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Subject: Consultations on Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026

Rob Flack,

The Town of Saugeen Shores appreciates the opportunity to provide comments on Bill 98, *Building Homes and Improving Transportation Infrastructure Act, 2026*. Council has reviewed the proposed legislation and generally supports the Province's objective of accelerating housing delivery, improving approval efficiency, and enhancing transportation integration across Ontario.

Saugeen Shores is one of the fastest growing municipalities in Bruce County, having experienced approximately 16 per cent population growth between 2016 and 2021, with continued growth pressures driven by strong regional employment, including Bruce Power. The Town is actively pursuing housing initiatives aligned with provincial and federal objectives, including attainable housing programs, Community Improvement Plan incentives, and participation in the federal Housing Accelerator Fund. Bill 98 aligns in principle with these efforts; however, several provisions raise significant concerns for rural and small urban communities.

1) Planning Authority and Official Plan Impacts

The Town acknowledges the Province's intent to increase consistency and predictability through standardized Official Plan templates and prescribed land use designations. However, these changes may materially affect existing growth management strategies, infrastructure planning, and local policy objectives. Clear transition provisions, reasonable implementation timelines, and ongoing municipal consultation during the development of regulations will be essential to ensure orderly implementation. Existing Official Plans must remain fully in effect until new requirements are adopted through a clear, municipality-led process.

2) Minimum Lot Size Standards

The Province's consultation on regulations establishing a minimum urban residential lot size of approximately 175 square metres represents a substantial reduction from the Town's current standards. While increased density may be appropriate in certain contexts, a provincially imposed minimum raises serious concerns regarding servicing capacity, environmental protection, infrastructure and asset management planning, and compatibility with established community character. A uniform standard does not reflect the diversity of urban, rural, shoreline, and cottage communities present within the Town. Municipal discretion to tailor lot size standards to local conditions must be preserved.

3) Parkland Dedication and Encumbered Lands



The Town has significant concerns with proposed changes to parkland dedication regulations that would permit encumbered lands to satisfy parkland requirements. While such lands may contribute to theoretical open space calculations, they are frequently unsuitable for public park purposes due to safety risks, limited accessibility, environmental constraints, operational challenges, and long-term liability concerns. Encumbered lands cannot reliably support active recreation, children's play, organized sports, or inclusive community use.

Allowing encumbered lands to substitute for functional parkland would materially undermine municipal efforts to deliver safe, usable, and well-designed parks that meet the needs of growing communities. This approach shifts long-term risk to municipalities, limits design and programming flexibility, and erodes the value of parkland dedication as a planning tool intended to ensure equitable access to quality public spaces as density increases.

The Town strongly urges the Province to maintain clear distinctions between functional parkland and constrained or encumbered lands, and to ensure that parkland dedication requirements continue to prioritize usability, safety, accessibility, and long-term community benefit. Municipal authority to secure parkland that can be meaningfully programmed, maintained, and relied upon must be preserved.

4) Site Plan Control and Landscaping

The Town has serious concerns regarding potential regulatory changes that would further restrict municipal site plan control authority, particularly with respect to landscaping and basic site design requirements. Site plan control is a critical implementation tool that enables municipalities to ensure development is functional, safe, environmentally responsible, and compatible with surrounding land uses. Further erosion of this authority would significantly impair the Town's ability to manage growth responsibly.

The ability to require basic landscaped site plans—including tree planting, buffering, naturalized areas, permeable surfaces, and appropriate grading and drainage—is not discretionary embellishment, but a fundamental component of sound planning and climate-resilient community design. These elements mitigate heat island effects, manage stormwater at source, support urban canopy objectives, protect adjacent properties, and reduce long-term infrastructure and maintenance costs. Removing or unduly limiting these tools risks development outcomes dominated by excessive hard surfaces, diminished environmental performance, and avoidable future retrofit pressures.

While the Town supports efforts to streamline approvals, efficiency must not come at the expense of basic design standards that protect the public interest. The Town strongly urges the Province to ensure that implementing regulations preserve clear and enforceable municipal authority to require appropriate site plan details, including landscaping, where necessary to address local conditions, environmental objectives, and servicing constraints. Any regulatory framework that diminishes site plan control without providing effective alternative mechanisms would undermine the creation of complete, healthy, and livable communities.

5) Communal Water and Wastewater Systems

The Town recognizes that expanded use of communal water and wastewater systems may support development in areas without access to municipal servicing. However, local and regional



experience demonstrates that small-scale communal systems can create significant long-term financial and operational risks. In several cases, systems initially operated privately were eventually assumed by municipalities following operator failure, requiring costly upgrades and resulting in high per-household operating and capital costs.

Clear provincial direction is required regarding ownership models, governance, long-term responsibility, funding mechanisms, and risk transfer. Municipal consultation during regulation development is critical to avoid unintended financial liabilities and unfunded asset management obligations.

6) Environmental and Sustainable Design Considerations

Bill 98 restricts municipal authority to impose local environmental and sustainability requirements beyond those authorized by provincial legislation and the Ontario Building Code. While the Town has historically relied on incentive-based approaches, maintaining sufficient regulatory flexibility is important to advance climate resilience, energy efficiency, urban tree canopy enhancement, and sustainable community design initiatives identified in the Town's 2026 Business Plan.

7) Development Charges and Financial Impacts

The exemption of non-profit retirement homes from development charges may help encourage needed housing types in communities with aging populations. However, additional reductions to development charge revenue—particularly without guaranteed offsetting funding—may impair a municipality's ability to fund essential infrastructure and raise concerns regarding long-term fiscal sustainability and ratepayer equity.

8) Transit and Transportation

The proposed Fare Alignment and Seamless Transit Act, 2026 is expected to have limited immediate impact on Saugeen Shores. However, the Town participates in Saugeen Mobility and Regional Transit (SMART), which provides specialized door-to-door services across Bruce and Grey Counties. Future regulations must recognize the unique mandates of specialized and rural transit providers and provide flexibility or appropriate exemptions, along with advance notice and opportunities for municipal input.

9) Rural and Indigenous Lens

Saugeen Shores has a rural and small urban context with dispersed settlement patterns, limited transit options, unique servicing constraints, and established shoreline and cottage communities that value a lower-intensity character. The Town is also located within the traditional territory of the Saugeen Ojibway Nation and recognizes the importance of respecting Indigenous rights, interests, and relationships in land use planning. Provincial standardization measures must be applied through both a rural and Indigenous lens to avoid unintended impacts and ensure respectful, inclusive implementation.

Conclusion

The Town of Saugeen Shores supports the Province's objectives to increase housing supply and improve approval efficiency. However, Council strongly recommends that Bill 98 and its implementing regulations preserve municipal flexibility, include clear transition provisions, ensure sustainable infrastructure funding, carefully address communal servicing risks, and meaningfully



involve municipalities and Indigenous communities throughout the regulatory development process.

Council endorsement of these comments reflects the Town's commitment to supporting housing delivery while protecting long-term community wellbeing, fiscal sustainability, and responsible growth management.

Respectfully submitted,

Josh Planz, Acting Director, Development Services
Town of Saugeen Shores

Approved by Council on April 27, 2026

cc. Jack Van Dorp, Director, Bruce County Planning and Development Department
Kara Van Myall, CAO, Town of Saugeen Shores
Luke Charbonneau, Mayor, Town of Saugeen Shores