

November 21<sup>st</sup>, 2025

**RE: ERO Postings No. 025-1077, 025-1100 and 025-1097**

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Dear Minister Flack,

On behalf of Middlesex County Council, I am writing to provide comments on behalf of the County of Middlesex on the following consultations published on the Environmental Registry of Ontario (ERO):

- ERO # 025-1077 – Consultation on Proposed Changes Related to Official Plan Standardization and Streamlining
- ERO # 025-1100 – Consultation on Minimum Lot Sizes on Urban Residential Land
- ERO # 025-1097 – Proposed Changes to the Planning Act (Schedule 10 of Bill 60 – Fighting Delays, Building Faster Act, 2025)

Middlesex County recognizes the government's intent to promote consistency, growth, and housing supply through these initiatives. It is essential that any implementing measures maintain sufficient flexibility for rural and small urban municipalities within their land use planning frameworks.

Municipalities across Ontario have varied geographic, demographic, and economic contexts. Rural and small urban communities require flexibility in their planning frameworks to address unique circumstances related to land use, infrastructure capacity, development pressures and long-term growth management. A one-size-fits-all approach may unintentionally limit a municipality's ability to implement Provincial direction, Council's vision, and respond to local priorities.

The following submission outlines Middlesex County's comments on the proposed changes related to official plan structure and content, variance processes, minimum lot sizes, and proposed Planning Act related amendments. This submission is aligned with the questions posed in the ERO postings and offers an integrated overview of key considerations associated with the Province's proposed planning and housing-supply framework changes.

Middlesex County recognizes the Province's intent to standardize and streamline

official plans to support greater consistency across jurisdictions. While this objective is understood, the proposed approach presents challenges for both the County and its local municipalities. Reducing flexibility in land use designations may limit a municipality's ability to reflect area-specific conditions, particularly in rural areas where planning considerations often require nuanced and locally informed policy direction. It will be important for the Province to clearly distinguish the roles of upper- and lower-tier official plans and, where an upper-tier plan functions as a lower-tier plan, ensure that sufficient flexibility remains to address local priorities.

Regarding proposed limitations on development or zoning standards within official plans, the absence of clear and instructive policies can lead to interpretations that result in development outcomes not fully aligned with Council's intended vision. The proposed standardization of land use schedules is extensive and may be overly prescriptive for rural and small urban municipalities. Should the Province proceed, it is recommended that the list of schedules be treated as a maximum standard, with flexibility for municipalities to omit or combine schedules to better reflect local context.

The Province is also consulting on prescribing a maximum length for official plans. Plan length is influenced by geographic size, the number of settlement areas, the complexity of local land use issues, and the degree of integration between upper- and lower-tier plans. A rigid limit may constrain the ability to fully capture Council's vision and could complicate alignment between County and local official plans. Instead of page or word limits, a guideline promoting concise language, clear writing, and effective organization may be more impactful.

The standardized land use designations proposed through the ERO posting appear largely urban-centric and may not adequately account for rural land use issues. This could result in an increased number of applicant-initiated official plan amendments to address site-specific matters not captured within a standardized designation or policy set. An appropriate transition framework should require upper-tier municipalities to transition first during their statutory review cycle under the Planning Act, followed by local municipalities.

The proposed "as-of-right" variance model for proposals within 10 percent of prescribed standards is intended to streamline approvals and reduce the number of minor variance applications. While this may lessen administrative burden, it raises concerns related to enforcement capacity and the potential for a more reactive approach to development control, particularly for municipalities with limited staffing or technical resources. This proposal also appears to have expanded beyond setbacks to include additional prescribed requirements.

Proposed changes to Minister's Zoning Orders (MZOs) aim to increase transparency and accountability but also expand ministerial authority. Increased reliance on MZOs could reduce local planning certainty and limit municipal input in land use decisions, with potential implications for long-term community planning.

Proposed changes to the Planning Act regarding Community Improvement Plans (CIPs) would be beneficial, as enabling upper-tier municipalities to establish CIPs and provide funding to lower-tier municipalities would remove existing barriers and support both levels of government in advancing community improvement and local development priorities.

With respect to the consultation on minimum lot sizes for parcels of urban residential land, rigid minimum lot sizes can limit housing options and constrain opportunities for gentle density. Any changes to remove or reduce minimum lot sizes should be accompanied by complementary zoning standards to ensure municipalities can continue to balance housing supply objectives with public health and safety considerations and infrastructure requirements.

## **Conclusion**

Middlesex County offers the following considerations for the Province's review as part of the ongoing consultation on the proposed Special Economic Zones framework:

- Maintain flexibility in official plans to reflect local conditions, particularly for rural and small urban municipalities.
- Treat standardized land use schedules as a maximum standard, allowing adaptation to local context.
- Avoid rigid page or word limits for official plans; focus on concise and well-organized plans.
- Address urban-centric bias in designations and implement a staged transition framework (upper-tier first).
- Consider enforcement and resource impacts of the proposed "as-of-right" variance model.
- Limit expansion of Minister's Zoning Order authority to preserve local planning certainty.
- Any changes to minimum lot sizes should be paired with complementary

zoning standards to balance housing, safety, and infrastructure needs.

Middlesex County remains committed to collaborating with the Province to ensure that any changes to official plan requirements, Planning Act provisions, and related land use planning frameworks are practical, flexible, and responsive to local needs. We appreciate the opportunity to provide input and welcome continued dialogue to ensure that provincial planning initiatives support sustainable, locally informed, and broadly beneficial growth across Ontario.

Sincerely,

Brian Ropp

A handwritten signature in black ink, appearing to read "Brian Ropp". The signature is fluid and cursive, with the first name "Brian" being more prominent than the last name "Ropp".

Warden, Middlesex County