

Ministry of Municipal Affairs and Housing  
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**RE: 025-1099 Consultation on Simplifying and Standardizing Official Plans – Fighting Delays, Building Faster Act 2025**

On October 8, 2025, Ottawa City Council unanimously approved a bold, [comprehensive strategy](#) to combat the housing crisis by removing barriers and deploying all available tools to increase housing supply and affordability. The plan includes simplifying and speeding up approvals, promoting a housing-friendly culture at City Hall, and targeting development near transit with revised zoning regulations. The plan stems from the Housing Innovation Task Force and includes 53 actions focused on streamlining approvals, updating zoning by-laws, and activating city-owned land. The plan also targets major growth with a goal of building 118,000 new households by 2035. Overall, the plan combines policy reform, financial tools, and land activation to boost housing supply and affordability across Ottawa.

City of Ottawa staff have reviewed the proposed changes associated with the *Fighting Delays, Building Faster Act, 2025*. This letter includes the City of Ottawa's response to the discussion questions posted for [ERO 025-1099](#) on simplifying and standardizing official plans.

The Province of Ontario is consulting on multiple changes that are proposed to standardize the structure and contents of official plans. These include the type of policy sections that may be contained in an official plan, the possible land use designations, types of schedules and information, length of plans, and the development standards that may be contained in official plan policies. Responses are provided below to each of the thematic discussion questions in the Provincial consultation.

The City of Ottawa is undertaking several of the proposed initiatives as a result of the Council approved Housing Acceleration Plan and recommendations from the City's Housing Innovation Task Force. For example, the City is undertaking a review of Secondary Plans, as recommended through the [Housing Acceleration Plan](#) with the goal of updating and streamlining older plans. The City's comments in relation to the ERO follow below.

## **A. Official Plan Structure and Contents – Discussion Questions**

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

Standardizing and simplifying the terminology and sections in official plans as proposed will increase consistency across municipalities; however, the “Municipal Strategic Framework” is the vision of official plans that sets how the municipality will grow and change, and these sections will require flexibility to have different contents amongst municipalities to reflect their contexts. While most development standards should be provided in zoning by-laws, official plan should still retain those standards required to implement the Provincial Planning Statement (PPS) and provide the necessary direction to adequately determine the consistency of zoning by-law amendment applications.

### **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?**

Standardized official plan content should recognize that single-tier municipalities need to plan for both regional and local scales, which should be reflected in allowances for a larger document. For example, the sections on the municipal strategic framework and settlement area structure will require more content to establish links between planning and the larger regional economy and the roles for implementation at local scales such as federal campuses, high-tech parks, industrial areas. The framework for residential growth will also need to reflect multiple roles, such as downtown concentrations, town centres, general infill, village settlement areas, and rural areas, which can require broader coverage than those in either upper- or lower-tier official plans. Single-tier official plans need to also recognize the relationship between the official plan and related master plans that implements complete and liveable communities, such as the infrastructure master plan, transportation master plan, parks and facilities master plan, affordable housing delivery master plan, and solid waste management master plan.

### **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?**

Limiting development standards in official plans should provide for a more flexible development process where there is less need for official plan amendments however, development timelines will remain unchanged from today as official plan amendments and zoning by-law amendments are submitted and approved concurrently.

Official plans should provide two general types of development standards: those that require PPS implementation and those that provide sufficient direction to zoning by-laws, particularly

when assessing a zoning by-law amendment or other implementing *Planning Act* application. One example of PPS implementation relates to MTSA minimum density targets. The official plan should determine the extent of the MTSA and whether it is more appropriate to allocate growth through different densities within the MTSA so that the average density over the area implements the PPS density.

One example of providing sufficient direction to zoning by-laws is establishing the thresholds of building heights between the different designations. This will determine if an application for a zoning by-law amendment for additional height is consistent with underlying land use designation that permits either low-rise or mid-rise built forms. Municipalities should have flexibility in determining the building heights within the proposed land use designations to align with their existing built forms that can vary between municipalities.

Generally official plans should establish the principles of built forms and the development standard should be established in zoning by-law. For example, the official plan may establish that a building step-back or a tower-and-podium built form will assist with compatibility when adjacent to low-rise built forms. The zoning by-law would then establish the standards that defines a step-back and/or appropriate podium heights.

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

To support Ottawa's *Housing Acceleration Plan*, the City is currently developing a scope and approach to review our existing secondary plans. This review will streamline and modernize these plans to provide the rationales for the necessary zoning uplift that would be absent if these plans were prohibited.

Prohibiting secondary plans and site-specific policies will have unintended consequences to the benefits that they provide as catalysts for development, such as infrastructure and financial coordination. We recommend standardizing the scope of secondary plans to retain their benefits for the development requirements. Standardizing the scope of secondary plans through a defined framework will continue their use to implement the PPS while focusing content. For example, secondary plans should focus on the following:

- Defined areas: limit secondary plans to key growth areas such as MTSA's, Community Improvement Plan Areas, or settlement expansion areas.
- Plan for rather than limit growth: secondary plans cannot remove or lower development standards below permissions in the parent official plan designation.
- Expediting Development: implementing the PPS strategic growth areas and settlement expansion areas to fast-track zoning and subdivision approvals. This includes identifying infrastructure service requirements, connections to transit stations and stops, locating the highest densities closest to transit stations and stops, the best locations for community amenities, and planning for complete communities in expansion areas.

- Rationale for Zoning: provide only what is necessary as the rationale for zoning implementation.
- Infrastructure and Financial Coordination: identify necessary infrastructure (sanitary, water, stormwater), transportation networks, public realm, schools, and parks, and how these may be financed so that individual development sites and future residents have the services that they need. In Ottawa, the development industry has specifically requested site-specific policies to enforce private cost-sharing agreements as a condition to relevant *Planning Act* approvals.
- Rural Settlement Areas: Distinguish how residential and mixed-use designations in rural settlement areas without municipal services have different development requirements than urban settlement areas to ensure health and safety, such as large enough lots to ensure adequate separation of well-water from septic systems. Implementation of the PPS for rural communities for the consideration locally appropriate rural characteristics, the scale of development, and the provision of appropriate service levels.

Scoping secondary plans will provide the required analysis to determine the appropriate zoning regulations. Without this secondary plan process, the planning review will be deferred to zoning by-law applications, which may not be able to proceed until a separate collective infrastructure plan has been completed for the infrastructure catchment area.

Finally, the secondary planning process is also used to define “designated and available” in the PPS for the determination of land supply and a secondary plan prohibition would leave a gap in implementing the PPS to ensure municipalities have adequate land supply. Secondary planning is the appropriate process to separate lands that are not moving forward in the development process from those that are contributing to the actual land supply. Without a secondary plan process, the development process will delay housing and complete communities in settlement expansion areas.

With regards to site-specific policies, cost-sharing agreements between private landowners are often included through site-specific official plan policies. Site-specific policies allow builders that front-ended infrastructure and to recover their costs from benefitting landowners.

**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?**

If the proposed “Schedule A1 Estimated Market Land Need” intends to convey growth projections, flexibility should be provided to include the growth projections as a table within the “Settlement Area Structure & Growth Needs and Management” section to improve readability. More information is required on what the proposed “Schedule A2 Serviced Land Requirement” intends to convey that is not already shown in proposed “Schedule A4 Settlement Boundaries”.

Serviced land requirements are normally part of growth management studies that lead to the settlement area boundaries and are not required to be shown within official plans. Serviced land requirements are otherwise adequately conveyed in the PPS as a three-year supply for municipalities to monitor and assess on a regular basis.

Proposed "Schedule B2 Wastewater & Stormwater" may not be necessary as a schedule in an Official Plan for larger municipalities that plan and show this infrastructure through an Infrastructure Master Plan. It is not clear why a schedule is required that cannot be accomplished by policy text within the proposed "Infrastructure, Transportation, and Public Service Facilities" section. Should there be a clear rationale to depict this infrastructure within official plans, it is not clear why wastewater & stormwater is proposed on a B-series schedule and why water resources is shown on a C-series schedule rather than keeping piped infrastructure within the same schedule series.

More information is required on how MDS can be shown on proposed schedule C4 at a point in time when livestock operations can change without informing municipalities. Official plan amendments would be required to continually update changes to livestock operations. We recommend that MDS may be an option for a municipality with resources to track livestock operations but not be a requirement to be shown on a schedule.

More information is required on how the Parks & Open Space designation proposed in schedule A is different or duplicates parks and open space in proposed "Schedule E1 Community Facilities, Parks & Open Space".

Implementing a requirement for wildland fire susceptibility in proposed schedule E1 could impact municipalities with limited resources to develop and update these schedules, which will require official plan amendments. We recommend that this schedule be an option for required for those areas where the Province identifies fire risks.

## **B. Limiting the Length of Official Plans – Discussion Questions**

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

Limiting the length of official plans will limit their ability to implement the PPS as there are sections that may need more or less content to implement depending on the municipal context. For example, PPS section 2.2.1.b) permits and facilitates housing options to meet the social, health, economic and well being requirements of current and future residents, including additional needs housing arising from demographic changes and employment opportunities. This would require additional content in official plans that can range from seasonal changes in recreational or post-secondary oriented municipalities to industry specific municipalities that are planning to diversify their economic base. PPS section 3.9.1 promotes healthy, active, and

inclusive communities through a suite of policies that will have differing content for different municipalities.

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

Official plan length limitations may be overly restrictive given the variety of municipal contexts to plan for. Any length limitations should consider the relative scale and complexity of different municipalities, including whether municipalities are single, upper, or lower tiers, their population size, their economic base, and unique characteristics that may require additional content. A length limitation that is suitable for a smaller lower-tier municipality, would be unduly restrictive for a large rural-urban municipality with many unique neighbourhoods, economic districts, and villages like Ottawa. Ottawa is a single-tier municipality that requires regional and local scale considerations, along with recognizing federal lands with federal plans that are not subject to the *Planning Act* but require acknowledgement for a cohesive and legible document.

**C. Creating Permissive Land Use Designations – Discussion Questions**

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

Standardizing the categories of land uses is better applied as a guideline to allow flexibility for implementation amongst the different local contexts. For example, Ottawa has a similar range of proposed simplified designations but there are no equivalents to “Mixed Use Areas I” as such areas have been increased to “Mixed Areas II”. The broad permissions will not always be suitable to existing lots. Ottawa’s equivalent to the “Residential II” designation are Minor Corridors where single-detached subdivisions predominate that are too small, even with lot assembly, for permitted colleges, universities, or hospitals. The permissions within the land use designations should be flexible to align with the existing lot fabric.

As part of the National Capital Region, Ottawa must recognize federal lands governed by federal plans that are not subject to the *Planning Act*. In this context, it would be useful for separate designations to recognize these lands to have a cohesive official plan document.

Finally, municipalities may have unique areas that require alternative policies to sustain and promote their economic or cultural contributions that will not be recognized through a standard generic designation.

**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)?**

The designations do not reflect consideration of planning needs for unique areas, either by virtue of cultural heritage or as a local community or international economic generator. Consideration should be given to a designation that enables municipalities to tailor policies to their unique areas, which cannot be standardized across the province.

The proposed designations do not include direct reference to aggregate resources, or airports in the proposed standard chapter order or standardized land use designations. Inclusion of aggregate resources and airports is an important consideration.

The major facilities designation should recognize the range of intensities and regulations within what is permitted in that proposed designation. For example, an airport with a sizeable operational influence zone, has significantly different needs than a rail yard with minor setback requirements.

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

Reducing the complexity of land use designations should be balanced with the need to provide sufficient direction and structure in official plan designations for the implementing zoning by-laws to establish a predictable and clear scale and intensity of development. Institutional permissions should have scale limits that are similar to commercial and mixed-use areas. Permitting residential uses in most designations will increase land values to the detriment of commercial uses, particularly local small businesses. The proposed permissions in rural areas should be refined to be consistent with the PPS section 2.5.2 to focus rural growth and development to rural settlement areas.

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

Accompanying definition guidelines will assist in implementing proposed land use designations. For example, providing a guideline range of building height for 'mid-rise' or range of densities for 'mid-density', while providing flexibility to also consider existing built forms, will provide more clarity to write the required regulations within zoning by-laws.

## **D. Transitioning to a New Framework – Discussion Questions**

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

The standardized official plan framework does not provide the ability to recognize unique economic drivers within a municipality. For example, Ottawa contains the country's largest high-tech business park with over 24,000 tech jobs and over 540 companies that is currently

recognized in the official plan as a special district to provide land use planning opportunities to maintain the district as a major economic generator. This recognition would be lost through a generic "Mixed Use Area II" designation that contains the same policies as a retail shopping centre. Consider the disadvantages that a standardized framework will have by providing unique economic generators that compete on the international stage with generic policies to apply equally to locally focused areas.

**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 the complexity and scale of a large and fast-growing municipality like Ottawa, a complete rebuild of the Official Plan even with a relatively simplified framework, will require additional resources and time. We prefer the proposed approach to comply within this new framework at our next 5-year update. This will provide time to complete existing official plan updates for consistency with the 2024 PPS, our growth projections, and consideration of existing and future settlement area expansion applications.

The 5-year update approach will also provide the Province with time to update required guidelines and implement any supports to municipalities during the transition.

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

The following Provincial supports will assist municipalities in transition to the proposed framework:

- Provide additional consultation to consider local perspectives for implementation
- Provide dedicated provincial planning staff to each municipality for coordination during the transition, including a fast track of Provincial review
- Ensure all provincial guidelines to implement the new official plans such as
  - projections methodology guidelines
  - agricultural systems approach guidelines
  - agricultural impact assessment guidelines
  - permitted uses in prime agricultural areas guidelines
  - the low impact development stormwater management guidanceare in-place before requiring the simplified and harmonized framework, and that provincial staff and workshops are carried out to guide appropriate implementation at the local levels.

## **E. Submission of Official Plans through Online Portal**

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

The City of Ottawa requires more information on the proposed portal before commenting on their support for such an initiative. We are particularly interested in the requirements for the submission, how the information is reviewed, whether necessary guidance was absent during the development of the update, and how comments may also be tracked.

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

The City of Ottawa requires more information on the proposed portal before commenting on the benefits and/or risks for such an initiative.

**Summary:**

The proposed standardization of the policy sections and land use designations in official plans intends to simplify their contents, which could minimize ambiguity and increase the ease of use of plans, provided there is adequate flexibility between proposed standard land use designations and policies to address local conditions. A proposed limit on the types of development standards that can be contained within official plans could streamline approvals by limiting need for amendments, but reducing concrete standards in Official Plans provides less structure and direction for the development of predictable new comprehensive zoning by-laws, and for assessing proposed zoning by-law amendments.

Standardizing the scope of secondary plans will maintain the benefits that they provide to implement the PPS so that areas are ready for future development in strategic growth areas and expansion areas to streamline developments and incorporate local development considerations, such as infrastructure and transportation capacity.

In Ottawa's context, any transition period should provide sufficient time to allow staff to complete an ongoing review of Ottawa's official plan growth projections, anticipated in Q2 2027 and undertake the complete change to the Official Plan that is contemplated in this consultation.

Sincerely,

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