



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

November 21, 2025

Re: Climate Action Council Response to **Consultation on simplifying and standardizing official plans ERO 025-1099**

The Climate Action Council (CAC) is a network of over 40 municipalities from across southern Ontario that work collaboratively on the development and implementation of climate change mitigation and adaptation actions. Climate Action Partnership (formerly Clean Air Partnership), a charitable organization whose mandate is to advance climate action ambition and implementation, serves as the facilitator of the CAC.

We are deeply concerned about the implications of Bill 60, the Fighting Delays, Building Faster Act, 2025, which, under the guise of economic development, proposes sweeping changes that threaten environmental protection, public health and safety, community livability and democratic processes.

Below is the consensus-based input from across the CAC municipal network related to ERO posting number **025-1099**:

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

We appreciate the effort to promote consistency of Official Plans (OP) across municipalities. However, it's critical to prioritize the diverse needs, sizes, demographics, and conditions of all communities. If the Province intends to standardize the structure and content of OPs, this should be done in close consultation with municipalities of varying sizes and archetypes to ensure local context is reflected and integrated.

Municipalities are on the front lines of climate action, particularly in addressing local impacts that pose economic, environmental, social, and health risks. Local decisions around growth management, such as land use, infrastructure, and community design, directly influence energy consumption and greenhouse gas (GHG) emissions. The way

a community is built, including its buildings, transportation, and waste systems, can account for 40-60% of total GHG emissions.

How the community impacts and is impacted by climate change should be considered when planning for growth and infrastructure. As such, the direction and principles that govern local decisions about land use and community energy needs must be laid out in Official Plans.

Currently, the Proposed Standard Chapter Order for Official Plans includes no reference to sustainability or climate change considerations in growth planning. This gap undermines municipalities' ability to ensure that new development contributes to safer, healthier, and more sustainable communities, communities that are more desirable to live in.

The province sets the foundation for land use planning through the Planning Act and the Provincial Policy Statement (PPS), while municipalities implement this framework through their local OPs.

Under this framework, municipalities are required to consider, among many priorities, environmental protection, resource conservation, public health and safety, and the sustainable development of their communities. The Planning Act explicitly states that *an official plan shall contain policies that identify goals, objectives and actions to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate, including through increasing resiliency* (2017, c. 23, Sched. 3, s. 5 (2)). This includes the need for municipalities to respond to more variable and extreme local weather events like heavy rains and droughts, public health risks from extreme heat, more flooding, and increased damage to public infrastructure.

In addition, municipal OPs provide an opportunity for climate change education within the planning department and across other municipal departments, and within council. This provides an opportunity for municipal staff to understand how municipal services and decisions affect climate (mitigation implications) and how climate impacts the community and municipal services and assets (resilience implications).

Since OPs require public consultation, they offer a valuable opportunity for climate education within the community. The OP can describe why climate change is important to the municipality and how local actions align with provincial and federal commitments.

We strongly urge the Province to include and prioritize climate change considerations in the Proposed Standards Chapter Order, ensuring municipalities are able to address the impacts of climate changes and enhance public safety while contributing to long-term community livability and resilience.

2. 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?

The CAC is committed to advancing climate action and sustainable community development. Most CAC member municipalities have declared climate emergencies, adopted science-based GHG reduction targets, and are actively implementing their climate action plans.

The Atmospheric Fund reported that, in 2023, buildings were Ontario's largest source of greenhouse gas emissions, contributing roughly 45% of the province's total. New construction offers a critical opportunity to reduce energy use and emissions from the outset, avoiding the need for costly retrofits down the line.

Member municipalities have direct experience developing, adopting, and implementing Green Development Standards and related site-level policies that address areas such as stormwater management, green infrastructure, greenhouse gas emissions, and urban heat reduction. GDS are essential tools for translating Official Plan policies and broader provincial objectives into actionable, site-level outcomes. Restricting the ability to include or implement these standards through Official Plans, or limiting their authority, undermines municipalities' capacity to fulfill their climate and planning responsibilities.

Municipalities seeking to advance their green standard authorities via their OP should receive approval from the Ministry of Municipal Affairs and Housing for their OP amendments or updates to enact their green standard authorities. The CAC has provided a response related to enhanced development standards in a separate [submission](#).

3. 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 play a vital role in ensuring that policies guiding new developments reflect the site's unique geography and characteristics. Since these plans shape how communities grow, they also serve as a strategic point for broader conversations about infrastructure and sustainability. In particular, municipalities need to be able to have the authority to engage with their development community on energy system discussions. Often these community energy discussions occur at the secondary plan stage, early in the planning process. These discussions often take place during the Secondary Plan



stage, making it a key opportunity for municipalities to collaborate with developers and shape energy strategies that align with local needs.

The CAC appreciates the opportunity to provide input and would be keen to engage more with the Ministry to answer any questions and provide more information related to this submission. The CAC can be engaged by reaching out to Dhiyandra Faizal at dfaizal@climateactionpartnership.ca.

Sincerely,

Dhiyandra Faizal

Buildings Decarbonization Coordinator
Climate Action Partnership