



Pre-Budget Submission Responding to Ontario's Housing Challenges with Strategic Solutions to Development Approval Timelines

About OPPI

OPPI is the recognized voice of Registered Professional Planners (RPPs), representing over 5,400 members of the planning profession throughout Ontario, granting the RPP designation to those who undergo extensive education and training to become a Professional Planner in Ontario. We are proud to be an integral part of ensuring well-connected, affordable, and healthy communities for Ontario families, with access to housing, transit, walkways, roads, emergency services, schools, parks, and playgrounds.

Professional planners have become critical partners in helping home building projects earn and maintain the credibility needed to fight bad actors and avoid lengthy political and legal battles with opposing community activists.

After WWII, planners in Ontario were integral to getting homes built quickly for returning soldiers and their families. This was possible due to the original 1946 *Planning Act*, which created the ability for governments to appropriately plan and prepare for expected growth. OPPI is committed to working with the Ontario Government, industry, and municipal partners to meet today's housing challenges – looking to the planning system for both opportunities as well as solutions to challenges across the entire planning spectrum.

Building Homes Faster

In response to proposed regulations under the *Planning Act* and the *City of Toronto Act, 2006*, following the passage of *Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025*, OPPI provided recommendations that we continue to work closely on with the Ministry, industry and municipal partners to come to consensus on the best path forward.

Official Plans

In contrast to a focused Provincial Planning Statement, Official Plans are often too lengthy, detailed, and cumbersome, requiring duplication of approvals. One procedural element to reduce Official Plan length will be to amend various Acts that mandatorily require certain items/language be included.

RECOMMENDATION: Create shorter, more flexible Official Plans through developing a streamlined Table of Contents template as a guideline for municipalities and to conduct a legal review of Legislation and Regulations to confirm which require inclusion in the official plan rather than be a reference for municipalities.

Reports and Studies

Currently, there are over one hundred Reports / Studies that municipalities can request. In some cases, the request is not considered to be appropriate for the type of application or stage in the process leading to unnecessary costs and delays. The current proposed prohibition on four studies Sun/Shadow, Wind, Urban Design and Lighting, is too limiting and does not account for the necessary circumstances – based on application type and context – where a study may in fact be required. OPPI recommends developing appropriate definitions for all Reports / Studies, creating a conditional list of Reports / Studies (which may only be requested if the condition exists), identifying what a municipal review of the Report entails, and ensuring there is an agreed upon list between the developer and the applicant with timelines for submission and review included.

Additionally, consultations on proposed Bill 17 regulations on complete planning applications requested input on which certified professionals should be included in a list of professionals whose reports/studies would be required to be accepted as final.

OPPI is concerned with this approach due to the operation and maintenance of certain public elements becoming the legal responsibility of a municipality following the completion of a development (i.e. roads, sidewalks, lighting). In the event of infrastructure failure or injury to the public, a municipality would be liable. Municipalities should be permitted to review and obtain comfort with a report by a certified professional before becoming responsible for its content instead of prohibiting due diligence.

RECOMMENDATION: Reform of Reports and Studies process through:

- Proposing a decision-making tool and matrix to provide guidance on when a report or study can be requested; and the appropriate content that should / could be included.
- Identifying within each Report / Study, the certified professional responsible, the criteria used to review a Report / Study submitted and appropriate time limits to be placed on a municipality's review by a certified professional.

Community Planning Permit System (CPPS)

Currently, a permitted tool under the Planning Act, a CPPS shortens development approvals, removes redundancy, and improves service for developers and municipalities. They create a more transparent process for communities, landowners and developers while allowing flexibility for home builders.

OPPI has prepared several case studies and additional resources for use by MMAH to demonstrate the value of these systems. While the Ministry of Municipal Affairs and Housing (MMAH) is supportive, there are limited resources and efforts to encourage municipal adoption. Applications to proceed with a CPPS system are awaiting approvals from the Ministry; this process should be streamlined.

RECOMMENDATION: Update online provincial resources on Community Planning Permit System (CPPS) with new case studies and other resources and increase promotion of this municipal tool to streamline development approvals.

Use of Ministerial Authority to make Planning Decisions

OPPI has previously stated to the Ministry that MZO's are effective in streamlining timelines associated with planning applications, public notice, consultation, Committee and Council deliberations and appeals with an appropriate evaluation framework in place. OPPI worked with MMAH on the current framework for MZO's. In establishing new processes, like the recent consultation on Provincial Policy Tests, providing that a decision by the Minister is not required to be consistent with policy statements issued, OPPI wishes to work with the government to ensure transparency measures and appropriate safeguards are in place.

The *Planning Act* and the Provincial Planning Statement (PPS) are our guiding documents. In following these, planners feel they are doing what the Ontario government has asked of them. In circumstances where this is not the case, and the policy statements are not a reflection of government priorities, not leading to good public outcomes, or blocking projects that are in the provincial or national interest, then it is likely that the policy statements ultimately need to be changed.

RECOMMENDATION: Establish a framework, similar to the MZO process, to ensure additional Ministerial authorities to make planning decisions, which are inconsistent with provincial policy statements, are used only in limited and necessary circumstances on individual priority provincial projects. Additionally, to ensure new authorities are meeting their desired effect, a formal consultation should be held to review measures and the effectiveness of the broader planning system every two to three years.

Summary of Budget 2026 Recommendations

Building Homes Faster is an essential economic priority for both the Ontario government and OPPI. To achieve this, OPPI recommends that Budget 2026 include reference to:

- Creating shorter, more flexible Official Plans through developing a streamlined Table of Contents template as a guideline for municipalities and to conduct a legal review of Legislation and Regulations to confirm which require inclusion in the Official Plan rather than being a reference for municipalities.

- Reform of Reports and Studies processes through:
 - Proposing a decision-making tool and matrix to provide guidance on when a report or study can be requested; and the appropriate content that should / could be included.
 - Identifying within each Report / Study in the Matrix, the certified professional responsible, the criteria used to review a Report / Study submitted and appropriate time limits to be placed on a municipality's review by a certified professional.
- Updating online provincial resources on Community Planning Permit System (CPPS) with new case studies and other resources and increase promotion of this municipal tool to streamline development approvals.
- Establishing a framework, similar to the MZO process, to ensure additional Ministerial authorities to make planning decisions, which are inconsistent with provincial policy statements, are used only in limited and necessary circumstances on individual priority provincial projects. Additionally, to ensure new authorities are meeting their desired effect, a formal consultation should be held to review measures and the effectiveness of the broader planning system every two to three years.

As the regulator of the Registered Professional Planner (RPP) in Ontario, OPPI is your trusted advisor on these, and other Planning Act matters. We are committed to working with Government on the above initiatives with a goal to ensure that they are resolved and implemented successfully in the upcoming budget cycle. Ontario's communities need more housing and OPPI members are poised and ready to assist in achieving housing targets bringing more affordable and attainable housing to market using the above projects as ways to shorten process timelines.

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