



April 1, 2026

TO: The Honourable Rob Flack, Minister of Municipal Affairs and Housing
Submitted to [ERO 026-0305](#)

RE: Request to Reduce Red Tape in Planning – Response to ERO Posting 026-0305

This letter has been prepared in response to ERO Posting 026-0305, and the Province's consideration of amendments to the various Planning Application Ontario Regulations (O. Regs).

We are pleased to see the Province considering changes to make digital submissions easier, as many municipalities have spent considerable time and money to adopt online application software. Based on the ERO posting, it is unclear if the proposed changes address the requirement for applications under the Planning Act to be signed by a Commissioner of Oaths as part of a complete application. Removing this requirement would significantly reduce administrative burden for both municipalities and members of the public, and streamline the application process, for the reasons set out below.

The legislative requirement for commissioning comes from the O. Regs identified below containing the information required as part of a complete application, which forms the basis for all applicable application forms. The requirement reads that "an affidavit or sworn declaration by the applicant that the information required under this Schedule and provided by the applicant is accurate." Municipal staff have confirmed on several occasions with our legal counsel that this requirement can only be satisfied through the commissioning of applications by a Commissioner of Oaths as defined by the Province. As a Registered Professional Planner and staff member with the Municipality of Middlesex Centre, it is my professional obligation to ensure our practices align with the requirements of the *Planning Act*, so we continue to require this step as part of all planning applications.

Middlesex Centre, along with a growing number of municipalities throughout the province, have adopted software platforms to modernize our planning practices, speed up the approvals process, and streamline the experience for applicants. Municipalities have spent considerable time and money working directly with software developers through this process to ensure it accurately reflects the legislative requirements established by the Province.

One aspect of the application process that continues to challenge both municipal staff and the general public is this requirement for an affidavit/sworn declaration. While the planning application can be filled out and submitted online, the applicants are still required to physically attend the municipal office to have their application commissioned by a commissioner of oaths and subsequently upload the signing page before they are able to submit a complete

application. I have confirmed with many municipalities throughout the province that this aligns with their own practices.

Virtual/Remote Commissioning

We have also attempted to implement remote commissioning/virtual commissioning, where the Commissioner of Oaths meets with the applicant virtually to digitally sign and commission the application. For the general public, however, this creates additional accessibility challenges, requires the ability to use certain video conferencing software, as well as additional administrative burden and coordination time for municipal staff. **Remote/virtual commissioning is not a practical solution and only creates additional challenges.**

In an age where you can obtain/renew personal identification, and even buy a home virtually, this requirement for official commissioning should be revisited. It is uncontroversial, low risk, directly aligns with the government's objective of reducing red tape, and represents a practical change that will have a meaningful impact on how we administer the *Planning Act* and most importantly will further the work Municipalities across the province are doing to streamline the planning process and make it more accessible to the general public.

For reference, I have provided the list of applicable O. Regs to which this requirement applies:

- [Zoning By-laws, Holding By-laws and Interim Control By-laws - O. Reg. 545/06](#)
 - Schedule 1 - INFORMATION AND MATERIAL TO BE PROVIDED IN AN APPLICATION UNDER SUBSECTION 34 (10.1) OF THE ACT, section 32.
- [Minor Variance Applications – O. Reg. 200/96](#)
 - Schedule – INFORMATION AND MATERIAL TO BE PROVIDED IN AN APPLICATION UNDER SECTION 45 OF THE ACT, section 26.
- [Consent Application – O. Reg. 197/96](#)
 - Schedule 1, INFORMATION AND MATERIAL TO BE INCLUDED IN AN APPLICATION for consent under subsection 53 (2) of the act, section 19.
- [Plan of Subdivision – O. Reg. 544/06](#)
 - Schedule 1 – INFORMATION AND MATERIAL TO BE PROVIDED WITH AN APPLICATION UNDER SUBSECTION 51(17) OF THE ACT, section 31.



Requested Amendment

I recommend that the applicable clause be amended as follows, or removed in its entirety:

~~"An affidavit or sworn declaration~~ statement by the applicant that the information required under this Schedule and provided by the applicant is true."

Closing

I appreciate your consideration and urge you to implement this administrative change as part of the government's ongoing efforts to reduce red tape and streamline the planning and development process.

Stephanie Bergman, RPP,
Manager of Planning and Development
Municipality of Middlesex Centre

cc: Ian Kerr, Regional Director, SWO