

November 21, 2025

**Subject: ERO 025-1099: Consultations on Simplifying and Standardizing Official Plans**

The Bay Area Climate Change Council (“BACCC”) catalyzes climate action across the Hamilton–Burlington Bay Area. BACCC brings together a broad spectrum of participants, including municipal leaders, non-profit organizations, academic institutions, the business sector, and community advocates.

This letter responds to the Consultation on Simplifying and Standardizing Official Plans (“OP Consultation”). BACCC welcomes the opportunity to provide input and looks forward to contributing further at the next stage. Given the importance of Official Plans in shaping municipalities’ long-term visions, we acknowledge that the OP Consultation offers a solid framework and poses many thoughtful, high-quality questions.

Official Plans (“OPs”) guide a generation of growth. BACCC has seen how important this tool is for Municipal planning and development – we support municipalities maintaining control over this process. It means that any change to the process needs to be founded in deep and consistent engagement with municipalities. BACCC anticipates that municipalities can be valued partners in any exercise that impacts the official planning process.

## COLLABORATION TO IMPROVE THE OFFICIAL PLAN REGIME

BACCC commends the Government of Ontario for its stated goal of improve consistency across the province through Official Plans. Planning experts are better suited than BACCC to respond to this OP Consultation and the questions it sets out. Nevertheless, BACCC has concerns that, like other legislative changes that the Government of Ontario has made in an attempt to reform the planning process, a new Official Plan framework will actually introduce yet more uncertainty and a lack of clarity.

BACCC offers the following comments on how the proposed regime should integrate broader considerations into this consultation process related to Official Plans (“OPs”):

**1. Balancing standardization with municipal uniqueness.**

The framework for directing municipal activities in developing OPs must recognize the significant variability reflected in existing plans. Official Plans are designed to reflect each municipality’s unique character and needs. The OP Consultation materials currently do not indicate how the Government of Ontario will achieve standardization while still enabling municipalities to address their distinct contexts.

2. **Establishing a coherent, coordinated approach to Indigenous engagement.**  
BACCC welcomes the intention to include a section on Indigenous engagement. To be effective, the province needs to do the heavy lifting to establish an approach that reduces the burden on First Nations and Métis communities. Otherwise, these communities will be required to respond to disparate requests from multiple municipalities across their traditional and treaty territories. The Government of Ontario should establish a collaborative process that brings all the municipalities within a territory together to engage Indigenous communities in the most effective manner. This will require the province to engage with both municipalities and Indigenous communities in a meaningful way.
3. **Collaborating for Managing OP and OPA approvals.**  
The final proposal for an OP framework should clearly outline how the province and municipalities will collaborate to meet the timelines proposed for the OP process. Municipalities revamp their Official Plans infrequently and rely instead on Official Plan Amendments (OPAs) to maintain relevance. Bill 17 amended the Planning Act to require municipalities to secure written approval of certain OPAs.
4. **Considering recent legislative changes and Ministerial authority.**  
Recent legislation—including Bill 23, Bill 17, and Bill 60—has expanded the Minister’s authority to override municipal decisions. Any new regime for simplifying and standardizing OPs must account for these powers and their implications for local planning. As an example, Bill 60’s amendment to the Planning Act section 3 will allow the Minister to make decisions that are not consistent with the Provincial Planning Statement (PPS). In contrast, municipalities (and other listed entities) will remain obligated to ensure their decisions are consistent with the PPS. This new framework will need to address how Ministerial decisions that override municipal decisions will impact each Municipality’s Official Plan.

We call on the Province of Ontario to work collaboratively with municipalities, Indigenous communities and other impacted parties as the province considers developing a new Official Plan framework for Ontario. It needs to deliver a predictable, consistent framework while aligning with the purposes of the *Planning Act*.

**Bay Area Climate Change Council**  
**bayareaclimate.ca**  
[info@bayareaclimate.ca](mailto:info@bayareaclimate.ca)