

May 13, 2026

TO: Ministry of Municipal Affairs and Housing

VIA: email & online submission: PlanningConsultation@ontario.ca

Subject: Submission on ERO 026-0300 and ERO 026-0315 – Land Use Planning Reforms

Dear Ministry of Municipal Affairs and Housing,

On behalf of the Ontario Association of Cemetery and Funeral Professionals (OACFP), we appreciate the opportunity to provide comments on the proposed changes to the Planning Act and related frameworks, as well as the consultation on upper-tier official plans, secondary plans, and site- and area-specific policies.

OACFP represents cemeteries, crematoria, funeral homes, and transfer services across Ontario, collectively serving more than 85,000 families annually. As the Province continues to grow, it is essential that land use planning frameworks evolve to ensure that bereavement infrastructure remains accessible, sustainable, and responsive to community needs.

1. Recognizing Cemeteries as Essential and Unique Infrastructure

Cemeteries are distinct from other forms of municipal infrastructure. They must be planned, developed, and maintained in perpetuity, while also serving immediate and long-term community needs.

We appreciate that the proposed changes under Bill 98 move toward explicitly permitting cemeteries across a broader range of land use designations. This aligns with our previous submissions that cemeteries are compatible across urban, rural, and mixed-use contexts and are integral to complete communities.

However, permissions alone are not sufficient to address the challenges facing the sector.

2. Planning for Both Growth and Reality: New Lands and Intensification

Ontario is facing increasing pressure on cemetery capacity, particularly in high-growth urban areas, where existing cemeteries are approaching end-of-life and new cemetery development timelines can exceed a decade.

At the same time, the sector is actively pursuing **intensification strategies**, including:

- Columbarium development
- Increased use of cremation-related interment
- More efficient use of existing lands

The OACFP supports a **balanced planning approach** that:

- Enables **new cemetery development across appropriate land use designations**
- Supports **intensification of existing cemetery lands**, particularly in urban areas

Recommendation:

Provincial policy should explicitly recognize both:

- **Cemetery land supply (new development)**
- **Cemetery intensification (efficient use of existing lands)**

This dual approach is essential to meeting future demand.

3. Integrating Cemetery Needs into Provincial Growth Planning

A critical gap in current planning frameworks is the absence of cemetery demand within growth planning metrics. While population growth is a central consideration in land use planning, **death rates and burial demand are not currently integrated into provincial growth frameworks**, despite being directly correlated.



Recommendation:

The Province should:

- Incorporate **death rate projections and demographic trends** into growth planning
- Require municipalities to **forecast cemetery capacity needs** as part of official plans
- This would align cemetery planning with other essential infrastructure planning processes.

4. Planning for Mortality, Cemetery Capacity, and Long-Term Demand

While population growth is a central consideration in land use planning, mortality and disposition demand are not currently integrated into provincial growth frameworks, despite being directly correlated.

Ontario is experiencing both population growth and demographic aging. Statistics Canada projects a growth in Ontario's population of 4.4 Million, or 27.4% by 2051 (<https://www.ontario.ca/page/ontario-population-projections>) This suggests that annual deaths will increase significantly over the coming decades, creating sustained and predictable demand for burial, cremation, and interment services. OACFP members alone performed 62,092 interments in 2024. The correlated projected increase by 2051 would put that total at 79,105.

When considered alongside the reality that:

- Cemetery development timelines can exceed 10 years
- Cemeteries must be planned and maintained in perpetuity
- Urban cemetery capacity is already constrained

This creates a structural gap in planning.

Recommendation:

The Province should:

- Require integration of death rate projections and cemetery demand forecasting into growth planning
- Align this requirement with the proposed Projection Methodology Guideline (ERO #026-0304)
- Ensure municipalities plan for cemetery capacity in the same way as other essential infrastructure

5. Cross-Regional Nature of Cemetery Services

A key issue currently challenging operators is that cemeteries inherently serve **multi-municipal and regional populations**.

Cemetery catchment areas routinely cross municipal boundaries, particularly in large urban regions such as the Greater Toronto Hamilton Area. As a result, planning at a purely local level is insufficient and risks creating gaps in service.

Without coordinated planning:

- No single municipality may take responsibility for future cemetery land supply
- Existing cemeteries may be overburdened
- Families may face reduced access to culturally appropriate options

Recommendation:

The Province should explicitly require:

- **Cross-municipal and cross-regional coordination** in cemetery planning
- Recognition of cemeteries as **shared regional infrastructure**
- Planning at an **appropriate geographic scale**, particularly in high-growth areas

This is particularly important in the context of proposed changes to upper-tier planning frameworks (ERO 026-0315).

6. Financial and Policy Barriers to Cemetery Development

In addition to land availability challenges, policy and financial requirements can unintentionally create barriers to establishing new cemetery lands.

In particular, parkland dedication requirements—while appropriate for many forms of development—may not be appropriate when applied to cemeteries.

Cemeteries are unique infrastructure in that they:

- Provide permanent green space and open space benefits to communities
- Deliver enduring cultural, historical, and community value
- Are maintained in perpetuity for public benefit
- Serve an essential need that is directly tied to population growth and demographic realities

Unlike conventional development, cemetery lands are not consumed for short-term private use or redevelopment.

Once established, they remain protected open space serving both current and future generations.

Applying parkland dedication requirements or cash-in-lieu obligations to cemetery development may create unintended financial and policy barriers that hinder the timely establishment of much-needed burial infrastructure—particularly in high-growth areas where land costs are already significant.

Recommendation:

The Province should:

- Review the application of parkland dedication and similar growth-related charges as they apply to cemetery development
- Clarify that essential bereavement infrastructure should not be subject to policy tools that may unintentionally restrict long-term cemetery land supply
- Consider Planning Act amendments or implementation guidance that recognize the distinct and perpetual nature of cemetery lands

7. Alignment Between Planning Frameworks and the FBCSA

We also need to bring to your attention challenges related to **misalignment between land use planning frameworks and the Funeral, Burial and Cremation Services Act (FBCSA)**.

In particular:

- Conflicting requirements between planning approvals and FBCSA provisions (e.g., public interest declarations)
- Uncertainty around approvals for structures such as columbarium buildings
- Duplication or inefficiencies in regulatory processes

These inconsistencies create barriers for both municipalities and operators and may undermine the intent of planning reforms.

Recommendation:

The Province should:

- Ensure **alignment between the Planning Act framework and the FBCSA**
- Identify opportunities to **streamline approvals processes**
- Consider these issues as part of future FBCSA modernization efforts

8. Supporting Municipal Implementation

OACFP recognizes that municipalities face competing land use pressures, particularly in urban areas where cemetery development must compete with residential and commercial uses.

At the same time, the absence of clear direction can result in inconsistent and, at times, restrictive approaches to cemetery planning.

Recommendation:

The Province should:

- Provide **clear guidance to municipalities** on cemetery planning
- Reinforce cemeteries as **compatible land uses across designations**
- Support municipalities in balancing intensification, growth, and long-term infrastructure needs

9. Conclusion

OACFP supports the Province's efforts to modernize Ontario's land use planning framework and improve consistency and efficiency.

At the same time, these reforms present a critical opportunity to ensure that cemetery and bereavement infrastructure is fully integrated into long-term planning decisions.

Further, as the Province moves to streamline planning approvals for schools and post-secondary institutions, consideration should be given to similar approaches for cemeteries.

Like schools, cemeteries are essential community infrastructure with long-term planning horizons and broad service areas. A streamlined or prioritized approvals pathway would help address current delays and better align planning frameworks with community needs.

Cemeteries are unique in that they:

- Must exist in perpetuity
- Serve both local and regional populations
- Require long-term planning horizons
- Are directly tied to demographic realities

We encourage the Province to strengthen these proposals by:

- Recognizing cemeteries as essential, long-term infrastructure
- Supporting both new development and intensification
- Integrating cemetery needs into growth planning
- Requiring cross-regional coordination
- Aligning planning frameworks with the FBCSA

OACFP welcomes the opportunity to continue working with the Ministry to advance a planning framework that supports complete communities—both in life and in death.

Sincerely,



Sandra Aguilar,
President



Darren Denomme,
Executive Director