

Schedule A -Comment Chart

ERO Postings related to Bill 98, *Building Homes and Improving Transportation Infrastructure Act, 2026*

Environment Registry of Ontario (ERO) Posting Number	Description Overview	Staff Comment
<p><u>ERO 026-0300</u></p> <p>Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes (Schedules 1, 2 and 7 of Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026)</p> <p>Comment Period: May 14, 2026</p>	<p>The government is seeking feedback on proposed legislative changes to the Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 through Bill 98, the proposed Building Homes and Improving Transportation Infrastructure Act, 2026.</p> <p>Schedules 1, 2 and 7 of Bill 98 propose a number of amendments to the Planning Act and City of Toronto Act, 2006 as described in Background section of the report.</p> <p>The following amendments are intended to come into force immediately upon Royal Ascent:</p> <ul style="list-style-type: none"> • Streamlining and Standardizing Official Plans <ul style="list-style-type: none"> ○ Proposed amendments to the <i>Planning Act</i> would put in place a standard structure for official plans, to be set out in Schedule 7. A summary of the structure can be found in the <u>ERO posting</u>. The proposed structure includes a standardized set of land use designations to be used in local official plans, with the ability for the Minister to set out further direction on implementing any of these designations, including using two or more sub-designations. Otherwise, the listed designations are the only ones that will be permitted in official plans. • Complementary Changes to Support Implementation of Streamlining and Standardizing Official Plans • Site Plan: Prohibit Mandatory Municipal Enhanced Development Standards and Green Building Standards <ul style="list-style-type: none"> ○ remove municipal authority to require certain mandatory Enhanced Development Standards (EDS) at the lot level, outside of buildings (e.g., green development standards), 	<ul style="list-style-type: none"> • Proposed changes are intended to provide provincial standardization. While consistency can be beneficial, these changes will impact municipal flexibility and will require changes to established practices, processes and plans. • The implementation timeline applicable to Owen Sound would be January 1, 2029. • Many municipalities, including Owen Sound, are undergoing costly and time-consuming processes to bring the local policies into conformity with the last set of provincial changes. These proposed changes will require these documents to be updated again. Given that the proposed changes are not substantive policy changes but rather mostly superficial formatting changes, the implementation timelines should provide for the changes to be implemented in the next required 5-year review, especially for smaller municipalities that do not have separate policy planning divisions. • Clear policy is critically important in ensuring that the Plan can be understood and allow for timely approvals. • Official Plans need to respond to specific context of communities across the province. A framework could actually cause redundancy and increase overlap within a document where context specific matters don't perfectly fit within a specific heading of a framework. • The province is asked to confirm if Hazard policies will be part of the standardized sections. C4 references Hazard. Ensuring the terminology aligns with the PPS would be helpful and minimize any misunderstanding. • Using the term "mixed use" areas gives the impression that these uses are all permitted without any policy context for how these uses should be developed.

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	<p>that are not specifically required for health or safety (e.g., stormwater management)</p> <ul style="list-style-type: none"> ○ provide clarity that green building/construction standards are voluntary and cannot be imposed by municipalities. ○ remove references to “sustainable design” from site plan control ○ clarify zoning cannot be used to require sustainable elements including prohibit municipalities from imposing requirements for infrastructure that supports electric vehicles. ○ expressly provide that mandatory green building/construction standards are not permitted, including as part of site plan control, and ○ remove provisions that would have authorized municipalities to require green building standards <ul style="list-style-type: none"> ● Minimum Lot Sizes – 175 square metres <ul style="list-style-type: none"> ○ Changes are proposed to the Planning Act to create a regulation-making authority to allow the Minister of Municipal Affairs and Housing to set a minimum lot size on parcels of urban residential land, outside the Greenbelt Area. ○ A parcel of urban residential land is defined in the Planning Act as a parcel within the settlement area of a municipality that is zoned for residential use (other than ancillary residential use) and is fully serviced by public sewage and water. ○ Any municipal zoning requirement for minimum frontage and/or minimum depth that would not allow for the minimum lot size standard to be met would be inapplicable. 	<ul style="list-style-type: none"> ● What might be more helpful is if there is specific implementing language for certain provincial policies that should be consistent across the province, then the province could provide that specific language for inclusion. In some cases, the province already provides detailed guidance, but this guidance could become more prescriptive. On-farm diversified uses would be a good example, how to get municipal infrastructure across a highway is the opposite. <p>Green Development Standards</p> <ul style="list-style-type: none"> ● On green development standards, rather than prohibit certain standards, provide supportive policy guidance and training to municipal staff for proven standards that are encouraged (such as green solutions for stormwater management that actually reduce impact and cost to municipal infrastructure as well) similar for climate change policies. ● The City’s Official Plan as recently approved does not include any enhanced green development standards.

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	<ul style="list-style-type: none"> ○ A regulation under this authority would not apply directly to the subdivision or consent process, but could be relevant to such applications • Encumbered Parkland and Privately Owned Public Spaces (POPS) <ul style="list-style-type: none"> ○ Changes are proposed to the <i>Planning Act</i> to facilitate easements for POPS, authorize municipalities to require agreements for encumbered land (i.e., strata lands) that can be registered on title, provide for a credit system whereby encumbered land and POPS arrangements would receive a minimum credit of 70%, and establish a timeframe of 90 days for municipal decisions after which a developer could appeal a non-decision to the OLT. • Upper-tier Planning Responsibilities in Simcoe County 	
<p><u>ERO 026-0301</u></p> <p>Proposed amendments to the Water and Wastewater Public Corporations Act, 2025 and consequential amendment to the Safe Drinking Water Act, 2002</p> <p>Comment Period: May 14, 2026</p>	<p>MMAH is proposing amendments to guarantee public sector ownership, help ensure contracts and employees that move to a corporation transfer uninterrupted; and prohibit the transfer of long-term debt from municipalities to a Water and Wastewater Public Corporation as well as consequential legislative amendment to the <i>Safe Drinking Water Act, 2002</i>.</p>	<p>No comment</p>
<p><u>ERO 026-0302</u></p> <p>Communal drinking water and wastewater system municipal consent requirements</p> <p>Comment Period: May 14, 2026</p>	<p>Amendments are proposed to the <i>Municipal Act, 2001</i> and <i>Safe Drinking Water Act, 2002</i>, to enable regulations to set out requirements for municipal consent of non-municipal communal drinking water and wastewater systems and to require municipalities to consent if requirements are met.</p>	<p>No comment</p>

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<p><u>ERO 026-0304</u> Draft Projection Methodology Guideline (PMG) to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024) Comment Period: May 14, 2026</p>	<p>To support the implementation of the Provincial Planning Statement, 2024, the Ministry is seeking feedback on a further revised draft Projection Methodology Guideline to assist planning authorities with identifying population and employment forecasts and assessing land needs. This is the second consultation on this matter.</p> <p>The PMG is an important tool in implementing the growth projections that will guide amount of population and employment for which municipalities are planning.</p>	<p>No comment</p>
<p><u>ERO 026-0305</u> Proposed Changes to Various Regulations Under the Planning Act to Facilitate the Electronic Submission of Information and Materials to Approval Authorities and Allow Notices to be Given Electronically to the Province Comment Period: May 14, 2026</p>	<p>The government is seeking feedback on proposed amendments to various regulations under the <i>Planning Act</i> to facilitate the electronic submission of information and material to approval authorities and allow notices to be given electronically to the Province.</p> <p>To support the government’s move towards building a digital Ontario, the government is seeking feedback on proposed changes to various regulations under the <i>Planning Act</i> that would:</p> <ul style="list-style-type: none"> remove the requirement for information and material to include an original or certified copy, and allow required notices to be given electronically to the Ministry of Municipal Affairs and Housing. <p>These proposed changes would facilitate the electronic submission of information and material to approval authorities. They are intended to help streamline and expedite review of land use planning matters and are complementary to the broader government move towards building a digital Ontario.</p>	<p>On submission items, it is ok for the forms to not require commissioning but should still require signature. Digital signature capabilities are widely available in 2026.</p> <p>Supporting documents should be stamped and signed by the qualified persons that prepared them.</p> <p>Digital submissions are generally the norm for most municipalities. Planning staff anticipate launching the Cloudpermit planning module June 2026.</p> <p>Any standardization that requires changing technology (for example, not using Cloudpermit) would be very costly and disruptive.</p> <p>To facilitate digital /electronic submissions across province, the province is strongly encouraged to focus on the ‘costumer’ experience and ensure ease of use by multiple different members of the same municipality. The current MTO portal is not user friendly and does not facilitate easy communication between various stakeholders.</p>
<p><u>ERO 026-0309</u> Proposed Regulation to Prohibit Mandatory Enhanced Development</p>	<p>The government is seeking feedback on a proposed Minister’s regulation that would have the effect of removing authority to require, as a condition of land division approvals, mandatory enhanced development standards at the lot level (outside of buildings), that are</p>	<p>City Planning Staff would echo the comments of the County of Grey.</p> <p>The media briefing document released by the province notes examples of “landscaping and foliage requirements, soil composition and ornamental and design considerations” as items which would be prohibited. If the prohibitions</p>

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Standards as a Condition of Land Division Approvals Comment Period: May 14, 2026	not specifically required for health, safety, accessibility or protection of adjoining lands (e.g., stormwater management).	limit municipal requirements to those “required for health, safety, accessibility or protection of adjoining lands (e.g., stormwater management)” then this would appear to limit many environmental protections, including those that implement Environmental Impact Studies (e.g., tree preservation, planting, and native species requirements). Clarification on the definitions of ‘sustainability’ and ‘enhanced development standards’ are needed, as well as potential carve-outs not only for health, safety, and accessibility, but also for the natural environment.
<u>ERO 026-0310</u> Proposal to reform site plan control under the Planning Act and the City of Toronto Act, 2006 Comment Period: May 14, 2026	The following potential reforms to municipal site plan approvals reflect both Provincial and stakeholder concerns that the site plan process is taking too long. These potential reforms are intended to generate discussion on these challenges and work towards solutions that would enable a faster, more predictable, cost effective and coordinated site plan approval process. Proposed reforms include: <ol style="list-style-type: none"> 1. Remove site plan control as a land use planning tool in the <i>Planning Act</i> and the <i>City of Toronto Act, 2006</i>. 2. Require municipalities to have a maximum of three circulations after which a mandatory meeting is triggered with all relevant municipal department representatives and the applicant to work through and resolve all outstanding issues. 3. Further scope the site plan review process to a standard site plan approval checklist of functional aspects of a site (e.g., those related to health and safety), with use of certified professionals for acceptance and approval of reports and studies. A municipality is not permitted to request additional studies and plans beyond what is included in the standard site plan approval checklist. If technical and drawing requirements identified in the checklist are met, site plan approval is issued. 4. Establish or require a municipal arbitration process / site plan review panel for site plan applications that have exceeded the 	Owen Sound consistently grants site plan approval within the 60-day window that is mandated. Key to the maintaining the timelines are the following: <ul style="list-style-type: none"> • A pre-consultation process that identifies the information necessary to make decisions and process an application efficiently. • The City uses a development team approach that brings the key staff in planning, building and development engineering together to collaborate and find solutions to move forward. • Matters of accessibility are delegated to staff utilizing a checklist so that committee schedules and approvals do not hold up timely development. • We use a checklist for complete applications based on pre-consultation. Everyone knows early on what is expected and conditions don’t change. • When approval is granted, staff immediately offer a meeting with developers to review conditions and changes so that limited re-submissions are required toward final approval. Robust pre-consultation often allows for complex developments to proceed with only one resubmission. • The City has a minor and major site plan approval process which already provides for a ‘streamed’ approach depending on the scale of the proposed development. • It is unlikely even the best arbitration process will improve timelines but having this as an option may be helpful. Who will pay the costs?

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	<p>government’s 60-day timeline and a specified number of circulations. Participants in this process would include the applicant and the municipal development review team. This would be an alternative to a hearing at the OLT with a goal of speeding up approvals and cutting down on associated costs. An arbitration process / site plan review panel decision-making timeline could be applied to ensure timely decisions on approvals.</p> <p>5. Establish or require municipalities to establish different site plan approval streams for different kinds of proposed development, with corresponding scope of matters that may be controlled. This would mean that a “full” site plan process would only be permitted for larger, complex development initiatives resulting in fewer matters being regulated through site plan control. Less complex development would be triaged to a more expedited stream or could be exempted from site plan control completely.</p>	<ul style="list-style-type: none"> • Site Plan control is of critical importance, and it has a profound and lasting impact on the built environment and how people experience their community. • Without site plan approval, the building permit process will become a bottleneck with hold ups relating to items of provincial conformity such as servicing (water, sanitary, stormwater, roads, etc.), cultural or built heritage resources, archaeology, brownfields, EIS, endangered species etc. • Eliminating site plan approval leaves the community significantly at risk as planning will be short-sighted and not consider cumulative or long-term planning. Who will ensure that traffic is coordinated and planned, that servicing infrastructure is sufficient, that entrances are safe and pedestrians have a place to walk. Leaving these matters to chance and leaving these decisions to developers will have significant and negative long term community impact. • There are related by-laws and legislation to address prior to building permit that are usually identified through site plan approval to the benefit of developers since they are identified earlier in the process than would be the case if left to permit process. Removing this process creates ambiguity over who is reviewing plans for compliance with by-laws and applicable law. Building Divisions are good at identifying non-compliance, Planners are good at walking developers through necessary steps to obtain compliance. • Municipal arbitration processes <ul style="list-style-type: none"> - If implemented, this requirement should include requirement for provincial Ministries that have permit or approval processes to attend. - This is only helpful if it is at the request of the developer or municipal staff. If both developers and municipal staff are working collaboratively through the process, this could disrupt something that is working.

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		<ul style="list-style-type: none"> • Approving development that ensures “adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems” per Section 2 of the Planning Act, requires a municipal public works and engineering departments that are resourced/staffed to have capacity for development review with strong understanding of available infrastructure or geological needs. • To have lands development ready and reduce the need for site specific study of servicing or stormwater capacity would require municipal wide servicing and infrastructure assessment and construction within urban areas. Ontario has a significant infrastructure maintenance deficit largely because of inability to fund infrastructure. Planning for infrastructure and asset management is very different than finding budget to implement that plan • Allowing review of critical matters that may impact health or have long term impacts such as environmental, storm water, traffic, servicing, etc. ensures that studies are not filed that will leave municipalities finding solutions to long term problems.
<p><u>ERO 026-0311</u></p> <p>Proposed Regulatory Approach to Establish a Minimum Residential Lot Size in Urban Areas</p> <p>Comment period: May 14, 2026</p>	<p>The government is seeking feedback on a potential regulation under the <i>Planning Act</i> to establish a minimum lot size of 175 square metres on urban residential lands in Ontario.</p> <p>Other considerations would continue to apply to decisions on land division applications, such as policies in the Provincial Planning Statement (PPS), 2024 that prohibit development (including lot creation) in certain circumstances. In addition, the regulation-making authority would be scoped to zoning and would not apply to subdivision control, and any municipal zoning requirement for minimum frontage and/or minimum depth that would not allow for the minimum lot size standard to be met would be inapplicable. Land owners would retain the ability to apply for the creation of larger or smaller lots through the land division process.</p> <p>The authority for this proposal regulation is being consulted on concurrently as part of Bill 98 proposed <i>Building Homes and Improving</i></p>	<ul style="list-style-type: none"> • The proposed minimum lot size is 175 square metres (1883 square feet). This is less than many homes today. Reducing the minimum lot size should consider: <ul style="list-style-type: none"> - Servicing - Storm water - Setbacks (especially given the proposed as-of-right variances) - Can this lot size support ARU’s - Is there room for snow storage? - Minimum frontage for access and provision of underground services • Instead of prescribing a size, prohibit minimum lot size in Official Plans (so no OPA required to change a lot size). Lot size descriptors in the OP

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	<p><i>Transportation Infrastructure Act, 2026</i> that proposes changes to the <i>Planning Act</i> ERO #026-0300.</p>	<p>should be allowed, to consider matters such as access, stormwater and servicing capacity.</p> <ul style="list-style-type: none"> • Consider impact of a very small minimum lot size in fragmenting lot fabric making it more difficult to consolidate for larger more dense forms of development may undermine the ability to build more “missing middle” housing. • If a minimum lot size of this nature moves forward, it should be applied only to multiple forms of housing (such as townhouses) to promote more “missing middle housing” types and deter small single detached lots that fragment urban blocks. • As noted above, these types of prescriptive regulations will require costly and time-consuming updates to the local planning documents. Staff time and municipal resources could be used much more efficiently.
<p>ERO 026-0312</p> <p>Proposed Changes to Support Standardizing of Parkland Requirements Under the Planning Act</p> <p>Comment Period: May 14, 2026</p>	<p>The government is seeking public feedback on a Minister’s regulation under the <i>Planning Act</i> to standardize parkland dedication requirements in Ontario in respect of the conveyance of developer-identified parkland, including encumbered lands and privately owned public spaces (POPS) arrangements, to implement Bill 23 provisions.</p> <p>The land suitability criteria that are proposed to be prescribed in regulation would include the following:</p> <ol style="list-style-type: none"> 1. Ineligible Land – land with any of the following conditions cannot be required to be conveyed to municipalities for park and recreational purposes: <ul style="list-style-type: none"> • Contaminated lands – lands that have in or on them any contaminants from industrial or other uses that pose a public health risk • Natural and human-made hazard lands – hazardous lands and hazardous sites as described in section 5.2 of the Provincial Planning Statement, 2024 (PPS 2024) as well as lands affected by human-made hazards as described in section 5.3 of the PPS 2024. 	<p>Planning Staff would echo the recommendations of the County of Grey as it relates to the Province providing template agreements to municipalities to offset the costs and workload associated with encumbered lands agreements.</p>

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	<ul style="list-style-type: none"> • Lands within and adjacent to natural heritage features and areas are eligible on the condition that a park would not interfere with or compromise the natural heritage features and areas. • Lands in the Natural Heritage System of the Greenbelt Plan or in the Natural Core or Natural Linkage Areas of the Oak Ridges Moraine Conservation Plan or unless in accordance with policies of the Niagara Escarpment Plan. • Lands that would not support park use – lands that would not accommodate fill and/or soil depths to accommodate structural footings as per the Ontario Building Code or support tree planting. • Lands with financial encumbrances – lands with liens, charges, etc. registered on title. • Lands that are privately-owned and not accessible to public at all times. <p>2. Land Accessibility/Comfort for Use – parkland must be accessible, visible and comfortable to facilitate public use of it and, in particular, must be:</p> <ul style="list-style-type: none"> • Accessible by all users directly from the public realm and readily visible from the public realm. • Land must be of a size and shape that is capable of serving park or public recreational purposes. 	
<p><u>ERO 026-0313</u> Streamlining the information and material that planning authorities can require as part of a complete application</p>	<p>The Ministry is seeking feedback on a proposed list of information and material that has been categorized into two types of studies and when they could be required:</p> <ol style="list-style-type: none"> 1. Core Studies: Core studies are those that could always be required since planning authorities typically require these to assess most planning application types (i.e., official plan amendments, zoning by-law amendments, plans of subdivision/plans of condominium, site plan control, and/or 	<ul style="list-style-type: none"> • These studies should not be a 'one size fits all' approach. Development scenarios across the province vary significantly and any list prescribed by the province may not be able to address all the situations. • The studies identified should be part of a thoughtful pre-consultation and based on a policy framework, not randomly or needlessly selected. • Having core studies and contingent studies is ok but always these study requirements need a policy basis.

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<p>Comment Period: May 14, 2026</p>	<p>consents). These studies address fundamental planning and engineering matters such as environmental impacts, existing servicing capacity, transportation impacts, and public health and safety.</p> <p>2. Contingent Studies: Contingent studies could only be required when a specific on-site or surrounding condition exists in the local municipality that makes the study relevant for the consideration of the planning application. For example, certain studies may only be needed if a subject property is located on or near airports, rail corridors, significant natural hazards, or major facilities, or when the property contains particular environmental, cultural, or resource-based features on site.</p>	<ul style="list-style-type: none"> • Through the pre-consultation process both the need for studies and their scope are often clarified. In many cases, the scope can be limited to site specific matters which save developers time and money in the long run • It may be included, but the employment land conversion justification may not be in the list in accordance with the updated PPS and Planning Act for Employment areas. • Additional contingent studies: <ul style="list-style-type: none"> - Visual Impact Study (NEC) - Housing Affordability Study - Lighting/Photometric Study - Appraisal (for purpose of parkland dedication)
<p><u>ERO 026-0314</u></p> <p>Proposed Changes to Various Regulations Under the Planning Act and the City of Toronto Act, 2006 to Specify Additional “Prescribed Professions” for the Purposes of a Complete Application</p> <p>Comment Period: May 14, 2026</p>	<p>The government is seeking feedback on proposed changes to various regulations under the <i>Planning Act</i> and the <i>City of Toronto Act, 2006</i> to identify additional certified professionals for the purposes of a complete application.</p> <p>The government is now seeking feedback on adding additional certified professionals, for example registered landscape architects, for the purposes of a complete application. This change would help further speed up development approvals and reduce some initial application costs associated with development proposals.</p> <p>The prescribing of certified professionals by regulation means that municipalities would be required to accept technical studies and reports prepared by these professionals in the first instance as satisfying complete application requirements (without requiring further review or revisions).</p>	<p>Planning Staff would echo the comments of the County of Grey that the regulation clarify that prescribed professionals can only submit reports under their prescribed area of expertise. For example, the regulation should be clear that an engineer couldn’t also submit a planning report on behalf of a planner, with the aim of ‘sheltering’ under their prescribed profession status.</p>
<p><u>ERO 026-0315</u></p> <p>Consulting on upper-tier official plans, secondary plans, and</p>	<p>Proposed modifications for official plans of upper-tier municipalities could include:</p> <ul style="list-style-type: none"> • Limiting duplication with official plans of lower-tier municipalities by creating specific land use designations that only apply to 	<ul style="list-style-type: none"> • In areas like Grey County, the City is a lower tier. As a fully serviced, primary settlement area, within Grey County, the County official plan primarily defers to the lower tier plan. Matters such as growth management, archaeology, housing are addressed at a county level. The

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<p>site and area specific policies</p> <p>Comment Period: May 14, 2026</p>	<p>official plans of upper-tier municipalities with planning responsibilities. For example, this could mean creating a broader land use designation that would combine the designations of Neighbourhoods, Mixed Use Areas, and Mixed Use Commercial Areas into a “Community Areas” designation.</p> <p>We are also consulting on a proposal to create a distinct framework with clear parameters for secondary plans and SASPs with the aim of increasing consistency across municipalities while preserving development permissions.</p> <p>Proposed changes for secondary plans and SASPs could include:</p> <ul style="list-style-type: none"> • identifying the types of areas where secondary plans could be used • separating secondary plans from the primary official plan, so they would exist as a standalone document while being subject to the same process requirements • exempting secondary plans from Minister’s approval (lower-tier municipalities in upper-tier municipalities with planning responsibilities would not be exempt from approval by the relevant upper-tier municipality). 	<p>role of a upper and lower tier plan should reflect the roles and responsibilities of the upper and lower tiers. For example, in Owen Sound, the County of Grey is responsible for housing and these key policies need to be addressed in the upper tier plan.</p> <ul style="list-style-type: none"> • Growth areas benefit from the more detailed plans and policies of secondary plans. • It is hard to imagine the benefit of a stand-alone document. Again, making developers and staff refer to more than one document is not necessary. The secondary plan can easily be included in the main official plan. This allows it to rely on the main policies, for example Residential, with only the “additional information” included in the secondary plan. • Implementation timing should be tied to existing 5-year review cycle for efficiency of resource use. • Separating secondary plans from primary OP would require more repetition in the secondary plan unless there is a guidance document. • A guidebook by the province could provide consistent language for all municipalities to use in secondary plans while allowing municipalities to choose what applies where through more specific secondary plan policies. However, the main OP can also be that guide. Having secondary plans incorporated into main OPs, even if appendices, helps reduce repetition (MRP) • Any prescribed changes to Official Plans and Secondary Plan structure necessitate clear direction on how public input into these amendments is intended to proceed and whether anyone has the right to appeal (including agencies and public bodies).