

April 16, 2026

Subject: Submission on Bill 98 – Implications for Municipal Climate Authority and Sustainable Growth

Dear Minister,

I am writing to provide comments on the proposed Building Homes and Improving Transportation Infrastructure Act (Bill 98) and its implications for municipalities' ability to plan for complete, sustainable, and climate-resilient communities.

While the stated intent of Bill 98 is to streamline planning processes and accelerate housing delivery, several proposed amendments raise significant concerns regarding the erosion of municipal authority and the removal of essential planning tools.

In particular, the proposed changes to the Planning Act that would eliminate requirements for municipal official plans to include policies on greenhouse gas mitigation and climate change adaptation represent a substantial policy shift. These provisions are foundational to local climate action and are directly linked to municipalities' ability to achieve established greenhouse gas reduction targets.

Further, the proposed repeal of authorities enabling municipalities to implement green development standards would limit the ability to require cost-effective measures such as energy-efficient building design and low-carbon systems. These standards are widely recognized as practical tools that reduce long-term energy costs for residents, improve building performance, and support resilience to climate impacts.

Collectively, these changes risk increasing long-term costs to households, deepening reliance on fossil fuels, and setting back progress toward provincial and municipal climate objectives. They also reduce municipalities' capacity to respond to local conditions, including infrastructure constraints and community needs, which are critical to effective land use planning.

Municipalities have, over the past decade, made significant investments in aligning planning frameworks, including the development and harmonization of green development standards that provide both predictability for industry and improved outcomes for residents. The proposed move

toward standardized provincial approaches risks undermining this progress while limiting opportunities for local accountability and public engagement.

Given these considerations, I respectfully urge the Province to:

- *Retain requirements for climate change mitigation and adaptation policies within municipal official plans;*
- *Maintain municipal authority to implement green development standards; and*
- *Ensure that any planning reforms support both housing supply and long-term affordability through energy efficiency and resilience.*

The ability of municipalities to integrate climate considerations into land use planning is essential to building complete communities that are affordable, healthy, and sustainable over the long term. The proposed amendments in Bill 98, as currently drafted, would significantly constrain that ability.

Thank you for the opportunity to provide input on this matter.

Sincerely,

Amy Schnurr

A handwritten signature in cursive script that reads "Amy Schnurr".

Executive Director
BurlingtonGreen Environmental Association