

Re: Comment from the City of Kawartha Lakes in Response to ERO No. **025-1099**

November 21, 2025

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch

13th Floor, 777 Bay St.  
Toronto ON M7A 2J3  
PlanningConsultation@ontario.ca

Dear Minister Flack:

Thank you for this opportunity to provide comments on the proposal to standardize official plans. We thank the Minister for working with OPPI to develop the proposed standardized table of contents and schedules.

These comments follow the headings used in the ERO posting.

### **A. Official Plan Structure and Contents**

First and foremost, we insist that communities are distinct and their official plans should reflect that. The ERO posting states "Currently, the content and structure of official plans are unique to each municipality." The case has not been made for why this is a bad thing. Just as the province would not want federally mandated official plans, municipalities do not want provinces mandating the content of official plans. While municipalities might be able to work within a general structure or template, the content of official plans must be the result of extensive consultation with local residents and treaty rights holders. Official plans must be created by the local community, not be ordered by any other level of government. When residents are excluded and do not see how a decision is made, it takes away public's confidence in the official plan's ability to respond to local values while balanced with provincial priorities. Furthermore, the

proposed template appears to be striving for the bare minimum, whereas we believe we should aim for what is best for our communities.

It is unclear why our official plan needs to follow the same format as, for example, Windsor's or Burlington's or Timiskaming Shores? These communities undoubtedly have their own needs and specificities that are addressed in their official plans. We can understand a need to coordinate the official plans of an upper tier municipality with its lower tiers and some standardization across those lower tiers. And there could be a case to be made for standardization of the official plans of the Large and Fast Growing Municipalities identified in the PPS, municipalities within the GTA, those within a shared region, or those with MTSAs. But there does not appear to be any need for a provincial standard.

Nonetheless, should the Minister wish to pursue standardization, we would recommend the province provide helpful guidelines for municipalities follow rather than a set of legislated rules. The Minister is aware of the level of professionalism registered planners exhibit when they go above and beyond to ensure their recommendations are consistent with the PPS. Why not tap into that professionalism and incorporate assistive official plan guidelines into the PPS? This approach, rather than legislating what municipalities can do, would avoid creating more red tape.

It is not clear what problem is being addressed by proposing to prohibit secondary or site-specific plans. Here in Kawartha Lakes we are primarily a rural community with four separate and distinct Urban Areas: Bobcaygeon, Fenelon Falls, Lindsay, and Omemee. While there is a shared commonality across Kawartha Lakes, each community has its own proud history and identity reflected in their own recently approved secondary plans, which guide and encourage responsible growth. Where appropriate, there are similarities across these secondary plans but each contains development policies specific to the areas, and these specific policies work to assist and support development, not delay it.

Secondary or neighbourhood plans can be nimble and efficient ways to plan a small area. Perhaps there can be some appropriate limits to them, but doing away with them altogether would be short-sighted and interfere with housing development. If the policy direction isn't in secondary plans, then it has to be in official plans, which will add to the length of official plans.

We agree that official plans should generally avoid development standards, which should be enshrined in zoning by-laws. That said, official plans are the right place for development and design guidelines. Other development standards in official plans, such as height, setbacks, and density, should be provided in ranges. For example, an area should be developed to provide a density between 30 and 40 people per hectare. Or heights in an area should be between 8 and 10 storeys. This provides direction, but allows flexibility to avoid the need to amend the official plan. Again, we would recommend these be provided as guidance to municipalities rather than creating more red tape in legislation.

Another opportunity to achieve not just standardization across municipal official plans, but to support and advance wise practices, would be to facilitate workshops with planners in different municipalities. It seems we're often working through similar issues and if we were to start developing solutions and strategies together there will naturally be a coalescing of the best approaches.

## **B. Limiting the Length of Official Plans**

Regarding the discussion questions about limiting the length of official plans, we agree that official plans could be pared down to be shorter and more precise. However, instead of strict word or page limits, provide more general guidance. A strict limit of 250 pages will inevitably invite requests to extend this by just a few pages. Instead, provide general parameters for different sections and the overall length. And most importantly, explain *why* – why are municipalities being asked to limit certain sections? This will assist municipalities in achieving the province's goals.

Excluding the history of the municipality was singled out in the ERO posting. Instead of excluding, we recommend that municipalities be given page range (e.g. 3 to 5 pages) to provide their history (both settler and indigenous) and, importantly, how these histories connect to the development policies within the official plan.

Other opportunities to reduce the length of official plans may be found in curtailing the use of images. Over the decades, official plans have evolved from strictly formal text to colourful documents full of photos. The use of images could be used strategically to

explanatory diagrams or examples of specific policies and not simply for aesthetics of the document.

It may also be worth exploring where value and descriptive statements should be found in official plans. It is essential that official plans contain specific values and objectives based on community consultation. However, describing a natural heritage feature or stating that the community values said feature does not provide policy direction.

Additionally, official plans can be made shorter and more effective by reducing or removing unnecessary enabling or discretionary policies and non-binding or aspirational statements outside of the objectives section.

In summary, instead of creating red tape by legislating official plans be X number of words or pages, provide municipalities with overall ranges and guidance to make official plans more enabling and precise.

### **C. Creating Permissive Land Use Designations**

The proposed standardized land use designations would appear to work for municipalities with the GTA. However, more work is needed if the province wishes to standardize land use designations across the province. We notice that the proposed designations do not even mention hamlets whereas our Official Plan has dozens of areas designated as Hamlet Settlement. Likewise, there is no mention of aggregates, sand, or bedrock. Our Official Plan also has a Waterfront designation to allow seasonal and permanent residential uses, as well as tourist uses related to lakes and rivers. This is distinct from our Official Plan's Rural and Prime Agricultural designations. Should the province wish to have standardized land use designations province wide, considerably more research and consultation is required to guide responsible development in all areas.

### **D. Transitioning to a New Framework**

We are beginning to develop a new official plan and this project will begin in earnest early in the new year. It is imperative the province keep an open dialogue with us so we can remain informed of their intent and any potential changes so our project is not delayed. Our current official plan was approved by the Minister in 2012 then subject to numerous appeals, the last of which were resolved in 2024. We are eager to develop a new official plan to conform to the 2024 PPS and meet today's needs.



### **E. Submission of Official Plans through an Online Portal**

We support the proposed digital-first approach.

Should you wish to discuss this matter further, please reach out at your earliest convenience.

Sincerely,

A handwritten signature in blue ink that reads "Mark Jull".

Mark Jull, PhD, RPP, MCIP  
Supervisor, Policy Planning  
City of Kawartha Lakes  
[mjull@kawarthalakes.ca](mailto:mjull@kawarthalakes.ca)