



Development Services
Public Works
Halton Region
1151 Bronte Road
Oakville, ON L6M 3L1

May 14, 2026

Planning and Housing Policy Branch
Ministry of Municipal Affairs and Housing
13th Floor, 777 Bay Street
Toronto, ON M7A 2J3

RE: Bill 98 Consultation and ERO Notices 026-0300, 026-0304, 026-0309, 026-0310, 026-0311, 026-0313, 026-0314, 026-0315

To Whom It May Concern:

Halton Region staff appreciate the opportunity to provide comments on the changes proposed through Bill 98 (re: *the Building Homes and Improving Transportation Infrastructure Act, 2026*), which builds on previous legislative and regulatory changes introduced through Bill 17 (re: *Protect Ontario by Building Faster and Smarter Act, 2025*) and Bill 60 (re: *Fighting Delays, Building Faster Act, 2025*). Regional staff thank the Ministry of Municipal Affairs and Housing (MMAH) for its continued efforts to advance housing supply and support the delivery of housing-enabling infrastructure.

Although Halton Region is an upper-tier municipality without planning responsibilities under the *Planning Act*, it plays an important role as a commenting agency that is also responsible for delivering and implementing critical regional infrastructure and services that enable local municipalities to meet their growth objectives and housing targets under the *Municipal Act*. These responsibilities include water and wastewater infrastructure, regional road infrastructure, source water protection, and waste management, among others.

While the objectives of Bill 98 are clear, it is recommended that any changes continue to support the Region's ability to effectively coordinate with its local municipalities to deliver regional infrastructure and services in a timely, efficient, and financially sustainable way. Comments are provided on the following Notices associated with Bill 98 posted on the Environmental Registry of Ontario (ERO):

A. EROs #026-0300 and #026-0311;

Regional Municipality of Halton

HEAD OFFICE: 1151 Bronte Rd, Oakville, ON L6M 3L1

905-825-6000 | Toll free: 1-866-442-5866

- B. ERO #026-0304;
- C. ERO #026-0309;
- D. ERO #026-0310;
- E. ERO #026-0313;
- F. ERO #026-0314; and
- G. ERO #026-0315.

Halton Region Staff Comments

A. EROs #026-0300 and #026-0311 (re: Proposed Planning Act Changes and Minimum Lot Size Regulation)

The value of simplifying and standardizing official plans to reduce the overall length and improve consistency is recognized. In this regard, it is important that official plans continue to include policies that facilitate and enable coordination between lower- and upper-tier municipalities regarding existing and planned regional infrastructure. This ensures existing and long-term capacity of regional infrastructure and services such as regional water and wastewater, transportation, and waste management systems align with municipal growth.

With respect to minimum residential lot sizes, it is noted that the proposed minimum lot size of 175 m² represents a substantial reduction from existing standards across the local municipalities in Halton. While existing standards vary, typical minimum lot size is around 400 m² in low density established neighbourhoods across Halton. In these established or built-out areas, the introduction of smaller lot sizes could have the potential to increase servicing pressures. Currently, staff actively collaborate with the Local Municipalities on regional initiatives such as the annual Enhanced Growth Monitoring exercise, as well as providing input on matters of regional interest through the local growth management process. While this will enable the Region to pre-emptively assess any potential future impacts on the Region's system capacity, it should be recognized that the Region will need to plan for, finance and deliver any necessary upgrades to support smaller lot sizes across the system, particularly in existing built out areas.

B. ERO #026-0304 (re: Draft Projection Methodology Guideline)

Regional staff note the improved clarity in the revised draft Projection Methodology Guideline, particularly with respect to referencing the use of 'major' Ontario Population Projection updates released by the Ministry of Finance every five years coinciding with the Census. This clarification will improve overall consistency and alignment amongst the local municipal population and employment forecasts within Halton, regardless of when the individual municipal reviews are initiated. The improved alignment across municipal

Regional Municipality of Halton

HEAD OFFICE: 1151 Bronte Rd, Oakville, ON L6M 3L1

905-825-6000 | Toll free: 1-866-442-5866

forecasts will also enable more effective coordination of regional infrastructure planning, delivery, and implementation.

C. ERO #026-0309 (re: Proposed Regulation to Prohibit Mandatory Enhanced Development Standards)

Regional staff request that any legislative or regulatory changes prohibiting mandatory enhanced development standards clearly identify which enhanced development standards are intended to be restricted and distinguish them from existing development standards related to health, safety, and environment protection that are essential and remain in force.

Clarity could include establishing a clear definition of “enhanced development standards” within the regulation, identifying a specific list or categories of standards that would be exempt from the prohibition, and confirming that municipalities can continue to enforce existing standards necessary to address local and regional matters related to health, safety, and environmental protection (e.g. servicing constraints, hazardous conditions, etc.).

From a regional perspective, clarity is important to ensure there are no unintended limitations on the Region’s ability in its role as a commenting agency to review and require compliance with municipal standards related to regional interests such as regional roads, source water protection, access or connection to regional services (e.g. water and wastewater, regional roads, etc.), and waste management services. Clarity will help to ensure that the Region can effectively plan, deliver, and implement regional infrastructure and services, which in turn can contribute to achieving the provincial objective of building housing faster.

D. ERO #026-0310 (re: Proposal to reform Site Plan Control)

Regional staff acknowledge the potential benefits of streamlining the site plan review process. Site plan control enables applicants to coordinate requirements efficiently with municipalities and commenting agencies. In the absence of site plan control, this would have to be completed through separate, independent processes to ensure compliance with municipal standards and guidelines for required delivery of critical infrastructure.

Site plan control also supports securing required land dedications for Regional transportation infrastructure as a condition of development, which directly supports housing growth and development. The Region would request that any changes to site plan control consider preserving this function to avoid unintended consequences such as the potential for increases in long-term infrastructure acquisition costs.

With respect to a proposed municipal arbitration process, it is noted that commenting agencies rely on the completeness of submissions and timely resubmissions of revisions from applicants in order to undertake a fulsome technical review within the prescribed statutory timelines (e.g. 60-day review timeline).

If a timely municipal decision is the primary objective, measures that promote complete and high-quality submissions that meet municipal standards would better enable municipalities and commenting agencies to review the application within the prescribed timeline.

E. ERO #026-0313 (re: Streamlining Complete Application Requirements)

Regional staff appreciate efforts to streamline the development application process. As a commenting agency, Regional staff note that proposed changes should not impact the Region's ability to review and assess development proposals against matters of regional interest such as Regional Road traffic and access, source water protection, waste collection, and water and wastewater servicing.

Often insufficient information at the time of application submission results in additional review cycles and delays, which can ultimately undermine the objective of streamlining the approval process. In this regard, Regional staff are supportive of establishing clear terms of reference for the core technical studies to ensure that submissions contain the necessary information required for a complete technical review by Regional staff. This approach would reduce the need for multiple review cycles, improve certainty for applicants, and better support more timely and efficient review of the application.

F. ERO #026-0314 (re: Prescribed Professions for Complete Applications)

Regional Staff do not have any concerns in principle, provided that professional and technical standards are upheld when certified professionals sign-off and/or stamp technical studies and reports prior to their submission. As a commenting agency that rely on completeness of studies and reports to conduct complete technical assessments, Regional staff note that where any issues or deficiencies have been identified, even where reports have been certified by a professional, there should be a mechanism requiring revisions to be submitted within a reasonable turnaround time.

G. ERO #026-0315 (re: Secondary Plans, and Site and Area-Specific Policies)

Currently, local municipal official plans include policies such as addressing regional water and wastewater servicing, regional transportation, waste management, and other regional services which are not typically repeated in secondary plans or SASPs.

Regional staff recommend that any changes affecting secondary plans and SASPs should clearly outline requirements to address regional infrastructure and servicing considerations to avoid gaps or inconsistencies that could delay the delivery of regional infrastructure and servicing required for housing development and growth.

Conclusion

Halton Region staff support the Province's objective of increasing housing supply and accelerating development approvals through the proposed changes under Bill 98 and Regional staff emphasize that the approach to achieving the objectives should recognize the need to support effective coordination, delivery, and implementation of regional infrastructure and services.

As an upper-tier municipality and commenting agency responsible for regional infrastructure and services, Halton Region relies on effective coordination with its local municipalities. Any changes that limit the Region's ability to review and conduct complete technical assessments as a commenting agency may impact ensuring regional infrastructure and services are delivered in a timely and fiscally responsible manner.

The opportunity to comment on Bill 98 through the ERO consultation process is appreciated. We look forward to continued collaboration with the Province and local municipalities to achieve the shared objectives of enabling more homes to be built faster in Ontario.

Respectfully submitted,



Laurielle Natywary
Director, Development Services
Development Services
Public Works
Halton Region

Regional Municipality of Halton

HEAD OFFICE: 1151 Bronte Rd, Oakville, ON L6M 3L1

905-825-6000 | Toll free: 1-866-442-5866