



**Date:** 2026-04-15

**Subject:** **City of Brampton Response to Bill 98, Building Homes and Improvement Transportation Infrastructure Act**

**From:** **Steve Ganesh, Commissioner, Planning, Building and Growth Management**

**Report number:** Planning, Bld & Growth Mgt-2026-363

**Strategic Focus Area:** Growing Urban Centres & Neighbourhoods

---

### Recommendations

1. That the report prepared by Steve Ganesh, Commissioner, Planning, Building and Growth Management to the Council Meeting of April 22, 2026 re: **City of Brampton Response to Bill 98, Building Homes and Improvement Transportation Infrastructure Act**, be received; and
2. That Council endorse the draft staff comments attached as Appendix A through M and direct staff to submit these comments to the Ministry of Municipal Affairs and Housing prior to the applicable Environmental Registry of Ontario (ERO) comment deadlines;
3. That Council authorize staff to continue monitoring the development of regulations associated with Bill 98 and report back with further analysis and implementation considerations as details are released; and
4. That the City Clerk forward this report to the Ministry of Municipal Affairs and Housing, Brampton's Members of Provincial Parliament, the Association of Municipalities of Ontario, and the Region of Peel.

### Report Summary

This report provides an overview of the Province's *Building Homes and Improving Transportation Infrastructure Act, 2026* (Bill 98) and associated Environmental Registry of Ontario (ERO) postings and seeks Council endorsement of staff comments.

Bill 98 represents the next phase of provincial planning and growth management reform, building off ongoing legislative changes focused on accelerating new housing supply, aligned with the Province's goal of building 1.5M new homes by 2031. While framed as measures to accelerate housing delivery and streamline approvals, the proposed changes introduce a coordinated set of legislative and regulatory shifts that affect how municipalities plan, review development, and deliver infrastructure.

For the City of Brampton, these changes have implications for how growth is managed, how development is reviewed, and how infrastructure is planned and funded. While some measures may support efficiency and consistency, several proposals may limit the City's ability to plan and manage growth in a way that reflects local priorities and infrastructure capacity.

This report outlines the key changes, their implications for Brampton, and summarizes staff's proposed response to the Province through the ERO process. Detailed submissions are included in the appendices.

---

## **Background**

Over the past several years, the Province has introduced a series of legislative reforms aimed at increasing housing supply and streamlining development approvals, including Bills 108, 109, 23, 60, and 17.

Bill 98 continues this direction and reflects a broader shift toward increased provincial direction, reduced municipal discretion, and greater reliance on standardized tools and prescribed processes.

Unlike earlier reforms, Bill 98 is being advanced alongside a coordinated suite of ERO postings that define how the proposed changes will be implemented in practice.

## **Current Situation and Key Implications for the City**

Bill 98 is currently in Second Reading and is not yet in force. Many provisions will come into force through proclamation and supporting regulations, with key details to be established through the Environmental Registry of Ontario (ERO) process.

Taken together, the proposed reforms represent a continued shift in how growth is planned, reviewed, and serviced across Ontario, with implications for municipal planning authority, development review processes, and infrastructure coordination.

### Planning Framework and Local Policy Flexibility

The Province is proposing to standardize Official Plans, including land use designations and plan structure, reducing reliance on secondary plans and site-specific policy frameworks.

**For Brampton, this limits the City's ability to implement a context-sensitive planning framework, including Brampton Plan, which was developed through extensive consultation and is still in early stages of implementation.**

Staff note that the proposed approach may reduce the City's ability to address key priorities such as climate change, environmental sustainability, and context-specific growth management. The removal of climate-related policy requirements from the Official Plans is of particular concern, as this may weaken the integration of climate considerations into land use planning, and ability to meet Council goals and

objectives outlined through the Environmental Master Plan (EMP) and Community Energy and Emissions Reduction Plan (CEERP).

**Staff position:** The City supports improved consistency across planning documents but recommends maintaining flexibility for municipalities to structure Official Plans, retain local-specific planning designations, and include locally relevant policy content, including climate and environmental policies. Staff also recommend that implementation timelines be aligned with statutory review cycles to avoid rework and disruption.

### Development Review and Municipal Oversight

The Province is proposing to streamline development approvals through changes to site plan control, complete application requirements, and increased reliance on prescribed professionals.

**For Brampton, these changes affect core tools used to ensure safe, functional, and well-designed development. In particular, limiting site plan control or removing it entirely would significantly reduce the City's ability to address site-specific issues, including safety, compatibility, and design quality, particularly in areas such as Major Transit Station Areas where site plan is the primary remaining approval tool.**

Similarly, restricting the information that municipalities can require as part of a complete application may limit the City's ability to assess environmental conditions, infrastructure impacts, and site-specific constraints.

**Staff position:** The City supports efforts to improve efficiency but recommends maintaining municipal authority to:

- review and refine development proposals through site plan control;
- require additional studies where needed to address local conditions; and
- independently review technical submissions to ensure quality and completeness.

Staff also note that removal of site plan control as a planning tool would have significant safety and design implications and should not be supported.

### Built Form, Community Design, and Public Realm

The Province is proposing to limit enhanced development standards, restrict sustainability-related requirements, and introduce changes to minimum lot sizes and parkland dedication.

**For Brampton, these changes may affect neighbourhood character, reduce the ability to secure functional parkland, and limit the City's ability to achieve environmental and sustainability objectives. The removal of requirements related to green building standards, landscaping, and environmental performance may**

**result in less efficient buildings, higher long-term costs, and increased environmental impacts.**

Changes to minimum lot sizes may also override the City's Comprehensive Zoning By-law and significantly increase subdivision potential in established neighbourhoods, with implications for infrastructure capacity and community character.

**Staff position:** The City recommends maintaining municipal authority to implement development standards that support complete communities, environmental sustainability, and public health and safety. Staff also recommend that any provincially prescribed standards consider local context, infrastructure capacity, and planning objectives.

With respect to parkland, staff recommend maintaining the City's ability to secure functional, publicly accessible parkland and limiting the extent to which encumbered lands or privately owned spaces can be credited toward parkland dedication.

Infrastructure Planning and Growth Coordination

The Province is proposing new governance and financing tools for water and wastewater infrastructure, including the ability to establish municipally owned public corporations to deliver and finance these systems. Additional amendments under Bill 98 would expand the Province's authority to regulate financial, governance, and transition matters related to such entities.

**For Brampton, this is significant as the City's continued growth depends on timely delivery of water and wastewater infrastructure, while recent development charge changes have shifted revenue collection later in the development cycle. This creates increased pressure to finance major infrastructure in advance of growth.**

Potential benefits of the proposed model may include new borrowing and financing flexibility, streamlined asset delivery, and alternative approaches to funding major capital works. However, the framework also raises important considerations related to municipal representation, accountability, debt allocation, cost sharing, and alignment with local growth priorities.

As a lower-tier municipality dependent on regional servicing decisions, Brampton has a strong interest in ensuring any new governance model maintains transparent decision-making, fair municipal participation, and clear accountability for service levels, costs, and long-term infrastructure planning.

**Staff Position:** Staff support exploring new tools that may help accelerate critical infrastructure delivery. However, any future model should maintain public ownership, protect municipalities from indirect financial risk or unfunded liabilities, ensure meaningful municipal representation in governance, and preserve strong coordination between infrastructure planning, land use planning, and housing growth objectives. Any future model should also support affordable and sustainable water rates for residents

and businesses, with user charges reflecting the cost of service and inflationary pressures, rather than being used as a primary mechanism to fund growth-related infrastructure.

### Growth Forecasting and Long-Term Planning (PPS/PMG)

The Province has released a draft Projection Methodology Guideline (PMG) to support implementation of the Provincial Planning Statement (PPS, 2024), which will guide how municipalities determine population and employment forecasts and land needs.

**For Brampton, this is a critical input into long-term planning decisions, as it directly influences growth allocation, land supply, infrastructure planning, and financial forecasting.**

Staff have previously identified concerns with the degree of reliance on provincial assumptions and the potential limitations on municipal flexibility.

**Staff position:** The City recommends that the PMG provide flexibility for municipalities to reflect local growth conditions, infrastructure constraints, and planning objectives, and that municipalities retain the ability to apply professional judgment in developing forecasts.

### Development Charges and Growth Financing

Bill 98 introduces targeted changes to the *Development Charges Act*, including proposed exemptions for non-profit retirement homes and potential future requirements for disclosure of development charges.

**For Brampton, these changes may reduce development charge revenue available to fund growth-related infrastructure, particularly when considered alongside previous reforms that deferred development charge collection.**

**Staff position:** The City supports measures that enable housing delivery but recommends that any changes to development charges consider impacts to municipal infrastructure funding and long-term financial sustainability. Staff also recommend that further clarity be provided on implementation and timing.

### **Implication Summary**

Taken together, the proposed changes represent a continued shift toward greater provincial direction, more standardized processes, and reduced municipal flexibility in key areas of the planning system.

**For the City of Brampton, this affects how growth is planned, how development is reviewed, and how infrastructure is delivered and funded. These impacts are particularly relevant in the context of Brampton's growth pressures, infrastructure needs, and ongoing planning initiatives.**

The most significant impacts relate to development review and planning policy, which affect the City's core ability to shape growth and development outcomes. While intended to support housing delivery, the effectiveness of these changes will depend on alignment with infrastructure capacity and implementation through regulation.

### **Next Steps**

Staff have prepared detailed submissions on priority ERO postings, included in the appendices for Council's endorsement.

Through these submissions, staff are recommending that the Province:

- maintain municipal flexibility in planning frameworks and policy development;
- retain municipal authority over development review processes;
- ensure alignment between growth planning and infrastructure capacity; and
- support phased and implementable transitions to new regulatory frameworks.

Staff will continue to monitor legislative and regulatory developments, participate in provincial consultation processes, and report back to Council as further details become available.

### **Financial Implications**

There are no immediate financial implications associated with this report. Financial impacts will depend on the final form of regulations and implementation of the proposed changes.

### **Conclusion**

Bill 98 and the associated ERO postings represent a significant phase in the Province's ongoing reform of the planning and development system.

While intended to support housing delivery and streamline approvals, the proposed changes introduce important considerations for how municipalities plan, review development, and coordinate infrastructure.

This report provides Council with a summary of these changes and seeks endorsement of staff's proposed response to the Province through the ERO process.

---

Steve Ganesh, MCIP, RPP, Commissioner  
Planning, Building and Growth Management

---

Marlon Kallideen, Chief Administrative Officer

Prepared by:

Shannon Brooks-Gupta, Manager, Policy Planning  
Integrated City Planning, Planning, Building and Growth Management

Carolyn Crozier, Strategic Leader  
Officer of the Commissioner, Planning, Building and Growth Management

Michelle Solski  
Senior Manager, Municipal Transition and Integration  
Office of the CAO

**Attachments:**

- Appendix A: ERO 026-0300 Bill 98 Legislative Changes ERO Response
- Appendix B: ERO 026-0301 Response on Water/Waste Water Changes
- Appendix C: ERO 026-0305 Electronic Submission and Notice
- Appendix D: ERO 026-0310 Site Plan
- Appendix E: ERO 026-0311 Minimum Residential Lot Sizes
- Appendix F: ERO 026-0312 Changes to Parkland
- Appendix G: ERO 026-0309 Changes to Enhanced Development Standards
- Appendix H: ERO 026-0313 Materials Required as Complete Application
- Appendix I: ERO 026-0314 Prescribed Professions
- Appendix J: ERO 026-0229 Proposed Changes to Parkway Belt West Plan
- Appendix K: ERO 026-0315 Consultation on upper-tier official plans, secondary plans and area specific policies
- Appendix L: ERO 026-0347 Parkway Belt West Land Study Area
- Appendix M: ERO 026-0304 Draft Projection Methodology Guidelines to support the implementation of the Provincial Policy Statement