

Thursday, May 14, 2026

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

Dear Minister Flack,

***Re: OPPI Feedback on ERO 026-0315: Consultation on upper-tier Official Plans, Secondary plans, and site and area-specific policies***

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry's latest proposals related to Upper-tier Official Plans, Secondary plans and Site and Area-Specific Policies (SASPs).

As you know, OPPI has previously provided input on these items so to ensure we can provide the most useful guidance in this round of consultations, we will respond using the guiding questions included in the ERO posting.

Secondary Plan and Site- and Area-Specific Policies

*Which types of areas are most appropriate for the use of Secondary plans (i.e. new neighbourhoods, growth areas, settlement areas, employment areas, and/or areas where there are land use compatibility concerns)? Are there additional types of areas or policy objectives that should be eligible or prioritized?*

- Secondary plans are most appropriate in areas where a higher level of coordination is required to enable development. Therefore, instead of geographic areas of focus for their use, a principle-based approach is most appropriate as long as Secondary plans continue to benefit from legal status as a regulatory document. In practice, Secondary plans are particularly effective where development depends on coordination across multiple landowners, infrastructure systems, or phases of growth. This may include areas with fragmented ownership, servicing constraints, or complex land use relationships.
- In addition, Secondary plans should be used where there is a need to coordinate the sequencing of development or redevelopment and infrastructure as well as guiding implementation of provincial objectives. This supports a more proactive, plan-led approach with the municipality acting as a coordinator which helps address delays that arise when development proceeds without clear coordination.
- Secondary plans should continue to be used in a broad range of contexts where detailed planning direction is required, including growth areas, redevelopment areas, and locations requiring coordinated infrastructure and development.

- The proposed direction toward more standardized and strategic Official Plans at both regional and local levels will require complementary tools to provide the necessary level of detail to guide development. Secondary plans are well positioned to fulfill this role by translating high-level policy direction into area-specific land use frameworks and detailed development guidance. As Official Plans become more streamlined and less detailed, it will be important to ensure that Secondary plans continue to provide the local nuance required to support effective and context-sensitive planning outcomes.

*What benefits or challenges, if any, might you anticipate if municipalities had the option to organize Secondary plans as standalone documents, while still being subject to the same Planning Act processes that apply to Official Plans (e.g., notification, public meetings, appeals)?*

- Standalone Secondary plans can improve clarity and make updates easier. Format should remain flexible, but Secondary plans must retain clear legal status within the planning framework. As such, Official Plans could identify where Secondary plans are required or prioritized to provide direction on where coordinated planning is expected. They must also remain linked to infrastructure planning and capital budgeting.
- Allowing Secondary plans to function as standalone documents may support clarity, usability, and implementation, provided that their relationship to the Official Plan remains clear and consistent.
- The proposed reforms place increased emphasis on efficiency, clarity, and streamlined approvals. In this context, Secondary plans can play a critical role as implementation-oriented frameworks, supporting coordinated and orderly development. By embedding phasing strategies, infrastructure sequencing, and delivery mechanisms, Secondary plans can help ensure that growth aligns with servicing capacity and investment planning, thereby supporting both efficiency and long-term sustainability.

*Looking ahead, how would a future framework support the ongoing applicability of existing Secondary plans and SASPs? Are there any considerations we should keep in mind about how these documents are maintained or updated over time? Should we establish principles to evaluate and transition existing Secondary plans and SASPs to a new framework, and if so, what should these principles include?*

- Secondary plans should function as active implementation tools of Official Plans that are adjusted as conditions and outcomes evolve. These plans should be flexible to respond to changing conditions, including infrastructure availability, servicing constraints, and development timing.
- They should be updated where assumptions change, particularly when growth is delayed or infrastructure sequencing needs to be adjusted. Consideration should also be given to whether Secondary plans are supporting intended development outcomes and reflecting municipal (and provincial) priorities.

- Transition should allow existing Secondary plans and site and area-specific policies to remain in place where they are functioning effectively. Updates should focus on areas where plans are not enabling development or where key assumptions have changed in addition to how they are linked to new Official Plans content and the proposed transition in Bill-98. Transition should target indications how plans perform in practice, not just how they are structured.
- A transition framework should be flexible and recognize the continued importance of existing Secondary plans, while allowing for gradual evolution to align with new policy directions.
- As the planning system evolves toward more streamlined approvals processes, there may be greater reliance on resolving key technical matters earlier in the planning process. Secondary plans provide an appropriate platform to address servicing, transportation, environmental, and infrastructure considerations in a coordinated manner, thereby reducing uncertainty at later stages and facilitating more efficient review of development applications. This approach can support more complete and predictable applications.
- Once a Secondary plan is built out, it should be repealed automatically, and for those Secondary plans with long time horizons like for MTSAs, there should be mechanisms to update them either initiated by the developers' group or the municipality. This way Secondary plans remain relevant. Also, municipalities as part of their Official Plan updates/reviews should clearly outline how the changes affect the different Secondary plans.

*Would you support exempting Secondary plans from Ministerial approval (except for lower-tier municipalities within an upper-tier municipality with planning responsibilities)? What advantages or risks do you anticipate with this approach?*

- Exempting Secondary Plans from Ministerial approval could be a benefit in streamlining approvals. Any changes should maintain clear legislative underpinnings and consistency in application and policy intent with the Official Plan to ensure that the plan continues to function as reliable planning policy frameworks that support stated priorities and predictable decision-making.
- Exempting Secondary plans from Ministerial approval will provide greater flexibility for municipalities to update Secondary plans as needed in a more efficient and streamlined process. This will help to address the comments provided under discussion question 2.

*What level of flexibility should municipalities retain to effectively implement, update, and maintain Secondary plans under the proposed framework?*

- Flexibility should be maintained to allow municipalities to determine where and how Secondary plans are used, based on local conditions and overall established planning objectives. This means that Secondary Plans should be subject to the same Planning Act requirements as Official Plans (e.g.: consultation and notification) to ensure transparency and consistency in application.

- As outlined in Question 3, Secondary plans should be exempt from Ministerial approval to support efficiencies in implementing, updating and maintaining flexibilities.
- If municipalities have Secondary plans in place, they should be required to be reviewed and updated within a specified period after a new Official Plan or Official Plan Amendment (under Section 26 of the Planning Act) is approved.

### Upper Tier Official Plans

*In addition to considering a combined “Community Areas” use designation described above, are there other designations that would be useful for upper-tier Official Plans that would help avoid duplication with lower-tier Official Plans?*

- Upper-tier plans should focus on matters of regional county/district governance that are unique to each two-tier governance structure, including growth distribution, infrastructure coordination, and cross-boundary systems. Simplification should not reduce the ability of upper tier plans to provide clear strategic direction with participation of lower tiers as a part of the planning hierarchy.
- A distinction needs to be provided here. Regions without planning powers will not have regional Official Plans to coordinate growth and infrastructure (sewer, water, waste) which many regions without planning powers are still responsible for. What is the mechanism for a region’s capital plan to align with the local municipal plans? Regions still need to provide a plan based on their responsibilities to support local growth and local Official Plans.

*Are there any parts of the standardized table of contents, schedules, and land use designations outlined in ERO 025-1099 that would need to be modified or would not apply to official plans for upper-tier municipalities?*

- As noted in previous submissions, the framework should be applied as guidance rather than prescriptive regulation, to allow municipalities to reflect local context and governance structures. As municipalities transition to a standardized structure, consideration should be given to how existing plans are functioning in practice and driving positive outcomes for growth and development, to help focus updates where they are most needed.

*Are there other considerations we need to take into account regarding the proposed framework for upper-tier official plans?*

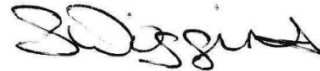
- The framework should recognize that municipalities operate in different growth contexts, even within the same upper-tier region. This distinction has implications for how upper-tier plans are structured and applied, including the level of detail required and the role of coordination across municipalities. Maintaining flexibility will help ensure upper-tier plans continue to support effective implementation across a range of municipal contexts.

Thank you for the opportunity to provide feedback on 026-0315. We would be pleased to meet with you to discuss our recommendations. If you have any questions or would like to schedule a meeting, please do not hesitate to contact me at (647) 326-2328 or by email at [s.wiggins@ontarioplanners.ca](mailto:s.wiggins@ontarioplanners.ca).

Sincerely,



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