

ERO 026-0300 Submission: Climate and Local Governance Considerations for Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026

I am submitting several climate and local governance considerations regarding Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026.

Public support for building the homes Ontarians need and investing in infrastructure to go with it is not the issue. The concern is how this gets done. However, in the context of a growing climate emergency, it is critical that this legislation does not weaken the proven leadership of municipalities that have spent years developing practical, locally tailored solutions. Communities such as Newmarket have made sustained, productive investments in climate responsive planning. These efforts should be reinforced, not constrained. Key considerations are outlined below.

1. Protecting Local Climate Action

Municipalities such as Newmarket have spent years advancing practical climate solutions, including green development standards, low emissions building approaches, and transit oriented planning that reduces community wide emissions. These are not theoretical measures. They are implemented, refined, and grounded in local conditions and community needs, and planned for in Official Plans.

As Bill 98 moves forward, municipalities must retain clear authority and flexibility to design and enforce these measures. Streamlined approvals and standardized planning approaches risk overriding locally developed requirements for energy efficient buildings, climate resilient infrastructure, and effective stormwater management.

2. Long Term Affordability

Basic green development standards typically add approximately 1% to 3% to upfront construction costs, often reaching near cost neutrality when planned from the outset. These costs are routinely recovered through lower operating expenses, making green standards a fiscally responsible baseline rather than a burden. Given that recent federal provincial housing and infrastructure funding agreements are intended to support sustainable, transit oriented growth, these public investments should be used to offset any marginal upfront costs, not to justify rolling back municipal green standards that are already delivering results.

Well designed green buildings are not only environmentally necessary, they are economically sound. Evidence shows that the additional upfront costs of energy efficient construction are typically recovered within a relatively short timeframe, often within 3 to 8 years, with continued operational savings over the full life of the building. For higher performance or net zero buildings, broader life cycle analyses show environmental and carbon payback periods in the range of approximately 6 to 11 years, reinforcing that these investments deliver measurable long term affordability for Ontarians

At a time when climate impacts are accelerating, limiting municipal tools would represent a step backward. Maintaining and strengthening local climate authority is essential to ensuring that

growth aligns with York Region and municipal climate commitments, and that progress already made is not undermined.

3. Infrastructure Capacity and Climate Resilience

Across York Region, including Newmarket and Aurora, infrastructure capacity, particularly water and wastewater, remains a fundamental constraint in meeting growth targets. Regional planning documents consistently show that capital needs are outpacing available funding, with development charge revenues not keeping pace with rising costs.

Advancing growth approvals without corresponding infrastructure delivery risks locking in long term vulnerabilities. Insufficient investment in water, wastewater, and stormwater systems can increase flood risks, strain existing services, and lead to more energy intensive and costly retrofits in the future.

Climate resilience depends on sequencing growth with infrastructure readiness. Bill 98 should explicitly support the ability of municipalities to align development approvals with the delivery of these foundational systems, rather than accelerating timelines in ways that create avoidable risk.

4. Transportation and Sustainable Mobility

The Bill's focus on transportation presents an important opportunity, but only if it aligns with established local and regional priorities. In York Region, municipalities are actively building transit oriented communities, expanding active transportation networks, and implementing complete streets that reduce emissions and improve quality of life.

York Region is already demonstrating that climate aligned infrastructure drives real results, attracting firms such as Convertus Group and advancing the electrification of York Region Transit, reducing emissions while building the foundation for stable, future ready jobs. These investments support long term economic resilience and create meaningful opportunities for our youth in growing sectors tied to clean technology, sustainable infrastructure, and modern transit systems.

This work is reinforced by recent federal transit funding commitments that emphasize long term investment in public transit, housing enabling infrastructure, and complete communities. These aligned investments reflect a shared objective across governments to connect growth with sustainable mobility.

If not carefully aligned, accelerated or standardized approaches could unintentionally prioritize road expansion over transit and active transportation. This would undermine both climate goals and the effectiveness of existing municipal plans. Strong municipal oversight is essential to ensure transportation investments support long term sustainability rather than short term expansion.

5. Regional Leadership, Coordination, and Local Voice

York Region plays a critical role in complementing municipal leadership. Municipalities such as Aurora and Newmarket are driving local solutions on housing, climate, and land use, while the Region coordinates essential cross boundary systems including water, wastewater, transit, and long term infrastructure planning.

This model works best when regional coordination supports, rather than overrides, local decision making. As communities grow and transition toward more sustainable development, alignment between municipal leadership and regional systems is essential to delivering effective, efficient outcomes.

To strengthen transparency and accountability, regional governance must better reflect the communities it serves. The reinstatement of an elected Regional Chair would directly improve public accountability and ensure regional decision making is more closely aligned with local priorities and community needs.

A more accountable regional structure will strengthen collaboration, improve trust, and support growth that is both coordinated and responsive to the communities it is meant to serve.

Recommendations

To align Bill 98 with sustainable growth, climate responsibility, and long term resilience, we recommend:

- Protect and strengthen municipal authority to adopt, implement, and enforce green development standards and climate responsive planning tools
- Ensure growth approvals are coordinated with infrastructure readiness, particularly for water, wastewater, stormwater, and transit systems
- Align transportation provisions with transit oriented development, active transportation, and complete community objectives
- Maintain meaningful local and regional input with elected officials to ensure that planning decisions reflect community needs, environmental standards, and long term climate commitments

Top Sources

1. York Region Official Plan and infrastructure planning
[Regional Official Plan](#)
2. Federation of Canadian Municipalities Green Municipal Fund and climate adaptation resources
[Sustainable Communities, Stronger Canada](#)
3. Government of Canada public transit funding and housing enabling infrastructure
[Zero-emission public transit for York Region | Prime Minister of Canada](#)