

## Town of Oakville Responses to ERO Postings

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## **1. ERO 026-0229 - Proposal to revoke the Parkway Belt West Plan, 1978**

**Commenting Period:** March 30, 2026 - May 14, 2026

The Ministry of Municipal Affairs and Housing is seeking feedback on a proposal to revoke the Parkway Belt West Plan, 1978, and the Parkway Belt West Planning Area to support the government's initiative to streamline, reduce and eliminate municipal and provincial burden, while providing continuous, modernized protection for key infrastructure corridors across a growing region. This notice re-engages on the previous 2022 proposal to seek current input.

### **Town Considerations:**

In 2026, Town OPA 74 modified Livable Oakville text and schedules as part of the Parkway Belt West Designation project to address the anticipated revocation of the Parkway Belt West Plan. Minor Official Plan modifications will be required to address the revocation of the Parkway Belt West Plan through the ongoing Official Plan Review. A zoning project will be required to address the lands currently zoned Parkway Belt

### **Comments to Province:**

The Town previously provided comments on the 2022 ERO posting and comments are consistent in response to the revised posting. Land use planning for growth and development that supports economic prosperity, protects the environment and helps communities achieve a high quality of life remains pivotal for the Town of Oakville and the Province of Ontario.

Town staff support the proposed revocation of the Parkway Belt West Plan, as it aligns with the province's direction to streamline, reduce or eliminate financial, policy, administrative burdens and potentially increase housing supply.

Town staff support the revocation of the Minister's Zoning Orders used to implement the Parkway Belt West Plan.

## **2. ERO 026-0230 – Proposal to Revoke the five MZOs associated with the PBWP**

**Commenting Period:** March 30, 2026 - May 14, 2026

The Ministry of Municipal Affairs and Housing is seeking feedback on a proposal to revoke the five remaining Minister's Zoning Orders used to establish the Parkway Belt West Plan (PBWP) and the Parkway Belt West Planning Area to support the government's initiative to streamline, reduce and eliminate municipal and provincial burden, and while providing continued, modernized protection for key infrastructure corridors across a growing region. One of the five remaining MZOs includes O.Reg. 481/73 – Oakville, Halton Hills, Milton, Mississauga.

## **Town Considerations:**

In 2026, Town-initiated OPA 74 modified Livable Oakville text and schedules as part of the Parkway Belt West Designation project to address the anticipated revocation of the Parkway Belt West Plan.

Minor Official Plan modifications will be required to address the revocation of the Parkway Belt West Plan and these can be addressed through the on-going Official Plan Review. A zoning project will be required to address the lands currently zoned Parkway Belt. Any existing development that was subject to modifications of the O.Reg. 481/73 would be considered existing

## **Comments to Province:**

The Town previously provided comments on the 2022 ERO posting and comments are consistent in response to the revised posting. Land use planning for growth and development that supports economic prosperity, protects the environment and helps communities achieve a high quality of life remains pivotal for the Town of Oakville and the Province of Ontario.

Town staff continue to support the revocation of the Parkway Belt West Plan and the province's direction to streamline, reduce or eliminate financial, policy, administrative burdens and potentially increase housing supply. Town staff also support the revocation of the Minister's Zoning Orders used to implement the Parkway Belt West Plan.

### **3. [ERO 026-0300 - Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes \(Schedules 1, 2 and 7 of Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026\)](#)**

**Commenting Period:** March 30, 2026 - May 14, 2026

The proposed changes in Bill 98 are intended to streamline land use planning and development approvals. Key changes include the introduction of a standardized structure and set of land use designations for municipal Official Plans. The Bill also limits municipal authority to require mandatory enhanced development standards and green building or sustainable design measures through zoning or site plan control, clarifying that such standards are voluntary unless related to health and safety. Additional amendments grant the province regulation making authority to establish minimum residential lot sizes in serviced urban areas, as well as remove notice requirements for Minister's Zoning Orders and revise parkland dedication provisions.

## **Town Considerations:**

A shift to a provincially prescribed, standardized Official Plan structure and land use designations will require a new Town Official Plan, through a future conformity exercise. Significant restructuring will be required, reconsideration of existing policies and land use designations and new mapping. Staff resourcing and the existing Official Plan Review work program will need support and reconsideration. Internal training and procedural updates will be required to ensure consistent interpretation and application of the new framework.

Staff raise concern with the implications of the proposed changes to the longstanding approach of systems planning. The proposed Official Plan framework based on features and areas shifts away from the system-based approach in the Provincial Planning Statement. A systems-based approach is critical to the ecological health, function, economic viability, and long-term protection of these resources. It is unclear how municipalities will be able to ensure development conforms to the Provincial Planning Statement or have regard for the Planning Act which is founded on a systems-based approach to Oakville's and Ontario's ecological, hydrological and agricultural resources.

The proposed removal of municipal authority to require mandatory enhanced development and green building standards through zoning or site plan control will affect the Town's sustainability and urban design objectives. Existing Town policies and practices related to sustainable design, low impact development beyond health and safety requirements, and green building measures will be undermined and not support the long term health of the municipality. The Town will need to place greater reliance on voluntary programs, incentives, and education, rather than regulatory requirements, to achieve sustainability objectives. This does not align with the Province's climate change goals.

The proposed Provincially regulated minimum residential lot size will limit the Town's ability to regulate lot frontage, depth, and area through zoning. This will negatively affect existing policies related to established residential communities and neighbourhood character, as well as the Town's urban structure and local context-based zoning regulations.

The removal of notice requirements for amendments to or revocations of MZOs reduces municipal involvement in decisions that may impact the Town, and raises concerns of public transparency.

Changes allowing encumbered parkland and privately owned public spaces to count toward parkland dedication with minimum credit requirements, will affect the Town's parkland acquisition strategy. There will increase administrative and legal complexity related to securing agreements, easements, and public access arrangements.

Bill 98 will have financial and operational implications on the Town, including staff time, training, legal and implementation costs associated with updating policies, procedures and agreements.

**Comments to Province:**

***Streamlining and Standardizing Official Plans***

The Town of Oakville supports the Province's objective to improve clarity, consistency, and efficiency in the planning system; however, the proposed approach to streamlining and standardizing Official Plans raises concerns. Official Plans are intended to reflect local context, growth management strategies, infrastructure capacity, environmental constraints, and community objectives developed through extensive public engagement and technical analysis.

The proposed standardized framework, including the prescribed table of contents for Official Plans, limits a municipality's ability to respond to local conditions, including established community character, servicing constraints, and planned growth patterns. Standardization assumes all municipalities have the same geography, size, resources, land uses, opportunities and challenges. There is great variety in the 444 municipalities across Ontario and a community's Official Plan should reflect the individual context.

Oakville is an urban municipality with a Council-approved urban structure that places a strong emphasis on strategic intensification, transit supportive development, cultural and built heritage, community design and environmental protection. The Town requires the ability to apply flexible, locally responsive policies to manage redevelopment and intensification that is consistent with Council approved objectives and long term fiscal and infrastructure sustainability.

Additional clarity is requested regarding the following:

1. The scope of policies intended to be contained within each section, and whether municipalities will retain the ability to address matters that are critical to good planning but may not be expressly identified in the proposed table of contents.
2. Whether the Province intends to implement consistent designation criteria and, if so, what those will be for each of the proposed designations. Currently the proposal states that the Minister may provide for two or more sub-designations; however, details beyond that are currently lacking. Additional details are required to consider local implications and provide comments to the Province on these aspects.
3. How existing secondary plans, and site-and area-specific policies will be addressed. Streamlining efforts should be focussed on reducing unnecessary

duplication, while preserving the ability of municipalities to tailor Official Plan policies to local circumstances and evolving community needs. Moving site-and area-specific policies and secondary plans to stand-alone documents outside of the Official Plan will add complexity for the policy reader. Without connectivity from a table of content perspective, a reader will not necessarily understand the applicability of these separate plans or policies. There will likely be duplication of policy content required as a result of being a stand-alone document, which will have the opposite effect of the streamlining being sought. More information is needed to understand how these documents would be subject to the same *Planning Act* processes that apply to Official Plans, without being part of an Official Plan under the *Planning Act*.

4. The Provincial Planning Statement clearly requires municipalities to plan for and map a *natural heritage system*. Additionally, the *Planning Act* requires that municipalities have regard for matters of Provincial Interest, including the protection of ecological systems. The proposed Official Plan framework does not reflect this requirement, instead referencing Natural Environment and Water Resource areas without recognizing their systemic function. Clear and explicit alignment with the Provincial Planning Statement, *Planning Act*, and associated guidance on the protection of Natural Heritage and Water Resource systems is required.

### ***Complementary Changes to Support Implementation of Streamlining and Standardizing Official Plans***

Meaningful implementation will require strong alignment between Official Plan policies, zoning, and infrastructure planning. The Town encourages the Province to continue engaging with municipalities in the development of regulations and guidance materials to ensure that implementation supports timely development while maintaining good planning outcomes.

The proposal puts forward limitations on the ability of municipalities to mitigate and adapt to a changing climate. It is proposed that Official Plans will no longer be required to contain goals, objectives and actions to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate. While this removes the requirement for climate change policies in Official Plans, the table of contents doesn't clearly provide for a section if a municipality were to choose to retain such policies. Removing the importance of climate change policies in Official Plans, particularly in the context of emerging intensive development types and the proposed prohibition on enhanced development standards under site plan, will undermine the role of land use planning as a key mechanism for achieving provincial and local climate objectives. As per the 2025 *Report on Progress to Reduce Greenhouse Gas Emissions* from the Office of the

Auditor General, 54% of Ontario's greenhouse gas emissions come from buildings and transportation. Such policies support compact, transit supportive development, reduce long term infrastructure and servicing costs, and help address climate-related risks such as flooding, extreme heat, and infrastructure vulnerability. Climate change considerations should continue to be required and strengthened through municipal Official Plans rather than removed in the interest of standardization.

### ***Site Plan: Prohibit Mandatory Municipal Enhanced Development Standards and Green Building Standards***

The Town of Oakville has significant concerns regarding the proposed prohibition on mandatory municipal enhanced development standards and green building standards through the site plan process. These tools have been critical in enabling municipalities to advance climate change mitigation, energy efficiency, and sustainable building practices in a tangible manner that reflects local priorities and environmental objectives.

Oakville has established sustainability and climate related targets through Council approved plans and policies, and municipal development standards play an important role in implementing those directions. Removing the ability to require such standards risks undermining local climate resilience efforts and result in long term environmental and servicing impacts that extend well beyond individual development applications.

While the Town recognizes the importance of consistency and predictability for the development industry, it encourages the Province to consider a more balanced approach that allows municipalities to apply enhanced standards where supported by local policy, technical justification, and Council direction, particularly in identified growth areas.

The Town has additional significant concerns around the proposed wording under subsection 41(4.1.2) which provides that, "for greater certainty" that "construction standards" which are excluded from site plan control under 41 (4.1) include environmental protection and conservation. This appears to be a broader restriction that would apply and is anticipated to have major implications beyond enhanced development standards. This will limit the Town's ability to, among other things, require the implementation of mitigation measures in accordance with Environmental Impact Assessments. As proposed, it is not clear under what authority municipalities would have to be able to require standard and basic mitigation measures for environmental protection when construction is proposed adjacent to natural heritage features, such as erosion and sediment control measures and timing windows.

### ***Minimum Lot Sizes***

The Town acknowledges that flexibility in minimum lot sizes can support gentle intensification and a broader range of housing options. However, from Oakville's

perspective, minimum lot size requirements must continue to be considered within the context of established neighbourhood character, servicing capacity, and community design objectives.

Oakville is generally supportive of opportunities for context sensitive intensification but cautions that a one size fits all approach to minimum lot sizes may result in unintended impacts on stable residential areas and create challenges related to infrastructure, functional community design, and compatibility. Municipal zoning standards, informed by Official Plan policies and community engagement, remain an important tool for managing incremental change.

The Province must ensure that any changes related to minimum lot sizes retain an appropriate role for municipal implementation and allow municipalities to tailor standards to local conditions and built form contexts. Such changes should be supported by co-ordinated planning for population growth, including adequate schools, community and municipal services, infrastructure, and local commercial uses to support complete communities.

### ***Minister's Zoning Orders***

The Town of Oakville remains concerned with the scope and use of Minister's Zoning Orders (MZOs), particularly where they bypass local planning processes, Council decision making, and public consultation. MZOs can create uncertainty for municipalities and have the potential to disrupt carefully planned growth strategies, infrastructure co-ordination, and environmental planning efforts.

While the Town recognizes that MZOs may be appropriate in limited circumstances of clear provincial interest, their use should be transparent, justified, and undertaken in collaboration with affected municipalities. The Town continues to advocate for advanced consultation, clear rationale, and consideration of local Official Plans and infrastructure capacity when MZOs are proposed.

Maintaining confidence in the planning system requires that MZOs be used sparingly and in a manner that respects municipal planning authority and accountability.

### ***Encumbered Parkland and Privately Owned Public Spaces (POPS)***

The Town supports the intent to clarify requirements related to encumbered parkland and Privately Owned Public Spaces (POPS); however, care must be taken to ensure that these spaces continue to provide meaningful public benefit. Oakville relies on public parkland and some POPS to meet the recreational and open space needs of our growing and intensifying communities.

Restrictions on municipal discretion to assess encumbrances or to secure appropriate design, access, and long-term maintenance arrangements could reduce the functional

and communal value of these spaces. From the Town's perspective, the ability to evaluate parkland quality, usability, and long-term public benefit is essential to achieving complete communities.

The Town encourages the Province to maintain flexibility for municipalities to negotiate parkland and POPS arrangements that respond to site specific conditions, community needs, and long-term stewardship considerations. There is not a one-size-fits-all approach when discounting encumbered land, as the reasons for discounting the land can vary on a case-by-case basis.

The minimum credit should be reduced to 0.5 with the ability to provide additional credit to ensure that the credit given can more closely match the value being received. This will mitigate the potential impact on the ability of municipal parkland systems to achieve the appropriate mix of part typologies and reduce the volume of appeals to the OLT on this issue. The Town requests that the Province continue to engage with municipalities on appropriate parkland dedication discount rates for encumbered land.

#### **4. ERO 026-0301 - Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and consequential amendment to the Safe Drinking Water Act, 2002**

**Commenting Period:** March 30, 2026-May 14, 2026

The proposed changes under Bill 98 include amendments to the *Water and Wastewater Public Corporations Act, 2025*, which was proposed through Bill 60, *Fighting Delays, Building Faster Act, 2025* and is not yet in force, and the *Safe Drinking Water Act, 2002*. Key changes to the *Water and Wastewater Public Corporations Act, 2025* include requirements that water and wastewater public corporations be 100 per cent publicly owned and that private ownership be prohibited, support for the continuation of existing contracts, the clarification of successor, employment, and pay equity rights, and the prohibition of the transfer of municipal water and wastewater debt to the water and wastewater public corporation.

The proposed change to the *Safe Drinking Water Act, 2002* clarifies that drinking water systems owned by water and wastewater public corporations are municipal drinking water systems and thus are subject to the provisions of the *Safe Drinking Water Act, 2002*.

#### **Town Considerations:**

Bill 60 received Royal Assent on November 27, 2025. It amended the *Municipal Act, 2001* to transfer jurisdiction over water and wastewater from Peel Region to the lower-

tier municipalities of Mississauga, Brampton and Caledon. The new public corporation will be jointly owned by the lower-tier municipalities.

Water and wastewater services and infrastructure are currently under the jurisdiction of Halton Region. Under the *Water and Wastewater Public Corporations Act, 2025*, the Minister of Municipal Affairs and Housing (MMAH) can designate a corporation as a water and wastewater public corporation on behalf of a lower-tier municipality. The water and wastewater public corporation must be incorporated under the *Business Corporations Act, 1990*.

If the intent of the proposed changes through Bill 98 is to enable the transfer of water and wastewater from other upper-tier municipalities such as Halton Region, water and wastewater would become the jurisdiction of the relevant lower-tier municipalities. The Town of Oakville is concerned that the proposed changes have the potential for significant impacts to the Town including reduced decision-making powers, increased administrative burden and associated costs, complications around ownership and asset management, increased financial pressures if there are impacts to Halton Region's debt capacity, and impacts to the provision of water and wastewater services.

Halton Region can remain as the water and wastewater infrastructure provider. As a lower-tier municipality, the Town of Oakville is not yet prepared to assume the costs related to the transfer of the water and wastewater infrastructure.

### **Comments to Province:**

#### ***Ownership of Shares and Assets***

The Town of Oakville is supportive of the Province's proposal to limit the ownership of shares to public entities; however, the Town is concerned that "agent" is not defined. If an "agent" is intended to be a public entity for consistency with the broader provision, this should be stated explicitly.

Also of concern is the proposed provision for the transfer of assets. The lack of stipulation for public ownership of assets coupled with the permission to transfer assets if they are "no longer needed" appears to enable private ownership of water and wastewater assets. The provision of water and wastewater is a public service that should be conducted with public infrastructure to ensure the continuation of high levels of service, water quality, efficiency, and financial management.

#### ***Transfer of Debt***

The Town of Oakville has concerns with the proposed restriction on the transfer of current water and wastewater debt to a water and wastewater public corporation. This could transfer water and wastewater revenues to a water and wastewater public corporation while associated debts remain with upper-tier municipalities. The additional debts could affect upper tier credit ratings, resulting in higher debt costs for lower tier municipalities.

### ***Ministerial Oversight***

The Town of Oakville has significant concerns with the proposed changes to increase ministerial oversight. If approved, the legal implications (including contractual and property rights and effects on transferred employees) of a transfer by-law would be at the discretion of the Minister. Furthermore, the Minister could force parties into an agreement related to transfers to a water and wastewater public corporation and modify the agreement to their discretion. These changes have the potential to remove significant municipal decision-making and governance powers related to the provision of public services while increasing the administrative and financial load of lower-tier municipalities.

## **5. ERO 026-0302 – Communal drinking water and wastewater system municipal consent requirements**

**Comment Period:** March 30, 2026 - May 14, 2026

The Ontario government is proposing legislative amendments to the *Municipal Act*, 2001 and the *Safe Drinking Water Act*, 2002 to facilitate the use of non-municipal communal drinking water and wastewater systems (i.e., privately owned and operated systems serving multiple users). These private communal services are referred to as "public utilities" in the Province's ERO posting.

Municipalities would remain the authority to permit new non-municipal communal systems; however, approval would now be mandatory if provincially prescribed criteria and conditions are met. The associated Provincial regulations are forthcoming.

### **Town Considerations:**

The Town of Oakville is concerned with the proposed legislation as the changes conflict with both the Provincial Planning Statement (PPS), 2024 and the Town of Oakville's Official Plans, and for their potential to introduce unsustainable water systems.

### **Comments to Province:**

Referring to non-municipal communal drinking water and wastewater systems as “public utilities” is misleading. The Town recommends using terminology consistent with defined terms in the PPS, 2024, including “private communal sewage services” and “private communal water services”.

### ***Provincial Planning Statement, 2024 Conflicts***

The proposed changes undermine the policy wording in section 3.6.2 of the PPS, 2024 that recognizes municipal servicing is the preferred form of servicing for settlement areas to ensure adequate oversight, health and safety and environmental protection. “Municipal sewage services” and “municipal water services” explicitly include both centralized and decentralized servicing systems, which further goes against the rationale for non-municipal servicing.

### ***Town of Oakville Official Plan Conflict***

The Town of Oakville Official Plans require municipal servicing for development in the settlement area.

While the proposed changes may therefore have limited applicability in Oakville given this requirement and the size of the settlement area, the introduction of such a system could be applicable in upstream and adjacent municipalities that have more rural land bases. Halton Hills, Burlington, and Milton are currently serviced for water and wastewater by Halton Region, and alongside Oakville, may have more pronounced servicing obstacles to development. The proposed changes introduce increased risk to the connected water systems. The changes also support increased urban sprawl and will exacerbate regional traffic challenges.

The Town does not support the proposed changes as they will:

- Introduce water quality risks in a connected water resource system;
- Support unsustainable development outside of planned growth centres (i.e., sprawl) in conflict with the PPS, 2024; and,
- Exacerbate regional traffic challenges.

There are already frameworks in place for communal water and wastewater systems subject to municipal approval. The Town welcomes additional supports for municipal servicing in lieu of the proposed changes.

## **6. ERO 026-0304 - Draft Projection Methodology Guideline (PMG) to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)**

**Commenting period:** March 30, 2026 - May 14, 2026

This posting is the second consultation on a revised draft Projection Methodology Guideline (PMG) intended to assist planning authorities with identifying population and employment forecasts and assessing land needs to support the implementation of the Provincial Planning Statement, 2024 (PPS 2024).

The new draft revised PMG (March 2026) refines and strengthens the August 2025 draft in response to stakeholder feedback. Overall, the revised PMG signals a shift from high-level guidance toward a more standardized and evidence-based planning framework.

Key changes made to the revised PMG in the second consultation include:

- **Stronger direction for population projections** – The revised PMG provides clearer direction that municipal population and employment forecasts shall be based on the most recent Ministry of Finance (MOF) major population projection update, with a defined projection range and enhanced documentation requirements.
- **Market feasibility and land constraints** – The revised PMG provides greater emphasis on market feasibility and land constraints when setting housing forecasts, intensification assumptions, and land needs.
- **Higher Analytical Standard for Land Needs Assessment** – The revised PMG eliminates the “people and jobs per hectare” land needs method in favour of density-based approaches, raising the analytical expectations for most municipalities.
- **Shift to NAICS for Employment Classification** – The revised PMG adopts NAICS as the preferred system for employment classification to better align employment forecasts with land use planning.
- **Intensification-only Growth Outcomes** – The PMG recognizes that, in appropriate circumstances, all forecasted growth may be accommodated through intensification, resulting in no additional land being required.

### **Town Considerations:**

#### *Initial response to first consultation (ERO 024-0844, October 11, 2025)*

In response to the first consultation on the PMG, the Town expressed general support for the proposed update to the PMG as a timely and necessary replacement for the 1995 guideline, aligned with implementation of PPS 2024. The Town’s comments focused on areas where additional clarity and guidance were needed to support practical application, particularly for land-constrained municipalities approaching the limits of their greenfield land supply.

Key points raised by the Town during the first consultation included:

- **Population projections** – Town supported use of Ministry of Finance (MOF) projections, with an emphasis on maintaining flexibility to adjust forecasts based on local conditions, infrastructure capacity, and market realities.
- **Housing needs in land-constrained municipalities** – Town requested clearer guidance on how municipalities that are approaching, or have reached, the limit of their greenfield land supply with no opportunities for greenfield expansion should apply the PMG. This includes the question whether intensification alone can satisfy PPS requirements and how to interpret “sufficient range and mix” of housing where low-density forms are no longer feasible.
- **Housing mix and market feasibility** – Town expressed concern reconciling market demand for low-density housing with physical land constraints, and whether housing mix requirements refer to new supply only or total housing stock across a municipality.
- **Employment forecasts** – Town recommended replacement of the National Occupation Classification (NOC) with the North American Industry Classification System (NAICS), to better align employment forecasts with land use and built-form requirements.
- **Land needs assessment outcomes** – Town requested that the PMG explicitly recognize “no additional land required” as a valid outcome where projected growth can be fully accommodated through intensification.
- **Inter-municipal co-ordination and governance** – Town requested clearer direction on the role of approval authorities and how inter-municipal discrepancies should be resolved where municipalities select differing projection methods or where combined forecasts exceed MOF census division totals.

Response to second consultation (ERO 026-0304, March 20, 2026)

Town staff generally support the direction of the revised PMG and note that several Town comments on the 2025 draft have been incorporated. The guideline better reflects planning realities in land-constrained urban municipalities approaching the limit of their greenfield land supply, such as Oakville. The PMG acknowledges that intensification-only growth scenarios are possible for fully urbanized municipalities and it better addresses employment classification.

The PMG continues to rely significantly on professional judgment, supported by documented justification. While this preserves flexibility, it also places increased responsibility on municipalities to demonstrate that forecasts, housing mix assumptions, and intensification targets are feasible, defensible, and aligned with PPS, 2024.

The following is how the revised PMG responds to Oakville's comments provided during the first consultation:

- **Population projections** – Oakville asked for flexibility to adjust Ministry of Finance (MOF) population projections based on local conditions. This request was mostly addressed in the March 2026 guideline. Municipalities can still change MOF forecasts to reflect local roads and services, market conditions, and development activity. However, the rules are now clearer. Forecasts must start with the most recent MOF major update, stay within a set range, and be backed up with strong market evidence. The Province accepted Oakville's main concern but placed tighter limits on how changes are made and required more detailed documentation to ensure consistency.
- **Housing needs in land-constrained municipalities** – Oakville asked for clearer guidance for municipalities that are running out of greenfield land and must rely mainly on intensification for growth. This issue was partly addressed in the March 2026 guideline. The Province recognizes that intensification may be the main, or only, way to grow. It better explains the difference between policy goals and what can realistically be built, and notes that not all housing types can be provided everywhere due to land limits and market conditions. The guideline also places more emphasis on existing housing stock, looks at housing balance across the wider market area, and encourages municipalities to clearly explain planning trade-offs.

However, important gaps remain. The guideline does not clearly state whether intensification alone always meets PPS 2.1.3 (which requires municipalities to provide enough land for long-term growth), or whether "range and mix" includes existing homes or only new supply. It also does not explain how to measure housing gaps or when an imbalance is acceptable. No examples are provided for land-constrained GTA municipalities. Overall, the issue is recognized, but key questions raised by Oakville are left to professional judgement rather than clear policy direction.

- **Housing mix and market feasibility** – Oakville raised a concern about situations where people still want low-density housing, but there is no land left to build it. The March 2026 guideline deals with this indirectly. It tells municipalities to plan for housing that can actually be built, not just what the market prefers. It also says communities should not repeat old housing patterns if land supply no longer allows it. Market demand still matters, but it does not override land limits.

However, the guideline does not explain how to handle unmet demand for low-density housing, for example, or how to clearly show that these limits are reasonable. The main message is simple: what is feasible comes first. This supports Oakville's situation, but it does not give the clear instructions the Town requested.

- **Employment Forecasts** – Oakville asked the Province to use the North American Industry Classification System (NAICS) instead of the National Occupation Classification (NOC) to sort jobs, because NAICS works better for planning land needs. This request was fully accepted in the March 2026 guideline. The revised PMG now uses NAICS as the main system for employment planning, with NOC only as extra support.
- **Land needs assessment outcomes** – Oakville asked the Province to clearly confirm that no additional land is needed when all future growth can be handled through intensification. This concern was mostly addressed in the March 2026 guideline. The Province now recognizes that municipalities with no more greenfield land supply may meet all their growth needs through intensification alone, if they can show this with evidence. Municipalities must still prove that intensification is realistic and achievable.
- **Inter-municipal coordination and governance** – Oakville raised concerns about what happens when municipalities choose higher population projections, fail to coordinate, or go beyond Ministry of Finance (MOF) totals. This issue was partly addressed in the March 2026 guideline. The Province now stresses the importance of working together at the census division level and checking forecasts against MOF numbers. It also expects approval authorities to review whether projections make sense.

However, the guideline does not explain how disagreements should be settled, whether approval authorities can override municipal forecasts, or what rules should be used to choose between different projections. The concern is recognized, but clear instructions on how to handle these situations are still missing.

### Comments to Province:

Town staff generally support the direction of the revised PMG and are appreciative that many Town comments on the 2025 draft have been considered and incorporated.

The Town provides the following comments to be considered before the PMG is finalized:

1. **Land-constrained municipalities** – The Town supports the Province’s recognition that some municipalities may need to fit all growth through intensification. The Town continues to encourage the Province to clearly confirm that, when this is shown to be feasible, an intensification-only approach meets PPS 2024 requirements for providing enough land for growth.
2. **Range and Mix of Housing** – Additional clarification would be beneficial on whether the PPS requirement for a “sufficient range and mix” of housing should be evaluated based on the total housing stock (existing and new) rather than

solely on new supply, particularly in municipalities with little to no greenfield land remaining.

3. **Reconciling Market Demand and Land Feasibility** – The PMG would be strengthened by guidance on how municipalities should deal with cases where the market may desire certain housing types, but there is no land remaining to build them.
4. **Inter-municipal Co-ordination and Approval Authority Role** – While the PMG stresses cooperation, more detail is needed on the role of approval authorities when municipalities do not agree, or when forecasts do not match census<sup>(O)</sup> division totals, including how conflicts should be resolved.

The Town appreciates the Province’s on-going efforts to modernize the Projection Methodology Guideline and looks forward to continued collaboration to ensure its effective and consistent implementation across Ontario.

## **7. ERO 026-0305 - Proposed Changes to Various Regulations Under the Planning Act to Facilitate the Electronic Submission of Information and Materials to Approval Authorities and Allow Notices to be Given Electronically to the Province**

**Commenting period:** March 30, 2026-May 14, 2026

The province is seeking feedback on proposed changes under the *Building Homes and Improving Transportation Infrastructure Act, 2026*, that would modernize processes under the *Planning Act* as part of a broader shift toward digital service delivery.

The proposed changes would remove requirements for submitting original or certified hard copy documents and instead allow materials and information to be provided electronically. The proposed changes would also require planning notices, such as notices of public meetings, open houses, complete applications, and adoption of Official Plans or amendments, to be submitted electronically to the Ministry of Municipal Affairs and Housing.

These updates would apply to several key regulations, including those related to Official Plans and Official Plan amendments, Zoning By-laws including holding by-laws and interim control by-laws, plans of subdivision, and consent applications.

### **Town Considerations:**

The Town of Oakville has already implemented a fully digital approach to the submission and circulation of applications under the *Planning Act* and has been accepting electronic materials for approximately six years. As a result, the proposed

changes are consistent with existing Town practices and are not expected to result in significant operational impacts.

From a process perspective, the Town's current digital workflows for application intake, circulation, and record-keeping would continue with minimal adjustment. The Town already provides required notices to the Ministry electronically, and therefore the proposed changes would not alter current practices.

The proposed changes are expected to support ongoing efficiencies, including reduced printing, storage, and handling costs, with no notable new financial implications to the municipality.

### **Comments to Province:**

The Town supports the proposed changes as they align with existing digital practices and help streamline planning processes. The removal of requirements for original or certified hard copy documents reflects the Town's current approach.

As the Town already submits notices digitally, this change is not expected to impact current processes but will help standardize practices across municipalities.

As digital submission processes are already in place, there are no significant concerns with the proposed direction. It would, however, be helpful for the province to provide clarity on any standardized requirements or formats for electronic submissions and notices to ensure consistency across municipalities.

Overall, the Town supports the proposed amendments as a positive step toward modernizing the planning framework and improving service delivery.

## **8. ERO 026-0309 - Proposed Regulation to Prohibit Mandatory Enhanced Development Standards as a Condition of Land Division Approvals**

**Commenting period:** March 30, 2026-May 14, 2026

The province is seeking feedback on a proposed Minister's regulation under the *Planning Act* that would limit municipal authority to require certain enhanced development standards (EDS) or sustainability measures as conditions of land division approvals.

The proposed regulation would prohibit municipalities from requiring mandatory sustainability or enhanced development standards at the lot level (outside of buildings), unless they relate to health, safety, accessibility, or the protection of adjoining lands (for example, stormwater management), effectively shifting other enhanced development standards from mandatory requirements to voluntary measures.

The intent is to address inconsistencies in how enhanced development standards are applied across municipalities, which can add complexity, increase costs, and reduce predictability in the development approvals process.

**Town Considerations:**

The Town of Oakville recognizes the Province's objective of improving consistency and predictability in development standards across municipalities, as well as the goal of streamlining approvals to support housing delivery.

The proposed changes would limit the Town's ability to require certain enhanced development standards as part of the development approvals process. These standards are currently used to support broader objectives related to sustainability, climate resilience, and functional community design.

Enhanced development standards can include measures such as tree planting, landscaping, permeable surfaces, low impact development features, and grading approaches that improve drainage. While not strictly required for immediate health and safety purposes for individuals, they contribute to overall population level health outcomes, long-term environmental performance, infrastructure efficiency, and community livability.

Enhanced Development Standards may be recommended in subwatershed studies as part of an overall stormwater management and water balance strategy for an area. The inability to follow the requirements of guiding subwatershed studies is in direct conflict with the Town of Oakville Consolidated Linear Infrastructure Environmental Compliance Approval CLI-ECA agreement. Furthermore, direction of the Provincial Planning Statement (2.9 and 3.6.8), as well as the delegated authority from the Province through the town's CLIECA, require an innovative approach to stormwater management that incorporates a treatment train and innovated measures which could be construed as enhanced standards in light of these changes.

While the proposal maintains municipal authority to require measures tied to health, safety, accessibility, environmental protection and protection of adjoining lands, it may be difficult to clearly distinguish between what is considered a core requirement versus a voluntary measure. This could create uncertainty in how the changes are applied.

Voluntary sustainability measures may also disproportionately benefit higher end developments while leaving lower income communities with fewer green amenities, exposing vulnerable populations to higher heat, poorer air quality and reduced outdoor

comfort. Mandatory core requirements ensure equitable public health outcomes across municipalities.

ERO 026-0309 mischaracterizes sustainability and enhanced landscape standards as nonessential, when they are in fact foundational to health, safety, accessibility, climate resilience, and public welfare. Making them voluntary undermines preventative, equitable, and science-based land use planning. These standards also support the function of the Natural Heritage System by helping to manage stormwater runoff, protect vegetation, and reduce impacts on nearby natural features. Without mandatory enhanced development standards, municipalities will not be able to demonstrate no negative impact to the natural heritage system as required in the Provincial Planning Statement. Limiting the ability to require such standards may result in less consistent outcomes across development projects and irreversible negative impacts to natural features or their ecological functions. There are also concerns related to how the reduction in enhanced development standards may impact the Town's ability to continue to meet and achieve climate change actions as identified within the Town's Climate Change Strategy.

**Comments to Province:**

The Town of Oakville understands the province's intent to create a more consistent and streamlined approach to development standards across Ontario.

However, further clarity is required regarding how "health, safety, accessibility, and protection of adjoining lands" will be defined in practice, and how this distinction will be applied consistently across municipalities.

Many enhanced development standards contribute directly and indirectly to broader public interest outcomes, including public health and safety, stormwater management, protection of natural features, and support for the Natural Heritage System. Measures such as tree planting, landscaping, permeable surfaces, low impact development features, and grading designed to improve drainage can reduce flooding risk, support heat mitigation, improve water quality, and enhance overall community resilience. While not always framed as immediate health and safety requirements, they play an important role in reducing long-term environmental and infrastructure risks that can affect public safety and service reliability.

The Town is concerned that shifting these measures from mandatory to voluntary could reduce consistency in achieving these outcomes through the development process.

If the intent is to standardize requirements, it is important to ensure that municipalities retain sufficient ability to implement locally adopted policies and respond to site-specific conditions. Further, if the issue is the lack of consistency or standardization across municipalities, allow for the development of standards for municipalities of similar geography and development patterns, rather than the complete removal of systems and solutions that are working

## **9. ERO 026-0310 - Proposal to reform site plan control under the Planning Act and the City of Toronto Act, 2006**

**Commenting period:** March 30, 2026-May 14, 2026

The Province is seeking feedback on proposed changes under the *Building Homes and Improving Transportation Infrastructure Act, 2026*, that would significantly change the site plan control process under the *Planning Act*.

These changes are intended to address concerns that site plan approvals are taking significantly longer than the legislated 60-day timeline and are not functioning as intended.

To address this, the province is considering a range of potential reforms aimed at creating a faster, more predictable, and cost-effective process.

These include:

- Remove site plan control entirely as a planning tool under the *Planning Act*.
- Limit municipalities to a maximum of three application circulations, after which a mandatory meeting must be held with all relevant municipal staff and the applicant to resolve all outstanding issues.
- Restrict site plan review to a standardized checklist focused on health and safety matters. Municipalities would not be permitted to request additional studies or plans beyond this checklist, and approval would be issued once checklist requirements are met.
- Introduce a municipal arbitration process or site plan review panel for applications that exceed the 60-day timeline and a set number of circulations, as an alternative to appeals to the Ontario Land Tribunal. Participants in this process would include the applicant and the municipal development review team with a decision-making timeline to ensure timely approvals.
- Require municipalities to create different site plan approval streams based on the scale and complexity of development, with simpler projects fast-tracked or exempted, and more complex projects subject to a more comprehensive review

### **Town Considerations:**

The Town of Oakville recognizes the Province's objective of improving the efficiency, predictability, and consistency of the site plan approval process under the *Planning Act*.

However, it is important that any reforms reflect the full range of factors that influence approval timelines, many of which extend beyond municipal control.

A key consideration is that municipalities do not control all elements that contribute to site plan approval timelines. While municipal departments co-ordinate internal reviews and provide consolidated comments, external agencies such as Conservation Authorities, pipeline utilities, the Regional Municipality and provincial ministries (e.g. Ministry of Transportation) operate on independent timelines. These timelines can significantly influence overall approval durations and are not within municipal control.

In addition, applicant response times following the issuance of consolidated municipal and agency comments are a significant factor in overall timelines. Once comments are issued, municipalities do not control the timing of revised submissions, while statutory timelines continue to run. As a result, measured timelines may include periods that are not attributable to active municipal processing.

The current legislative framework also does not pause statutory timelines during periods when submissions are with external agencies or when applications are awaiting applicant resubmission. This can result in municipalities being assessed against timelines that do not fully reflect the end-to-end approval process.

#### **Comments to Province:**

The Town supports the Province's objective of improving efficiency and consistency in the site plan approval process. Meaningful improvements to timelines will require consideration of all contributors to the process, including external agency review timelines and applicant resubmission cycles, which are outside municipal control.

Comments on the Province's proposed reforms:

#### ***1. Remove site plan control as a land use planning tool in the Planning Act and the City of Toronto Act, 2006.***

Response: The Town strongly disagrees with the removal of site plan control. Site plan control is a critical implementation tool that ensures development approved through zoning is appropriately designed and constructed.

It plays an important role in addressing matters that directly affect public health and safety, including safe access and circulation, emergency access, grading and drainage, servicing, lighting, and waste management. It also helps ensure that impacts to abutting properties are appropriately mitigated, and that developments are designed in a manner that supports accessibility and pedestrian safety.

Without site plan control, there is a risk that these site-specific considerations would not be fully addressed prior to construction, potentially resulting in negative impacts to surrounding properties and reduced ability to ensure safe, accessible, and well-functioning developments.

Site plan control is a necessary planning tool to ensure development does not result in a negative impact to the natural heritage system and water resource system consistent with the *Planning Act* and *Provincial Planning Statement*.

Potential consequences:

Site plan control is not regulatory excess, it is a foundational mechanism that enables safe, resilient, accessible, and healthy places. Its removal would erode protections that directly support the public interest, contradicting the stated objectives of the *Planning Act*.

- a. Loss of oversight for public safety. Site plan control ensures pedestrian, bicycle and vehicular routes and paths of travel are safe, including sightlines, barrier-free access and separation of conflicting uses. Without it, critical design elements such as lighting, grading, retaining structures, and emergency access may be inadequately addressed, increasing injury risk.
- b. Increased flooding risk and premature degradation of municipal stormwater infrastructure. Site plan manages stormwater, grading and drainage on development sites, reducing flood risk and protection of adjacent properties. Removal weakens flood control at a time communities are experiencing intensifying rainfall events. Furthermore, the cumulative increase in runoff without requiring mitigation to stormwater risks will contribute to premature failures and degradation of town infrastructure.
- c. Degradation of ecological health. Site plan review protects trees, soils, wetlands, and the natural heritage system. Without it, communities may experience reduced biodiversity and natural features, urban tree canopy, and air and water quality.
- d. Decline in public realm quality and livability. Site plan control secures functional and safe streetscapes, parks and plazas that support mental and physical health. Its removal prioritizes expediency over functional site design, diminishing comfort, usability and long-term community well-being.
- e. Accessibility and equity impacts. Site plan control implements AODA compliant routes and inclusive spaces with equitable access. Without mandatory review, vulnerable populations face increased barriers and exclusion from public and semi-public spaces.

- f. Long term municipal risk. Poorly co-ordinated private development on sites adjacent to public lands and facilities could lead to infrastructure failures, premature repairs, increased financial burden and liability exposure borne by taxpayers.
- g. Loss of professional accountability and co-ordination. Site plan control integrates the expertise of landscape architects, engineers, planners, and municipalities.
- h. Site plan is the primary mechanism for refining building massing, articulation, façade treatment, and the interface with the public realm. Without it, developments may proceed with minimal improvement beyond initial zoning compliance, resulting in poorer design outcomes.

Without iterative municipal input, developers may default to repeatable, cost-efficient designs that prioritize speed over contextual responsiveness, reducing architectural quality, diversity and character, leading to degradation of the public realm.

Eliminating site plan control as a land use planning tool will significantly increase the risk of inconsistent and inadequate implementation of the *Planning Act*, the PPS, and other legislation. This in turn would increase the likelihood of substandard development with outcomes that are unsafe, inefficient, or otherwise detrimental to the public interest.

***2. Require municipalities to have a maximum of three circulations after which a mandatory meeting is triggered with all relevant municipal department representatives and the applicant to work through and resolve all outstanding issues.***

Response: The Town of Oakville already provides applicants with the opportunity for a technical review meeting following receipt of the initial comprehensive comments report. This meeting is provided after the first circulation to support early resolution of issues; however, it is noted that applicants do not always accept or participate in these meetings.

The Town would also note that the proposed requirement for a mandatory meeting “...with all relevant municipal department representatives...” should be broadened to explicitly include external agencies and provincial ministries, where outstanding technical issues have been identified. In many cases, these parties play a key role in resolving site plan matters, and their involvement is essential to meaningful resolution of outstanding issues.

Consideration should also be given to how non-participation by external agencies or ministries would be treated within this framework. If required external agencies or

ministries do not participate in a mandatory meeting or provide input within established timelines, municipalities should be allowed to proceed on the basis that no further concerns are outstanding from that agency or ministry.

Overall, the Town supports structured co-ordination meetings where they assist in resolving issues; however, flexibility is required to ensure that all relevant parties, including external agencies and ministries, are appropriately engaged in the process.

**3. Further scope the site plan review process to a standard site plan approval checklist of functional aspects of a site (e.g., those related to health and safety), with use of certified professionals for acceptance and approval of reports and studies. A municipality is not permitted to request additional studies and plans beyond what is included in the standard site plan approval checklist. If technical and drawing requirements identified in the checklist are met, site plan approval is issued.**

Response: The Town of Oakville has concerns with further restricting municipal ability to request additional information or studies during the site plan review process, particularly where site-specific conditions arise through detailed technical review under the *Planning Act*.

Prior to changes introduced through Bill 185, municipalities were permitted to hold mandatory pre-consultation meetings prior to application submission. These meetings played a key role in identifying the required studies, reports, and plans at the outset, and as a result it was uncommon for additional studies to be requested after submission, beyond what had already been identified through that process. Since the removal of mandatory pre-consultation requirements, there is increased reliance on information provided at submission, and a greater risk that additional reports or plans may be identified as necessary during detailed technical review as site-specific issues are assessed.

It is also important that municipalities retain the ability to identify when submitted materials do not meet established requirements, and to seek appropriate clarification or revision through the review process. Without this flexibility, there is a risk that technical issues affecting safety, accessibility, and functionality may not be fully resolved prior to approval.

In addition, site plan applications can be submitted prior to the approval of required zoning amendments. In these circumstances, approval cannot be issued within 60-day statutory timelines where the underlying planning permissions are not yet in place. This

sequencing issue should be considered in any proposed reforms to ensure the process remains functional, legally consistent, and capable of supporting safe and appropriately serviced development outcomes.

Furthermore, not all site plan applications are appropriate for approval. For example, where an application proposing development within a floodplain, this could facilitate development that poses risks to human health and safety and is inconsistent with the *Planning Act*, the PPS, and other applicable Provincial legislation. Providing the authority to refuse such applications would promote more efficient processing of site plan applications and enable staff resources to be allocated more effectively.

Overall, while the intent to streamline review is supported, sufficient flexibility is required to ensure that applications are properly supported, technically sound, and able to meet core health, safety, and accessibility objectives prior to approval.

Potential consequences:

Limiting site plan review to a rigid checklist with guaranteed approval removes the critical ability to address site specific health, safety, environmental, and accessibility concerns. This approach prioritizes procedural efficiency over the public interest, undermining the foundational purpose of land use planning in Ontario.

1. One size fits all checklists ignore site specific risk: Site plan is inherently contextual. Standardized checklists cannot adequately address the complexities of unique features and functional design elements both on the site and surrounding the site.
2. Erosion of environmental protection: Checklist compliance prioritizes minimum standards, not cumulative impact. Without discretionary review, valuable trees, soils, and features may be lost, reducing air quality, flood mitigation, and health benefits.
3. False equivalence between certification and public interest: Certified professionals serve the client first, not the public. Municipal review provides an essential public interest safeguard, ensuring professional submissions align with local conditions, policies, and community welfare.
4. Loss of integrated interdisciplinary review: Site design must co-ordinate with planning, urban design, engineering, and parks. A checklist approach fragments this coordination, increasing the likelihood of design failures that affect safety and long-term performance.
5. Weakening of design quality in the public realm: Health and welfare are influenced by comfort, usability, and dignity, not just technical compliance. Checklist driven approvals reduce the quality of the built environment and shared spaces that support physical activity and social well-being.

Shifting from design excellence to minimum compliance risks reducing development quality, as checklist-driven approvals tend to incentivize meeting baseline requirements rather than fostering well-designed, contextually responsive outcomes.

- 4. Establish or require a municipal arbitration process / site plan review panel for site plan applications that have exceeded the government's 60-day timeline and a specified number of circulations. Participants in this process would include the applicant and the municipal development review team. This would be an alternative to a hearing at the OLT with a goal of speeding up approvals and cutting down on associated costs. An arbitration process / site plan review panel decision-making timeline could be applied to ensure timely decisions on approvals.**

Response: This proposed approach treats site plan review as a dispute, not a safeguard. Site plan review is a preventative public interest tool, not an obstacle. Arbitration reframes health and safety concerns as delays to be resolved, rather than risks to be mitigated.

The Town of Oakville is open to exploring alternative dispute resolution mechanisms that could support more timely resolution of outstanding issues and reduce reliance on appeals to the Ontario Land Tribunal.

However, further clarity would be required regarding how a municipal arbitration process or site plan review panel would function in practice, including governance, decision-making authority, participation of external agencies, and how statutory responsibilities under the *Planning Act* would be maintained.

It would also be important to ensure that such a process does not duplicate existing municipal technical review functions or create additional procedural layers that could unintentionally increase complexity for applicants and reviewing bodies.

- 5. Establish or require municipalities to establish different site plan approval streams for different kinds of proposed development, with corresponding scope of matters that may be controlled. This would mean that a "full" site plan process would only be permitted for larger, complex development initiatives resulting in fewer matters being regulated through site plan control. Less complex development would be triaged to a more expedited stream or could be exempted from site plan control completely.**

Response: The Town is generally supportive of the concept of differentiated site plan approval streams based on the scale and complexity of development.

The Town already implements a scoped site plan review process for 1-3 unit residential developments that are adjacent to a watercourse, as introduced under Bill 23-related changes.

Clear provincial criteria would be required to define how applications are categorized within any tiered system, to ensure consistency in application across municipalities and avoid uncertainty in interpretation.

It is also important that municipalities retain sufficient flexibility to adjust review scope based on site-specific conditions, infrastructure capacity, and environmental constraints, which can vary significantly even within the same development category.

Small development can still create significant risk or impact. Even modest projects can introduce flooding, drainage failures, tree loss, and safety concerns (such as non-compliant accessible routes, trip hazards, poor visibility, etc). Site development impacts are not proportional to building size and should not be presumed low risk. Exempting or expediting minor developments removes oversight of incremental impacts such as tree loss, hardscape expansion, and impervious cover. Cumulative effects undermine watershed health, urban canopy, and climate resilience.

Additionally, this approach may overlook opportunities to align smaller developments with broader urban design objectives at a broader scale, such as intensification corridors or transit-supportive communities.

### **Other suggestions for the Province's consideration:**

The foregoing alternatives seek to address concerns that site plan approval takes significantly longer than the legislated 60-day timeline in the *Planning Act* before an appeal for non-decision can be filed and does not function as intended. This posting provides opportunity for municipalities, developers and other stakeholders to provide comments primarily in response to the stated options. Further consideration could also be given to clearly define bottlenecks and develop targeted solutions within the existing site plan framework.

For example, common bottlenecks include the submission of incomplete or substandard application materials by proponents, delays in receiving comments from external agencies, extended timelines for proponents to revise and resubmit materials, speculative applications that divert significant staff time and resources, and complex issues that require considerable coordination and collective effort to effectively resolve.

It would assist if the Province could set out expectations for the length of time to process site plans with varying complexity and provide Municipalities with more tools to achieve the same. In addition, there are several factors outside municipal control that could be better reflected in the overall framework:

External agency and ministry timelines:

Consideration could be given to establishing clear response timelines for external agencies and Provincial ministries involved in the review process. Where responses are not received within a prescribed timeframe, a default assumption of 'no comment' could apply. This would help reduce delays where municipalities are awaiting input that is not within their control.

Applicant resubmission timelines:

Consideration could be given to introducing clear expectations for applicant resubmission timelines following the issuance of consolidated comments. Where an applicant does not resubmit within a prescribed timeframe, the application could be deemed inactive, and the municipality provided with the ability to reassess the file status. This would avoid prolonged periods of inactivity within the review process.

Applicant submission/resubmission materials:

Consideration could be given to the quality and inter-disciplinary co-ordination of the information conveyed in an applicant's materials. It is not uncommon to receive a submission package where the plans and drawings prepared by consultants differ resulting in confusion, time lost in seeking clarity, and unnecessary review of inconsistent materials.

Statutory timeline management:

The Province could consider mechanisms to pause statutory timelines during defined intervals, such as periods when applications are awaiting applicant resubmission. This would ensure that statutory timelines more accurately reflect active review periods and provide a more consistent basis for measuring performance across municipalities.

Sequencing of Approvals (zoning and site plans):

Consideration should also be given to the sequencing of approvals where site plan applications are submitted in advance of required zoning amendment approvals. In these circumstances, it is not feasible for municipalities to issue site plan approval within the 60-day statutory timelines, as the underlying zoning regulations necessary to support the proposed development are not yet in place. Either municipalities should be permitted to refuse these site plan applications, or the Province should provide greater

clarity on sequencing which would help ensure timelines reflect the actual status of a proposal for approval.

The Town remains committed to working collaboratively with the Province to improve development approval timelines; however, reforms must reflect the full approval system, including external agencies, ministry and applicant-driven timelines, to ensure that improvements are both effective and achievable in practice.

#### **10. ERO 026- 0311 - Proposed Regulatory Approach to Establish a Minimum Residential Lot Size in Urban Areas**

**Commenting Period:** March 30, 2026-May 14, 2026

The Province is seeking feedback on proposed legislation under the *Building Homes and Improving Transportation Infrastructure Act, 2026*, that would make changes to the *Planning Act* to create a regulation-making authority allowing the Minister of Municipal Affairs and Housing to regulate minimum lot sizes on parcels of urban residential land, outside the Greenbelt Area (ERO #026-0300).

In tandem, the Province is seeking feedback on a regulation (ERO #026-0311) that would set a minimum lot size of 175 square metres (1,884 square feet) for parcels of urban residential land. A parcel of urban residential land is defined in the *Planning Act* as a parcel within the settlement area of a municipality that is zoned for residential use (other than ancillary residential use) and is fully serviced by public sewage and water.

The intent of the legislation and associated regulation is to enable increased housing supply and provide options for a wider range of lower-cost housing within residential urban areas.

The proposed regulation would override existing zoning standards governing minimum lot frontage and minimum lot depth where those standards would prevent the proposed minimum lot-size requirements from being met. In effect, zoning provisions that conflict with the ability to achieve the prescribed minimum lot size would no longer apply for the purpose of assessing compliance with that standard.

However, other planning considerations, such as the policies in the *Provincial Planning Statement (PPS)* would continue to apply and may still restrict development in certain circumstances, including where lot creation is not permitted.

The regulation making authority would be scoped to zoning and would not apply to subdivision control. However, landowners would retain the ability to create lots through

the consent process, with the resulting lots permitted to meet the prescribed minimum lot size (175 square metres), notwithstanding local context or existing municipal standards.

### **Town Considerations**

The Town recognizes that the proposed regulation is intended to support a range of potential benefits, such as:

- enabling increased housing supply within urban residential areas
- improving housing affordability
- diversifying housing choice
- making efficient use of land and infrastructure
- supporting more complete communities
- reducing urban sprawl and associated environmental footprint

However, as proposed, the Town has identified several concerns, which are listed and expanded upon below:

- loss of municipal control
- growth management impacts
- neighbourhood character impacts
- heritage conservation impacts
- land use impacts
- infrastructure readiness
- environmental impacts
- uncertain affordability outcomes
- implementation considerations

#### **Loss of Municipal Control**

- The regulation would reduce municipal autonomy in establishing zoning standards.
- A one size fits all approach across Ontario does not allow for context specific considerations.
- The proposed regulation would limit the Town's ability to address local conditions, including neighbourhood character, heritage conservation, infrastructure capacity, servicing constraints, and environmental matters.

#### **Growth Management**

- The proposed regulation has the potential to undermine the larger Town-wide urban structure and growth management framework that directs the majority of growth to a system of nodes and corridors to support the broader transportation and transit systems, while also maintaining the character of residential areas.
- The proposed regulation may alter growth and development projections, including housing delivery based on housing type/form/affordability, based on planned population growth patterns.
- The proposed regulation does not consider nor align growth potential with transit access and could perpetuate car-dependant development patterns within areas that have limited transit access, further worsening traffic.

### Neighbourhood Character

- A standardized minimum lot size does not account for established neighbourhood character and will create significant impacts related to built form, scale, height, massing, setbacks, orientation and separation distances and lotting patterns within the surrounding neighbourhoods.
- Small lots will place additional pressures on permitted building typologies and density permissions within various land use designations and zones and will likely trigger the need for broader land use and zoning reviews.
- Existing zoning regulations for the zone in which new small lots are created, such as built form, yard setbacks, lot coverage, building heights, etc. will be out of scale with small lots, creating inconsistencies in implementation.
- The extent to which other zoning provisions would no longer apply to facilitate minimum lot sizes remains unclear and requires further clarification. Reduced lot sizes will result in reduced green space, tree canopy, and privacy within established neighbourhoods which greatly contribute to local context and character.
- Official Plan policies regarding neighbourhood character do not align with the proposed framework. Increased intensification may also affect local traffic patterns and the function of existing street networks.

### Heritage Conservation

- A standardized minimum lot size is not responsive or appropriate in areas subject to heritage conservation, including Heritage Conservation Districts and properties designated under the *Ontario Heritage Act*.
- The proposed regulation may limit the Town's ability to manage development in a manner that conserves cultural heritage resources and landscapes.

### Land Use

- Small lots may require additional building typologies and densities to be permitted within various zones and/or land use designations. This will necessitate broader updates to the Town's Official Plan policies and Zoning By-laws.

### Infrastructure Readiness

- Existing Infrastructure Master Plans are based on planned growth within identified nodes and corridors and do not account for increased development potential created through this regulation.
- Additional residential intensification may place pressure on public service facilities including schools, parks and community infrastructure.
- The proposed regulation may perpetuate car-dependant developments placing strain on the transportation network.
- Water, wastewater and stormwater systems may experience cumulative impacts that are not currently accounted for.

### Environmental Impacts

- Increase coverage will reduce permeable surfaces and cumulative impacts will impact municipal infrastructure as well impacts to adjacent properties.
- The proposed regulation will contribute to unknown stormwater impacts which must be considered/studied, including draining, flow, and spill risk.
- The proposed regulation may place additional strain on adjacent natural heritage systems, natural areas and natural features, creating cumulative impacts on the health of the natural environment.

### Affordability

- Smaller lots do not necessarily result in more affordable housing. In many cases, smaller lots in many neighbourhoods will likely still produce housing which remains unaffordable, limiting the effectiveness of this approach in addressing housing affordability.

### Implementation Considerations

- The proposed regulation must ensure that land division processes for small lots will offer the same protection to the natural environment as would otherwise be provided through a fulsome zoning by-law amendment and review process.
- Is there proposed to be a maximum number of lots that can be created through the land division process under the proposed regulation? Would policies limiting the number of lots that may be created under the proposed regulation be appropriate to limit impact?

- The proposed regulation must consider additional impacts to Official Plan policies and zoning regulations, which would become out of sync with future developments for small lots.
- How does this work with implementation of development applications
- How are existing Zoning By-laws to be updated to reflect built conditions?
- The proposed regulations must ensure it does not create conflict with provincial policies in the PPS or other plans.

## **Comments to Province**

The Town acknowledges that flexibility in minimum lot sizes can support gentle intensification and a broader range of housing options. However, from Oakville's perspective, minimum lot size requirements must continue to be considered within the context of established neighbourhood character, servicing capacity, functional and community design objectives, and heritage conservation matters.

Oakville is generally supportive of opportunities for context sensitive intensification but cautions that a one-size-fits-all approach to minimum lot sizes will result in unintended impacts in established residential areas and create challenges related to infrastructure, functional community design and compatibility. Municipal zoning standards, informed by Official Plan policies and community engagement, remain an important tool for managing incremental change.

The Town encourages the Province to ensure that any changes related to minimum lot sizes retain an appropriate role for municipal implementation and allow municipalities to tailor standards to local conditions and contexts. Without a co-ordinated approach, the proposed regulation will create planning conflicts and poor design outcomes.

### *Heritage Planning*

The proposal to prescribe minimum lot sizes by regulation causes significant concerns for properties designated under Part IV and Part V of the *Ontario Heritage Act* (OHA). The Province should not apply any new regulations related to minimum lot sizes to designated heritage properties. Properties designated under Part IV of the OHA may have heritage attributes that would be negatively impacted by a reduction in lot size. This is especially the case for cultural heritage landscapes which include more than just buildings and structures and can include landscape and natural elements.

For heritage conservation districts (HCD) designated under Part V of the OHA, the plan and guidelines for these districts typically require lot sizes that are compatible with the heritage character of the HCD. In many cases, the proposed 175 square metres will be significantly smaller than the typical lots within a HCD, and this reduction would have the potential to undermine the intent of the HCD. For example, a larger 1000 square metre lot in one of Oakville's HCDs would currently receive support to be severed into

two 500 square metre lots. Under the proposed regulation, the lot could be severed into at least five lots, which would negatively affect the character of an HCD and would completely negate the purpose of protecting the HCD in the first place. Because municipalities take great effort to ensure that their zoning by-law implements their official plan, including their HCD plan and guidelines, this change will create a major disconnect between zoning by-laws and HCD plan and guidelines document. Municipalities will need to update their HCD documents to reflect the updated zoning, which is a long and complicated process under the OHA. And in many cases it will be impossible to marry the two, as the new minimum lot size regulation will nullify the very essence of the HCD plan and guidelines.

#### *Additional Considerations and Implementation*

The Town requests further clarity on how the proposed regulation would be implemented within existing zoning frameworks, including how municipalities are expected to reconcile minimum lot size permissions with other zoning provisions that regulate built form, massing, and site layout. Clear implementation direction will be important to avoid unintended inconsistencies and to support coordinated application across municipalities.

The Town notes that the proposed approach may have implications for how development applications are processed. By enabling minimum lot sizes through regulation, without the need for zoning by-law amendments, there may be fewer opportunities to comprehensively review built form, site design, and compatibility considerations through a coordinated planning process. This could result in greater reliance on the consent process to address matters that are typically considered through zoning and broader planning review, which may limit the ability to evaluate cumulative impacts and ensure integrated, context-sensitive outcomes

Given that the regulation would operate through zoning but be realized through land division, the Town encourages the Province to clarify how municipal staff are expected to evaluate applications where minimum lot size permissions may not align with broader planning considerations, including compatibility, servicing, and cumulative impacts.

The Town encourages the Province to consider how the proposed approach aligns with infrastructure planning and servicing capacity, particularly in established areas where infrastructure and public service facilities are not designed or planned to accommodate the proposed intensification.

Consideration should be given to monitoring the regulation's impacts over time to assess whether it is achieving its intended housing outcomes without creating unintended impacts on established neighbourhoods, heritage conservation, infrastructure capacity, and environmental conditions.

Overall, while the Town supports the Province’s objective of increasing housing supply and providing a broader range of housing options, it is important that any regulatory approach appropriately considers local context, infrastructure capacity, and community design. Greater clarity on implementation and an appropriate role for municipal application will be critical to ensuring that the proposal's intended outcomes (affordable housing) are achieved without creating unintended planning challenges.

## **11. ERO 026-0312 - Proposed Changes to Support Standardizing of Parkland Requirements Under the Planning Act**

**Commenting Period:** March 30, 2026 – May 14, 2026

Proposed changes to the *Planning Act* through Bill 98 are intended to standardize parkland dedication requirements across Ontario and to bring into force parkland reforms first introduced under Bill 23.

The changes would allow landowners to identify specific lands to satisfy parkland dedication obligations, including encumbered lands and privately-owned public spaces, provided those lands meet criteria set out in regulation.

Certain lands would be deemed ineligible for parkland conveyance, such as contaminated lands that pose a public health risk and natural or human-made hazard lands. Natural heritage areas may qualify where park use is determined to not compromise ecological features. The proposal notes that parkland must be accessible, visible, and comfortable to facilitate public use of it. The land must be:

- Accessible by all users directly from the public realm and readily visible from the public realm.
- Of a size and shape that is capable of serving park or public recreational purposes.

Where the land is encumbered, the land would be counted towards the parkland dedication requirements at a discounted rate of 0.7.

Appeal rights are proposed, which would allow a landowner to appeal to the Ontario Land Tribunal if a municipality rejects a proposed parkland conveyance or fails to make a decision within 90 days.

### **Town Considerations**

Currently, the Town’s [Parkland Dedication Procedure](#) outlines the type of lands that are acceptable to the Town and details the procedural elements of accepting land or payment-in-lieu of land under Parkland Dedication By-law 2024-034.

The list of ineligible land in the proposal is in line with the land identified as not acceptable in the Town's Parkland Dedication Procedure. The requirement of providing credit at a rate of 0.7 though, will have a negative impact on the Town's ability to achieve the desired parkland system.

Encumbered land in the form of Strata arrangements, Privately Owned Public Spaces (POPS) and constrained land is currently acceptable to the Town. However, the land area is required to be appropriately discounted for a variety of reasons, including in the case of:

- Strata ownership arrangements: the land area is discounted in recognition of lifecycle cost issues, including maintenance and landscape replacement that are typically at a higher cost, and over a shorter time frame, than fee simple land.
- POPS arrangements: the land area is discounted in recognition of the Town's lack of programming control and the long-term viability of the POPS space with respect to the evolving commitment of the affected landowner, or condominium board.
- Constrained lands: where constrained lands are accepted (i.e. lands with steep slopes, utility corridors, stormwater management facilities), the land area is substantially discounted in recognition of the associated constraints of the land to accommodate recreational opportunities.

Providing credit in amounts that exceed the true value of the encumbered land will result in challenges in achieving the Town's parkland system, and be financially constraining to municipalities. Receiving land is integral in providing the targeted amount of parkland and supporting complete communities.

### **Comments to Province**

There is not a one-size-fits-all approach when discounting encumbered land, as the reasons for discounting the land can vary on a case-by-case basis. The minimum credit should be reduced to 0.5 with the ability to provide additional credit to ensure that the credit given can more closely match the value being received. This will mitigate the potential impact on the ability of municipal parkland systems to achieve the appropriate mix of part typologies and reduce the volume of appeals to the OLT on this issue.

### **12. ERO 026-0313 - Streamlining the information and material that planning authorities can require as part of a complete application**

**Commenting period:** March 30, 2026-May 14, 2026

The province is seeking feedback on proposed changes under the *Building Homes and Improving Transportation Infrastructure Act, 2026*, that would standardize what can be required as part of a "complete application" for planning approvals.

The proposed changes would establish a province-wide list identifying the only types of information and studies that planning authorities may require for applications such as Official Plan amendments, Zoning By-law amendments, Plans of Subdivision and Condominium, Site Plan Control, and Consents. This is intended to improve consistency and predictability for applicants across Ontario and reduce variation in application requirements between municipalities.

The Ministry is seeking feedback on a proposed list of information and material that is grouped into two categories:

#### Core Studies

Core studies are those that could always be required, as planning authorities typically need them to assess most *Planning Act* application types. These address fundamental planning and engineering matters such as environmental impacts, servicing capacity, transportation impacts, and public health and safety. They would include:

- Environmental Impact Statement
- Environmental Site Assessment
- Functional Servicing Report
- Geotechnical Report
- Hydrogeological Report
- Planning Justification Report
- Transportation Impact Study

#### Contingent Studies

Contingent studies would only be required where a specific on-site or surrounding condition exists that makes the study relevant to the application. For example, these may apply where a property is located near airports, rail corridors, significant natural hazards, or major facilities, or where the site contains specific environmental, cultural, or resource-based features. They would include:

- Aeronautical Report
- Aggregate/Minerals/Petroleum Resource Impact Assessment
- Agricultural Impact Assessment
- Air Quality/Odour Study
- Arborist Report
- Archaeological Assessment
- Contaminant Management Plan
- Cultural Heritage Impact Assessment
- Economic Viability Assessment
- Electromagnetic Field Management Plan
- Financial Impact Analysis
- Human-made Hazard Impact Study/Assessment

- Impact Assessment for Waste Disposal/Former Landfill Sites
- Lakeshore Capacity Assessment/Water Quality Impact Assessment
- Land Use Compatibility Study
- Minimum Distance Separation Formulae Assessment
- Natural Hazard Impact Study/Assessment
- Noise/Vibration Study
- Rail Safety and Risk Mitigation Report
- Servicing Options Report
- Wildland Fire Assessment
- Wind Study

### **Town Considerations:**

New development in the Town of Oakville is premised on building compact, pedestrian-friendly and transit-oriented development. This requires a multi-disciplinary group of experts to ensure that intensification does not create negative impacts on existing residents, businesses, and natural and cultural heritage in the Town.

Reports, studies and plans are required by the Town for complete applications to ensure all aspects of development are considered. This can include those listed in the province's "Core Studies" and "Contingent Studies" categories, as well as other studies not listed.

The Town's Official Plan includes a comprehensive list of reports and studies that can be required. These requirements keep both the public and private sectors accountable for the impacts of new development. It is standard practice for this requirement to be scoped to only the necessary submission requirements, given what is proposed and the local context, through a pre-consultation meeting. Should a proponent disagree with any of the submission requirements, the *Planning Act* provides for an opportunity for the Proponent to submit an appeal.

Based on staff experience, this process has been functioning effectively. Notably, there have been no appeals submitted for a complete application for several years, which speaks to its success. Staff have developed, and continue to update, a comprehensive series of 'terms of reference' for all requested reports, studies and plans to assist developers and their consultants with the expected content for these submission materials. This level of autonomy also enables the Town to tailor submission requirements to the local context and specifics of the proposal, for example, differing from those applicable to greenfield developments in northern municipalities. This flexibility is essential for staff to conduct thorough reviews and supports the broader objective of building a vibrant, livable, distinctive, and economically resilient community.

Furthermore, these proposed changes, specifically the topics/studies listed, remove important tools municipalities use to ensure that new developments fit and function well within existing communities and protect the quality of life for residents. Studies on

sun/shadow and lighting impacts, and assessment of design compatibility, provide critical information about how a development will affect – impact or support – surrounding properties, public spaces, and neighbourhood/community character. Without this information, municipalities may be forced to approve development proposals without fully understanding the impacts.

In addition, taking away the ability of municipalities to require context-based studies undermine local decision-making and ignores the fact that communities across Ontario have different contexts and needs. A one-size-fits-all approach may speed up approvals, but it could lead to poor planning outcomes and long-term issues that are more difficult and expensive to fix later. Good planning depends on a complete picture, and this proposal risks removing key pieces of that picture.

### **Comments to Province:**

The Town supports the intent to bring more consistency and predictability to complete application requirements under the *Planning Act*.

The Town also notes, as a general matter, that completeness under the *Planning Act* includes not only the required information and materials, but also the applicable application fees. Fees are an integral component of a complete application submission and are a key part of initiating the review process.

In response to the province's request for feedback, the following comments address the specific questions outlined below.

**1. *Is the list of the types of information and material identified in this proposal comprehensive enough for planning authorities to effectively evaluate all planning applications they may receive?***

Response: No. While the proposed list of core and contingent studies captures many of the technical studies typically required to support development applications, it does not fully reflect all necessary submission requirements to effectively evaluate applications.

**a) *If not, why? What information or material is missing from the proposed list?***

Response: There is a notable gap in the proposed list of core and contingent studies if the intent is to establish a comprehensive review and decision-making framework. Key submission materials such as draft plans of subdivision for a subdivision application and site plan and building elevation drawings for site plan applications are not included.

The core and contingent lists primarily focus on studies and reports, with limited inclusion of other key submission materials such as plans and drawings. If the Province's intent is to establish a complete master list of materials that may be required, it should be truly comprehensive. As currently drafted, the omission of core application plans (for example, draft plans and site plans) creates uncertainty about how these foundational submission requirements are intended to fit within the framework.

#### Additional Core/Contingent Reports/Plans:

- Draft Plan of Subdivisions/Draft Plan of Condominium
- Site Plan/Concept Plan
- Landscape Plan
- Area Design Plan
- Survey/Legal Plan: Establishes accurate property boundaries, existing conditions, and legal parcel configuration to support review of the proposal.
- Draft Zoning By-law Amendment/Draft Official Plan Amendment: Sets out the proposed policy or zoning changes, allowing the applicant to clearly identify and justify requested modifications.
- Grading and Servicing Plan: Confirms proper grading to avoid water runoff onto adjacent properties and ensures connection to municipal services.
- Floodplain analysis: Evaluates flood risks, especially in areas near rivers, creeks, or low-lying lands
- Shoreline Hazard Study: Assesses risks associated with flooding, erosion, and shoreline instability to support public health and safety.
- Parking Justification Study: Evaluates parking needs and supply.
- Active Transportation Plan: Reviews pedestrian and cycling infrastructure and connectivity.
- Pedestrian Circulation Plan: Demonstrates safe, accessible, and connected pedestrian movement through the site, supporting public safety and accessibility.
- Market Impact Study/Retail/Service Commercial Needs Assessment: Evaluates potential impacts on existing commercial areas and assesses demand to support balanced and sustainable growth.
- Lighting Plan/Photometric Plan: Assesses lighting levels and distribution to ensure safety, minimize spillover impacts, and reduce effects on adjacent properties, NHS and the public realm.
- Shadow Impact Assessment: evaluates whether the proposal causes undue shadow impacts on the subject lands and on the surrounding context, including public outdoor amenity spaces, public parkland, sidewalks and other components of the public realm.

These materials are important to understanding development proposals and support a complete application review; however, their requirement should remain context-dependent and determined by the municipality.

#### ***b) Should any of the types of studies identified in this proposal be removed from the proposed list?***

Response: Most of the listed studies are understood to be part of a comprehensive provincial framework. While some studies may not be commonly required in Oakville due to local context (for example, Aggregate/Minerals/Petroleum Resource Impact Assessment), the Town recognizes that the intent is to create a province-wide list and

staff would have the ability to not require certain studies if warranted based on the context. It is important for local flexibility to determine relevance.

**2. Do you have any feedback on the objectives identified for each of the types of studies listed in this proposal? Are they broad enough to support planning authorities in obtaining sufficient information to evaluate applications, comply with applicable legislation, and determine consistency with provincial policies or conformity with provincial and municipal plans? Is there anything missing?**

Response: The objectives for the listed studies are generally appropriate and broadly reflect the matters that are intended to address, including environmental, servicing, transportation, and public safety matters.

It is suggested that some of the study titles be expanded to better reflect the full scope of work typically required. For example:

- Functional Servicing Report could be more appropriately identified as a Functional Servicing Report/Stormwater Management Report
- Arborist Report could be expanded to be identified as Arborist Report/Tree Inventory/Preservation Plan.

These refinements would improve clarity and better align expectations for study deliverables.

Clarity should be maintained that the application of each study must remain context dependent to ensure relevance to the specific proposal and local conditions.

**3. Should the list identify the types of applications that the information and material could be required for (i.e., official plan amendment, zoning by-law amendment, site plan control, plans of subdivision/condominium, consents)? If so, why?**

Response: No. The Town does not support further prescribing which studies or materials should be linked to specific application types. Application requirements should remain flexible and be determined by municipalities based on the nature, scale, and context of the proposal.

**4. Are there studies listed that should only be required for certain types of applications? If so, which ones and why?**

Response: No. The applicability of studies should remain context-driven and determined by municipalities on a case-by-case basis. Prescribing when specific studies must apply to certain application types would reduce necessary flexibility and limit the ability to tailor requirements to local conditions and the specifics of each proposal.

**5. Should planning authorities maintain the ability to develop terms of reference to specify the breadth of information required for each of the types of studies included in the provincial list? Please elaborate on your response.**

Response: Yes. Municipalities should retain the ability to establish and apply terms of reference for studies included in the provincial list.

This flexibility is important because some studies will not be relevant in all contexts, including within Oakville. Maintaining this ability ensures that study requirements can be appropriately scoped, tailored, and, where necessary, excluded where they are not applicable or threshold of development is not met.

Maintaining municipal discretion through terms of reference allows municipalities such as the Town of Oakville to avoid a one-size-fits-all approach and ensure that only relevant information is required to support a complete and meaningful review under the *Planning Act*. This approach also supports efficient review processes and ensures that submissions are appropriate to the scale and complexity of each application.

**6. Do you have any other input or suggestions of relevance to this proposal?**

Response: Overall, the Town supports the intent of improving consistency and predictability in application requirements. However, it is important that the framework does not unintentionally reduce the ability of municipalities to tailor submission requirements to local context.

Maintaining municipal flexibility is essential to ensure that planning applications are appropriately scoped, efficient to process, and responsive to local conditions. This flexibility also supports the broader objective of creating complete, high-quality applications that enable effective decision-making and support the delivery of a vibrant, liveable, distinctive, and economically resilient community.

**13. ERO 026-0314 - Proposed Changes to Various Regulations Under the Planning Act and the City of Toronto Act, 2006 to Specify Additional “Prescribed Professions” for the Purposes of a Complete Application**

**Commenting period:** March 30, 2026-May 14, 2026

The Province is seeking feedback on proposed changes under the *Building Homes and Improving Transportation Infrastructure Act, 2026*, to expand the list of “prescribed professionals” whose certified report and studies must be accepted as part of a complete application under the *Planning Act*.

These proposed changes build on earlier legislative amendments introduced through the *Protect Ontario by Building Faster and Smarter Act, 2025* (Bill 17), which created the regulation making authority to prescribe certified professionals for the purpose of

complete applications. Subsequent regulations in January 2026 identified professional engineering as a “prescribed profession” for the purpose of a complete application.

The current proposal seeks feedback on adding additional certified professionals, such as registered landscape architects, whose reports would be deemed to satisfy complete application requirements at the point of submission, without requiring further revision for completeness purposes.

The intent of the proposal is to further streamline approvals, reduce initial submission costs, and support faster development review timelines.

### **Town Considerations:**

The Town of Oakville notes that there has been some confusion in practise regarding whether reports prepared by prescribed professionals accepted as part of a complete application preclude the ability for municipal review.

The Province has clarified that while municipalities must accept these reports in order to deem an application complete under the *Planning Act*, municipal staff retain the ability to review technical content and request additional information during the application review process.

The Town appreciates this clarification and confirms that the Town’s current practice already aligns with this approach, in that technical studies are not pre-reviewed as part of deeming an application complete but are instead fully assessed during the detailed review stage.

There is value in establishing clarity around the scope of practice associated with any additional prescribed professions, to confirm alignment between the type of report being submitted and the professional qualifications/credentials required to prepare it. This would help avoid uncertainty where certain study types may overlap across disciplines and ensure consistency in how requirements are applied across municipalities.

### **Comments to Province:**

The Town of Oakville is generally supportive of expanding the list of prescribed professionals for the purposes of a complete application under the *Planning Act*, as this may help streamline submission requirements and improve consistency across applications.

Recommended Certified Professionals:

- Registered Professional Planners (MCIP, RPP) – for planning justification reports, policy alignment analysis, urban design and land use planning matters.
- Architects (OAA) - preparation of concepts and drawings (plans and elevations, etc.) and urban design matters.
- Landscape Architects (OALA, LEED EP) – for landscape and site design reports.
- Licensed Hydrogeologists (P.Geo,)– for groundwater impact assessments and hydrogeological studies.
- Qualified Environmental Professionals (e.g., QPRA under Ontario Regulation 153/04) – for environmental site assessments.
- Certified Arborists (ISA Certified Arborist)– for tree inventories and preservation plans.
- Ontario Land Surveyors (OLS) – for land surveys.
- Land Economist – for commercial studies.
- Archaeologist – for archeological studies.

However, if the list is expanded, it will be important for the Province to clearly define the scope of practice and the types of studies each prescribed profession is intended to prepare. This is particularly important where responsibilities may overlap between disciplines. The scope of each prescribed profession should consider their designated mandate and any applicable oaths and prescribed ongoing certification requirements. For example, clarity would be helpful in determining whether certain site related submissions such as grading plans should be limited to appropriately qualified professionals such as professional engineers and landscape architects (as opposed to an architect).

If the Province’s intent is to streamline approvals, it will be important to ensure that prescribed professional requirements remain closely aligned with relevant technical expertise. Without this alignment, there is a risk that additional clarification may be required during review, which could inadvertently introduce delays in the planning process.

Clear guidance on these distinctions would help ensure consistency in application across municipalities and reduce uncertainty regarding appropriate qualifications for specific study types

#### **14. ERO 026-0315 - Consultation on upper-tier Official Plans, secondary plans, and site and area-specific policies**

**Commenting Period:** March 30, 2026-May 14, 2026

The Province is undertaking a public consultation on proposed policy and legislative changes intended to simplify and standardize the format and content of upper-tier

Official Plans, as well as the use and structure of secondary plans and site- and area-specific policies. In the context of the Town of Oakville, the use and structure of secondary and site-and area-specific plans within the provincial planning framework is applicable.

As part of the consultation on simplifying and standardizing planning documents, the Province is seeking feedback on proposed changes to the role, format, and use of secondary plans and site- and area-specific policies under the *Planning Act*. The proposed approach in Bill 98 limits localized or area-specific policies through reliance on standardized Official Plan permissions.

### **Town Considerations**

It is unclear how areas previously addressed through site-and area-specific policies and/or secondary plans will be addressed in the proposed standardized Official Plan format. Changes will affect how local policies are prepared and applied across the Town and the content of the Official Plan, affecting the ability to address local context, character and infrastructure considerations through these policy frameworks.

### **Comments to Province on Discussion Questions**

Clarity is required regarding how existing secondary plans, and site-and area-specific policies will be addressed. Streamlining efforts should be focused on reducing unnecessary duplication, while preserving the ability of municipalities to tailor Official Plan policies to local circumstances and evolving community needs.

Moving site-and area-specific policies and secondary plans to stand-alone documents outside of the Official Plan will add complexity for the policy reader. Without connectivity from a table of content perspective, a reader will not necessarily understand the applicability of these separate plans or policies. There will likely be duplication of policy content required as a result of being a standalone document, which will have the opposite effect of the streamlining being sought.

More information is needed to understand how these documents would be subject to the same *Planning Act* processes that apply to Official Plans, without being part of an Official Plan under the *Planning Act*.

Confirmation of the Province's interpretation of what constitutes Secondary Plans and site-and area-specific policies is needed to clarify the differences in scope and otherwise between these frameworks. By moving context-specific policies to separate, stand-alone documents, the Province may risk inconsistency in interpretation and operation.

Part E – Growth Areas, Special Policy Areas and Exceptions, of the Town’s Livable Oakville Plan consists of comprehensive objectives and policies for the nodes and corridors within the Urban Structure. The Special Policy Areas include areas subject to further study and areas for which additional policies apply. Exceptions are also contained in this part of the Plan. The Town’s preference is to maintain this structure, as it works well from a clarity and implementation perspective, and the benefits of moving these sections to a separate document are unclear.

Heritage Conservation Districts need to be considered. They are currently identified within an appendix schedule to the Livable Oakville Plan, and clarity is sought on whether they would be considered within a heritage-specific standalone schedule or would be integrated into the standardized table of contents

**15. ERO 026-0347 - Proposal to identify and protect a corridor of land for future electricity infrastructure within and adjacent to the Parkway Belt West Plan Lands**

**Comment Period:** March 30, 2026 - May 29, 2026

The Ministry of Energy and Mines is launching a study to preserve a corridor of land within and adjacent to the Parkway Belt area for future transmission infrastructure. The purpose of this study is to identify which of those lands will be needed to ensure electricity demand growth in the Greater Toronto Area can be met reliably and affordably. The study area follows the Parkway Belt West Plan lands, which includes lands already designated or used for electricity infrastructure, as well as additional lands that may be needed for future expansion.

**Town Considerations:**

The proposed Parkway Belt Transmission Corridor falls entirely within the Parkway Belt West Planning Area, 1978. The Parkway Belt West Plan Area, March 2026 consolidation, includes lands currently subject to the Parkway Belt West Plan. Some locations of the proposed new transmission infrastructure corridor are outside of the Plan Area; however, where this occurs, it coincides with existing transmission infrastructure.

In 2026, Town OPA 74 modified Livable Oakville text and schedules as part of the Parkway Belt West Designation project, in response to the anticipated revocation of the Parkway Belt West Plan. One aspect of OPA 74 was the application of a secondary designation for lands designated Regional Natural Heritage System in the Region of Halton Official Plan, along with the application of the associated Regional policies. This ensured that upon revocation of the Parkway Belt West Plan, lands currently designated

Regional Natural Heritage System will continue to be protected and subject to the applicable policies.

OPA 74 was premised on revocation of the Parkway Belt West Plan. Now with the proposed new Parkway Belt Transmission Corridor, the approach taken under OPA 74 to apply a secondary designation for lands, such as Regional Natural Heritage System, should be maintained with the new corridor lands.

**Comments to Province:**

The Town of Oakville supports the provincial efforts ensuring timely and cost-effective transmission expansion for future transmission infrastructure throughout the Greater Toronto Area. The Town requests ongoing municipal engagement through the study and subsequent Environmental Assessments and project phases for the forthcoming infrastructure projects.

Given the location of the proposed Parkway Belt Transmission Corridor lands and potential expansion within the Town's Regional and Local Natural Heritage Systems and Greenbelt Natural Heritage System, consideration should be given to the ecological mitigation hierarchy when selecting the corridor locations or expansions. Consideration should be given for the continued protection of sensitive communities, such as the Joshua's Creek valleylands system.

The Town requests the ability to retain a secondary designation where applicable to ensure appropriate policies are in place for secondary uses that are supportive of an essential infrastructure corridor.

**16. ERO 026-0426 - Proposed Regulation to streamline planning approvals for Kindergarten to Grade 12 (K-12) publicly funded schools under the Planning Act**

**Commenting period:** April 21, 2026-June 5, 2026

The Province is seeking feedback on proposed changes under the *Planning Act* to streamline land use planning approvals for stand-alone K–12 publicly funded school buildings, but would not apply to schools that are integrated with other forms of development (e.g., podium schools), or co-located facilities with municipal uses such as community centres or libraries.

The intent of the proposal is to support faster and more predictable approvals for School Boards, while focussing municipal review on core health, safety, and functional aspects of school sites, and recognizing School Board expertise in matters such as child safety.

Key elements of the proposed regulation include:

## **Zoning**

To eliminate the requirement for:

- Minimum and maximum building height;
- Minimum and maximum density (floor space index or floor area ratio);
- Minimum and maximum lot coverage;
- Minimum and maximum setbacks; and
- Parking requirements.

## **Complete Application Requirements (Site Plan)**

To limit the information and materials that municipalities can require as part of a complete site plan application.

This would exclude studies and materials related to:

- building massing and conceptual design
- building elevations
- urban design
- landscaping and planting
- tree management and preservation
- lighting
- environmental impacts

## **Conditions of Site Plan Approval**

Municipal authority to impose certain site plan conditions would be restricted.

Specifically, municipalities would no longer be able to require:

- Provision of facilities for the lighting, including floodlighting, of the land or of any buildings or structures
- Provision of hedges, trees, shrubs or other groundcover or facilities for the landscaping of the lands on a school site

## **Small Additions**

Additions to existing publicly funded K–12 schools would be exempt from site plan control where the addition does not exceed 15% of the existing gross floor area.

## **Town Considerations**

The Town of Oakville recognizes the Province's objective of streamlining planning approvals for publicly funded K–12 schools and supports efforts to facilitate the timely delivery of school infrastructure to serve growing communities.

Ensuring that schools can be delivered more efficiently and predictably is important for supporting complete communities and responding to population growth. The Town acknowledges that delays in approvals can impact the timely provision of educational facilities and that there is value in identifying opportunities to improve coordination and reduce unnecessary process related delays.

While the proposed regulation is intended to focus municipal review on health, safety, and functional matters, many elements proposed to be excluded from review, such as site design, landscaping, tree preservation, lighting, and environmental considerations, are closely linked to broader public health and safety, accessibility, and long-term community outcomes. In practice, these elements play an important role in ensuring that school sites are safe, well-integrated into surrounding neighborhoods, and compatible with adjacent uses.

While the Town supports the intent to streamline approvals and facilitate the delivery of school infrastructure, it is critical that municipalities retain sufficient ability to address site-specific conditions and ensure that school developments are safe, functional, and appropriately integrated within their surrounding context.

### **Comments to Province**

The Town generally supports the objective of enabling publicly funded schools to be delivered more quickly and efficiently, particularly where this supports the timely creation of complete communities and responds to growing enrolment pressures. However, it is important that any regulatory changes continue to ensure that school sites can be developed in a manner that is safe, functional, and appropriately integrated within surrounding neighbourhoods.

The following comments are provided in response to the specific proposed changes:

### **Zoning**

The Town of Oakville is generally supportive of providing greater flexibility in zoning to facilitate the timely delivery of publicly funded K–12 schools.

However, the proposed removal of key zoning standards raises important concerns related to site functionality, compatibility, and public safety. In particular, the absence of minimum parking requirements can create operational and safety challenges. While flexibility in parking standards may be appropriate in some contexts, consideration should be given to establishing a baseline requirement to accommodate staff parking, accessible parking, and short-term pick-up/drop-off activities. Without this, there is a risk that parking demand could shift to adjacent streets, which may create safety concerns, particularly in areas with young children where on-street parking can obstruct visibility and increase conflicts between pedestrians and vehicles.

In addition to parking, consideration should be given to how school sites will safely accommodate bus circulation and loading areas. These functions are critical to the safe and efficient operation of a school and are closely tied to broader health and safety objectives.

The proposed removal of setback requirements also raises compatibility and safety considerations. While flexibility may be appropriate, some form of transition or performance-based standard may be warranted, particularly where school buildings are adjacent to low-density residential uses. For example, minimum setbacks tied to

building height could help ensure appropriate separation, access to light, and privacy, while also supporting safe movement and clear sightlines around the site.

Overall, while the intent to streamline zoning requirements is supported, sufficient standards must remain in place to address core health, safety, accessibility, and compatibility considerations, particularly as they relate to the day-to-day operation of school sites and their integration within surrounding neighbourhoods.

### ***Complete Application Requirements (Site Plan)***

The Town generally supports efforts to streamline and standardize complete application requirements for publicly funded schools; however, the exclusion of key technical studies and materials raises concerns regarding the ability to properly assess site functionality, safety, accessibility, and integration with surrounding areas.

Comments on each proposed exclusion are provided below.

#### Building massing, Conceptual Design, Elevations, Urban Design

While it is understood that the intent is to streamline review requirements, these elements are closely linked and collectively inform how a school is safely and appropriately integrated within its site and surrounding context. This includes ensuring appropriate building placement, scale, and orientation, as well as maintaining safe and functional relationships between the building, outdoor spaces, and adjacent uses.

Review of these elements also supports critical health and safety considerations, including safe pedestrian, bicycle, and vehicular circulation, clear sightlines for supervision, and appropriate separation between conflicting uses. In addition, they help ensure barrier-free access and compliance with AODA principles by supporting inclusive and accessible movement throughout the site.

Without consideration of these integrated design components at the planning stage, there is an increased risk that important functional and safety-related issues, such as emergency access, visibility across the site, and safe movement of students and vehicles, may not be adequately addressed prior to construction.

#### Landscaping, Planting and Tree Management/Preservation

It is understood that School Boards will apply their expertise in child safety in the design of school sites, including the arrangement of outdoor spaces. From a municipal perspective, landscaping, planting and tree management continue to play an important role in supporting the safe and functional integration of school sites within the broader community context.

In Oakville, schools are often located adjacent to public parks, where there is shared use of pathways, open spaces, and, in some cases, parking and access points. This creates a direct interface between school facilities and public spaces, where both child safety and broader public safety considerations must be addressed in a coordinated manner. Landscaping and tree management are therefore important not only within the

school site, but also in how existing vegetation and planting plans connect with surrounding public realm infrastructure and shared areas of movement.

Trees provide important shade for children in outdoor learning and play areas, including reducing the heat island effect in hardscaped spaces, which supports student comfort and safe use of outdoor spaces throughout the school day. In addition, where school sites include publicly accessible pathways connecting to adjacent parks or open spaces, tree cover can provide shade and comfort for members of the public using these routes, supporting safe and usable pedestrian connections through the site.

In addition, co-ordinated planting and site design support both school and adjacent public areas, helping to ensure safe interaction between school users and members of the public.

While School Boards are expected to address child safety within their site design, municipalities continue to play a role in ensuring that the interface between school sites and public spaces (i.e., neighbourhood/community parks and streetscapes) is designed in a way that supports overall public safety, health, accessibility, and functional connectivity.

### Lighting

Lighting is a key consideration in ensuring the safe and functional operation of school sites. Parking areas require adequate illumination to support safe use during early morning and evening hours, particularly where schools host after-hours events or community activities. In Oakville, school parking lots are also frequently used by members of the public accessing adjacent parks, including shared walkways that connect through or alongside school sites. Appropriate lighting in these areas is therefore an important public safety consideration beyond school use.

Lighting design is also important to avoid the creation of poorly lit or “dark” areas around school buildings and pedestrian routes, where reduced visibility can increase safety risks for both students and members of the public. Well-lit pathways, including shared pedestrian routes to public parks, support safe movement through the site and contribute to overall site security.

Where floodlighting is used for outdoor sports fields, careful consideration is required to manage impacts and over-lighting on adjacent residential properties and NHS, including light spill, source glare, and impacts on inhabitants. This is particularly relevant where school fields are used by third-party community groups during evenings and weekends, extending hours of use well beyond the school day.

More broadly, lighting design should support safe pedestrian movement and provide clear visibility of circulation routes and on-site destinations, while balancing the need to minimize adverse impacts on surrounding residential uses.

### Environmental Impacts

Environmental review plays an important role in ensuring that school sites are developed in a manner that is safe, functional, and appropriately integrated within their surrounding context. While School Boards are expected to address site-specific environmental considerations through their expertise in school design and child safety, certain environmental matters also have broader implications for public safety, and infrastructure performance.

Changes in grading, drainage, and surface coverage can affect stormwater flows both within the school site and onto adjacent lands. Extensive hard surface coverage may reduce infiltration and increase runoff, which can have downstream impacts on municipal infrastructure, adjacent properties, and nearby natural features. These considerations are particularly important where school sites are located adjacent to parks, open space systems, or the Natural Heritage System.

Environmental design also intersects with safety considerations, including ensuring that pedestrian and vehicular routes remain safe under varying weather conditions, and that emergency access routes are maintained. Site grading and drainage design can directly influence accessibility and the safe movement of students, staff, and members of the public through the site.

Where school sites interface with public parks and shared pathways, these environmental considerations also extend to public users of those spaces.

While the intent to streamline review is understood, maintaining an awareness of environmental impacts at the planning stage helps ensure that public health, safety, and infrastructure resilience considerations are appropriately addressed in the overall site design.

### ***Conditions of Site Plan Approval***

The Town generally understands the Province's intent to streamline and standardize site plan approval requirements for publicly funded schools; however, the proposed regulations would remove municipal authority to impose certain site plan conditions related to lighting and landscaping.

Lighting is a key safety consideration for school sites, particularly where parking areas, pedestrian routes, building entrances, and shared pathways to adjacent public parks are used by both school users and members of the public. Appropriate lighting supports safe movement and reduces areas of low visibility that may present opportunities for improper behaviour and safety concerns during early morning, evening, and after-hours use.

As discussed above, landscaping plays an important role in supporting safe and functional school sites. It helps define pedestrian circulation routes, supports barrier-free access, provides shade and cooling in outdoor learning and play areas, and contributes to the safe integration of school sites with adjacent public spaces such as parks and shared open space systems.

More broadly, while School Boards are responsible for addressing child safety within the design of school sites, municipalities must also consider the broader public safety context in which these sites operate. School properties are not fully restricted to school use and are accessed by the public after hours, particularly where they provide pedestrian connections or shared access to adjacent parks and open spaces. In these circumstances, it is not possible to fully separate school and public use, and site design must therefore consider the safety of all users. This is especially important where school sites are directly connected to or interface with public parks, shared pathways, and other community infrastructure, where coordinated consideration of lighting, landscaping, and circulation is required to support overall public safety.

### ***Small Additions***

The Town has no fundamental concerns with the proposed exemption of additions to K–12 publicly funded schools that are no more than 15% of the total gross floor area from site plan control. This approach is consistent with previous policy changes that have exempted portable classrooms from site plan approval requirements, and may support more efficient delivery of minor expansions to existing school facilities.

### ***Co-located School/Municipal Facilities***

The Town understands that the Province is not currently proposing to apply the regulations to co-located developments involving publicly funded schools and municipal facilities such as community centres or libraries, and is seeking input on this approach.

The Town supports maintaining co-located school and municipal facility projects within the site plan approval process. These types of developments present more complex site planning considerations due to their shared use, higher intensity of activity, and integration of multiple user groups with different operational needs and safety requirements.

In Oakville, municipal facilities are routinely subject to site plan approval to ensure that appropriate standards are met in relation to site layout, circulation, parking, accessibility, servicing, landscaping, and public safety. This approach ensures consistency in design standards and ensures that municipal facilities are held to the same planning and development requirements as other forms of development.

Given the shared nature of co-located school and municipal facilities, maintaining site plan approval would ensure these developments are reviewed in a coordinated manner, with appropriate consideration of shared access, shared spaces, parking demands, pedestrian safety, and overall site functionality.