

April 29, 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 Upper-Tier Official Plans, Secondary Plans, and Site and Area-Specific Policies.

On behalf of the County of Dufferin, staff is pleased to provide written comments pertaining to the proposed changes to upper-tier official plans, secondary plans, and site- and area-specific policies ('SASPs') that were prepared by the Ministry of Municipal Affairs and Housing ('MMAH'). It is our belief that the following comments will assist the MMAH in strengthening and refining the currently proposed changes to those three (3) critical land use policy tools.

The County of Dufferin appreciates the MMAH's desire to build upon the previous consultation that occurred in the Fall of 2025 under Environmental Registry of Ontario ('ERO') No. 025-1099. Land use planning is a complex matter and every effort to simplify that process will only expedite the achievement of critical priorities relating to housing, infrastructure, and employment. Dufferin County recognizes and values the steps being taken by the MMAH to advance land use planning in the province through updates to the existing land use policy framework.

Through the County of Dufferin's review of ERO No. 026-0315, the following comments, questions, and suggestions are provided. Each point provided falls under one of the three categories – upper-tier official plans, secondary plans, and SASPs.

Upper-Tier Official Plans

- Agricultural and Rural land use designations should remain as two distinct and separate classifications. The policies and regulations associated with each designation, especially in rural municipalities, are quite detailed and complex given that they are the two most prominent land use designations utilized. In our opinion, maintaining these land use designations as separate items within upper-tier official plans would ensure the appropriate implementation of these policies and, ultimately, greater clarity for readers of the policy.

- The County of Dufferin would suggest combining the land use designations of “Employment Areas” and “Major Facilities” into one “Employment” designation. Further, the County of Dufferin would suggest combining the land use designations of “Prime Agricultural Areas” and “Specialty Crop Areas” into one “Agricultural” designation.
- Dufferin County would recommend the removal of the “Parks and Open Spaces” section for upper-tier official plans. In our opinion, this land use designation is not overly associated with a “regional-scale matter”, which seems to be MMAH’s intent for upper-tier official plans.
- If the intent of upper-tier official plans is to “provide broad strategic direction”, then the implementation of Climate Change related policies should be solely included in upper-tier official plans. In our opinion, policies pertaining to climate change are critical to ensuring the long-term protection and success of municipalities throughout Ontario. To avoid duplication, however, climate change policies may be better suited for upper-tier official plans that focus more on regional-scale matters, which, in our opinion, climate change would fall under the scope of.
- Additional clarity should be provided regarding whether certain land use designations, if not applicable to the upper-tier municipality, can be omitted from the official plan. If so, what is the process of omitting a particular land use designation? On the other hand, if an upper-tier municipality deems a land use designation as vitally important to the official plan, but it does not fall under the list of contents, can that be added? If so, what is the process of adding a particular land use designation or section to the official plan should it be beyond the scope?

Secondary Plans

- The County of Dufferin believes that secondary plans should not be limited to particular areas as defined by the Province. It is our belief that the utilization of this tool should be left to the discretion of lower-tier municipalities, in consultation with upper-tier municipalities where applicable.
- Dufferin County does support the exemption of secondary plans from Ministerial approval in the case where no upper-tier municipality with planning authority exists. In cases where there is an upper-tier municipality with planning authority, Dufferin County supports the MMAH’s recommendation to require approval from the upper-tier municipality. In our opinion, this approach ensures consistency, collaboration, and coordination between the upper and lower-tier municipalities, which is critical for a land use policy of that scale.
- If the MMAH were to permit secondary plans as standalone documents, it is suggested that all secondary plans be combined into one singular policy document. This, in our opinion,



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would provide readers a consolidated document that includes can be easily referenced, instead of numerous different policy documents, which may cause confusion.

SASPs

- The County of Dufferin has no notable comments or recommendations pertaining to the changes being proposed to SASPs.

The County of Dufferin appreciates the opportunity to provide comments on the proposed changes to upper-tier official plans, secondary plans, and SASPs. We also want to reiterate our appreciation to the Province of Ontario, but specifically the MMAH in their work to streamline and simply land use planning in Ontario. It is our hope that the comments provided above will assist the MMAH in refining the proposed changes to standards for upper-tier official plans, secondary plans, and SASPs.

Respectfully submitted,

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

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