

Simplifying and Standardizing Official Plans

Subject: ERO 025-1099 – Simplifying and Standardizing Official Plans

Introduction and Context

I appreciate the opportunity to comment on the Province's consultation document regarding the simplification and standardization of Official Plans. I am submitting these comments as an individual as a Registered Professional Planner with over 20 years of expertise in community development and legislative affairs and as a mid-career Doctor of Design candidate at the University of Calgary. My doctoral research examines how small-town Official Plans in Northern Ontario can evolve from static compliance documents into persuasive storytelling tools that attract development investment and strengthen community confidence. In effect, my innovation is to create a new model for how to rewrite the OP process itself. Therefore, how the Government of Ontario should change the requirements of the Official Plan process now, and more specifically how any of the proposed changes should apply to rural towns and small towns in the North is critically important.

While I support the Province's overall stated objectives behind modernizing and standardizing the planning framework to reduce duplication and increase simplification, I find the substance of the suggestions only touches symptoms rather than causes. One that is negatively affecting Northern Ontario and impeding the ultimate goal of driving sustainable growth and development there. For Northern and rural Ontario in particular, the main challenge is not *over-regulation* but *under-capacity*. Pursuing reforms to the Official Plan process at this time could become a powerful lever for growth, but only if they recognize that local delivery strength is provincial economic strength.

Of an interesting and important note in this regard, the consultation materials state that these change would apply "across Ontario". But they appear to assume a southern-Ontario context characterized by upper-tier and lower-tier governance, rapid growth management, and better-resourced planning departments. These assumptions do not hold in Northern Ontario, where municipalities that do exist are single-tier and – outside of the 'big 5' cities – are largely under-resourced (both the public sector and the private firms that support them) and focused on attracting growth rather than managing it. Northern Ontario's governance structure - single-tier municipalities surrounded by vast unincorporated territories – requires a fundamentally different approach than the upper-tier systems assumed in the consultation document. A one-size-fits-all framework across the province for the OP process risks deepening this divide.

I propose that what we actually need in this context is to multi-function the Official Plan into other small-town municipal governance processes to drive better outcomes in addition to building capacity, not only just to limit page numbers, sections, and overlays that will result in sameness. We need to focus on the assets unique to each specific community, build localism, and drive growth from there. Choosing the proposed path risks shrinking the limited planning options rural and small towns have to prosper and attract right-sized development.

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My comments therefore align with the Province's objectives to encourage effective growth and development but translate them through a Northern Ontario and small-town lens emphasizing local empowerment, practical feasibility, and the ability of plans to drive visible results. In fact, as you will no doubt read as an undercurrent to the recommendations below, I believe that for small places, both in the North and South, the Provincial Government needs to reframe the Official Plan as a vehicle to attract investment, improve viability and translate its vision into implementable pathways for development. This will have the effect of reducing upper-level government reliance and handouts and rebuilding public trust in the planning system to deliver results. In other words, I understand and agree with the objectives of the potential changes but believe that the proposed direction will only work effectively in a certain urban transect of Ontario's 414 local municipalities.

I have divided my comments below over several recommendations for ease of reading while integrating the substance of the questions and intent found in the consultation document. I am pleased to discuss any of these issues in greater detail to help refine potential legislation so that it meets objectives of effectively driving growth and development in small towns and the North.

General Position

I agree that the Official Plan system needs reform. My experience is that Ontario's is one of the most over-regulated in the country. Complexity and inconsistency have eroded public confidence and slowed implementation. However, simplification should not mean uniformity. The Official Plan is the only civic document through which a community expresses its collective 'why' on land use: its purpose, values, and future possibilities for development.

In this context, planning is not simply a regulatory function. I believe it sits at the very heart of local economic development. My doctoral research is focused on *reorienting* small town planning around this reality. The Official Plan should act as a convening mechanism to align land, infrastructure, and investment toward shared outcomes. When written clearly and credibly, it becomes a competitive instrument that signals confidence in place internally and externally to both residents and investors. When written poorly, it deters both. Effective reform should therefore treat planning not only as process improvement but as a *cornerstone* of Ontario's economic strategy.

Ontario's growth ambitions depend on three forces working together: the Province sets direction and incentives; the market responds with capital and innovation; and municipalities translate both into real projects on the ground on behalf of the community through planning permissions. When any one of these three forces is weak, housing and economic growth slow down. Right now, the community piece of that partnership – or the municipal delivery system – is underpowered. The proposed reforms should therefore aim not only to streamline process but to strengthen municipal delivery capacity as an effective means to accelerate projects and build investor confidence. The proposal risks further weakening that municipal system and limited nimbleness that it

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currently has available. In practical terms, that means giving municipalities the clarity, flexibility, and data tools to make timely, investment-ready decisions within their Official Plans. This is particularly important in places that are looking to create the pre-conditions for growth – many smaller towns – versus those larger centres that are managing growth that is intrinsically present. It is, in fact, applying a better *rural lens* to help drive small places to improve their development realities.

My recommendations draw on five interrelated dimensions that have emerged so far through my doctoral research on the small-town plan process: Conductibility (leadership and partnerships that carry momentum), Desirability (the consistent message of values and objectives that ultimately attract investment), Feasibility (technical and financial realism to make it happen), Visibility (public understanding and confidence in the message), and Viability (long-term economic sustainability and integration into other local government processes). Together, these dimensions describe the implementation energy that determines whether a plan remains static or becomes actionable. A new Official Plan process for small towns should capitalize on this approach to multi-function the document to shift the product from plan to place. These elements themselves, could, in fact themselves form the structural overlay of an OP on top of what is proposed as the core (technical but dry) land use components. If we standardize all OPs along the proposed table of contents provided, we're only focusing on what I would consider the backbone of the story, not what creates change and stimulates investment. This involves making new rules for small places in order to help resource-constrained local governments drive development.

Key Recommendations

1. Differentiate Requirements for Growth Centres or Urban vs Rural Contexts

The Province should adopt a proportional framework distinguishing between municipalities that manage growth and those that must attract it first. Northern and rural municipalities require flexibility in chapter structure, schedule detail, and analytical expectations. A two-tiered framework would improve feasibility and viability while acknowledging Ontario's regional diversity. In fact, I believe that to truly implement a rural and Northern Ontario lens on planning issues, we need to actually better define the difference between '*rural*' and '*urban*'. This could actually mean having a two-tiered Planning Act and regulations that apply to the large centres that are focused on managing growth vs those that are aiming to attract it and develop resource capacity. But it's more than a numbers and density calculation as suggested in the consultation questions. It's a balance that needs to be found and I would implore the government to further investigate this possibility and follow best practices in Canada and internationally on this very foundational topic to economic prosperity. Otherwise a tug-of-war will continue to play out between these opposing groupings of places.

2. Establish a Provincial Capacity Fund for Small Municipalities

Simplification will succeed only if municipalities can implement it. A targeted capacity-building fund should support staff training, GIS modernization, and regional shared-

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service delivery. Regionalism and partnerships are what will bring prosperity in the North. Building capacity along these lines strengthens the balance between government, market, and community; ensuring local governments remain empowered actors in shaping their own economic and social futures (reducing the upper-level government financial dependency loop effect). Instead of the Province placing too much focus on forcing a standardized OP structure, officials could support communities in identifying and then meeting overall community objectives by using a variety of tools in the toolbox in an appropriate way.

3. Treat Length and Structure Standards as Guidance, Not Regulation

OP page length caps should be advisory and not set in legislation. The Province can enforce brevity and reduce repetition through the approval process that already exists when it is needed. The focus should be on content and story investment capacity, not page or word counts. I agree that, especially in the last decade or so, Official Plans have grown in size. In addition, more than one OP I have read have been largely duplicates of other places 'in disguise' and simply regurgitations of parts of the PPS. Easy work for the planner-of-record but a very poor professional approach in any event that erodes trust in the profession. I believe the goal of the OP should be comprehension and story, not compression. Readability, plain language, visuals, and a structure will improve accessibility more than arbitrary limits. Plans that people can read and believe in are the plans that get done through detailed implementation strategies. Authenticity of place in the plan is key. Any changes to the OP process should render it effectively impossible to write a plan for one small town that can be copied to another. Which, in my experience, is all too common in Northern Ontario. The OP should be treated as a story of the place for what they want to achieve and also the actions how to get there.

4. Include a "Community Vision Story" Section in Every Plan

I have reviewed the proposed Table of Contents in the discussion document. Frankly it reads as a document that will not facilitate nor drive development in a community that is attempting to build a growth base. Yes, many of the sections are required from a technical land use perspective and forms a backbone of sorts. However, it remains difficult for the public to read and understand – which is a critical failing of the planning profession. I believe that those sections are not the entire plan, rather an annex – missing a beginning, a narrative core, and an end. We need to focus on the overall objective and the audience and the brand that the OP projects to those readers as a place being investment ready.

Each municipality should include a concise narrative that captures local values and aspirations: where we are now, what we value most, and what future we are working toward. This requirement would operationalize the reform's goal of clarity while introducing a narrative element that strengthens authenticity and accountability. This is built on an asset-based approach to economic development and planning. Currently I find that most vision statements in OPs are far too generic (I.e. "live, work, play"). That gets us nowhere.

Every OP must speak convincingly to two audiences. The first is internal. The

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residents, staff, and councils who must see their own identity reflected. The second is external. The business community, partners, and other governments who must perceive credibility and clarity in the community's direction to want to invest. The external audience is not exclusively the 'state pillar' (i.e.: province or federal government), as might be inferred by the proposed direction of the regulations. When both audiences believe the story, implementation energy follows. The success of any plan depends on how authentically its vision translates from paper to visible improvements on the ground.

5. Clarify the Relationship Between the Official Plan and Zoning By-law

The OP should define why certain forms are desirable; the zoning by-law should regulate how they occur. This separation reduces amendment fatigue, streamlines approvals, and enhances flexibility, key factors of feasibility in small municipalities. In that regard, I agree that development standards should not be directly included in an OP the objective to create certain standards for a particular area, though, could be included in an implementation plan set out in the OP if it makes sense to spur investment. One discussion question asked whether site plans or secondary plans should be prohibited outright. The answer is categorically no. Those plans, *if used appropriately*, provide a unique opportunity give agency to local governments to meet growth objectives by tailoring policies to specific areas, especially if they have unique planning considerations. We need to focus on when and why those tools should be used appropriately, not ban them in the effort to avoid nimbism.

6. Permit Modular or Phased Plans for Smaller Municipalities

Municipalities under a certain population threshold should be allowed to prepare modular or phased OPs. For example, a core land-use framework with companion housing or design modules. This approach recognizes capacity limits and enables incremental implementation. As mentioned above, consideration of redefining 'urban/rural' or considering growth management vs growth stimulation places should also be considered.

7. Embed Implementation Tracking and Public Reporting

Implementation tracking is not merely administrative. It is one of the conductors of success that keeps current flowing through the plan and sees it enacted. Without visible conductors, the plan's energy dissipates. A light-touch requirement for annual progress dashboards would keep that current alive and visible, building public trust. Official Plans should require detailed implementation plans that set out achievable objectives in the short, near and long term with a review of this section on a shorter time frame than review of the entire OP. This element is so critical to getting plans on paper to built form on the ground, that a community with a set OP budget should *spend at least half of the total budget on a detailed implementation plan* and the first steps to get there including integration into other municipal governance processes such as budgeting. One point to note, though, is the lengthy review process of the Province for OPs due to its own capacity constraints. When considering what needs provincial approval, consideration should be given to having certain sections, including periodic review of the implementation section, outside of that statutory approval process or on a 'fast-track' basis.

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8. Empower Local Governments as the Community Pillar of Development

Ultimately, reform should strengthen the foundational balance among government, market, and community. Empowering municipalities through authority, clarity, and resources allows planning to become a true driver of economic development rather than a compliance exercise. Small towns have an advantage over larger municipal governments in that, while resource constrained, they have an inherent nimbleness to achieve quicker results – if the right people are around the table and setting the winning conditions and have a ‘get to yes’ mentality. No OP reform should hinder that inherent nimbleness for the sake of ‘sameness’.

9. Implementation and Capacity Support

Many small municipalities lack the staffing, technology, and fiscal base to reformat schedules or datasets to provincial standards. Without targeted assistance, standardization could widen capability gaps. The Province should pair regulatory change with shared-service options, standardized data templates, and transitional funding to maintain equity across Ontario’s geography. Building this local capacity reinforces the community’s role in balanced growth and ensures that planning reforms deliver visible results, not just procedural efficiency. In line with this recommendation, should these changes be implemented evenly for all municipalities, a significant transition period should be included so not to further hamper small municipal resources in the North that are looking to attract investment. One suggestion is that there is a staged implementation process that could only apply in Southern Ontario with upper-tier municipalities going first. Perhaps a process could be a ‘diagnosis’ phase of existing plans to evaluate effectiveness first (under a Provincial financial grant system) followed by a ‘design’ phase of new plans second? In either case, significant capacity development would be needed to radically overhaul the OP process for small towns.

Conclusion

Ontario has a rare opportunity to modernize its planning system while strengthening local autonomy which can lead to improved trust in local government and the planning system as a whole. Simplification and standardization should not erase local distinctiveness but help communities articulate it more clearly. Empowering municipalities to lead with vision and purpose reinforces the essential balance between government, market, and community.

The opportunity before Ontario is not only to make planning faster but to multi-function it to make it more effective as a driver of economic development without increasing costs for municipalities that are faced with increasing requirements. Clear, credible, community-authored plans generate the confidence that attracts both capital and participation. Turning planning into one of the province’s quietest but most powerful economic tools.

When local governments have both the authority and the capacity to act, the Official Plan becomes more than a statutory requirement. It becomes a civic contract that enables communities to participate meaningfully in their own development. The real test

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of reform will be whether residents can see themselves in their community's plan and whether municipalities *choose* to update their plan to any new model. Visibility builds trust, and trust builds investment. Plans that people can read, believe in, and implement are the plans that get done. Right now, far too often that is not the case.

Ontario's next generation of growth will depend on how well the three delivery forces – the Province, markets, and community – work together. The Official Plan is the bridge among them regarding land use. By ensuring that local governments have the authority, clarity, and capacity to act, the Province can turn planning reform into a genuine growth-*delivery* strategy. Empowered communities are not a barrier to investment; they are the mechanism that stimulates investment and with greater public confidence.

Thank you for considering these comments. I would welcome further discussion on how these reforms can best serve Ontario's diverse communities, particularly in rural and northern regions.

Sincerely,

A handwritten signature in black ink that reads "Daniel M Mercer". The signature is written in a cursive, flowing style.

Daniel M Mercer, urbaniste, RPP, MCIP