behalf of the Council of the Township of Mapleton, we appreciate the opportunity to comment on Bill 98, *Building Homes and Improving Transportation Infrastructure Act, 2026*, and the province's continued efforts to modernize Ontario's land use planning system. Council supports the objective of increasing housing supply and improving approval timelines; however, the proposed amendments must also preserve the flexibility rural and small municipalities need to manage growth responsibly.

As drafted, Bill 98 introduces sweeping changes to the *Planning Act* and related statutes that will have disproportionate and unintended impacts on rural and small municipalities, where development patterns, servicing constraints, and fiscal capacity differ significantly from large urban centres.

**1. Loss of Municipal Planning Authority**

Bill 98 substantially limits municipal discretion across multiple planning tools, including:

- Significant curtailment of site plan control to matters strictly related to health and safety;
- Elimination of municipal authority to require environmental or sustainable design standards through planning or by-law mechanisms;
- Standardization of official plans, land use designations, and application requirements; and
- Expanded appeal rights and reduced ability to refuse or tailor parkland dedication and development conditions.

For rural municipalities, these tools are not administrative burdens—they are essential mechanisms to manage growth responsibly in areas that are often unserved, environmentally sensitive, agriculturally productive, or fiscally constrained.

## **2. Impacts on Rural Infrastructure and Municipal Finances**

Proposed reductions and exemptions related to development charges, combined with restrictions on planning conditions, shift a greater share of infrastructure and lifecycle costs to municipalities. Unlike large urban municipalities, rural communities:

- Have limited tax bases and higher per-unit infrastructure costs;
- Rely heavily on development charges to fund roads, drainage, water, and wastewater where expansion occurs; and
- Lack economies of scale to absorb provincial policy shifts without service-level impacts or increased tax burdens on existing residents.

While housing affordability is a shared goal, reduced municipal cost-recovery without matching, long-term funding tools risks undermining the very infrastructure required to support new development.

## **3. Standardization of Official Plans and Rural Context**

The move toward provincially standardized land use designations and official plan structures may improve consistency, but it also risks erasing local characteristics. Rural municipalities must balance growth with:

- Agricultural viability and minimum separation distances;
- Aggregate, natural heritage, and water resource protection;
- Low-density settlement patterns and private servicing limitations; and
- Distinct community character shaped by geography rather than market intensity.

A uniform framework designed primarily for growth municipalities does not adequately reflect these realities.

## **4. Need for Differentiated Treatment of Rural Communities**

Council respectfully submits that the Planning Act must recognize that “one-size-fits-all” planning policy does not automatically produce equitable or effective outcomes. Rural municipalities require:

- The ability to retain enhanced site plan and design controls where justified by environmental, servicing, or agricultural considerations;
- Authority to impose locally appropriate development standards that exceed provincial minimums;

- Flexibility to structure official plans and secondary policies that respond to local conditions; and
- Protection against mandatory policy overrides that do not align with rural growth patterns.

Bill 98's proposed framework reduces municipal planning to compliance rather than place-based decision-making.

- Potential loss of rural character and community identity if lot sizes become more urban in form and appearance.
- Reduced green space, outdoor amenity area, and separation between dwellings, with possible impacts on livability and neighbourhood design.
- Additional pressure on roads, parking, snow storage, and other local infrastructure, particularly where development charges and servicing tools are limited.
- Need for municipal flexibility to determine where and in what proportion smaller lots are appropriate within new development.

The primary concern is not the concept of smaller lots itself, but the risk that a provincially imposed minimum lot size may not reflect the character, servicing capacity, and growth expectations of rural and village communities.

## 5. Requested Considerations and Amendments

Council respectfully requests that the province consider the following adjustments to Bill 98 and related regulations:

1. **Explicit rural carve-outs or opt-in provisions** allowing rural and small municipalities to retain broader planning authority;
2. **Recognition of unserviced and partially serviced communities** as distinct from fully urbanized areas;
3. **Authority for municipalities to exceed provincial minimum standards**, where supported by Council policy and public interest;
4. **Enhanced consultation with rural municipalities** prior to finalizing regulations that further restrict local planning tools; and
5. **Alignment of fiscal reforms with planning responsibilities**, ensuring municipalities are not required to facilitate growth without adequate funding mechanisms.



## 6. Conclusion

Rural municipalities play a critical role in Ontario's economic, environmental, and agricultural future. Achieving housing objectives must not come at the expense of local governance, long-term infrastructure sustainability, or community resilience.

Council respectfully urges the province to recalibrate Bill 98 to ensure that rural communities are treated not as scaled-down urban centres, but as distinct planning environments requiring local discretion and tailored solutions.

Thank you for your consideration of these comments. We would welcome further dialogue with Ministry staff to discuss the rural municipal implications of these reforms.

Respectfully,

Michelle McCabe, MPlan, RPP Candidate  
Planning & Development Manager