



May 14, 2026

Environmental Registry of Ontario
Ministry of Municipal Affairs and Housing
Government of Ontario

submitted via: ERO online submission

Dear Minister,

Re: Town of Penetanguishene Comments on Bill 98 – *Building Homes and Improving Transportation Infrastructure Act, 2026*

The Town of Penetanguishene supports the Province's objective to increase housing supply and streamline development approvals through Bill 98. The Town is generally supportive of measures that improve consistency and efficiency across Ontario's planning system, including standardized Official Plan content and digital submission processes. However, the Town has several significant concerns:

1. Minimum Residential Lot Sizes

The proposed province-wide minimum lot area of 175 square metres does not adequately account for local conditions such as drainage, servicing capacity, topography, and established neighbourhood character. The Town's existing zoning standards reflect the minimum lot sizes necessary to safely and appropriately accommodate residential development. A uniform provincial standard that is substantially lower than local standards is not supported and risks permanent impacts to neighbourhood amenity and safety.

2. Site Plan Control

The potential removal or significant limitation of Site Plan Control would reduce the ability of municipalities to address site-specific engineering, servicing, accessibility, and design matters that are not regulated through zoning or the Building Code. While improved timelines are important, approval delays are often due to applicant resubmissions. Any prescribed review timelines should apply only to active municipal review periods. Municipal authority to peer review technical studies should be retained to ensure submission quality and appropriate development outcomes. Additionally, it is suggested that the "clock" stops altogether if any resubmission is longer than 60 days in fairness to municipalities.

3. Environmental and Community Outcomes

Continued restrictions on municipal authority to require sustainable or climate responsive development measures may limit long-term environmental quality, community resilience, and public health outcomes.



4. Parkland Dedication

The proposed approach to parkland dedication shifts decision-making toward developer identified lands and may limit a municipality's ability to plan and deliver a cohesive, functional parks system.

In conclusion, while the Town supports efforts to modernize Ontario's planning framework, it respectfully requests that the Province reconsider aspects of Bill 98 that significantly reduce municipal discretion and responsiveness to local conditions. Greater flexibility will better support the development of complete, safe, and sustainable communities across Ontario.

Sincerely,

THE CORPORATION OF THE TOWN OF PENETANGUISHENE

Andrea Betty, MCIP RPP
Director of Planning and Community Development

Cc: Mayor and Council