

November 14, 2025

Hon. Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Minister Flack

Re. County of Dufferin Response to the Ministry of Municipal Affairs and Housing Proposed Changes to Simplify and Standardize Official Plans

On behalf of the County of Dufferin, staff are pleased to provide written comments pertaining to the Ministry of Municipal Affairs and Housing ('MMAH') proposed changes to simplify and standardize official plans in Ontario. It is our belief that the following comments will assist the MMAH in strengthening and further refining the currently proposed changes to official plan standards.

The County of Dufferin appreciates the MMAH's commitment to creating a land use framework in Ontario that assists municipalities in planning for both short-and-long-term growth. Dufferin County understands that in order for Ontario to balance housing development, economic growth, and the protection of critical natural heritage features, municipalities must first have the appropriate land use policy framework in place. It is our belief that the current actions by the MMAH reflect a government that continues to strive to establish a land use framework that works for all.

Through the County of Dufferin's review of the proposed changes to simplify and standardize official plans, which were outlined in ERO # 025-1099, the following comments, questions, and recommendations are provided. Each point provided falls under one of the five (5) proposed areas of change – Standardized Official Plan Structure and Content, Limitation on the Length of Official Plans, Establishment of Standardized and Permissive Land Use Types, New Framework for Official Plan Updates and Conformity Exercises, and Establishment of Online Portal.

Standardized Official Plan Structure and Content

- The currently proposed chapter structure has natural heritage, water resources, and agricultural and mineral resources under **one** section. For rural municipalities, especially Dufferin County, all of the sections are, individually, critical components of the Official Plan. It is our recommendation that each one of these features should be a distinct, standalone chapter of a standardized official plan structure. In rural municipalities each

one of these features has extensive policies and regulations, which, if combined together, would likely inundate the reader with information and cause even greater confusion.

- While Dufferin County does agree to a certain extent that the downloading of development and zoning standards to zoning by-laws is an appropriate action, this should not occur for required lot sizes. Minimum lot sizes are critically important to rural municipalities, especially when it comes to agricultural and rural lot sizes created from consents to sever. The County of Dufferin believes it is important to protect and preserve farmland throughout Ontario and, as such, it is critically important to continue having minimum lot size regulations in official plans as a means to avoid the fragmentation of farmland in Ontario.
- Dufferin County would recommend that the MMAH prepare a proposed structure and content for official plans in a two-tier system. This approach, in our opinion, will likely assist in gaining clarification on how official plans should be structured at both the upper-and-lower-tier levels to avoid any redundancy between plans.

Limitation on Length of Official Plans

- In reviewing this proposed change, the County of Dufferin has no notable concerns with the updates being proposed.

Establishment of Standardized and Permissive Land Use Types

- The County of Dufferin has no significant concerns with the changes being proposed under this section.
- Dufferin County does believe, however, that additional clarity can be provided with respect to land use designations at the upper-and-lower-tier levels, especially in rural municipalities. It is, therefore, our recommendation that the MMAH establish a list of standardized land use types for both upper-and-lower-tier municipal official plans.

New Framework for Official Plan Updates and Conformity Exercises

- The County of Dufferin supports the MMAH's proposal to allow for smaller and rural municipalities to update an official plan at the next 5- or 10- year update. It is our belief that this will likely provide significant flexibility for those municipalities, such as Dufferin County, when required to update their official plan.



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Establishment of Online Portal

- The County of Dufferin appreciates the MMAH desire to utilize an online portal platform given the advancing digitization of the planning profession, and, as such, this is a proposed change Dufferin County would be supportive of.

The County of Dufferin appreciates the opportunity to provide comments on the proposed changes to simplify and standardize official plans in Ontario. We appreciate the MMAH's effort in implementing changes that seek to create a land use framework focused on growing municipalities by way of eliminating uncertainty surrounding the municipal land use process. It is our hope that the comments provided above will assist the MMAH in strengthening and refining the proposed changes to official plan standards in Ontario.

Respectfully submitted,

A handwritten signature in black ink that reads 'LM'.

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