



Ministry of Municipal
Affairs and Housing
Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON
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Canada
VIA ERO: 025-1099

Township of Puslinch
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November 21, 2025

RE: 9.4.2 Report COR-2025-057 Reporting Out from Council Direction Update

On behalf of the Council of the Township of Puslinch, thank you for the opportunity to comment on the province's consultation under ERO 025-1099 regarding proposed changes to simplify and standardize official plans across Ontario. Council has several concerns that the Township respectfully ask the Ministry to consider.

The Township understands the intent behind adopting a standardized official plan structure with prescribed schedules and overlays. While greater consistency across municipalities may appear beneficial, such standardization does not adequately recognize the unique circumstances and planning contexts of individual communities. Each municipality faces distinct geographic, environmental, and servicing conditions that influence how its planning policies and mapping are structured. Imposing a uniform chapter order and mandatory schedules risks creating unnecessary administrative burdens for municipalities and may limit their ability to reflect local priorities and constraints. When making decisions have local perspective should be deemed a priority as opposed to the regional perspective which does not always take into account the local nuisances. It is therefore essential that flexibility be maintained to allow municipalities to adapt the standardized framework to their specific needs, omitting or tailoring schedules and mapping where appropriate to ensure relevance and practicality.

The Township has particular concern with the notion of limiting the content of official plans by moving development standards, such as building heights, lot sizes, and densities, out of official plan policies and into zoning by-laws. Official plan policies play a critical role in guiding compatibility, servicing, and environmental protection where site-specific conditions matter (e.g. hamlet boundaries, agricultural interfaces, or natural heritage features). Removing these detailed standards from official plans may reduce the effectiveness of the plan as a strategic



framework and risk relegating important rules to regulatory instruments that are less visible to the public.

The Township also disagrees with placing a limit on the length of official plans. While the intent is understandable, applying a rigid cap may force municipalities to oversimplify or exclude important policies, or shift those policies outside the statutory document into less visible appendices or guidelines.

The Township also has concerns regarding the move toward more permissive land-use designations across municipalities, such as limiting them to a short list of designation categories. While standardization may streamline plan structure, in rural municipalities broad permissions under general designations (for example, mixed-use near agricultural operations or aggregate resources) could lead to land-use conflicts, increased pressure on local roads, and servicing challenges. It is important that municipalities retain the right to tailor permitted uses, separation distances, and performance criteria that reflect local servicing capacity, agricultural systems and haul routes.

The Township commends the province's intention to streamline planning frameworks and make official plans more accessible. Nonetheless, several elements of the proposal, such as greater permissiveness in land-use designations, removal of site-specific standards from official plans, and elimination of secondary plans, may cumulatively weaken the tools municipalities rely on to manage compatibility, servicing, roads, drainage and natural heritage. Therefore, the Township asks that the final framework explicitly preserve municipal autonomy to include local policies in official plans where rural servicing, environmental features, agricultural systems or aggregate operations demand them.

Thank you for considering our comments and the Township looks forward to continued collaboration as these important reforms are developed and implemented.

Sincerely,

Justine Brotherston
Municipal Clerk