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Date: November 12, 2025
To: Ministry of Municipal Affairs and Housing (Planning Consultations)
From: Wellington County Planning and Development Department
RE: **Bill 60 Fighting Delays, Building Faster Act, 2025**
(ERO Postings 025-1099)

This submission is in response to the consultation posted on the Environmental Registry of Ontario (ERO) related to Bill 60- Protect Ontario by Building Faster and Smarter Act, 2025. Particularly ERO Posting:

- **0025-1099-** Consultation on simplifying and standardizing official plans

The comments below are organized based on the discussion questions contained in the ERO posting. We note that due to the short comment period, Planning Staff are submitting these comments without receiving County Council endorsement.

As context for our comments, we note the following:

- The County is over 2,600 square km (1,000 square miles) in area.
- The County of Wellington Official Plan is an upper-tier plan that also functions as the lower-tier official plan for five of our seven lower-tier municipalities.
- The Township of Centre Wellington has a local official plan which only applies to its urban centres and the Town of Erin has a local official plan which applies to both the rural and urban areas.
- There are 209 pages of text in the County's Official Plan (including 40 pages of local policies).
- There are 7 land use designations in the Rural System.
- There are 7 land use designations in the Urban System.
- There are 2 land use designations in the Greenlands System.
- There are four schedules broken down by each lower-tier.

A. Official Plan Structure and Contents Discussion Questions	
Question	Comment
<p>What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?</p>	<p>The County supports the desire to simplify official plans but has concerns with attempting to establish a standardized framework for municipal planning documents across Ontario. Municipalities are unique in their composition, challenges, and historical decisions, and this is driving diversity in official plan policies. Further, implementing matters of Provincial interest and applicable Provincial Plans is contributing significantly to the size and complexity of these documents.</p>
<p>What distinctions should be made between the content of upper and lower-tier official plans? What considerations should apply in municipalities where the upper-tier official plan acts as the lower-tier official plan?</p>	<p>Upper-tier plans that do not function as lower-tier plans, should focus on cross-boundary matters, such as resource management, transportation, and infrastructure planning. Lower-tier plans should deliver specific land use guidance within developing areas. Documents should have minimal duplication unless necessary to enable local-level policy development/delivery.</p> <p>Where an upper-tier Official Plan functions as a lower-tier official plan, there needs to be consideration for site-specific policies that are applicable to one municipality and not others. The County Official Plan contains a local policy chapter that accommodates site-specific policies for our seven member municipalities. This allows our plan to be tailored to our member municipalities' needs while maintaining the broader parent designations that generally apply.</p> <p>Also, in the two-tier system, some municipalities have their own Official Plan for specific areas (e.g., urban centres). There should be exemptions established to remove duplicative amendment processes that are currently required. The creation of an administrative amendment process to address such issues could streamline the implementation of municipal decisions.</p>

<p>What is your perspective on limiting development standards in official plans? To what extent should development standards be set out in official plans vs in zoning by-laws?</p>	<p>The County generally agrees that development standards are best left to the municipal zoning by-laws and municipal development standards documents. However, standards established through a comprehensive process like a secondary plan that are based on infrastructure planning and the eventual build-out of an area may require Official Plan-level policy direction.</p>
<p>What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies?</p>	<p>The removal of site-specific policies is a concern. These policies are used to plan for a specific area and are often a product of community consultation and negotiation. Several site-specific policy areas exist in the County of Wellington.</p>
<p>What is your perspective on the number and types of standardized schedules, overlays and data proposed to be required? Should any be removed, or are there any other schedules that could help improve official plans?</p>	<p>The inclusion of Minimum Distance Separation (MDS) and the Agri-food Network appears contrary to the objective of simplifying official plans. The MDS document is 132 pages long and exists as separate guidelines (Publication 853). The Agri-Food Network is a map product of the Province which has many layers of information which is not maintained locally.</p> <p>The overall number of schedules, overlays and data proposed exceeds the current County Plan and in some cases, includes matters dealt with at the local level such as wastewater, stormwater, and cultural heritage resources.</p>

<p>B. Limiting the Length of Official Plans Discussion Questions</p>	
<p>Question</p>	<p>Comment</p>
<p>What is your perspective on the changes being considered to limit the length of official plans?</p>	<p>Limiting the length of an Official Plan document does not necessarily result in a more effective document. If a standardized framework is to be effective, it needs to have the ability to reflect local diversity and context.</p>
<p>Should there be different limits placed on different types of municipalities (e.g., based on population size)?</p>	<p>Geographic size and complexity are also determinants of the length of an official plan.</p> <p>Municipalities that have policy frameworks related to Community Planning Permitting Systems,</p>

	<p>Community Improvement Plans, and other enabling policies, should not be penalized for inclusion of these policies.</p> <p>In parts of the Province where municipalities are required to implement Provincial Plans, these municipalities should not be penalized for having policies supporting the implementation of these plans.</p> <p>We also note that zoning-like standards exist in some of these plans (e.g., Greenbelt Plan NHS policies), which may require Official Plan policies to contain similar development standards.</p>
<p>Are there other approaches that could be used to limit the length of official plans?</p>	<p>Make Provincial Plans stand on their own without Official Plan integration. Implementation requirements of these plans should be directed to municipal zoning. The policies and schedules of these plans, where applicable, supersede those policies of the Official Plan.</p>

C. Creating Permissive Land Use Designations Discussion Questions

Question	Comment
<p>What is your perspective on the changes being considered to standardize the number and type of land use designations?</p>	<p>The County supports standardization where appropriate. Our Official Plan already implements one residential designation, where all housing types are permitted subject to zoning.</p> <p>We would caution that the standardization of some employment areas, particularly Rural Employment Areas, needs to be sensitive to the servicing realities in these areas with permitted uses scoped accordingly.</p>
<p>Would standardized land use designations between upper-tier and lower-tier official plan improve clarity? Where are the opportunities to reduce duplication between the upper and lower-tier official plans in land use designations?</p>	<p>Yes. Most of our municipalities rely on our Official Plan for planning purposes.</p>

<p>Are there additional designations that would be required? Are there opportunities to streamline or further combine some of the proposed designations (e.g. Residential I and II, and Mixed Use I and II)?</p>	<p>From a rural municipal context, the following additional designations would be appropriate:</p> <ul style="list-style-type: none"> • Country Residential Designation • Recreational Designation • Hamlet Area Designation • Rural Employment Area Designation
<p>Are there implications to making land use designations more streamlined and permissive?</p>	<p>There are implications to the character of communities with more permissive land use approaches. The look and function of new development is often a major concern for the public when it is proposed. Having strong requirements for compatibility and design can help overcome some of these challenges. It would help shift the discussion about new development from “Can this development occur?” to “How can this development occur?”</p>
<p>Are there land use designation terminology or descriptions that would be easier to understand?</p>	<p>Updates to the proposed Residential designation classifications to use words like low, medium or high versus numbers such as I,II, and III. This will provide more clarity for the public. Similar changes to the Mixed-use categories may also be appropriate.</p>

D. Transitioning to a New Framework	
Question	Comment
<p>What is your perspective on the changes being considered to transition to a standardized official plan framework?</p>	<p>More information is required to understand what the framework will look like. What are the province’s next steps? Will these changes be implemented under section 26 or 17 of the Planning Act?</p> <p>The province should consider giving itself flexibility to go beyond the standardized official plan framework. The importance of addressing municipal uniqueness or complexity should be paramount.</p>
<p>What is a realistic implementation timeline for your municipality to update</p>	<p>It is unrealistic to expect any municipality to update its official plan within two years.</p>

<p>its official plan to comply with a standardized framework (e.g., structure, land use designations, page/word limits), and why? Please consider staffing, council cycles, data/mapping updates, public engagement, and statutory review requirements in your response.</p>	<p>Wellington County has a relatively small policy team. In some cases, new data/mapping will need to be created. Other current provincial initiatives are currently top of mind.</p> <p>If this is to be a Provincial priority, municipal policy planners need the Government to place a pause on additional legislative changes impacting land use planning to clear the way for us to complete the work</p>
<p>How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?</p>	<p>Provide specific examples of what you are looking for.</p> <p>Provide guidance rather than prescribing.</p>

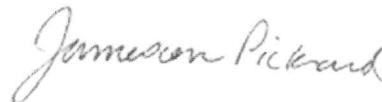
E. Submission of Official Plans through Online Portal	
Question	Comment
<p>Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?</p>	<p>Depends on how easy and flexible the system is for municipalities to use.</p>
<p>What benefits and/or risks do you foresee from transitioning to submission through an online portal?</p>	<p>Insufficient information to comment.</p>

Thank you for the opportunity to comment and for your consideration.

Respectfully submitted,



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