

Re: Comment from the City of Kawartha Lakes in Response to ERO No. **026-0300**

May 4, 2026

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch

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Dear Minister Flack:

Thank you for this opportunity to provide comments on Bill 98. These comments relate to Schedule 7, the proposed changes to the Planning Act (ERO 026-0300). Since there are separate EROs related to minimum lot size and encumbered parkland, the comments here relate to standardized official plans and prohibiting sustainable design at site plan.

Standardizing official plans

The City of Kawartha Lakes supports the Province's objective to improve the clarity, usability, and consistency of official plans. Over time, many official plans have grown in length and complexity, often combining broad policy direction with detailed or aspirational content in ways that make them difficult to navigate and apply. Efforts to modernize structure, reduce duplication, and improve readability are welcome and align with ongoing work in the planning profession.

The City is also at an important juncture in its own land use planning framework. Kawartha Lakes is preparing to undertake a new official plan, which will be the first comprehensive plan developed specifically for the amalgamated municipality. The current Official Plan is largely carried forward from the former County of Victoria following amalgamation of 18 lower tier municipalities in 2001, and the forthcoming review represents an opportunity to establish a clear and cohesive planning framework for the community.

In this context, the timing of the proposed standardization is welcome. It provides an opportunity for the City to align with the Province's direction early in the process and to work collaboratively as the new official plan is developed.

At the same time, it will be important to ensure that any standardized framework retains sufficient flexibility to respond to local context. Municipalities such as Kawartha Lakes must plan for a wide range of conditions, from urban settlement areas to extensive rural landscapes to shoreline communities, and provincially regulated areas. An official plan framework that is overly rigid will likely shift complexity elsewhere in the system, including increased reliance on secondary plans or area-specific policies.

We offer the following comments and questions regarding the proposed standardized chapter structure and land use designations:

- **Clarity and supporting guidance**

We request the Province provide detailed guidance on how each chapter and land use designation is intended to function in practice. This would be inline with the recently revised Projection Methodology Guideline which provides a high level of clarity – would a similar guidance document be developed for standardized official plans (and secondary plans)?

Greater clarity on how municipalities are expected to apply and interpret the standardized designations would assist in ensuring consistency and reducing the need for workaround policies or amendments.

- **Land use designations – clarity and internal consistency**

The distinction between "Mixed-Use Areas" and "Mixed-Use Commercial Areas" is unclear. Typically, "mixed-use" implies a combination of residential and non-residential uses. If "Mixed-Use Commercial Areas" is not intended to include residential uses, then, to prevent confusion, it should not include the term "mixed-use."

The PPS identifies a 300 m buffer around employment areas (Policy 2.8.3) but it is unclear how this policy is to be reflected within the proposed land use framework. Perhaps "Mixed-Use Commercial Areas" is intended to address this

policy. If so, perhaps this should be made more apparent, in part by renaming the designation.

The inclusion of a “Major Facilities” designation raises questions. Two of the three listed uses appear to align with “Employment Area” uses. Clarification is requested on the purpose of this designation and whether these uses could be incorporated within “Employment Areas.”

The “Employment Areas” designation aligns with the *Planning Act’s* definition of “Area of Employment,” which is limited to manufacturing and the warehousing of those manufactured goods. For clarity, consider renaming the designation “Manufacturing.” In Kawartha Lakes, less than 10% of employment is in manufacturing and warehousing; as such, a designation titled “Employment Areas” that permits only these uses does not reflect the broader composition of employment within the municipality.

“Rural Lands” permits resource-based recreational uses, while “Shoreline Areas” also permits recreational uses. This appears duplicative. Clarification is requested on how these designations are intended to be distinguished, including guidance on the appropriate extent of shoreline areas.

“Rural Lands” permits residential uses, while “Prime Agricultural” and “Specialty Crop” areas do not. Clarification is requested on whether this is intentional or an omission.

- **Application within real-world planning contexts**

Can clarification be provided on how municipalities are intended to use the standardized land use designations in relation to the prescribed schedules? It is not clear where the detailed differentiation of land uses is expected to occur – whether within the primary land use designation, through additional schedules, or through policy text.

For example, “Parks and Open Space” is a single designation. If municipalities wish to distinguish between different park types (e.g., municipal-wide, neighbourhood, parkette) or related uses such as cemeteries, can this be shown only on a separate schedule (e.g., Schedule B3), but not on Schedule A3 Land Use Designations?

Similarly, within the “Neighbourhoods” designation, it is unclear how municipalities are to plan low-, medium-, and high-density residential areas, or identify areas intended for intensification. Can this be spatially represented on Schedule A2 only, or can it be shown on Schedule A3 Land Use Designations? Or perhaps it must be addressed solely through policy?

A similar issue arises in rural contexts. How should municipalities identify and plan for Hamlets within the standardized framework? While these areas may fall within “Rural Lands,” both good planning practice and the PPS direct growth to defined settlement areas. Clarification is requested on whether such areas are intended to be identified only on Schedule A1 Settlement Boundaries, but cannot be shown on Schedule A3 Land Use Designations.

It is unclear how provincially mandated frameworks such as the Oak Ridges Moraine Conservation Plan would be implemented within the proposed structure. Key ORMCP designations (e.g., Natural Core, Natural Linkage, Countryside) and associated policies (e.g., Minimum Area of Influence, Minimum Vegetation Protection Zone) do not appear to align with the proposed land use designations or within the prescribed schedules.

If the intent is for such frameworks to be implemented through secondary plans or area-specific policies, additional guidance should be provided. This should include when secondary plans are appropriate, what they are intended to contain, and whether they may include designations or policy frameworks beyond those set out in the standardized official plan structure.

Where within the standardized structure would municipalities incorporate affordable housing policies and associated implementation tools?

Sustainable design

The City of Kawartha Lakes has concerns with the proposed prohibition on sustainable design requirements at the site plan stage.

Sustainable design is generally understood to include measures that improve energy efficiency, reduce environmental impact, and support the long-term durability and

performance of development. These measures can provide direct benefits to homeowners through reduced operating costs, while also supporting broader provincial objectives related to climate resilience and environmental protection. Clarification is requested on what types of requirements the Province intends to prohibit under this proposal.

The City would also note the importance of demonstrating that such requirements are a significant source of delay in the development approvals process. Previous legislative changes limited municipal authority over exterior design. In our experience, these changes have not demonstrably resulted in meaningful improvements to approval timelines, but have reduced municipalities' ability to influence the quality of the built environment.

On balance, the City would support a more targeted approach that distinguishes between aesthetic design and functional sustainable design measures, rather than a broad prohibition.

Should you wish to discuss this matter further, please do not hesitate to reach out.

Sincerely,



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