

May 12, 2026

SUBMITTED VIA EMAIL (irpb-mmah@ontario.ca)

Intergovernmental Relations and Partnerships Branch
Minister of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3

To Whom it May Concern:

**Re: ERO No. 026-0302
Communal drinking water and wastewater system municipal
consent requirements**

Comments from Landlab Inc.

Landlab Inc. ("**Landlab**") is a boutique land development firm that is dedicated to the creation of healthy and vibrant communities through high quality and thoughtful planning and innovative urban design and architecture.

We are writing to express support for proposed amendments under Bill 98 to the Municipal Act, 2001 and the Safe Drinking Water Act, 2002, filed under ERO No. 026-0302. In particular, Landlab supports the establishment of clear, regulation-based conditions and criteria which, if satisfied, would require municipal consent for non-municipal water and wastewater communal systems. These changes will meaningfully improve the ability to deliver housing in areas without municipal infrastructure which, in turn, will increase housing supply and choice for Ontarians.

Landlab has been working for several years to advance development on a site in the Township of Alnwick-Haldimand, in the County of Northumberland, which has unique access to Lake Ontario's shoreline,

landlab.dev
general@landlab.dev
*Better Design,
Better Neighborhoods*

USA
727.306.9804
200 Central Ave., 4th Floor
St. Petersburg FL 33701

Canada
613.688.5777
150 Elgin St., Suite 1000
Ottawa ON K2P 1L4



providing access for the community to the lake and gorgeous panoramic views. The project is planned to deliver approximately 964 units in a compact form, while protecting natural features and providing public access to the water. The proposal is aligned with the provincial objectives set out in the Provincial Planning Statement, 2024 (“PPS”), including policies that prioritize efficient forms of development on private services where municipal servicing is not available.

Landlab supports the proposed legislative amendments for the reasons outlined below:

- 1. Procedural Clarity:** At present, municipalities can arbitrarily halt development on private communal services by declining to execute Municipal Responsibility Agreements with developers. Landlab supports amendments that establish clear, transparent, and objective criteria for evaluating non-municipal communal water and wastewater systems and that require municipalities to give consent to their construction and operation where such criteria are satisfied. This change will ensure certainty and predictability for landowners, municipalities and operating authorities and will ensure that systems are properly built, operated and maintained. Importantly, the legislative amendments also advance provincial objectives by enabling development in appropriate rural and settlement areas where municipal servicing is unavailable, while ensuring servicing solutions are safe, sustainable, and protective of public health and the environment. The proposed amendments would also build accountability into the system, for municipalities and for landowners.
- 2. Facilitating and Accelerating Housing Development:** The proposed amendments will accelerate the development of new housing by permitting alternative and innovative water and wastewater servicing approaches in areas that do not currently have municipal water and wastewater servicing and will not be provided with it in the near-term. The use of non-municipal communal servicing systems will enable the creation of compact



communities, making efficient use of land in areas where the only alternative is private on-site servicing (wells and/or septic systems) that require large lots. In doing so, the amendments directly support PPS policies that call for a range and mix of housing types, densities, and tenures, and that prioritize compact, efficient development patterns that reduce land consumption and support complete communities. This will unlock new housing opportunities, including family-oriented housing, in areas with otherwise constrained development potential. These same water and wastewater solutions can solve existing problems within many municipalities by allowing old and outdated infrastructure to tie into the new system. This is particularly important where municipalities have aging septic systems that may be leaching.

- 3. **Faster Infrastructure Delivery:** Across Ontario, new development and redevelopment can often be delayed due to the lack of infrastructure, capacity issues and availability, even where planning approvals are already in place. The proposed amendments offer a solution to accelerate development and the provision of housing by requiring municipalities to accept alternative forms of infrastructure delivery, provided they meet certain criteria. Without these changes, municipalities may arbitrarily withhold consent for non-municipal communal systems, resulting in delays and missed opportunities.

Landlab strongly supports the legislative amendments proposed through Bill 98 related to non-municipal water and wastewater systems. The proposed reforms are critical to increasing the housing supply, choice, and affordability for all Ontarians.



We thank you for the opportunity to make this submission and look forward to the opportunity to comment on the future regulations regarding the criteria and conditions for applications for municipal consent. Regarding the regulations, Landlab strongly urges the Province to refrain from imposing caps on the number of homes that may be served by communal water and wastewater, and instead to establish criteria that can be evaluated on a case-by-case basis.

Yours truly,



Sean McAdam
President

Copy: Katarzyna Sliwa and Max Reedijk, Dentons, LLP
Emma West and Dan Watchorn, Bousfields
Imad Aouli, WSP Canada Inc.

