

City Planning

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Ministry of Municipal Affairs and Housing Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3
Canada

Re: Consultation on simplifying and standardizing official plans ([ERO 025-1099](#))

On behalf of the City of Toronto, I am pleased to submit comments and recommendations on ERO 025-1099 as posted on the Environmental Registry.

City staff supports the overall intent of this proposal to simplify official plans, making them easier to understand and more consistent across Ontario. In achieving these objectives, it will be important to maintain a stable and predictable regulatory and policy environment to sustain progress on housing starts and increase housing supply.

Key Recommendations:

1. **Clarity and Usability:** Staff supports in principle the Province providing high level guidance on minimum content, definitions, and structures to simplify official plans and create greater consistency.

Any guidance would need to carefully balance achieving the clarity and precision required for defensible policy with any efforts to reduce the length, ensuring simplification does not create ambiguity.

2. **Secondary Plans to Guide Growth:** Staff recommends that the Province provide clear guidance on the structure and content of Secondary Plans and area-specific policies, and not prohibit their use.

Secondary Plans are key tools to facilitate significant housing supply growth through infrastructure planning and identifying communities' needs. They provide transparency and reduce risk for the public, landowners, and stakeholders.

3. **Balanced Standardization:** Staff recommends that any standardized table of contents and land use designations be flexible enough to adapt to local context.

It is important that standardization is balanced with the diversity of Ontario's municipalities that vary in size, location, complexity and needs. Flexibility within a standardized framework will ensure Provincial objectives are met while enabling municipalities to respond effectively to local conditions.

4. **Predictable Transition:** Staff recommends that the Province provide adequate time for municipalities to align with any new official plan framework and provide clear transition guidance.

Predictability is essential for municipalities and the development industry to avoid delays and uncertainty that could slow housing delivery.

5. **Implementation Certainty:** Staff recommends that any official plans and zoning by-laws developed through this exercise be sheltered from appeal.

This would support timely adoption and implementation, and prevent delays that undermine housing delivery and housing-enabling infrastructure planning.

Staff note and concur with many in the development industry who have cautioned that a stable and predictable regulatory environment is needed, especially in the current economic climate, to facilitate financing and drive investment in new housing at all scales.

City of Toronto's Official Plan

Over the last four years, **the City has systematically updated its Official Plan to become more permissive for housing.** Nearly all residential lands in Toronto have been re-designated or re-zoned in this period to increase residential permissions. Some key examples include:

- **224km²** of lands designated *Neighbourhoods* now enable multiplexes as-of-right;
- **283km** of Avenues have been added to allow mid-rise buildings in areas well served by transit, with a city-wide program to provide as-of-right permissions for mid-rise buildings;
- **97km²** consisting of 120 Protected and Major Transit Station Areas (MTSA) have unlocked higher density near existing and future higher-order transit stations; and
- **7.5km²** of *Regeneration Areas* have been added to stimulate a new mix of uses, including residential, in lands previously designated for employment uses.

Today, Toronto's Official Plan addresses many provincial policy requirements while focusing on local conditions to ensure Toronto remains an attractive place to live, work,

invest and thrive. The current **Official Plan is a result of simplifying and standardizing seven official plans into one** comprehensive policy framework for the amalgamated city.

Toronto's parent Official Plan consists of **five chapters of city-wide policies and eight broad land use designations**. These designations are intentionally flexible, allowing for a wide range of uses and building types to accommodate growth and changing needs.

The City is also modernizing its Official Plan to improve accessibility, transitioning to a web-based format that is machine readable and compatible with AI tools, ensuring greater usability for both the public and stakeholders.

The attached recommendations and detailed comments (Attachment 1 – City's Response to Discussion Questions) provide the City's responses to the Province's discussion questions in the ERO. These are intended to offer initial feedback to inform the Province's considerations of how best to approach an updated official plan framework for Ontario's municipalities.

City staff are ready to work collaboratively with the Province to shape a new official plan framework that advances the Province's objectives while providing policy certainty for housing delivery and economic growth.

Should you have any questions regarding the City's submission or would like to arrange a meeting with City staff, please contact Corwin Cambray, Director, Strategic Initiatives, Policy & Analysis Section (Corwin.Cambray@toronto.ca).

Sincerely,

A handwritten signature in black ink, appearing to read "J. Thorne".

Jason Thorne, MCIP, RPP
Chief Planner and Executive Director
City Planning

Attachment: City's Responses to Discussion Questions re: Consultation on simplifying and standardizing official plans ([ERO 025-1099](#))

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A. Official Plan Structure and Contents

ERO Q1:

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

City Response:

- **Staff supports** in principle the Province’s intent to simplify and standardize the structure and contents of official plans.
- Re: standard table of contents and schedules
 - **Staff recommends** the Province provide additional guidance and annotation if a standard table of contents is developed.
 - **Staff recommends** the Province identify the intent of “market needs” and clarify how this concept could inform official plan policies. Municipalities do not plan solely for market needs; they also plan for the needs of the entire population, which often include elements the market does not provide, such as affordable housing, infrastructure, and community facilities to support complete communities.
 - **Staff recommends** the Province provide an outline of the appropriate locations within official plans for policies related to: area specific policies and maps for P/MTSAs; Inclusionary Zoning; energy conservation, air quality and climate change (PPS 2.9); amongst others.
 - **Staff recommends** land use designation policies (proposed Chapters 6 – 9 in the ERO) are brought into one chapter to improve user navigation and provide greater clarity.
 - **Staff recommend** additional guidance be developed to define the monitoring expectations in proposed Chapter 10 of the ERO.

ERO Q2:

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?

City Response:

- Not applicable to the City of Toronto. As noted in cover letter, the City developed a new Official Plan replacing 7 official plans (Metro Toronto, former cities of North York, Etobicoke, Scarborough and Toronto, and boroughs of East York and York) for the post-amalgamated City of Toronto.

ERO Q3:

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?

City Response:

- **Staff supports** the principle that specific development standards should be limited in official plans and primarily identified in zoning by-laws.

- Toronto’s parent Official Plan (Chapter 1 to 5) generally does not include specific numerical development standards related to building size.
- There are certain instances where development standards are required by provincial policy and have been included in site and area specific policies of the Official Plan (e.g., P/MTSA minimum densities in the new Official Plan chapter 8).
- A consequence of the provincial planning appeals system is that official plan policy is often written with legal defensibility as a key priority. There are instances where development standards are needed to ensure that precision, clarity and intent are provided should policy be appealed to the Ontario Land Tribunal.
- Other specific numerical standards included within the Official Plan have direct policy links and identify critical issues (i.e., proximity to a rail facility, potential natural hazards, or contaminated sites).

ERO Q4:

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

City Response:

- **Staff does not support** removing or prohibiting secondary plans and site-specific policies in official plans.
 - Secondary plans and site and area specific policies accelerate approvals, increase clarity and reduce risk for all stakeholders in areas where growth and density are emerging.
 - Secondary plans and site and area specific policies are an important tool to guide capital planning and infrastructure coordination that is necessary to enable development and intensification.
 - For areas undergoing transition, area-specific policies provide opportunities to more quickly respond to local conditions and community priorities, which is essential in a city as large and diverse as Toronto.
 - Secondary plan development includes a locally focused community consultation process to reflect local priorities and build community capacity and support for growth and change.
- **Staff supports** opportunities to increase inter-municipal legibility of secondary plans and site and area specific policies by developing Province-wide templates to guide consistent structures for these policies.
- **Staff supports** exploring opportunities to move stable elements of secondary plans into zoning or the parent official plan as areas transition towards stable growth. This could include introducing a sunseting process for site-specific policies in built out areas.

ERO Q5:

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?

City Response:

- **Staff does not support** a rigid set of schedules. A certain level of flexibility and customization must be possible to recognize the land use variation across Ontario's urban and rural municipalities and to ensure legibility of official plan maps (e.g., new official plan Water Resources Map was split in two to increase readability of visual maps).
- **Staff recommends** additional maps necessary for official plan implementation be included in any guidance, including Inclusionary Zoning Market Areas, and P/MTSA delineation maps.
- **Staff supports** a clear articulation and definitions of terminology such as: schedules, overlays and official plan maps.
 - It is critical for consistent implementation that all the items listed in this section be defined as either a map, a table, text, etc.
 - Staff note that some of the data mentioned in this section may not yet be collected and would take significant staff time and resources to collect/validate/map/maintain/etc. For example, none of Toronto's current official plan maps appear to fit into schedules A1, A2, B2, C3, C4, C5, and F1 listed in the ERO.
- **Staff have concerns** that some data required in this standardization exercise may be confidential and proprietary, and may become outdated or misinterpreted if posted on a different schedule than what the municipality maintains.

B. Limiting the Length of Official Plans

ERO Q6:

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

City Response:

- **Staff does not support** the use of page or word counts to reduce the size of official plans, which would be difficult to apply across the Ontario’s diverse municipalities with varying sizes, complexity and local needs.
- **Staff recommends** that high level guidance on appropriate content would better deliver a substantial decrease in the size of official plans.
- **Staff supports** a shift in focus away from static official plan documents to improve the accuracy, accessibility and readability of official plans.
 - Toronto is currently shifting the official plan into an web-based format to quickly reflect policy updates, address AODA requirements, improve machine readability and make it AI-accessible.
 - Toronto uses “planning 101” documents, like the Province’s Citizen Guides, to support various stakeholder audiences.

ERO Q7:

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

City Response:

- **Staff does not support** defining limits to official plan length based on municipal variations.
- **Staff recommends** that high level guidance on appropriate content would better deliver a substantial decrease in the size and complexity of official plans.

ERO Q8:

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

City Response:

- Noted above.

C. Creating Permissive Land Use Designations

ERO Q9:

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

City Response:

- **Staff has concerns** that a standardized set of land use designations would be challenging to apply Province-wide.
 - Toronto's parent Official Plan includes eight land use designations.
 - Smaller, less-urbanized municipalities may face challenges in meeting land use standards already achieved at the City of Toronto. For example, the proposed Mixed Use Areas II designation would need to apply to vastly different contexts – from Toronto's Downtown Core (where buildings exceed 300+ metres / 85+ storeys) to smaller municipal centres/cores (where tall buildings may only be appropriate at 15-20 storeys).
 - Likewise, the City of Toronto should not be subject to more limited land use designations used in smaller municipalities. For example, Toronto's *Neighbourhoods* designation now permits heights up to 6-storeys in certain locations (whereas low-rise is often defined as a maximum of 4-storeys).
- **Staff recommends** that any standard land use designations developed by the Province remain broad and flexible to allow municipalities to define a range of uses and building typologies at the local level. When developing these new standards, it is critical to avoid inadvertently constraining growth or limiting the ability of large urban centres to plan for high-density development and diverse housing forms required to meet provincial housing targets.

ERO Q10:

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?

City Response:

- Not applicable to the City of Toronto

ERO Q11:

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)?

City Response:

- **Staff recommends** that any standardized land use designations set out guidance for municipalities on what to include in each designation, but not restrict municipalities from customizing each designation for each municipality.
- **Staff recommends** that the proposed “Major Facilities” designation be partially merged with the proposed “Employment Areas” designation, and a new designation created to align with the City’s existing “Utility Corridors” designation.
 - The proposed Major Facilities designation includes overlapping uses with the proposed Employment Areas designation and would in-part serve the same function but without having the “areas of employment” protections afforded to it by the *Planning Act* and PPS 2024.

ERO Q12:

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

City Response:

- **Staff has concerns** that a standardized land use designation system could result in stifling growth in areas of transition.
 - Official plans need to strike a balance between clarity and brevity. If land use designations do not provide enough direction, they create uncertainty in the development industry as well as in creating growth projections and planning for infrastructure. Clarity establishes predictable expectations, which help inform the full development cycle from land acquisition due diligence through to project completion.
 - The proposed land use designations allow for “low-rise, mid-rise or tall” buildings. In Toronto, low-rise is 4 storeys and mid-rise is generally up to 11 storeys. The City’s Expanding Housing Options in Neighbourhoods (EHON) initiative, however, has opened large areas of low-rise (4 storeys) Neighbourhoods to 6 storeys. If staff had been limited to choosing between 4 storeys or up to 11-storeys, the initiative may not have been achievable or viable.

ERO Q13:

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

City Response:

- **Staff supports** short, plain-language wording. Toronto for example has only 8 land use designations in the parent Official Plan. City staff welcome opportunities to further refine official plan policy wording through regular review and updating as required by the Planning Act.

D. Transitioning to a New Framework

ERO Q14:

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

City Response:

- **Staff has concerns** that major changes to municipal planning frameworks will create policy uncertainty during the transition period. Policy uncertainty has historically led to development slowdowns as developers freeze “first mile decisions”.
- **Staff supports** efforts like a pilot project where volunteer municipalities, including a range of sizes and urban and rural settings, can test a standardized official plan framework to resolve any issues prior to a Province-wide rollout. There may be an opportunity for municipalities with official plans that have not been recently updated to participate in the pilot.

ERO Q15:

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.

City Response:

- **Staff supports** identifying an appropriate phase-in period once the Province provides greater guidance on the scope of a potential new official plan framework.
 - The Toronto Official Plan replaced seven former municipal official plans pre-amalgamation, starting in 2000. The 2013 Municipal Comprehensive Review took 5 years and has been subject to appeals for over 12 years.
 - A new Zoning By-law conforming with the current Official Plan was adopted by Council in 2013, but as of 2025 there are still parts of the city subject to former municipal Zoning By-laws, due to outstanding appeals.

ERO Q16:

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

City Response:

- **Staff recommends** ensuring that any new or updated official plan conforming to the standardized direction be sheltered from appeal. Zoning by-laws implementing those official plans should also be sheltered from appeal. This will ensure timely implementation of the new or updated official plan and corresponding zoning. It would maintain a predictable policy environment, which is critical for facilitating investment, development activity and sustained growth in new housing. It would also avoid individual property owners using a municipal-initiated city-wide process to advance site-specific exceptions that may ultimately contradict the intent of the exercise to achieve a simplified and harmonized framework.
- **Staff recommends** that the Province align the timing of any new official plan framework with the timing in the Projections Methodology Guidelines and the Census cycle. This would include providing clarity on which Ministry of Finance projection year a municipality should use.

E. Submission of Official Plans through Online Portal

ERO Q17:

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

City Response:

- **Staff supports** a consistent and reliable submission process for municipal submissions to MMAH.
- **Staff recommends** a drop-box or shared drive method that can accept a complete package of submission files together (i.e., ZIP files) and acknowledges successful submission.
- **Staff does not support** the creation of a cumbersome system where individual documents would have to be uploaded one at a time. A new online portal should be easy to use by municipal partners as well as MMAH staff.

E.2: What benefits and/or risks do you foresee from transitioning to submission through an online portal?

City Response:

- **Staff recommends** early beta testing any new submission process with municipalities prior to Province-wide rollout. City staff would like to participate in the development and testing.
 - While an improved submission process would be welcomed, any new process must represent an improvement from the current submission system (courier USB or email) in time and labour.