



Friday, November 21, 2025

Ministry of Municipal Affairs and Housing
Provincial Planning Branch
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3
Submitted online

Re: WOWC Submission to Proposed Changes to the Planning Act – Bill 60, Schedule 10 (ERO 025-1097)

The Western Ontario Wardens' Caucus (WOWC) represents 15 counties and 117 municipalities across rural Western Ontario – communities that are ready to build, grow, and support your government's housing and economic goals. As the economic engine of Ontario, the WOWC region is a critical piece of the Province's prosperity and growth. Our region is poised for tremendous opportunity, with over \$40 billion in new economic investments and the creation of 30,000+ jobs resulting from the rapid growth of the electric vehicle and clean energy sectors.

The WOWC appreciates the opportunity to comment on proposed amendments to the Planning Act under Bill 60. As always, our comments are offered in the spirit of partnership and constructive collaboration. Planning Act changes can significantly affect the ability of counties to provide coordinated regional planning, manage infrastructure, and support sustainable growth. Many of our member municipalities are experiencing growing development pressures, and frequent legislative changes have created uncertainty for both municipal governments and the development sector.

1. Preserve essential upper-tier planning responsibilities

Upper-tier municipalities play a foundational role in:

- Growth management and allocation
- Transportation and corridor planning
- Regional natural heritage and watershed planning
- Coordinated infrastructure and servicing planning

Any changes that diminish these roles or reassign decision-making authority risk fragmenting planning functions, creating duplication, and increasing long-term infrastructure costs. WOWC strongly recommends maintaining the integrity of upper-tier roles.

We also welcome proposed changes that enhance upper-tier capacity, such as granting all upper-tier municipalities the ability to adopt Community Improvement Plans (CIPs). Many of the challenges facing Western Ontario—housing supply, infrastructure servicing, labour force attraction, and industrial investment—are regional in scale and cannot be addressed solely through local CIPs.



Allowing upper-tier CIPs would enable counties to:

- Coordinate incentives for affordable and attainable housing, purpose-built rental projects, and supportive housing across multiple municipalities
- Support servicing and infrastructure upgrades required to unlock designated growth areas
- Facilitate industrial and employment land development, particularly in response to EV-sector and clean-energy investments
- Undertake regional brownfield programs, transportation corridor improvements, and other cross-boundary initiatives
- Align financial incentives with growth management strategies and capital planning at both tiers of government

Such a tool would help ensure that incentives are deployed strategically, consistently, and in areas where they can deliver the greatest regional benefit—fully supporting the Province’s goals of building housing faster and enabling economic growth.

2. Promote a stable, predictable planning environment

Municipalities require long-term certainty to develop capital plans, implement Official Plans, and respond to growth pressures. Over the past several years, the pace of legislative change has strained administrative capacity and increased planning costs.

WOWC urges the Province to:

- Limit mid-cycle conformity requirement changes
- Provide advance notice and guidance before new requirements take effect
- Commit to a planning framework that remains consistent for multiple years

Related to this principle, the WOWC has significant concerns about proposals that would allow Minister’s decisions—whether through MZOs or Official Plan approvals—to proceed without being consistent with the Provincial Planning Statement (PPS) or provincial plans.

Municipalities are required to conform to provincial policy documents that are developed through extensive consultation. The Province should be held to the same standard to maintain trust, ensure transparency, and preserve public confidence in the planning system. If policies require reconsideration, mechanisms already exist for the Province to amend the PPS or provincial plans.

Maintaining consistency between provincial and municipal decision-making is essential to a stable and transparent planning environment.



3. Avoid introducing unfunded mandates

Any new procedural requirements, reporting obligations, or expanded review roles must be accompanied by provincial support. Upper-tier counties operate within constrained rural tax bases and cannot assume additional responsibilities without funding.

WOWC encourages the Province to ensure that any new processes—such as changes to minor variances or MZO administration—do not offload costs or responsibilities onto municipalities without adequate resourcing.

4. Ensure transparency in ministerial and provincial decision-making

If the Province expands its decision-making powers or fast-track authorities, municipalities require:

- Clear criteria for provincial decisions
- Timely communication on the status of provincial reviews
- Public reporting to maintain accountability
- Mechanisms for municipal feedback before decisions are finalized

This is particularly important for Minister's Zoning Orders (MZOs). While there can be merit in limited and strategic use of MZOs, proper municipal and Indigenous consultation should be considered mandatory prior to their issuance.

To improve efficiency while respecting local planning roles, the WOWC recommends that municipalities regain the ability to amend MZOs after their approval—through local zoning by-law amendments or minor variances—so that municipalities are not required to seek provincial approval for small, technical adjustments.

This approach would uphold provincial objectives for faster approvals while respecting local implementation realities.

5. Strengthen coordination—not fragmentation—of planning functions

The goal of reducing delays should be pursued through improved resourcing, coordination, and guidance—not through the removal of key municipal roles.

Some of the proposed changes to as-of-right minor variances could help streamline approvals, but these tools must be applied carefully. Flexibility should not be universal or numeric-only (e.g., blanket percentage reductions), as many zoning standards exist to ensure safety, infrastructure access, and good planning. WOWC supports the consideration of approaches such as:

- Allowing exceptions from circulation or public meetings for very small variances within prescribed limits



- Delegating certain minor variance decisions to municipal staff
- Continuing to require that **all** variances—regardless of approval pathway—meet the established four tests

These refinements could provide meaningful efficiencies while upholding sound planning principles and service-delivery requirements.

Conclusion

The WOWC supports planning improvements that enhance clarity and accelerate approvals but urges the Province to preserve critical upper-tier responsibilities and avoid changes that introduce uncertainty or unfunded obligations.

We also encourage the Province to maintain transparency and consistency in all decision-making processes and to provide municipalities with practical tools—such as upper-tier CIPs and workable approaches to minor variances and MZOs—that support efficient, coordinated regional growth.

Our member counties and municipalities remain committed partners in delivering housing, economic development, and sustainable communities across Western Ontario.

Respectfully submitted,

Western Ontario Wardens' Caucus