

**TOWNSHIP OF WEST LINCOLN
GROWTH AND SUSTAINABILITY DEPARTMENT**

May 13, 2026

Re: Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 through Bill 98, the proposed Building Homes and Improving Transportation Infrastructure Act, 2026

Thank you for the opportunity for the Township of West Lincoln to formally provide comments on Bill 98. The Township offers the following comments on the proposed legislation.

Prohibit Enhanced Development Standards as a Condition of Land Division Approvals. ([ERO 026-0309](#))

There are certain development standards which are appropriate for consents, including the provision of sidewalks, or a financial contribution towards future sidewalks, boulevard and flankage tree plantings, requirements for minimum driveway standards (e.g. not permitting gravel in an urban setting). These standards are beneficial in contributing towards the municipal design standards and should still be permitted to be required by the approval authority.

Reform to Site Plan Control ([ERO-0310](#))

The Township is receptive to changes to the site planning process where the municipal interests can remain protected. There are many current issues with the site planning approvals process, but not all of which lie with the municipal approval authorities. Many site plan approval delays are also related to incomplete submissions, submissions that do not meet applicable regulatory design standards, lack of understanding or qualifications on the applicant's side, extensive timelines for the applicant to address municipal comments, infrastructure capacity issues and frequent changes to legislation.

Removing site plan approval will not allow municipalities to protect their interests and ensure that the critical infrastructure supporting their communities remain protected.

Removal of site plan control will not allow municipalities to review overall functionality of a site, i.e., making sure accessible parking is appropriately located to entrances, safe pedestrian access, and site functionality for phased developments.

Mandatory meetings could help improve the process, but it is not known how that would be policed. The OLT may not have the appropriate technical understanding to address what are typically highly technical infrastructure related issues within the site plan approval process.

The Township is agreeable to having a clearer trigger for when site plan, or major or minor site plans/amendments are required, as the current language in the Act is subjective.

Minimum Residential Lot Sizes ([ERO 026-0311](#))

Establishing a minimum lot size across Ontario does not take into consideration the following:

- Existing side, rear and front yard requirements, lot coverage provisions as well as parking requirements in municipal zoning by-laws.
- The difference between rural municipalities and major urban centres. Should the same minimum lot size standard apply to the Township of West Lincoln as it does to the City of Mississauga? Where larger centres may have access to transit and not require parking, rural municipalities with no transit require greater parking, and with smaller lots, parking will not be able to be accommodated within the smaller lot, or on the street due to the increase in driveways.
- The ability for a municipality to regulate density where a minimum lot area of 175 square metres may result in a higher density than permitted in the official plan, which may impact established communities.
- One of the main costs of developable land is land speculation and costs associated with infrastructure, not necessarily minimum lot sizes.
- This would take away significant ability for local municipalities to have a say in what is appropriate development for their communities and would significantly limit local controls established in the zoning by-law.
- Although smaller lots are typically for townhouses, will 175 square metres provide appropriate setbacks for overall functionality of a single detached dwelling, creating a viable building envelope and allowing for adequate drainage?

While building homes is critical, building communities where people can live is vital.

Standardizing Parkland Requirements ([ERO 026-0312](#))

The Township has just completed a new Parks and Recreation Master Plan, as well as new master community plan nearly doubling the size of our main urban centre and doubling our population to the year 2051. These plans include a comprehensive plan for public parkland to accommodate various age groups and abilities, creating a healthy and livable community.

Any further changes to parkland dedication that limits the Municipalities ability to select parkland as determined by secondary plans, master plans or official plan designations will undermine the ability for the Township to appropriately plan for future parkland.

Refusal of land should be warranted a longer period of time than 20 days, as the typical Council cycle is monthly.

Streamlining Information and Material that Planning Authorities can require as part of a Complete Application ([ERO -0313](#))

Does the Agricultural Impact Assessment include information on the Minimum Distance Separation Setbacks required by the PPS for certain uses in the Agricultural Area, or should they be a separate allowable study. Other than that, the list appears comprehensive.

Studies should not be tied to specific planning applications as some municipalities may pre-zone land and not require zoning amendments, or their planning applications timing may be in different order.

Municipalities should be permitted and/or required to have a terms of reference for studies they are requiring, ensuring that the terms of the study work are established prior to the study commencing.

Proposed Changes to Various Regulations to Specify Additional “Prescribed Professions” for Complete Applications ([ERO-0314](#))

The legislation should allow a municipality to establish terms of reference for specific studies or plans to ensure that, even if completed by a ‘prescribed profession’, the study or plans are complete and address the appropriate issues.

There are also certain professions that by nature are more subjective and less standardized than others. As an example, professions working in natural heritage and ecology.

Sincerely,

Gerrit Boerema
Director of Growth and Sustainability