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November 21, 2025

Hon. Rob Flack  
Minister of Municipal Affairs and Housing  
777 Bay Street, 14<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Dear Minister Flack

***Re: OPPI Feedback on ERO 025-1099: Consultation on Simplifying & Standardizing Official Plans***

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Municipal Affairs and Housing (MMAH)'s request for comments on simplifying and standardizing Official Plans.

As you know, OPPI has been working on this topic, with a group of our members, for the past several months. We agree that Official Plans (OP) have become lengthier, more detailed, and restrictive over the past several years. As we have discussed with you Minister, OPPI's starting point for a streamlined, more flexible, and permissive OP was to develop a standardized Table of Contents that could serve as a base model for municipalities.

The draft Table of Contents (TOC) issued as part of this consultation is a great start and contains some of our thinking. Our working group has a few recommendations related to the TOC that we feel are important to ensure that the model works for municipalities of all sizes and in all geographic locations including those working in a two-tier system.

We have attached a marked-up version of the draft Table of Contents (Standard Chapter Order), as well as the Standardized Schedules, Overlays and Data and included as **Appendix "A"** of this submission. We would be happy to further clarify any of the changes proposed or the comments made on these base items.

We have a few additional comments on other aspects of the proposal that we will respond to using your Discussion Questions.

**Section A Official Plan Structure & Contents**

***What is your perspective on the changes being considered to simplify and standardize the structure and contents of Official Plans?***

The most important guidance we can provide to the Ministry, once the TOC is finalized, is to issue the document as a Guideline, rather than in regulation. There are so many nuances to be managed within a municipality, most important of which are size, location and local delivery

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capacity. As we know, Ontario's 444 municipalities do not operate under the same planning realities and the impact of a regulated TOC may have unintended consequences. There are many municipalities that are focused on managing development and there are many others trying to stimulate growth. The standardized model should reflect these fundamental different realities. In particular, many communities in rural and Northern Ontario are single tier, have limited staff capacity and rely heavily on consultants which is a significantly different reality than many in southern Ontario and more urbanized or peri-urban municipalities.

Without acknowledging these distinctions, the proposed model risks creating obligations that many municipalities cannot reasonably meet, which could ultimately undermine the Province's broader economic development and housing delivery objectives.

If the model TOC becomes a regulation, municipalities will lose the flexibility to reflect the uniqueness of their community. Municipalities may become creative to try and find a work around to a prescribed regulation which could result in more lengthy, confusing documents, the opposite of the intended goal. Creating clear objectives along with the model TOC as a Guideline would go much further in creating streamlined and simplified Official Plans.

***What distinctions should be made between the content of upper and lower-tier official plans?***

Upper tier plans should relate to matters of regional interest and services, such as growth management, regional infrastructure etc. and lower tier official plans should focus on community related matters.

***What is your perspective on limiting development standards in Official Plans?***

Official plans should lay out the vision, goals, policies and enable growth, while land use regulatory tools (such as Zoning By-laws or CPP By-laws) should control development. Development standards should generally not be included within Official Plans as it requires duplicate approval processes when market and conditions change. A streamlined municipal planning framework would have very limited need for an Official Plan Amendment (only for settlement boundary expansion, principle of land use change), and most matters could be dealt with through the implementing regulations.

Having said this, there may be certain circumstances where the limitation of development standards in Official Plans is reasonable. For example, if they are used as part of growth management to plan for infrastructure and servicing or for environmental protection efforts (e.g. floodplains, waterfront development).



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Limiting the use of development standards would be most effective in simplifying and streamlining Official Plans, when compared to all of the other changes the province is considering.

***What is your perspective on changes related to secondary plans and site-specific policies?***

Secondary Plans can be a useful tool for municipalities to proactively plan for and facilitate growth. Secondary planning can help define a multi-disciplinary framework to facilitate growth in a particular area (such as land uses, phasing, infrastructure needs, access and mobility, etc.), which can facilitate coordination across multiple landowners and developers. Secondary planning is a critical process that can be used to expedite the process to move development forward and help resolve barriers to development. Similar to Official Plans, Secondary Plans should not result in development controls being included in the Official Plan Amendment (OPA), however, a combined OPA and implementing by-law (Zoning by-law or CPP by-law) can help implement the policies for growth in a manner that avoids developers having to undertake duplicate/lengthy Zoning By-law Amendments to implement the outcomes of a Secondary Plan. Secondary Plans should be written in a way that they can be incorporated into the Official Plan (such as using the same land use designations where appropriate), to avoid lengthy area specific policies.

**Section B Limiting the Length of Official Plans**

OPPI does not support any form of page counts or limitations on the length of an Official Plan. There are simply too many variables to consider among Ontario's 444 municipalities. Instead, the Province should focus on the additional elements of the proposal to help municipalities reduce the length of official plans.

One of the key challenges is that Official Plans are written for a broad range of users. If municipalities focus the target audience of the Official Plan on community builders (those using the document on a regular basis), it is likely that some elements (typically in that Official Plan) would be better suited to public-facing educational materials, reducing length of the document. Official Plans typically serve two primary audiences: internal (residents, staff, council), and external (business, investors, provincial partners). Improving clarity through plain language and narratives benefits both groups and enhances implementation.

Additionally, as we have mentioned, there are certain Acts and Regulations that require enabling language to be included in an OP. The implementation section of an OP tends to have many repetitive enabling policies due to legislative requirements, that if modified, would result in a significant reduction in page count. The OP can simply refer to a particular legislative/regulatory requirement rather than including its contents. Finally, there are many cases where visuals (e.g.



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photos and graphs) further demonstrate the intent of an OP requirement. Though they add to the size of an OP, visuals should be encouraged.

In one municipality that recently underwent the development of an updated OP, the Definition Section was sixteen pages, and the Implementation Section was forty pages. These two important sections bookend the content of the OP and provide the necessary “how to” for users of the document.

### **Section C Creating Permissive Land Use Designations**

We have a number of recommendations related to the proposed standardized list of land use designations. We have attached the list as **Appendix “B”** and included specific marked-up changes/recommendations.

#### ***What is your perspective on the changes being considered to standardize the number and type of land use designations?***

Similar to our recommendations on the Table of Contents, Schedules, Overlays and Data, OPPI believes that establishing model designations as a Guideline for municipalities to adopt could be helpful. Requiring specific land use designations through regulations will not provide the intended results and will cause a variety of implementation challenges due to the nuances within Ontario’s 444 municipalities.

In addition to our comments in Appendix “B”, further consultation is recommended as not all permitted land uses would fit within the proposed list of designations. For example, a commercial designation is recommended. There are areas in municipalities where residential uses should not be permitted in order to protect the long-term viability of industrial uses or airports, and commercial uses can provide a transition of use from industrial to residential or mixed-use designations. In addition, in rural areas additional rural land use designations may be required (e.g. rural estate, waterfront).

Additionally, as part of model land use designations, consideration should be given to a colour coded system (e.g. neighbourhood designations being yellow, mixed use and commercial designations being red, employment areas designations being grey, institutional designations being blue, natural heritage and open space being green). If all municipalities used the same general colours for land use designations, it could help both locally and provincially to visually understand the land-use make-up of the province.



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## **Section D Transitioning to a New Framework**

### **What is your perspective on the changes being considered to transition to a standardized official plan framework?**

Our comment in response to this question is direct but a sentiment that we have shared repeatedly. The province continues to make legislative and regulatory changes to help streamline the process. But each suite of changes takes time and dedicated staff hours to implement. Until implemented, policy uncertainty causes instability, increased complexity and conflict, which works against the desired outcome.

Given the number of proposed changes in Bill 60, the weight of the burden has been expressed to OPPI by its membership. We would be happy to work with MMAH staff on a transition timeline and guidance documents that aligns with the timelines discussed in the next question.

### **What is a realistic timeline for municipalities to update its official plan to comply with a standardized framework?**

We support the requirement for new official plans to comply with the new framework at their next 5- or 10- year update allowing the regular rhythm of change to continue. Setting a date for OPs to comply within two years is simply not realistic for small municipalities and/or for those who have just completed or are in development of their OP. The size of the municipality – large vs small – is not necessarily the issue; it is where the municipality currently is in their cycle and what financial and resource capacities they have based on local economic realities.

### **How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?**

We have two items to mention. First, for smaller municipalities, financial assistance may be required should the time limits to complete the changes be stringent. They simply would not have capacity to comply without some form of support.

Our second item, submitted with respect, is to ensure that updated language and time commitments related to Ministry approvals of Official Plans is included in the final guidance documents.

## **Section E Submission of Official Plans through Online Portal**

Generally speaking, OPPI supports the movement to an online submission using a standardized portal for all municipalities across Ontario. It would be great if the municipalities login could be the same as is for other provincial government systems. This portal should include confirmation



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of receipt of the documents, be capable of handling large documents and graphics, and clearly identify who the review is assigned to at MMAH.

We do want to note however that the municipality still needs to have open dialogue and discussion throughout the process with provincial representatives that can provide direct and timely feedback, so we want to be sure that this online submission would work in collaboration with providing meaningful input from regional directors throughout the process.

Thank you for the opportunity to provide feedback on the ERO 025-1099. We have enjoyed collaborating with the Minister's office and MMAH staff leadership team on the Official Plan streamlining initiative. If you have any questions regarding our comments or would like to schedule a meeting, please do not hesitate to contact Susan Wiggins, Executive Director at (647) 326-2328 or by email at [s.wiggins@ontarioplanners.ca](mailto:s.wiggins@ontarioplanners.ca).

Sincerely,

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

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

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

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

## APPENDIX “A” Proposed Standard Chapter Order (Table of Contents) & Standardized Schedules, Overlays and Data

### Proposed Standard Chapter Order (Mandatory Titles/Order)

1. Introduction & How to Use this Plan
2. Municipal Strategic Framework (Vision, Goals, Provincial and Regional/Local Planning Context)
3. Indigenous Engagement & Interests
4. Settlement Area Structure & Growth Needs and Management (Analysis of Market Needs, Settlement Area Boundary Expansions, Serviced Land Needs, Intensification, Strategic Growth Areas, and 20–30-year land horizon)
5. General Policies Applicable to All Designations
  1. Natural & Human Made Hazards
  2. Cultural Heritage & Archaeology
  3. Community Design & Complete Communities
6. Residential and Mixed Uses (range and mix, affordability, inclusionary zoning)
7. Economy & Employment (areas of employment)
8. Infrastructure, Transportation, and Public Service Facilities (transportation, corridors, compatibility, wastewater/stormwater, energy, parks/open space, transit, trails)
9. Natural Heritage, Water Resources, Agriculture & Mineral Resources
10. Implementation & Interpretation (processes, tools, phasing, monitoring, s. 26 update, definitions)
11. Schedules & Appendices (standardized set)

### Standardized Schedules, Overlays and Data

- A1 Estimate of Market Need
- A2 Serviced Land Requirement
- wA3 Land Use Designations
- A4 Settlement Boundaries, Urban/Rural Structure, Provincial Plans (ORMCP, Greenbelt, NEP, etc.)
- A5 Strategic Growth Areas & Intensification Areas
- B1 Transportation & Corridors (Highways, Railways, Airports, transit, active transportation facilities etc.)
- B2 Wastewater & Stormwater
- C1 Natural Heritage System
- C2 Natural and Man-made Hazards

**Commented [HM1]:** We assume that there would be flexibility as some municipalities may not have all of these designations (i.e. ag, mineral)

**Commented [SW2]:** Is there a reason “commercial” was not included?

**Commented [HM3R2]:** Please add that if the expectation is that Commercial will always be mixed use, that there are times that would not be appropriate.

**Commented [SW4]:** It is good to have this as a separate section but it also must be included in other sections.

**Commented [AL5]:** This section should be developed with rights holders.

**Commented [HM6]:** This should consider Indigenous Heritage as well as colonial.

**Commented [AL7]:** This is an optional tool - need to ensure there is flexibility in the document related to the use of tools available.

**Commented [JG8]:** Include commercial here where applicable

**Commented [SW9]:** Currently, these are permitted in any designation in most OPs. We want to confirm that this may be a description, but not that this will be a designation that would be applied to each of these?

Most of these seem to be linear infrastructure, but is it also intended to cover things like solar, wind, Battery energy storage, etc. under energy?

**Commented [HM10]:** It is not clear why these 4 are in the same chapter. It may be more appropriate to split

**Commented [HM11R10]:** Also add shoreline?

**Commented [JG12R10]:** Agree, need to pull out policies for agricultural lands compared to NHS/Min agg

**Commented [SW13]:** Important to consider the order of the list re priorities

**Commented [SW14R13]:** Heritage and Environment at the top

**Commented [AL15]:** Designations should align with TOC structure. In addition, this should not be a prescribed list

**Commented [JG16]:** Settlement boundary expansions should be outlined in the community structure, don't

**Commented [JG17]:** What exactly is this intended to include? New settlement areas would be shown on

**Commented [JG18]:** Designations should come after the community structure (e.g. A4 and A5) and need to

**Commented [JG19]:** Many municipalities combine these into a single map that shows settlement areas, strategic



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- C3 Human-made Hazards (pits and quarries, mineral aggregate resource deposits)
- C4 Agricultural System & Minimum Distance Separation (MDS), Agri-Food Network
- C5 Water Resources (drinking water source protection areas, etc.)
- D1 Cultural Heritage Resources
- E1 Community Facilities, Parks & Open Space
- F1 Wildland Fire Susceptibility

Schedules and overlays should use standardized naming (e.g., NHS-1 Significant Woodland; HZ-F Floodplain; EMP-AE Area of Employment). Metadata must include layer naming conventions, sources and dates, and link to provincial datasets.

**Commented [SW20]:** Resource deposits that are not being used are not a human-made hazard so suggest that this be on a different schedule.

**Commented [SW21R20]:** I am OK with them being on one schedule but think the name is off, see repeat of "man-made hazards" in C2 and "Human-made hazards" in C3, need to refine language, suggest calling C3 Mineral Aggregate Resources and leaving pits and quarries with the resource deposits

**Commented [HM22]:** Suggest that this include archaeological resources where available (i.e. there is an Archaeological Master Plan)

## APPENDIX “B” Creating Permissive Land Use Designations

**Commented [SW23]:** Is there a reason why “commercial” was not included?

1. Residential I: Designated for low-rise/density residential buildings. Permits special needs housing, small-scale commercial uses (e.g., home businesses, neighbourhood convenience stores) and institutional uses (e.g., schools, places of worship, libraries, recreation centres).
2. Residential II: Designated for mid-rise/density residential buildings. Permits special needs housing, commercial uses, and institutional uses (e.g., schools, colleges and universities, hospitals, places of worship, libraries, recreation centres).
3. Mixed Use Areas I: Designated for low/mid-rise/density buildings, including village or neighbourhood centres (local-scale mixed uses). Permits residential, special needs housing, commercial uses (e.g., offices, retail, hotels) and institutional uses (e.g., schools, colleges and universities, and hospitals, libraries, recreation centres) and industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects.
4. Mixed Use Areas II: Designated for high-rise/density buildings, including urban centres, transit station areas. Permits residential, special needs housing, commercial uses (e.g., offices, retail, hotels, entertainment) and institutional uses (e.g., schools, colleges and universities, and hospitals, libraries, recreation centres) and industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects.
5. Rural Areas: Designated for low-rise/density rural and related uses and small-scale employment/industrial uses. Permits low density residential, small-scale commercial uses (e.g., home businesses/ industries), small-scale employment/industrial uses, agricultural and agricultural-related uses, tourism, resource uses, cemeteries, etc..
6. Employment Areas: Designated for clusters of buildings and lands for business and economic uses that may require separation from some sensitive uses. Permits business and economic uses, including manufacturing, research, and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities.

7. **Major Facilities:** Designated for industrial and infrastructure land uses (other than employment areas) that require separation from sensitive uses. Permits uses including manufacturing, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries, energy generation facilities and transmission systems, and resource extraction activities.
8. **Parks and Open Space:** Designated for recreation and public open space. Permits recreation uses, public realm amenities including active parks, passive open space, and waterfront parks.
9. **Natural Heritage:** Designated for the conservation of ecological features and functions, including core natural areas and linkage areas. Permits environmental protection areas, and identifies areas where development is not permitted, such as natural hazards.
10. **Agricultural Areas:** Designated for agriculture and agriculture-related uses to preserve farmland and support the agricultural system, including prime agricultural lands. Permits agricultural and agriculture-related uses, as well as on-farm diversified uses (agritourism, value-added products, etc.).
11. **Shoreline**
12. **Commercial**

**Commented [SW24]:** This category feels like a “catch-all”. Might be better to break out into separate categories.

**Commented [HM25R24]:** Also per above most of these are currently permitted anywhere.

**Commented [SW26]:** Is this different than employment?