

November 21, 2025

Province of Ontario – Ministry of Municipal Affairs and Housing

**Re: Consultation on Simplifying and Standardizing Official Plans**

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario (ERO) posting 025-1099 regarding consultation on potential proposed legislative changes to the *Planning Act* through Bill 60, the proposed *Fighting Delays, Building Faster Act, 2025*. The consultation aims to solicit feedback on a proposal that would increase consistency in official plans across municipalities and reduce the burden of developing such plans. The proposal includes consideration of the structure and content of official plans, limiting the length of official plans, creating permissive land use designations, transition provisions for the potential official plan changes, and the digital submission of official plans for Ministry review.

The Simcoe County District School Board (SCDSB) is supportive of the intent to streamline land use planning processes in Ontario. As a legislated commenting agency as well as an active participant of the development process in 16 lower-tier municipalities and two (2) separated cities, the SCDSB has a unique perspective on the proposed changes. The intent of this letter is to outline and provide feedback on amendments of interest to the SCDSB. Comments are provided in the following table:

#	Changes Being Considered	SCDSB Comment
1.	<p><u>Official Plan Structure and Contents</u></p> <ul style="list-style-type: none"> <li>- Simplify and standardize the structure and contents of official plans (OPs) as per provided structure and schedules listed in the ERO posting</li> <li>- Limit development/zoning standards in OPs and require existing development standards to be incorporated into zoning by-laws</li> <li>- Require OPs to be a singular, comprehensive document for the entire municipality, including potentially prohibiting the use of secondary or site-specific plans</li> </ul>	<p>The SCDSB is generally supportive of the proposed structure and contents of official plans (OPs) and to limit development/zoning standards within OPs as proposed through the ERO, as this should improve the ease of use of documents and reduce interpretative administrative burden for entities that work in multiple jurisdictions.</p> <p>The board is highly supportive of public service facilities having their own section with provisions, and note that public service facilities such as schools and child care should be permitted in all land use designations, except where the sensitivity of the land use does not allow.</p> <p>SCDSB planning staff also respectfully request that the public service facilities section include a policy that requires applicants to complete a public service facility needs assessment where development proposals may place significant pressures on existing public service facilities in</p>

the community. For example, the City of Toronto's Official Plan includes the following language that supports the development of public service facilities to facilitate growth; "Strategies for providing new social infrastructure or improving existing community service facilities will be developed for areas that are inadequately serviced or experiencing major growth or change and will be informed through the preparation of a community services strategy, which will include: a) a demographic profile of area residents; b) an inventory of existing services within the area, or readily accessible to area residents; c) identification of existing capacity and service gaps in local facilities" (Section 3.2.2.5 a), b) and c)).

This policy language could be used as a baseline to be included in all Official Plans moving forward to support the provision and development of public service facilities such as schools.

SCDSB planning staff are highly concerned with the proposal to prohibit the use of secondary plans or site-specific plans. Secondary plans are extremely useful to the SCDSB to determine the best location for new school sites in growth areas, as secondary plans outline land uses, the servicing strategy and phasing, road and pedestrian connectivity, etc. in a comprehensive manner across multiple lands and landowners. Secondary plans also ensure that all developers profiting from growth are equally responsible for contributing to required public service facilities such as schools, as landowner groups can cost-share and work together to achieve needed amenities and facilities that will benefit all future residents. The use of secondary plans also ensures that school board needs are identified early in the planning process and eliminates landowners feeling specifically targeted by the board when lands are required for new school sites. The SCDSB respectfully requests that municipalities continue to be able to use secondary plans to comprehensively and holistically plan for growth.

Without secondary plans, school boards would be required to secure needed school sites as individual development plans are submitted, on a plan-by-plan scale. Given that including an elementary or secondary school site minimizes the pro forma of the individual developer, generally developers oppose designating a

		school site within their lands. This results in the school board having to use expropriation powers to acquire school sites. This can often be a lengthy, costly, and contentious process. Using secondary plans reduces the need for expropriation processes and contributes to a coordinated, orderly, and logical planning process for public service facilities like schools.
2.	<u>Limiting the Length of Official Plans</u> <ul style="list-style-type: none"> <li>- Limit the length of OPs by setting a page limit or a word limit</li> </ul>	SCDSB is generally supportive of limiting the length of OPs to improve readability and applicability of information contained in the document.
3.	<u>Creating Permissive Land Use Designations</u> <ul style="list-style-type: none"> <li>- Standardizing the number and type of land use designations in OPs</li> <li>- Make designations more permissive</li> </ul>	The SCDSB is generally supportive of the intent to standardize the number and type of land use designations in OPs and to make designations more permissive. The board reiterates the need to ensure that schools and child care, as public service facilities, are permitted in all land use designations except where the sensitivity of the land use does not allow, in order to provide needed school accommodation where students are located. The Zoning By-law can provide further refinement of the suitable location for land uses based on local context and land use compatibility for specific uses.
4.	<u>Transitioning to a New Framework</u> <ul style="list-style-type: none"> <li>- Require new OPs to comply with a new OP framework at their next 5 year or 10 year update,</li> <li>- Require that lower-tier municipalities wait until the upper-tier municipality with planning responsibilities have completed their transition before they update theirs,</li> <li>- Set a date for OPs to comply with new OP framework, for example, within 2 years of a new framework coming into force, or</li> <li>- Requiring large and fast growing municipalities to update their OPs within 2 years of a new framework and allowing smaller and rural municipalities to update their OP at their next 5 or 10 year update</li> </ul>	SCDSB planning staff have no comment on the specific transition provisions to apply; however, the board requests additional information about how a transition provision would be enforced should a municipality not comply with the new OP framework within the specified timeline.
5.	<u>Submission of Official Plans through Online Portal</u>	The digital submission of official plan information and documents is not applicable to the SCDSB; however, the board is supportive of efforts by the province to modernize processes.

Enact regulatory changes to allow the submission of OP information and documents to the Ministry through an online portal	
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With the Province's stated goal to construct 1.5 million new homes by 2031 comes the need to ensure Public Service Facilities are sufficient to meet the needs of the residents of these new homes. The Simcoe County District School Board is supportive of the government's proposals to expedite and simplify the planning process regarding Official Plans for facilities like schools, which will support the board in its efforts to accommodate growth and ensure that every student has access to quality education.

Should you require additional information, please do not hesitate to contact this office.

Sincerely,



Kristen Bartmann, MPLAN  
Planner  
Simcoe County District School Board

Cc:

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