

November 21, 2025

Minister Sarkaria
Ministry of Transportation
777 Bay Street, 5th floor
Toronto, Ontario M7A 1Z8

Dear Minister Sarkaria,

Re: OPPI Feedback on ERO 025-1140: Supporting the Harmonization of Municipal Road Construction Standards

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Transportation's proposed legislative amendments to support the implementation of harmonized road standards, including for municipal road construction.

OPPI is the recognized voice of the planning profession in Ontario. With more than 5,000 members, OPPI serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum for developers, consulting firms, municipal governments and within the Ontario Public Service, other community agencies, and academic institutions. They work across a geographically diverse cross-section of Ontario in communities of all size and represent a range of professional areas of practice including but not limited to transportation planning.

OPPI acknowledges that there are several benefits to harmonizing road construction standards. These benefits include:

- Providing clarity and consistency for industry and contractors operating across multiple municipalities.
- Reducing duplication of effort on typical design details and specifications.
- Improving efficiency in design, procurement, and construction, which can support housing and infrastructure delivery objectives.

Technical standards are powerful planning and design tools that shape travel behaviour and mode share, development patterns and transit viability, urban design, tree canopy, stormwater management, and climate resilience.

To ensure the benefits of construction standards are realized, it is important that harmonized standards align with provincial and municipal planning policy on:

- Transit-supportive densities
- Active transportation and Complete Streets
- Healthy, safe, and climate-resilient communities

To achieve these goals, it is critically important the province engage with municipal practitioners from a range of community sizes and contexts (single-tier, two-tier, urban, rural, northern). Also at the table should be broader industry including professional planners and engineers, as well as experts in accessibility, public health, and climate resilience. Once the standards are legislated, there must be mechanisms in place for periodic reviews and updates so standards can respond to new evidence, innovation, and changing policy directions.

Provincial standards should function as minimum baselines, not ceilings. The ministry would need to provide mechanisms to allow municipalities to exceed the baseline where local plans call for higher safety performance, enhanced active transportation infrastructure, or stronger climate adaptation. Where exemptions are required, the process should be transparent, technically grounded, and time efficient. Lastly, it should explicitly recognize the legitimacy of context-sensitive and multimodal designs consistent with approved municipal plans.

We encourage the Ministry to be cautious of a one-size-fits-all approach as there could be unintended consequences. To use just one example, roads and streets perform very different roles depending on local land form and land use which can be heavily influenced by where a municipality exists geographically within the province. Roadways can range from rural arterials to urban main streets, industrial corridors, and local residential streets – all of which have different functional and operational expectations and needs.

We also caution the Ministry about using overly prescriptive, uniform standards as these could pose potential risks. Examples include:

- Prioritizing vehicle throughput over safety, accessibility, and public realm quality which is counter to provincial policy and guidelines as well as local master plans.
- Limiting the ability to tailor cross-sections, design speeds, and intersection treatments to local land-use context and community needs thus negatively impacting the desirability of community development.
- Slowing adoption of innovative or evidence-based safety measures that emerge ahead of provincial updates which could lead to future adaptation challenges and financial risk.

For harmonization to be successful, road standards must be integrated with Municipal Official Plans and Transportation / Integrated Mobility Master Plans, Local Vision Zero and road safety strategies, and Transit and goods-movement strategies in both single-tier and two-tier systems.

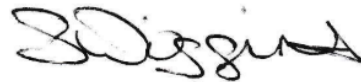
Professional planners are well-placed to help ensure that harmonized standards support, rather than constrain, the delivery of safe, multimodal, and complete street networks. To that end, we would be willing to work with the Ministry in any way that is helpful to ensure that harmonized road construction standards, when launched, will be celebrated by the industry regardless of profession, municipality, or project.

Thank you for the opportunity to provide feedback on the ERO 025-1140. We would be pleased to meet with you to discuss our recommendations, and their utility to the overarching objective to build faster while enhancing community safety. If you have any questions or would like to schedule a meeting, please do not hesitate to contact Susan Wiggins, Executive Director at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI