

Sent by Email

November 21, 2025

The Honourable Rob Flack  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17th Floor  
Toronto, Ontario  
M7A 2J3

Subject: Consultation on simplifying and standardizing official plans  
- Comments from the City of Pickering – ERO Posting 025-1099  
File: L-1100-069

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The City of Pickering is pleased to provide comments in response to the Consultation on simplifying and standardizing official plans.

Official Plans are a Municipality's primary, long range, comprehensive planning document, that provides the framework for land use decision-making in the City. The document is intended for and used by a number of people and groups including residents, the business community, developers, consultants, and Councils. Official Plans should be drafted and designed to achieve the following goals:

- Easy to use (readable, accessible, visual to improve the understanding of the policy concepts, clear in direction and expectations, etc.).
- Provide all relevant information related to anticipated growth and how growth can be accommodated.
- Reflect local priorities and visions, while implementing provincial interests.

Maintaining flexibility for Official Plans is important as not all municipalities are facing the same challenges. The proposed approach would remove the flexibility required to ensure Official Plans meet local priorities. In addition to the removal of flexibility, the imposition of a rigid structure could lead to Official Plans becoming less detailed or unclear, leading to misinterpretation or speculation and therefore less user-friendly.

Pickering does not support changes that can impact the goals that all Official Plans should achieve as outlined above. Many of the proposed changes have the potential to limit flexibility and may negatively impact the ability to provide fulsome and clear direction. The proposed changes also have the potential to create significant additional work for municipalities as they work towards implementing meaningful changes to address other policy objectives, specifically addressing the current housing crisis.

The City of Pickering appreciates the chance to provide comments and welcomes the opportunity to continue identifying how municipalities can continue to assist in implementing provincial priorities while ensuring local priorities are respected.

Please find the City of Pickering's detailed comments enclosed.

Yours truly

A handwritten signature in black ink, appearing to read "Catherine Rose", with a long horizontal flourish extending to the right.

Catherine Rose  
Chief Planner

BW:nr

Enclosure: City of Pickering Detailed Comments on the consultation on simplifying and standardizing official plans

Copy: Chief Administrative Officer  
Director, City Development & CBO  
Manager, Policy & Geomatics

## City of Pickering Comments Table on ERO Posting 025-1099

<p>ERO Posting 025-1099 (Closing November 22, 2025)</p> <p>Consultation on simplifying and standardizing official plans</p>	
<p>Topic and Questions posed in ERO posting</p>	<p>City of Pickering Comments</p>
<p><b>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>Creating a Standardized layout of Information</b></p> <p>There can be a benefit to having a general order of information within Official Plans for those individuals, such as consultants and developers, who work across municipalities in the Province. However, it provides no inherent benefit to the local municipality. The City's preference would be to have only a list of items that must be included in any Official Plan across the Province.</p> <p>A concern with the proposed approach is the inability to modify the structure to fit local context, history, priorities and issues.</p> <p>Flexibility is important as not all municipalities are facing the same challenges or have the same vision for the next 20-30 years. For example, many municipalities outside of the GTHA may have slow to no growth and prioritize agricultural protection. In those municipalities, under the proposed structure, agricultural policies would be located at the back of the plan, even though that may be the most important issue to those municipalities. It would seem counter intuitive to impose a structure that does not reflect or respect those local priorities.</p> <p>Pickering recommends a standard list of contents be identified, but that the structure of Official Plans be left to the discretion of the area municipality so the Plan can provide flexibility to reflect the local context.</p> <p><b>Mandatory Titles and Schedules</b></p> <p>Consistent with Pickering's comments above, the order of the Schedules should be left to area municipalities, providing the required information is shown on the schedules.</p>

	<p>The intent is always to provide sufficient information to all users of Official Plans, so that the planning process remains transparent. There is the concern that if the changes are too restrictive, limiting the number schedules/overlays could lead to Official Plans becoming less detailed or unclear, leading to misinterpretation or speculation and therefore less user-friendly.</p> <p>The City of Pickering recommends there be the ability to add additional schedules or maps as required to convey information to users of the Official Plan and follow an appropriate numbering sequence.</p>
<p>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?</p>	<p><b>Role of Development Standards in Official Plans</b></p> <p>Official Plans set the framework, vision and guidelines for land use decisions, growth, and development within a municipality.</p> <p>Zoning By-laws are implementation tools that provide detailed site-specific provisions based on the guidance from Official Plans.</p> <p>While Official Plans are not the implementing document, there needs to be sufficient direction or guidance included in the Official Plan to inform zoning by-law provisions.</p> <p>Pickering agrees that development guidance in official plans should be high level and limited in scope, providing direction on development goals and local priorities while more detailed provisions be included in Zoning By-laws. Development standards in Official Plans that provide guidance should use language such as, “encourage, generally, should”. However, there are some standards, such as transition policies surrounding SGA’s, that are required to be specific to meet the Provincial Planning Statement.</p> <p>Eliminating development standards completely, whether they are mandated or aspirational, would make Official Plans less easy to use and to be understood by the public, and less clear on how growth and development should occur within municipalities.</p>

<p>What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies?</p>	<p><b>Role of Secondary Plans and Site-Specific Policies</b></p> <p>Although the -City has an overall land use structure, it contains components that differ in character context, functionality, and scale.</p> <p>Secondary Plans provide detailed development policies to guide growth and change in a defined area of the municipality. They provide specific policies for those areas of the City where more detailed direction is needed for matters beyond the general land use framework provided by the Official Plan. This can include more detailed policy direction regarding new urban expansion areas, intensification areas, or areas experiencing changes due to policy or market changes.</p> <p>Secondary plans also allow for municipalities and the development community to have more detailed conversations and clear direction and expectations regarding phasing and the implementation of soft and hard infrastructure.</p> <p>Secondary plans also provide the basis for focused implementation tools, such as community improvement plans; area specific development or community improvement charges; area specific tax levies; or other financial tools respecting development or redevelopment within the secondary plan area.</p> <p>Site-specific policies play a role in addressing unusual or existing circumstances or site conditions, impacting an individual property or group of properties.</p> <p><b>Impacts on Removing Secondary Plans and Site-Specific Policies</b></p> <p>In Pickering’s experience, the development community has not opposed the use of Secondary Plans. In the case of Northeast Pickering, a secondary plan is proceeding in advance of the current Official Plan Review. If the secondary plan process was not permitted, this planning work would be required to occur through the Official Plan Review, potentially delaying the timing of this planning work.</p> <p>Eliminating secondary plans would also result in the loss of an easily located set of comprehensive policies addressing the development of a part of a community. The policies would end up being dispersed through the body of the plan by topic, instead of by geography. This could have the unintended</p>
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	<p>consequence of a resident having no clear vision of the development scheme for the new area or a developer of the requirements for the development of an area, without reading the entire official plan from front to back.</p> <p>Similarly, eliminating site-specific policies erroneously suggests the City presents a homogeneous context in which development will occur. Allowing site-specific policies allows context sensitive policies to be prepared to address unique development opportunities or constraints. In Pickering, there is a Flood Plain Special Policy Area that is used to implement specific items related to hazards and development, to be consistent with the Provincial Planning Statement, that does not apply City wide. This is an example of a site-specific policy used in Pickering.</p>
<p>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?</p>	<p>The broad range of issues that municipalities face across Ontario is extensive. Placing strict limits on how information can be conveyed may result in less accessible, readable, and clear Official Plans.</p> <p>As outlined above, Pickering does not support any change that can impact the goals that all Official Plans should achieve, which include ease of use, clear communication of information, and reflect local conditions and priorities.</p> <p>It is not clear what is expected for Schedule A1 “Estimate of Market Need”.</p> <p>It is not clear what is expected for Schedule A2 “Serviced Land Requirements”.</p> <p>It is not clear what data sources are available, if any, for Schedule C4 “Agricultural System &amp; Minimum Distance Separation, Agri-Food Network”.</p> <p>Schedules should be able to be informed and updated by local studies (e.g. EIS work for development applications or local infrastructure projects).</p>

<b>Limiting the Length of Official Plans</b>	
<p>What is your perspective on the changes being considered to limit the length of official plans?</p>	<p>As highlighted previously, municipalities across Ontario vary in size and the complexity of issues they face.</p> <p>Placing an arbitrary page limit on Official Plans is not helpful in implementing provincial policy or achieving the goals of Official Plans.</p> <p>Municipalities have started implementing more info graphics, maps, charts, and tables to better illustrate information than simply relying on written policies in an Official Plan. This approach can create a more visual and accessible document with less policies; however, it may result in a larger page count for a document.</p> <p>Placing an arbitrary page number could force Official Plans to be less visual, less user friendly, and could create additional ambiguity over more general policies, resulting in confusion which could impact the development process.</p> <p>It is Pickering's position that Official Plans should be succinct, and municipalities should strive to create plans that are limited to the minimum size required to create a fulsome document that is user friendly and accessible to not only the development community but also residents and Council.</p>
<p>Are there other approaches that could be used to limit the length of official plans?</p>	<p>Pickering's position is that the goal should be to create an Official Plan that is clear, concise, user-friendly, and promotes sustainable growth. This should be accomplished through a document that has been created through a robust community engagement process.</p> <p>It is Pickering's opinion that placing an arbitrary page number on the length of Official Plans will not advance the goal of creating plans that are clear, concise, and user-friendly.</p> <p>Pickering suggests the Province explore ways to help municipalities avoid repetition and duplication in Official Plans and provide ways to accommodate information in more general policies that would not be subject to appeals. This could help to achieve the goals of limiting repetition and lengthy policies, leading to longer documents.</p>

<b>Creating Permissive Land Use Designations</b>	
What is your perspective on the changes being considered to standardize the number and type of land use designations?	<p>Having a general or suggested set of land use categories that municipalities can use could potentially increase useability across municipalities. However, there should be the ability for municipalities to adjust or create flexibility where required to reflect local conditions and priorities.</p> <p>As is a consistent theme in Pickering's comments, creating a one size fits all approach for 444 municipalities that face many different challenges can create more obstacles to Official Plans than help streamline them.</p>
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?	<p>While the Region of Durham no longer has planning authority in Pickering, the Region Official Plan and lower tier Official Plans did not all use the same designations. This can create confusion and make the documents less user friendly.</p> <p>This could improve consistency throughout Regions, provided the upper and lower municipalities agreed on the designations, and there was flexibility, where required, to address unique situations.</p>
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)?	<p>Since Pickering is not in favor of a one size fits all approach, the notion of streamlining or combining designations is not recommended.</p>
Are there implications to making land use designations more streamlined and permissive?	<p>Municipalities should be encouraged to make land use designations more permissive, through examples of how to be permissive while addressing land use conflicts and meeting the Provincial Planning Statement.</p> <p>Simply enforcing permissive land use designations at the cost of good planning principles is not advisable and may prove</p>

	<p>counterintuitive, creating more land use conflict or compatibility concerns.</p> <p>There could be significant implications should there be no flexibility in the designations being proposed in the ERO posting. Many municipalities may have to make decisions on redesignating lands. This decision could result in additional uses being permitted or removal of permitted uses because they no longer fit into the one size fits all box provided.</p> <p>Making these types of changes can slow development and may remove land use rights for uses that property owners acquired the properties for based on current Official Plans.</p> <p>As an example, many municipalities are currently undertaking a review of their employment areas. This review is due to changes in the definition of Area of Employment in the <i>Planning Act</i> and in the Provincial Planning Statement. As a result, municipalities are working to plan for uses, including offices, employment supportive retail and personal service, etc., no longer permitted in these areas. This has created confusion in some cases and may result in more limited land use permissions or requirements for land owners to submit private applications.</p>
<p>Are there land use designation terminology or descriptions that would be easier to understand?</p>	<p>Community Areas is preferable to Residential. It better describes the range of uses likely to be found within the areas so designated.</p>
<p><b>Transitioning to a New Framework</b></p>	
<p>What is your perspective on the changes being considered to transition to a standardized official plan framework?</p>	<p>As stated in the Provincial Planning Statement “Municipal official plans are the most important vehicle for implementation of the Provincial Planning Statement and for achieving comprehensive, integrated and long-term planning.”</p> <p>For Official Plans to continue to be the vehicle that guides local growth and change municipalities need the flexibility to include policies that address local context, needs and priorities.</p> <p>Creating a strict template cannot address the challenges and priorities that Ontario’s 444 municipalities are facing. A strict structure has greater potential to create challenges for municipalities and the development community.</p>

	<p>This approach may negatively impact the work municipalities have already implemented in their Official Plans to address the current housing crisis and speed up development.</p> <p>If the proposed framework proceeds, it will create significant work for Pickering, (and possibly the additional 443 municipalities in Ontario) as the contents of the proposed Plan Framework, contains information not currently included in Pickering’s current official plan.</p>
<p>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.</p>	<p>The City of Pickering is currently in the middle of an Official Plan Review. This work includes merging the former Region of Durham Official Plan into the Pickering Official Plan. The amount of staff resources and time that has been committed to this project is significant. Our current target is to have a draft available for public consultation in early 2026.</p> <p>Requiring changes of this magnitude to the structure or schedules in the current Official Plan Review would result in a waste of a significant amount of time and work completed to date. These changes would require significant additional work and delay the project, impacting the City’s ability to implement recent changes to provincial policy.</p> <p>Pickering recommends that if such significant changes are made to limit the structure and size of Official Plans that it be a requirement as part of the next initiated Official Plan Review required under the <i>Planning Act</i>.</p> <p>Taking this approach would allow existing Official Plan Reviews to continue unimpeded, avoiding significant delays to bring Official Plans up to date with many other significant policy changes made recently. This approach would also allow municipalities to adequately budget and allocate resources appropriately when initiating their next Official Plan Review.</p>
<p>How can the Province best support municipalities in transitioning to a simplified and harmonized official plan framework?</p>	<p>The Province can best support municipalities by providing a high-level flexible framework that municipalities can implement during their next Official Plan Review.</p> <p>Pickering is concerned that the proposed changes, if too specific or rigid, will not expedite development or housing, but instead slow it down. The proposed changes may also require more municipal resources and negatively impact many of the initiatives municipalities have undertaken in recent years to help expedite development, specifically housing.</p>

<b>Submission of Official Plans through Online Portal</b>	
<p>Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?</p>	<p>Pickering supports the submission of Official Plan information through an online portal.</p> <p>Pickering has implemented many initiatives to make application submissions and review more streamlined, including online submissions for <i>Planning Act</i> applications.</p>
<p>What benefits and/or risks do you foresee from transitioning to submission through an online portal?</p>	<p>Pickering supports an online portal as it can expedite the development review process, and is environmentally more sustainable.</p>