

Attachment 2 – Official Plan Standardization – Responses to Discussion Questions ERO Posting 025-1099

1. What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?

Newmarket supports efforts to improve clarity and accessibility of official plans; however, a standardized structure must allow flexibility to reflect local context and priorities. A one-size-fits-all approach is not suitable for municipalities at different stages of their Official Plan review or those facing unique growth pressures.

While proposed Section 5.3 (“Community Design & Complete Communities”) may provide a general location for urban design policies, municipalities should retain the discretion to include more detailed urban design and public realm policies where appropriate. These policies are critical for guiding built form, placemaking, and intensification, particularly in Strategic Growth Areas. The framework should explicitly acknowledge this flexibility to ensure local planning and urban design objectives can be achieved. This aligns with Section 2(r) of the *Planning Act*, which identifies as a matter of provincial interest “the promotion of built form that is well-designed, encourages a sense of place, and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant”.

The proposed structure does not clearly identify where climate change and sustainability policies should be located. These areas are increasingly central to municipal planning and are directly tied to other matters of Provincial interest under Section 2(q) (“the promotion of sustainable development.”) and Section 2(s) (“climate change”). Municipalities should have the ability to include climate adaptation, mitigation, and resilience strategies in a way that reflects local priorities and aligns with broader Provincial and federal objectives. To support this, the framework should include a dedicated section for climate-related policies or clearly indicate where such content should be integrated within the general policy structure.

2. 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?

Clear distinctions should be maintained between upper-tier and lower-tier official plans, particularly in areas of growth management, infrastructure planning, and regional servicing. In municipalities where there are upper-tier and lower-tier Official Plans, the framework should avoid duplication between upper-tier and lower-tier Official Plans in ways that support and reflect the local context and priorities.

3. 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?

While zoning by-laws are the appropriate tool for detailed development standards, official plans should maintain the ability and flexibility to set strategic direction for built form, density, and urban design in a way that reflects the local context. Building height is a fundamental element of urban design and a critical factor in achieving community buy-in for planned levels of intensification. Clear height parameters provide certainty and predictability, allowing residents to understand what to expect in their neighbourhoods. This transparency acts as a “community contract with the community”, fostering trust and supporting informed engagement in the

Attachment 2 – Official Plan Standardization – Responses to Discussion Questions ERO Posting 025-1099

planning process. Height policies also help balance growth objectives with local context, ensuring intensification occurs in a way that is strategic, context-sensitive, and publicly supported.

Many municipalities, such as the City of Toronto, have shifted toward a more flexible, high-level policy framework. However, removing these policies entirely from official plans for less mature municipalities could reduce clarity for both the public and the development community.

Zoning by-laws are designed to apply town-wide, using standardized categories to regulate uses and basic development parameters. They are not intended to capture the unique geographic or contextual nuances. Official plans and Secondary Plans provide a democratic and participatory process for shaping how specific communities evolve. These plans often emerge from extensive public consultation and reflect local priorities, creating a strategic framework that guides implementing zoning bylaws. Removing development standards entirely from official plans risks the loss of a community-driven vision, reduced clarity for residents and the development industry.

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

Secondary plans and site-specific policies are essential tools for managing growth in complex or intensification areas, and their continued use should be supported. In Newmarket, for example, the Urban Centres Secondary Plan provides a detailed framework for intensification along the Yonge Street and Davis Drive corridors. It includes implementing zoning and parking standards that have already been implemented through the Town's by-laws. This demonstrates how secondary plans can effectively guide development while ensuring alignment with broader Official Plan policies and objectives.

Limiting or removing the ability to use secondary plans would significantly constrain municipalities' capacity to respond to local conditions, particularly in areas undergoing rapid change or targeted growth.

Rather than restricting their use, the Province could consider standardizing the format for secondary plans, requiring clearer implementation frameworks to improve consistency while preserving local flexibility. Secondary plans remain a core component of the planning toolkit, translating strategic official plan direction into actionable policies and guiding the implementing zoning by-laws.

5. 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?

While consistency in mapping and standardizing data can improve clarity, the proposed list of standardized schedules and overlays may be overly onerous for smaller municipalities. Newmarket is particularly concerned about the cost and capacity required to produce certain datasets, such as market-based housing need estimates, especially where regional work has already been completed (e.g. 2022 Land Needs Assessment) and Newmarket is in the final phases of updating its Official Plan.

Attachment 2 – Official Plan Standardization – Responses to Discussion Questions ERO Posting 025-1099

The Province should consider a phased or tiered approach based on municipal size and planning capacity to alleviate the cost burdens. Alternatively, certain studies should be optional where regional work already exists. This approach would ensure consistency without imposing disproportionate costs on smaller municipalities, while still supporting provincial objectives for clarity and accessibility.

6. What is your perspective on the changes being considered to limit the length of official plans?

A rigid page or word limit may not reflect the complexity of planning issues in growing communities. Limiting length could result in oversimplification, reducing clarity and omitting critical policy detail.

The Province should consider a more effective approach that could involve setting guidelines to ensure clarity and relevance or encouraging the use of plain language and streamlined formatting. This approach would improve accessibility without compromising the depth and quality of planning documents needed to address diverse growth challenges.

7. Should there be different limits placed on different types of municipalities (e.g., based on population size)?

Limits on official plan length should be flexible and context sensitive, rather than based on a rigid fixed page or word counts. While Newmarket supports the goal of avoiding overly lengthy or wordy plans, some Large and larger or rapidly growing municipalities may require more detailed content to address complex planning issues, growth pressures, and community priorities.

A strict limit could constrain the ability to provide necessary policy direction, particularly in areas such as intensification, infrastructure coordination, and climate adaptation. A tiered or context-sensitive approach would better reflect the diversity of planning environments across Ontario.

8. Are there other approaches that could be used to limit the length of official plans?

Instead of imposing fixed page or word limits, the Province could promote modular OP structures that organize content into clear, navigable sections, clearer policy hierarchies to distinguish strategic direction for implementation details, and digital formatting standards that improve navigation and usability. This approach would allow municipalities to tailor content to local context while still meeting provincial objectives for clarity and consistency.

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

Newmarket supports efforts to improve clarity and consistency in land use designations across municipalities. However, the proposed standardized designations must allow flexibility to reflect local planning contexts. Over-simplification could limit a municipality's ability to guide development effectively and reduce responsiveness to community needs and priorities.

Attachment 2 – Official Plan Standardization – Responses to Discussion Questions ERO Posting 025-1099

10. Would standardized land use designations between upper-tier and lower-tier official plans improve clarity? Where are the opportunities to reduce duplication between the upper and lower-tier official plans in land use designations?

Standardized land use designations could improve clarity where upper-tier and lower-tier plans overlap, particularly in areas such as growth management and infrastructure coordination.

However, in municipalities like Newmarket, where the Region no longer has planning responsibilities, duplication is less of a concern. The framework should recognize these governance changes and avoid imposing requirements that assume continued upper-tier involvement.

The Province should incorporate flexibility for municipalities operating without upper tier planning oversight, ensuring that standardization does not create unnecessary administrative burdens or redundant processes.

11. 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)?

Newmarket recommends reviewing whether the proposed Residential I and II and Mixed Use I and II designations could be consolidated or clarified to reduce complexity. However, additional designations may be needed to reflect specific local contexts. Flexibility to add or refine designations, within reason, should be retained to ensure municipalities can effectively guide development while addressing unique community needs. The Province should adopt a balanced approach that combines clarity and consistency with local adaptability.

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

While streamlined and permissive land use designations may support housing delivery, they could also reduce municipalities' ability to manage land use compatibility, infrastructure capacity, and community character. For example, Newmarket's Urban Centres Secondary Plan relies on nuanced land use designations to guide intensification along key corridors while balancing public realm improvements and infrastructure needs. A more permissive framework must still allow for local discretion and detailed implementation tools.

Through detailed Secondary Plan exercises, municipalities invest in studies of both hard and soft infrastructure capacity, including transportation networks, water and wastewater systems, schools, and community services. These studies ensure growth is sustainable and aligned with community objectives. Simply making a land use designation more permissive, while eliminating the Secondary Plan process, removes this critical analysis and limits a municipality's ability to plan for additional growth pressures in a specific geographic area. A more permissive framework should retain local discretion and implementation tools, ensuring municipalities can continue to conduct infrastructure capacity analysis, manage land use compatibility and deliver high-quality, context-sensitive intensification.

Attachment 2 – Official Plan Standardization – Responses to Discussion Questions ERO Posting 025-1099

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

Clear, plain-language terminology is essential for public engagement and transparency. While terms like “Mixed Use” and “Residential” are generally well understood, further clarification of subcategories (e.g., Residential I vs. II) would help ensure consistency in interpretation.

Descriptions should be accompanied by illustrative examples or mapping guidance to support implementation. Municipalities could consider broader, more inclusive designations, such as “Community Areas”, instead of narrowly defined land use terms like “Residential I and II.” A designation like “Community Areas” signals a more permissive approach, supporting complete communities by allowing a wider range of uses (e.g., housing, local services, and amenities) without requiring an Official Plan amendment. The implementing zoning could then allow for greater flexibility while maintaining clarity.

This approach balances clarity, consistency, and local adaptability, ensuring that planning frameworks remain accessible to the public while supporting Provincial objectives for housing and complete communities.

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

Newmarket supports efforts to improve clarity and consistency in official plans across Ontario. However, the Town is concerned that a standardized framework may not fully account for local planning contexts, especially for municipalities that have recently undertaken comprehensive Official Plan updates or that operate without upper tier planning support.

15. 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.

Given Newmarket’s position near the end of its OP update process, a realistic timeline for transition to a standardized framework would be at the time of the next Official Plan Review (in 6 or 7 years). This timing accounts for revisiting policy directions, undertaking additional studies (e.g., market-based housing need), updating mapping and data, conducting public engagement, and aligning with statutory review requirements. Budget constraints and limited staffing capacity make a shorter transition period infeasible. A phased approach would allow municipalities to plan effectively while maintaining compliance with Provincial objectives.

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

To ensure municipalities can successfully transition to the proposed standardized Official Plan framework, the Province should provide:

- Funding assistance for required studies and data collection
- Technical guidance and templates for standardized content and mapping

Attachment 2 – Official Plan Standardization – Responses to Discussion Questions ERO Posting 025-1099

- Training and capacity-building for municipal staff
- Clear transition timelines that reflect the diversity of municipal contexts and resource capacity

17. Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?

Newmarket supports the move toward allowing submission of official plan materials through an online portal, provided the system is user-friendly, secure, and compatible with existing municipal GIS and document management systems. To improve transparency and manage expectations, the portal should include a feature that informs municipal staff of their position in the review queue and provide an estimated timeframe for receiving comments or decisions. These enhancements would help municipalities plan internal workflows, coordinate reporting to Council more effectively and improve predictability and transparency in the review process.

18. What benefits and/or risks do you foresee from transitioning to submission through an online portal?

Benefits include improved consistency in Official Plan submissions, centralized access to planning documents for municipalities and the Province, and, potentially streamlined provincial review and faster feedback.

Risks include potential technical challenges during implementation or integration with municipal systems, data security concerns requiring safeguards, and additional staff training and IT capacity for municipal staff. Funding assistance may be required for smaller municipalities to fully participate in a digital-first approach.