

Ministry of Municipal Affairs and Housing  
 Provincial Planning Branch  
 777 Bay Street  
 Toronto, ON M7A 2JA

November 19, 2025

Re: [ERO 025-1099](#)

The City of Mississauga has reviewed the proposed legislative changes shared through the above listed registry posting and would like to provide the following comments and suggestions for your consideration.

**Description of Changes and Comments to the Province**

Summary of Proposed Provincial Changes	Staff Comments on Potential City Impacts / Comment to Province
<p>The Province is requesting feedback on setting clear parameters for municipal official plans with the aim of increasing consistency across municipalities, while also reducing the burden of developing these plans.</p> <p>Specifically, the province is seeking feedback on: official plan structure and contents, limiting the length of OPs (e.g. word limit and page limit); standardizing the type and number of land use designations; and transitioning to a new framework (e.g. Requiring large and fast growing to update their official plans within 2 years of a new framework).</p> <p>The following are discussion questions related to each topic area:</p> <p><b>Part A: Official Plan Structure and Content</b></p> <ul style="list-style-type: none"> <li>• What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?</li> </ul>	<p><b>Part A: Official Plan Structure and Content</b></p> <p>The concept of simplifying official plans is supported in principle, but the standardization of items should provide flexibility to respond to local context and areas experiencing growth</p> <p>Particularly, flexibility will be necessary for lower-tier municipalities where the respective upper-tier municipality is one without planning authority. Certain provincial interests, particularly housing, are not the direct responsibility of the lower-tier municipality, but must continue to be included in lower-tier official plans.</p> <p><u>Limiting Development Standards in Official Plans</u></p> <p>Staff are supportive of limiting development standards in Official Plans, except where development standards like building height and density are used to plan for infrastructure and servicing as well as allocate locations for major growth. These are growth management functions, whereas a zoning by-law sets out how to develop on individual sites. The OP sets out the area wide vision and overall</p>

<ul style="list-style-type: none"> <li>• 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?</li> <li>• 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?</li> <li>• What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies?</li> <li>• 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?</li> </ul> <p><b>B. Limiting the Length of Official Plans</b></p> <ul style="list-style-type: none"> <li>• What is your perspective on the changes being considered to limit the length of official plans?</li> <li>• Should there be different limits placed on different types of municipalities (e.g., based on population size)?</li> <li>• Are there other approaches that could be used to limit the length of official plans?</li> </ul> <p><b>C. Creating Permissive Land Use Designations</b></p> <ul style="list-style-type: none"> <li>• What is your perspective on the changes being considered to standardize the number and type of land use designations?</li> <li>• 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?</li> </ul>	<p>framework for growth which is then implemented in greater detail through standards in the zoning by-law.</p> <p><u>Secondary Plans and Site-Specific Policies</u></p> <p>Requiring official plans to be a singular, comprehensive document is supported as this would help improve readability and reduce duplication.</p> <p>Secondary Plans or site-specific policies should still be permitted as they provide direction for areas either experiencing development pressure or anticipated to accommodate growth. They ensure planning policies stay relevant and reflect the needs of a growing community. Secondary plans contain detail on the location of new and expanded roads, public parks, infrastructure, amenities and services that are required to plan for growth and accommodate new housing.</p> <p>They are typically led by municipalities and developed in consultation with the public. When combined with pre-zoning, they can facilitate development without the need to negotiate public amenities (e.g., public parkland, roads) through individual development applications that would lead to more housing delays. Secondary Plans help front load the planning work needed to accommodate growth in strategic growth areas and greenfield areas.</p> <p>Mississauga has been able to accommodate development through site specific policies in conjunction with corresponding zoning amendment applications. Where OPA and Zoning by-law amendment applications are reviewed concurrently they do not result in delays to development.</p> <p><u>Standardized OP Schedules</u></p> <p>There may be opportunities to standardize the structure and mapping of Official Plans while also allowing municipalities flexibility to respond to local needs and context. For example, not all parts of an Official Plan are operative (e.g. vision, goals and objectives, historical context, figures and diagrams).</p>
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- 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)?
- Are there implications to making land use designations more streamlined and permissive?
- Are there land use designation terminology or descriptions that would be easier to understand?

#### **D. Transitioning to a New Framework**

- What is your perspective on the changes being considered to transition to a standardized official plan framework?
- 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.
- How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?

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

These are often included to provide the reader with added context.

Further consultation with municipalities is recommended to establish a standardized list of chapters (e.g. land use chapter/section). Municipalities should be allowed to set out their own subsections.

Greater flexibility is recommended in the types of schedules to be included in the OP. This could be done by identifying required and optional schedules. Some schedules would not apply to all municipalities, and appear to be geared to less urban environments. A description of the information to be provided in the schedules should also be provided (i.e. explain Schedule A1 – Estimate of Market Need and how it relates to land use planning).

#### **Part B: Limiting the Length of Official Plans**

The Province should provide high-level guidance and direction for Official Plans without setting hard caps on page or word limits. Each municipality has a unique context that may require more policy wording on certain subjects. It would be difficult to apply a one-size, fits-all approach for all municipalities. In extreme cases, an overly prescriptive approach may create more bureaucratic red tape, forcing municipalities or development applicants to seek Provincial exemption from Province-wide standards for policy amendments resulting in an official plan exceeding page or word limits.

#### **Part C: Creating Permissive Land Use Designations**

Requiring standardized land use designations may help simplify interpretation of land use permissions for the public. Ontario municipalities vary in context and types of uses and should have the ability to identify specific permitted uses for each land use designation.

The proposed Mixed Use Areas designation allows for too broad a range of uses that has the potential to create land use conflicts and the unnecessary need to evaluate this issue

as part of a development application. The range of uses within a land use designation should be compatible to allow for pre-zoning and eliminate the need for extensive studies to be submitted with a development application. Consideration should be given to either allowing municipalities to determine the uses within this designation or removing Industrial, manufacturing and small-scale uses.

Further consultation with municipalities is recommended as not all permitted land uses would fit within the proposed list of designations. For example, automotive service commercial uses have historically located within industrial areas and away from sensitive land uses due to noise, odour and vibration impacts and should not be in a mixed use designation.

A commercial designation is also recommended to provide a buffer between major facilities, employment areas and sensitive uses as the proposed mixed use and residential designations would not allow for transition.

#### **Part D: Transitioning to a New Framework**

Mississauga has recently completed an Official Plan review process that will unlock new housing and is currently with the Province for approval.

Requiring municipalities to transition to a new OP framework within two years would introduce uncertainty for the development industry and may delay City initiatives and the subsequent zoning conformity process that aim to streamline housing approvals.

The province should consider transitioning approvals of Official Plans for municipalities that have recently been approved or which are currently with the Province for approval. Alternatively, this could be mandated to occur at the time of the next 5 -or 10-year official plan update.

The frequency of provincial legislative changes requires the continual reassessment of official plans, and makes it challenging to update these plans in a timely manner.

	<b>Part E: Submission of Official Plans through Online Portal</b>
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The City supports an online portal that can accommodate the submission of large documents and/or graphics. The portal design should also provide a confirmation notice that the documents have been successful uploaded and assigned for review.

If you have any questions or require additional information, please contact Amina Menkad, Planner at (905) 615-3200 ext. 5545.

Sincerely,



Ben Phillips  
Executive Manager, Official Plan

cc. Leadership Team  
Jason Bevan, Director, City Planning Strategies  
Lia Magi, Deputy City Solicitor