

November 20, 2025

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

Re: Consultation on simplifying and standardizing official plans – ERO Number 025-1099

This letter constitutes formal comments for ERO Number 025-1099, posted to the Environmental Registry of Ontario on October 23, 2025. It is the County's understanding that while no legislative changes have yet been proposed on this topic, the government is seeking early feedback on the topic of simplified and standardized Official Plans. Proposed changes range from simplifying and standardizing contents of official plans to be more strategic and flexible in terms of permissions to limiting the number of pages that could be in an official plan. It is the County's understanding that the Province wants to simplify, standardize and make more permissive municipal official plans so they are shorter, easier to understand, and more consistent across Ontario, to help municipalities plan for growth and housing more efficiently.

Council and staff have reviewed the consultation questions outlined as part of ERO Number 025-1099. In considering the consultation questions from a Perth County context, we respectfully provide the following responses for consideration:

1. The proposed structure appears to be taken from an urban context, where residential uses and transportation are prioritized over agricultural and natural resources. In rural communities, there is an equal, or greater, priority for the protection of the agri-food network and the agricultural system as a whole. In rural communities, it would be more appropriate to prioritize these resources and locate these sections towards the beginning of the Official Plan rather than towards the end. This is specifically relevant when considering the proposed section "Structure, Growth, and Land Needs" being located at the beginning of the standardized Official Plan structure before agricultural resources are introduced. In rural communities, the protection of the agri-food network should be prioritized over outward expansion of settlement areas and the structure of the Official Plan should reflect this.

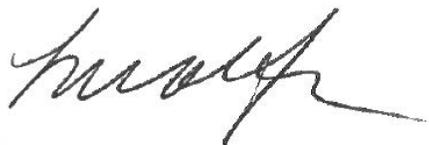
2. Where “Market-Need” is being proposed as a standardized schedule, what data is being used to guide the estimate of market need? Further, how is this information proposed to be illustrated within the standardized schedule?
3. County staff require further clarity on the source requirements for schedules/overlays and whether provincial datasets will be the only sources of data permitted to be utilized or whether municipalities can undertake their own data gathering studies.
4. Official Plans should be able to include and focus on high-level guiding policies that can be applied to large swaths of land or multiple lots of a new development, whereas Zoning By-laws should apply development standards on a site-by-site basis for individual buildings. County staff believe there remains a need for Official Plans to be able to apply certain development standards related to density and land efficiency to protect agricultural lands for the long term from outward expansion and growth.
5. In reviewing the proposed timelines for compliance with the new, proposed Official Plan framework, the County’s preferred approach from the options presented by the Province to require large and fast growing municipalities to update their Official Plans within 2 years of a new framework and allow smaller and rural municipalities to update their Official Plan at their next 5 or 10 year update. As Perth County received Minister approval of our Official Plan in September 2025, the requirement to complete a new Official Plan would be a duplication of effort and would take staff away from current policy priorities, including updating the local Zoning By-laws to be consistent with provincial policy interests.

The above-noted responses have been discussed by County Council and endorsed for submission to the Ministry for consideration regarding the consultation questions proposed through ERO Number 025-1099.

Sincerely,



Doug Kellum, Warden



Lori Wolfe, Chief Administrative Officer