

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 Streamlining of Complete Application Requirements.

On behalf of the County of Dufferin, staff are pleased to provide written comments pertaining to the proposed streamlining of the information and materials required for a complete application. It is our belief that the following comments will assist the Ministry of Municipal Affairs and Housing ('MMAH') in strengthening the proposed framework to ensure that land use planning processes across Ontario are efficient, predictable, and supportive of sustainable growth and development.

The County recognizes the province's efforts in addressing the housing supply challenges as well as to move forward key infrastructure and transportation priorities. We appreciate the focus on creating a more streamlined and transparent application process, which is important for both applicants and municipalities. At the same time, it is important that planning authorities continue to have the flexibility to request the information needed to properly evaluate development proposals in different local contexts.

Through the County of Dufferin's review of Environmental Registry of Ontario ('ERO') No. 026-0313, the following comments, questions, and suggestions are provided.

- The County of Dufferin appreciates the MMAH's desire to streamline complete application requirements. Where the County has significant concern, however, is in cases where disagreements arise between the municipality and applicant on potential contingent studies requested. Should a disagreement emerge, will a form of 'appeal' be available to the applicant? Does the final decision on a matter ultimately land with the municipality?
- While the list provided by the MMAH is quite comprehensive, it seems that technical studies with a focus on urban design and visual impacts have been omitted. These noted studies, though more secondary to review processes, greatly assist municipalities in determining whether a development represents 'good planning'. Even more, urban design focused reports

allow for municipalities to understand how a proposed development will integrate into the existing built form.

- What the County of Dufferin has also identified as being absent from the proposed list provided by the MMAH are the drawings and illustrations commonly submitted by applicants and often requested as part of a complete application. Those drawings include, but are not limited to, plans of survey, topographic surveys, concept plans, landscape plans, pre-and-post drainage development plans, illumination plans, erosion and sediment control plan, draft plans of subdivision/condominium. Though we understand that the proposed list focuses on solely ‘studies’, the aforementioned drawings are commonly requested by municipalities as part of development applications and, as such, clarification should be provided by the MMAH as it relates to those drawings and illustrations.
- To ensure consistency in the implementation of these requirements, if adopted through legislation, the County would suggest that the MMAH prepare Terms of References for each study provided on the core and contingent lists. This, in our opinion, would likely eliminate any potential confusion for applicants, thus leading to a more efficient planning application process throughout the province. Significant consultation with municipalities during the preparation of those Terms of References would be strongly urged.
- The County of Dufferin suggests that clarification be provided to confirm that all studies, including core studies, are only required where relevant, in relation to planning application and its context. For example, the proposal does not identify which studies may be required for specific application types (e.g., official plan amendments, zoning by-law amendments, site plan control, consents). It is recommended that this be clarified to improve transparency and ensure the appropriate approach to study requirements.
- Certain studies should be limited to specific development types or scales. Additional guidance on this would help avoid redundant studies and their requirements. It is to note that while a standardized list of studies is helpful, each municipality has unique geographic, environmental, and community conditions, and, as such, flexibility should still be provided to municipalities in determining what studies are required to be submitted.
- The County of Dufferin notes that municipalities will likely be required to update official plans and internal processes to align with the proposed changes should they be legislatively adopted. Consideration should be given to transition timelines and implementation of these studies to support municipalities through this process.
- The County of Dufferin encourages MMAH to consider direction for ongoing collaboration between the province, municipalities, and applicants to continuously refine the application requirements, ensure alignment with provincial policies, and share best practices. This could



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include workshops, guidance documents, or digital tools that support both applicants and municipal staff in preparing complete applications.

- The County of Dufferin recommends that the proposal recognize the importance of Indigenous consultation where planning applications may affect Indigenous communities, and traditional lands and with provincial policies. Particularly an Archaeological Assessments and Cultural Heritage Impact Assessments, may directly involve Indigenous knowledge or require Indigenous participation. The County suggests clarifying that municipalities should engage relevant Indigenous communities in the preparation and review of these studies when appropriate.

The County of Dufferin appreciates the opportunity to provide comments on the proposed changes to the requirements for a complete application. We also want to reiterate our appreciation to the MMAH for their work in establishing a more predictable and streamlined land use planning process in Ontario. It is our hope that the feedback provided above will assist the Ministry of Municipal Affairs and Housing in refining the proposed framework for complete application requirements.

Respectfully submitted,

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

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