

**Attachment 6 – Region of Durham Submission on Bill 60 (ERO 025-1099)**

Summary and Comments in Support of the Fighting Delays, Building Faster Act, 2025 through Bill 60 (“An Act to amend various Acts and to enact the Water and Wastewater Public Corporations Act, 2025”)

ERO/RR Posting and Comment Period	Durham Region Staff Comments (Council endorsement to be sought on November 26, 2025)
<p>ERO 025-1099 October 23, 2025 – December 22, 2025 (60 days)</p> <p><a href="#">Consultation on simplifying and standardizing official plans   Environmental Registry of Ontario</a></p>	<p><b>(1) Official Plan Structure and Contents</b></p> <p>What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?</p> <p><b>Staff Comments:</b></p> <ul style="list-style-type: none"> <li>• As per the Region’s <a href="#">comments on Bill 17</a>, submitted on June 11 2025, while consistency and certainty in the development process are important, municipal interests differ across the province. This proposal will result in a loss of municipal autonomy and control related to specific development-related concerns.</li> <li>• It is important to continue to allow municipalities to determine what designation, structure and studies may be necessary to allow for local planners to best respond to the needs of the community.</li> <li>• In terms of specific changes to the proposed structure, the Natural Heritage/Water Resources should be a standalone chapter. By including this topic with Agriculture and Mineral Resources, as proposed, the importance of environmental protection/conservation is diluted.</li> <li>• Lastly, the climate change and sustainability policies should be included within the ‘General Policies’ section because they are applicable to all other policy sections.</li> </ul> <p><b>What distinctions should be made between the content of upper and lower-tier official plans? What considerations should apply in municipalities where the upper-tier official plan acts as the lower-tier official plan?</b></p> <p><b>Staff Comments:</b></p> <ul style="list-style-type: none"> <li>• Where lower-tier official plans (OPs) are in place, upper-tier OPs could be scoped to matters that are cross-jurisdictional, impacting multiple lower-tiers and/or neighbouring municipalities to the upper-tier municipality. For example, cross-jurisdictional matters of upper-tier interest would include, but not limited to:             <ul style="list-style-type: none"> <li>○ Transportation networks, including Transit, TOD, and Regional ROW requirements;</li> <li>○ Water and wastewater (sewage) servicing;</li> </ul> </li> </ul>

- Growth modelling to support regional infrastructure and service planning, such as the above noted long-term transportation and water/wastewater needs;
- Assisted housing, where the upper-tier is the Service Manager under the Housing Services Act, 2011; and
- Broad-based regional systems planning, such as Natural Heritage and Agricultural Systems. This should include provincial systems planning, such as the Greenbelt Plan Area and Oak Ridges Moraine.

**What is your perspective on limiting development standards in official plans? To what extent should development standards be set out in official plans vs in zoning by-laws?**

**Staff Comments:**

- The hierarchical nature of OPs and zoning by-laws (ZBL) is a foundational concept in land use planning in Ontario. OPs should continue to provide development standards, where required to either conform to a provincial plan or policy, or where that standard applies across an OP designation or multiple designations, examples may include setbacks established within the Lake Simcoe Protection Plan; requirements for noise or vibration studies; etc.
- Maintaining broad-based standards within OPs and not transferring all development standards to the detailed level of the ZBL, will help maintain [or reduce] the amount of duplication that would be necessary within a zoning by-law.

**What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies?**

**Staff Comments:**

- Secondary plans are used to coordinate multiple stakeholders within a plan area, align growth with infrastructure, and engage residents on the specifics of how their communities will change.
- Prohibiting the use of secondary plans could lead to uncoordinated development, increased stakeholder conflicts, and significant infrastructure challenges (e.g., overload/underutilization), which all extend development timelines.

**What is your perspective on the number and types of standardized schedules, overlays and data proposed to be required? Should any be removed, or are there any other schedules that could help improve official plans?**

**Staff Comments:**

- Additional information is needed on what is intended by an “Estimate of Market Need” in Schedule A1, including clarification on the format (i.e. data table, mapping, etc.). In general, market “need” may not represent a practical or achievable development scenario. As a result, this information is better suited to technical background study that help inform the OP’s policies.
- Schedule C3 should not be titled ‘human made hazards’, rather it should simply be aggregate resource mapping. Additionally, individual pits and quarries should not be included as these sites are licensed and surrendered faster than OP mapping can be updated. Alternatively, OP readers should be directed to the Ministry of Natural Resources’ [Pits and Quarries Online](#) website for information about individual licenses.
- Schedule C4 should explicitly map prime agricultural areas, along with other elements of the agricultural system. It is important to protect prime agricultural areas separately from other uses considered as part of the agricultural system in order to maintain a productive land base for primary agricultural production and to discourage land uses that would sterilize prime agricultural lands.
- Schedule D1 should not be mapped within OPs. These are sensitive areas, and the data should be protected, not publicized. These areas could contain Indigenous cultural heritage places or objects, and are vulnerable to damage and theft.
- Some of the datasets required to build the environmental/water resources maps are vast and, if layered on a single map, are confusing to interpret. It is recommended that multiple maps be used to display this information.

**Other Staff Comments:**

- To support the province’s stated initiative of streamlining municipal application processes by leveraging platforms and municipal data tracking IT solutions to improve the efficiency of land use planning, efforts should include the digitization of the proposed standardized schedules, overlays and data to increase usability by a wide range of audiences.
- In relation to the proposed Chapter 4, as per the Region’s submission on changes to the Provincial Planning Statement (Report #2023-P-13), it is recommended that the province require that settlement area boundary expansions be permitted only at the time of a comprehensive official plan review or update, informed by a standardized methodology. Within a regional context, the implications of infrastructure and servicing on settlement area boundary expansions collectively, should rest with upper-tier municipalities as the jurisdiction responsible for the infrastructure and servicing, regardless of planning approval responsibility.

	<ul style="list-style-type: none"> <li>• Additionally, it is recommended that the province require municipalities to develop population and employment forecasts to a common 25 or 30-year time horizon based on a standard methodology provided by the province</li> </ul>
<p>ERO 025-1099 October 23, 2025 – December 22, 2025 (60 days)</p> <p><a href="#">Consultation on simplifying and standardizing official plans   Environmental Registry of Ontario</a></p>	<p><b>(2) Limiting the Length of Official Plans</b></p> <p><b>Discussion Questions:</b></p> <p><b>What is your perspective on the changes being considered to limit the length of official plans?</b></p> <p><b>Staff Comments:</b></p> <ul style="list-style-type: none"> <li>• Language within the Provincial Planning Statement states that the policies of the PPS represent minimum standards. Planning authorities may go beyond these minimum standards to address matters of importance to a specific community. Municipalities should therefore be granted the flexibility to do just that without being constrained by page/word limits.</li> <li>• Rather than broadly limiting the length of all OPs through page and word limits, if there are instances where the province can work collaboratively with a municipality to reduce the size or redundancy within its specific OP, that would be a preferable approach.</li> <li>• Accessibility must remain a priority. Visual elements—such as maps, charts, and graphics—should not be excluded/reduced solely to limit page count, as they are essential for effectively conveying spatial and conceptual information to diverse audiences.</li> </ul> <p><b>Should there be different limits placed on different types of municipalities (e.g., based on population size)?</b></p> <p><b>Staff Comments:</b></p> <ul style="list-style-type: none"> <li>• Southern Ontario municipalities are regulated by a high volume of complex, overlapping provincial land use planning legislation, policy and plans, such as the PPS, Greenbelt Plan, ORMCP, Niagara Escarpment Plan, etc. These plans often take precedence over OPs, wherein the OPs need to reflect and conform to these provincial requirements. As a result, the OPs for these geographies are naturally going to be larger, more complex documents.</li> </ul> <p><b>Are there other approaches that could be used to limit the length of official plans?</b></p>

	<p><b>Staff Comments:</b></p> <ul style="list-style-type: none"> <li>Standardizing official plan chapters, as proposed in ERO 025-1099, may help to align official plan lengths across the province.</li> </ul> <p><b>Other Staff Comments:</b></p> <ul style="list-style-type: none"> <li>Official plans set out the long-term goals and policies for land use and growth in a municipality. They are intended to reflect both best practices in planning, as well as the community’s collective vision for their community. A document of this scope, scale and importance should not be capped by relatively arbitrary page or word limitations. Furthermore, reduced length does not translate to a more efficient or effective guidance document.</li> </ul>
<p>ERO 025-1099 October 23, 2025 – December 22, 2025 (60 days)</p> <p><a href="#">Consultation on simplifying and standardizing official plans   Environmental Registry of Ontario</a></p>	<p><b>(3) Creating Permissive Land Use Designations</b></p> <p><b>Discussion Questions:</b></p> <p><b>What is your perspective on the changes being considered to standardize the number and type of land use designations?</b></p> <ul style="list-style-type: none"> <li><b>Staff Comments:</b> The proposed change to standardize the number and type of land use designation does not take into account the differences and complexities between municipalities in Ontario. By creating boilerplate designations, it reduces autonomy and the ability for municipalities to be responsive to the development needs in their community. For example, the flexibility needed to encourage growth in downtown Oshawa is vastly different than supporting more rural areas of Durham Region. Municipalities must be able to have the autonomy to create official plans that work for their communities in order to recognize local priorities while still supporting housing goals.</li> </ul> <p><b>Would standardized land use designations between upper-tier and lower-tier official plan improve clarity? Where are the opportunities to reduce duplication between the upper and lower-tier official plans in land use designations?</b></p> <ul style="list-style-type: none"> <li><b>Staff Comments:</b> Prior to Bill 23, there was already substantial coordination and clarity between Durham’s upper-tier and lower-tier official plans; the upper-tier official plan set broad land use permissions and overarching policies for a broad set of land uses (e.g. Community Areas, Employment Areas, Major Open Space), and these were implemented locally and refined into</li> </ul>

locally-appropriate, more specific designations such as Medium Density Residential, Mixed Use, Major Commercial, etc.

**Are there additional designations that would be required? Are there opportunities to streamline or further combine some of the proposed designations (e.g. Residential I and II, and Mixed Use I and II)?**

- No Comment

**Are there implications to making land use designations more streamlined and permissive?**

- **Staff Comments:** The Region supports efforts to streamline the approvals process in Ontario when it does not come at the expense of safeguarding against environmental and community impacts (as noted in Report #2025-CG-07 on May 28, 2025).
- **Staff Comments:** There will inevitably be local factors that require several site-specific restrictions and permissions. Therefore, it is important that municipalities retain the ability to control area-specific land use permissions based on local needs.

**Are there land use designation terminology or descriptions that would be easier to understand?**

- **Staff Comments:** If the intent is to standardize land uses within each designation, explicitly defining terms/uses will be required to support consistency in OP interpretation and implementation.

**Other Staff Comments:**

- Having separate official plans for each lower-tier municipality without a unified, overarching upper-tier official plan is bound to result in different policy directions and interpretations between adjacent municipalities.
- The “Agricultural Areas” designation should be changed to “Prime Agricultural Areas”. The basis for mapping in the rural area should be preservation of Prime Agricultural lands, and the relevant permissions associated with them. As such, the “Rural Areas” designation being established here should clarify that it is only available on lands not considered Prime Agriculture by provincial mapping.
- Based on the proposed changes, it is unclear where major recreational uses (e.g., golf courses) will be permitted.
- The Natural Heritage designation should be for the protection, restoration and enhancement of ecological features and functions. Permissions should not be expanded within this designation.

ERO 025-1099 October 23, 2025 – December 22, 2025 (60 days)

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#### **(4) Transitioning to a New Framework**

##### **Discussion Questions:**

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

##### **Staff Comments:**

- The land use planning system in Ontario has been in a near-constant state of flux for several years, largely a result of several omnibus bills, such as Bill 23, Bill 185, this Bill 60, etc., each proposing sweeping changes to the Planning Act.
- These changes create uncertainty and require municipalities to continually adapt their planning frameworks, often amid an OP review/update, zoning by-law consolidation, or other major initiative. As a result, both upper- and lower-tier municipalities are in a continuous cycle of pivoting their efforts and "catching up" to major legislative changes. This has resulted in the inability for local municipalities to focus efforts on zoning by-law updates.
- In the near term, these proposed changes would continue to perpetuate this cycle of changes; over the mid to longer term, there is little evidence that these changes would help alleviate or resolve this cycle.

**What is a realistic implementation timeline for your municipality to update its official plan to comply with a standardized framework (e.g., structure, land use designations, page/word limits), and why? Please consider staffing, council cycles, data/mapping updates, public engagement, and statutory review requirements in your response.**

##### **Staff Comments:**

- Pursuant to Bill 23, the Region of Durham no longer has the responsibility of preparing an official plan. However, given our recent experience with Envision Durham – the municipal comprehensive review of the former Regional OP, creating a new OP is a highly consultative, time- and resource-intensive undertaking.
- Furthermore, several of the Region's lower-tier municipalities are already in advanced stages of their respective OP Reviews, which include integrating Envision Durham and provincial conformity exercises (i.e. PPS 2024).
- While it's reasonable to assume that considerable amounts of the work completed to date could be incorporated into the proposed new framework – pivoting efforts, resources and re-engaging stakeholders and the public, as well as other matters such as educating councils and interested

	<p>parties on the changes being proposed, would most likely take the average municipality over two years to execute.</p> <p><b>How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?</b></p> <p><b>Staff Comments:</b></p> <ul style="list-style-type: none"> <li>• It would be helpful for the Province to provide guidance and recommendations for data modeling and workflows. Specifically, the Region of Durham would like clarification on the recommended naming conventions for field names, attributes and coded values.</li> </ul>
<p>ERO 025-1099 October 23, 2025 – December 22, 2025 (60 days)</p> <p><a href="#">Consultation on simplifying and standardizing official plans   Environmental Registry of Ontario</a></p>	<p><b>(5) Submission of Official Plans through Online Portal</b></p> <p><b>Discussion Questions:</b></p> <p><b>Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?</b></p> <p><b>Staff Comments:</b></p> <ul style="list-style-type: none"> <li>• Regional staff support the proposed transition towards an online portal.</li> <li>• Currently, submissions must be made in both hard copy and in digital form. The use of an online portal would expedite this process, reducing hard copy printing, delivery and longer-term storage costs.</li> </ul> <p><b>What benefits and/or risks do you foresee from transitioning to submission through an online portal?</b></p> <p><b>Staff Comments:</b></p> <ul style="list-style-type: none"> <li>• The primary benefits include speed, cost and ease of delivery.</li> <li>• There may be an opportunity to combine spatial information (i.e. Official Plan Schedules) into a combined land use mapping dashboard for greater collaboration between municipalities and other stakeholders.</li> <li>• There is a risk that, without a recommended approach to online portals and data continuity, bringing datasets together from multiple sources could have obstacles.</li> <li>• If there is an expectation of creating/submitting interactive web maps, then data sharing agreements and available resources (programs/staff) need to be considered.</li> </ul>

October 23, 2025 – Ministry of Municipal Affairs and Housing – Technical Briefing – Fighting Delays, Building Faster Act, 2025

**MMAH – Technical Briefing – Fighting Delays, Building Faster Act, 2025**

**Staff Comments:**

- As per The Region’s comments on Bill 17 (June 4, 2025), the Region is supportive, in principle, of streamlining the tracking of planning data. For infrastructure and service planning purposes, the Region relies on standardization and consistency of data and have committed to working with the area municipalities to achieve standardization in Durham.
- However, relying on AI to conduct planning reviews may not be appropriate at this time. Development applications are complex in nature, and present unique challenges in relation to the underlying conditions. Achieving positive results in the development review process requires collaboration between a multitude of professionals and stakeholders, which cannot be achieved solely through the use of AI.
- Standardized application data is currently being reported to the province by prescribed single-tier and lower-tier municipalities as per the Municipal Planning Data Reporting requirements under [O. Reg. 73/23](#). However, this data is also required by upper-tier municipalities to supplement development tracking for growth management and infrastructure planning purposes. The province should use this as a starting point for consulting with municipalities on ways to improve data coordination and standardization.
- Standardizing development planning application requirements and supporting coordinated online application submission platforms may improve coordination, transparency, and efficiency, as well as reduce the amount of municipal staff time required for data entry; this, in turn, helps allow more time for quality control, analysis, and review of the merits of applications.