



A community that grows together

May 14, 2026

Hon. Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Minister Flack

Re. County of Dufferin Response to the Ministry of Municipal Affairs and Housing Proposed Changes to Site Plan Control under the *Planning Act*.

On behalf of the County of Dufferin, staff is pleased to provide written comments pertaining to the proposed changes to site plan control under the *Planning Act*, which were prepared by the Ministry of Municipal Affairs and Housing ('MMAH'). It is our belief that the following comments will assist the MMAH in refining the currently proposed changes to site plan control in Ontario.

The County of Dufferin wants to first make mention of our appreciation to the MMAH for their continued action to address problematic land use planning tools and mechanisms. Through different legislation, which includes Bill 60, Bill 17, Bill 109, and now the current proposal, the Province has continued to strive to establish a land use planning framework that works for all parties associated with the land use development process. This ongoing work, in our opinion, is critically important to advancing key land use planning goals in Ontario, especially the goal of expanding the residential housing stock in the province.

While the County of Dufferin does understand that the site plan control process can be improved, this does not occur through the complete removal of this land use mechanism. The site plan control process is an important tool that is frequently utilized to address the detailed design components of a development application that are not commonly implemented as part of other planning application processes. The removal of this tool, therefore, may lead to situations whereby municipalities request additional studies or design drawings be submitted for their review earlier in the planning process as a result of the absence of site plan control. This, in turn, may lead to longer review times or, in some cases, even delays, at earlier stages of the planning process. Even more, site plan control ensures new development is well-designed and results in a built form that supports environmental and infrastructure related standards. Site plan agreements provide municipalities a tool that allows them to bind owners to drawings and technical studies that have been reviewed and agreed upon by the appropriate municipal staff. By capturing these items in the site plan agreement, municipalities

secure a development that is required to meet a high standard of design and that can be viewed as a positive gain to an existing area.

Though minor refinements to the site plan control process itself were also proposed, Dufferin County does have concerns with each of the proposed changes. For the proposal to establish a maximum of three (3) circulations after which a mandatory meeting is triggered, this is a process that is likely already occurring throughout the province. In Dufferin County, for instance, County planning staff have been party to numerous meetings regarding site plan approvals, specifically how certain comments can be addressed by the applicant. This proposed change, therefore, would merely act as ‘red-tape’ to a process that is likely occurring organically in municipalities. Dufferin County also has concerns about the arbitrarily established maximum of three circulations. In instances whereby the applicant has met the maximum circulations, and a meeting has been held, but comments remain outstanding, what is the next course of action? Site plan approvals are an iterative process and, as such, implementing a circulation maximum may only lead to situations where less than satisfactory site plans are required to be approved. For more complex site plan applications, a maximum of three circulations may not be sufficient enough to address all comments and concerns. What the County of Dufferin, therefore, may suggest is should the MMAH proceed forward with a maximum number of circulations, the total amount should be based on whether the site plan is major or minor. Even more, it is recommended that the establishment of those maximums occur only after a jurisdictional scan has taken place to determine the average number of circulations for major and minor site plans.

Proposed reforms to the scope of site plan reviews and the establishment of a site plan review panel also bring forth questions and concerns for the County of Dufferin. The most notable area of concern for Dufferin County, as it pertains to the proposed changes to the scope of site plan reviews, is the last sentence in the proposal. It states that “if technical and drawing requirements identified in the checklist are met, site plan approval is issued”. In our interpretation of this proposed change, the mere submission of particular drawings and technical studies warrants the approval of a site plan application. If that is the intent of this proposed reform, the County of Dufferin has notable concerns with whether appropriate municipal reviews and sign-off are being allowed through this process. Municipalities, and associated departments, have a strong local knowledge that is vital to the implementation of development that represents ‘good planning’. The removal of this knowledge removes collaboration and municipal input from the site plan process, which would likely lead to disconnected and incompatible developments. Further, though we can appreciate the province’s desire to establish a municipal arbitration process solely for site plan approvals, this seems to be a redundant process given the presence of the Ontario Land Tribunal (OLT). The OLT already offers a mediation process that acts as an early resolution platform prior to a formal hearing, which is, in essence, what is currently being proposed by the MMAH. In our opinion, the establishment of a separate municipal arbitration process for site plan approvals will likely not streamline approval. This



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process will likely be inundated with 'appeals' from unsatisfied applicants that believe they can bypass the site plan approval process. Should this begin to occur, the municipal arbitration process will likely become highly backlogged with 'appeals', thus further delaying site plan approvals.

The proposed change Dufferin County is in support of is the establishment of different site plan approval streams for different types of development. We agree that site plan applications are not all the same and, in fact, there are many minor applications that could avoid a fulsome site plan application process if the appropriate protocols were established. Given that, the County of Dufferin would welcome the MMAH's implementation of a framework that outlines what can be defined as a 'major' and 'minor' site plan and, for those deemed minor, the process by which they can be expedited by municipal staff. Though Dufferin County would support the introduction of a guideline for technical studies and drawings that can be requested as part of each site plan type, it is our belief that this should be solely a guide and not a mandated approach. Avoiding the implementation of a mandated framework would provide municipalities the flexibility to request technical materials on a case-by-case basis and not through a 'one-size fits all' approach.

The County of Dufferin appreciates the opportunity to provide comments on the proposed changes to site plan control under the *Planning Act*. We also want to reiterate our appreciation to the Province of Ontario, but specifically the MMAH in their work addressing problematic or outdated planning tools and mechanisms. It is our hope that the comments provided above will assist the MMAH in developing the proposed changes to site plan control under the *Planning Act*.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'LM'.

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