

## **Bill 98 – Comments on Changes to Lower Tier/Single Official Plan Structures**

**Subject: ERO 026-0300 – Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes (Schedules 1, 2 and 7 of Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026)**

### **Introduction and Context**

I appreciate the opportunity to comment on ERO-026-0300 outlining the Province's proposed changes to the Planning Act through Bill-98 that is currently being studied in detail in the Standing Committee on Heritage, Infrastructure and Cultural Policy. In particular, while there are many proposed changes to the Planning Act, I wish to comment on the those specifically related to Official Plans for lower tier and single tier municipalities. This relates directly to the fall 2025 consultation through ERO 025-1099, and my previous submission through that process, as well as ERO 026-0315 on proposed changes to upper tier OPs currently open for comment.

I am submitting these comments as an individual as a Registered Professional Planner practicing in Ontario with over 20 years of experience in community development and legislative affairs and as a mid-career Doctor of Design candidate at the University of Calgary. My doctoral research examines how small-town Official Plans in Northern Ontario can evolve from static regulatory documents into more effective implementation tools that support coordinated growth, infrastructure alignment, investment readiness, and community confidence over time. As such, I see the constraints and failures of the current OP process under the Planning Act and the shortcomings that it places on helping small communities grow and develop.

Overall, I see value in the Province's objective to introduce a more standardized Official Plan framework and land use designations as a means to improve clarity, consistency, and efficiency across municipalities. I also agree that Official Plans have become increasingly lengthy, repetitive, and difficult to navigate. Especially for developers or project proponents working across different municipalities and planning systems. However, while the proposed framework improves the structure of Official Plans, there remains an important opportunity to strengthen how plans function in practice as implementation-ready tools capable of coordinating development and supporting broader housing and growth objectives. In other words, what is missing in these proposed changes is a focus on outcomes that Official Plans are creating to improve economic development results in small towns. Especially those that capacity-constrained and struggling to attract development to improve their own economic future instead of relying on funding from other levels of government to meet basic local service needs.

In reviewing the proposal, one of the clearest observations is that the framework establishes a phased transition process and standardized structure, but provides comparatively limited direction on how municipalities will transition in practice from existing Official Plans to updated implementation-ready plans. Similarly, I would point out the limited attention paid within the standardized table of contents on the actual 'implementation section'. This distinction is important. Structural consistency alone will

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not necessarily improve housing delivery or development outcomes if municipalities lack the capacity, sequencing tools, direction, or institutional alignment required to move projects forward efficiently.

This challenge is particularly important in smaller and resource-constrained municipalities, including many communities in Northern Ontario, where Official Plans need to play a broader multi-functional and strategic role beyond regulatory conformity alone. In these contexts, plans need to function not only as policy documents, but also as tools used to coordinate infrastructure priorities, guide investment discussions, align local decision-making, and signal direction to external partners and the development community. Municipalities managing rapid urban or peri-urban growth and municipalities attempting to attract growth do not operate under the same planning realities, and the implementation needs of these communities may differ significantly.

The proposal also raises important questions regarding transition timing and municipal capacity. The proposed phased approach outlined in ERO 026-0300 (and directly in Bill-98) recognizes differing municipal contexts to some degree by focusing on the identified 29 large municipalities in the first phase and the remainder in the second phase. However, implementation pressures will still vary significantly across Ontario depending on staffing levels, consultant availability, existing Official Plan review cycles, infrastructure realities, and local governance structures. This is particularly important for smaller municipalities and the planning professionals in public and private practice that support them.

As such, I am offering the following targeted suggestions, all focused on the goal of better results and outcomes of an improved planning system for small towns.

### 1. Focus Transition on Implementation Readiness

The transition to a standardized Official Plan framework should focus not only on updating document structure, but also on supporting municipalities in developing implementation-ready Official Plans. This includes consideration of how plans align with infrastructure priorities, capital and operating budgets, servicing capacity, development sequencing, and intergovernmental priorities through broader growth objectives.

Official Plans also serve an important external function by signaling municipal priorities, readiness, and long-term direction to investors, infrastructure partners, developers, and other levels of government. In smaller municipalities in particular, this signaling function can influence whether communities are perceived as coordinated, credible, and prepared for growth opportunities. That means whether a place is chosen for projects big and small – and these signals can change the longer-term resiliency of places.

As part of this transition, there may be value in evaluating how existing Official Plans are functioning in practice before requiring wholesale restructuring. While background studies are typical in any OP review process, the effectiveness of previous OPs in driving growth or aligning policies are not typically completed. In some municipalities, plans

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may already be effectively supporting growth and development despite differing formats or organizational approaches. Transition efforts should therefore focus on improving implementation effectiveness rather than solely achieving structural uniformity and evaluating for that effectiveness and system weaknesses.

### 2. Recognize Different Municipal Growth Contexts

The proposal appropriately seeks consistency across Ontario. However, it fails to recognize that municipalities operate within significantly different growth contexts. Some municipalities are managing sustained growth pressures, while others are attempting to stimulate or attract investment and development activity. Typically, this growth context also impacts capacity – both in human and financial resources.

This distinction has implications for how Official Plans function in practice. In smaller municipalities, Official Plans may serve a broader strategic role in directing limited infrastructure investment, establishing development priorities, coordinating partnerships, and building confidence among external investors and funding partners. At the heart of this is for the community to establish its value or proposition or its 'why' as well as to have the ability to adapt to changing opportunities as they come along. Flexibility within the framework should therefore remain sufficient to reflect differing local planning realities and implementation needs.

### 3. Strengthen the Role of Official Plans as Strategic Implementation Tools

As the Province advances standardization, there is an opportunity to further strengthen the role of Official Plans as practical tools that help direct priorities, sequencing, and coordinated decision-making over time.

This includes ensuring stronger alignment between Official Plans and:

- infrastructure planning;
- capital budgeting;
- servicing capacity;
- development sequencing; and
- municipal growth objectives.

In practice, Official Plans are most effective when they provide clarity regarding where growth should occur, what investments are required to support it, and how implementation should proceed over time. Effective implementation also requires municipalities to identify and communicate clear priorities regarding where growth should occur, how infrastructure investment should be sequenced, and which development objectives should be advanced first over time. But frequently OPs are created in isolation without the full context or integration into existing larger municipal governance processes and challenges emerge from lack of effective decision-making. Improving this coordination function may ultimately contribute more to development outcomes than structural standardization alone.

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### 4. Pilot the Framework Prior to Full Rollout

A structured pilot phase involving a range of municipal contexts would provide valuable insight into implementation challenges, local capacity requirements, transition pressures, and approval processes prior to broader rollout of the framework. I do not recommend following the transition plan provided in Bill-98 or in the ERO posting. Piloting means providing a test across a transect of municipalities including rural, northern, isolated, declining growth, increasing growth, urban and peri-urban contexts. Importantly, a pilot evaluation should extend beyond document structure and machine readability to include overall plan effectiveness in supporting development outcomes, planning approvals processes, economic development indicators, and impact on municipal finances, all with embedded tracking and community auditing processes. Ultimately, the goal is to improve the planning process to achieve results for communities, and collectively entire province.

This would help ensure the proposed reforms translate into improved implementation capacity and more effective delivery of provincial housing and growth objectives over time. The next challenge for Ontario planning reform is not simply standardization, but improving the coordination capacity of Official Plans.

### Conclusion

Ontario has an important opportunity to modernize the Official Plan system while strengthening the ability of municipalities to coordinate growth and development in practice. Standardization may improve clarity and consistency across the system; however, the long-term success of the reforms will depend on how effectively municipalities are able to transition toward implementation-ready plans that support coordinated action, infrastructure alignment, and investment over time.

As mentioned, my practice and research are focused in small towns. Especially those municipalities that are struggling to identify their own value proposition to attract growth and development to create viable and resilient futures. In that context, ultimately, Official Plans should function not only as regulatory frameworks, but also as practical tools that help municipalities move development forward in a coordinated, predictable, and locally responsive manner. Ensuring that the new framework supports this broader implementation role will be critical to achieving the Province's housing and growth objectives across Ontario's diverse municipal contexts.

Thank you for considering these comments.

Sincerely,



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