

Thursday, May 14, 2026

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

Dear Minister Flack,

Re: OPPI Feedback on ERO 026-0305: 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

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the proposed amendments to certain *Planning Act* regulations to enable electronic submission of information and material to approval authorities.

OPPI appreciates the Province's efforts through the proposed *Building Homes and Improving Transportation Infrastructure Act, 2026* to streamline planning and infrastructure approval processes. In principle, we support the proposed changes to the *Planning Act* that would facilitate the electronic submission of information and materials to approval authorities, as well as the filing of electronic notices. These changes have the potential to significantly improve efficiency within the planning process while also supporting more effective record tracking and long-term document management through digital systems.

Planning approvals for complex projects often extend over many years, from initial concept through implementation. Maintaining digital records can improve continuity across long project timelines and support easier access to information for municipalities, applicants, agencies, and approval authorities. For example, an Environmental Assessment for a transportation project may be completed several years before construction proceeds. A secure and reliable digital record system would help ensure that approved materials, technical studies, and correspondence remain accessible over time without reliance on paper-based archives.

We also encourage the Province to consider the practical realities of how planning applications are administered. In many cases, submissions are managed by municipalities, consulting teams, or organizations rather than by a single individual. As such, any electronic filing or submission system should support organization-based accounts and shared administrative access, rather than relying solely on individual user accounts. This would help ensure continuity in the approvals process where staff responsibilities change or where key contacts may be temporarily unavailable.

As the Province advances this transition toward digital systems, implementation will be critical to ensuring confidence, usability, and consistency across the planning framework. OPPI encourages the Ministry to ensure that any electronic submission platform is accessible, secure, multilingual, and designed with the needs of its user groups in mind. A modern digital platform

should move beyond email-based processes and be supported by reliable technological infrastructure that protects the integrity and confidentiality of submitted materials. It will also be important to ensure that municipalities are not burdened with additional costs associated with the implementation or use of these systems.

We also encourage the Province to provide additional clarity regarding the proposed removal of certified or original copy requirements. Existing certification processes help establish authenticity and create a reliable evidentiary record. As digital systems are introduced, consideration should be given to how authenticity, completeness, and version control will be maintained within an electronic environment, including whether measures such as digital certification, timestamps, or submission verification protocols will replace current requirements. Clear direction on these matters will help avoid disputes regarding the status or completeness of submitted materials.

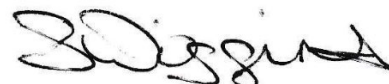
Finally, as these changes may also affect matters before the Ontario Land Tribunal, it will be important to ensure that digital filing and record management processes continue to support clear evidentiary records for hearings and appeals. Continued collaboration with municipalities, tribunals, planning professionals, and other stakeholders will help ensure that the Province's objectives of streamlining and modernization are achieved in a practical, transparent, and effective manner.

Thank you for the opportunity to provide feedback on 026-0305. We would be pleased to meet with you to discuss our support and input and how it would be of use to the implementation of these changes. If you have any questions or would like to schedule a meeting, please do not hesitate to contact us at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI