



Planning and Economic Development Department

Planning Division

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Phone: 905-546-2424

November 21, 2025  
Ministry of Municipal Affairs and Housing  
Province of Ontario

***SENT VIA ERO POSTING***

**RE: City of Hamilton Comments on ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

Attached, please find City of Hamilton Staff Comments in response to the above noted ERO posting. Hamilton Planning Committee and City Council will be reviewing these comments at their January 13, 2026 and January 21, 2026, meetings.

Hamilton City Council may choose to amend or add to the enclosed comments which would be provided in a subsequent letter.

Should you have questions or comments, please contact myself or Charlie Toman, Program Lead, Policy Planning and Municipal Comprehensive Review, Sustainable Communities Section, at (905) 546-2424 Ext. 5863 or by email at [Charlie.Toman@hamilton.ca](mailto:Charlie.Toman@hamilton.ca).

Regards,

A handwritten signature in black ink, appearing to read "Anita Fabac".

Anita Fabac, MCIP, RPP  
Acting Director of Planning and Chief Planner,  
Planning Division  
Planning and Economic Development Department  
City of Hamilton

Enclosed.

## ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans

The following table contains guiding questions provided by the province through [ERO 025-1099](#) to elicit feedback on proposed changes to simplify and standardize municipal official plans in Ontario.

Questions	Comments
<b>Topic: A. Official Plan Structure and Contents</b>	
<p>What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?</p>	<p>City of Hamilton staff support efforts made by the Province that help to simplify Ontario’s complex land use planning system in a manner that makes it easier for everyone to understand and participate in planning matters. Simplification will help reduce duplication, provide clear and focused policy direction. This is supported and made easier through Ontario’s policy led planning system where the Provincial Planning Statement and Provincial Plans (e.g. Greenbelt Plan) provide clear direction on the goals and outcomes municipalities must achieve through local Official Plans. With the adoption of the new Provincial Planning Statement and repeal of the A Place to Grow, Growth Plan for the Greater Golden Horseshoe, the Province now allows more flexibility for municipalities to implement Provincial policy in the local context.</p> <p>Part of the role of an Official Plan is to describe to the public, development industry and Indigenous communities what the Provincial policy direction and desired outcomes are and collaborate on how these can be achieved through the Official Plan. Official Plan reflect the public interest and what is important to each community.</p> <p>City of Hamilton staff recommend that the Province create Official Plan guidelines rather than prescriptive legislative requirements on what can and cannot be included as part of an Official Plan. The benefits of Province wide guidelines are that:</p> <ul style="list-style-type: none"> <li>• They can clearly state what does and does not need to be included in Official Plans. This can include what, at a minimum, must be included like land use policies to achieve forecasted population, household and employment growth and what should not be included in an Official Plan (e.g. policies for which</li> </ul>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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	<p>municipalities have no jurisdiction, or are focused on municipal programming, not land use policy).</p> <ul style="list-style-type: none"> <li>• Enable flexibility for a local planning authority to work with residents and the private sector to develop new and innovative policy solutions to address land use planning issues – including the testing of new housing forms.</li> <li>• Recognizes that Ontario municipalities are diverse in size, geography and population, and provides flexibility beyond a ‘one size fits all’ approach. For example, specialty crop areas within the City of Hamilton are unique in that they are impacted by air drainage off the Niagara Escarpment and require special policies to ensure new development does not adversely impact ‘downstream’ airflows which can cause frost pockets that damage fruit blossoms.</li> </ul> <p>Local expertise of municipalities must remain central to how Ontario delivers housing. Municipalities understand their infrastructure, geography, and community needs best. Protecting the ability of municipalities to reflect local context in planning decisions will be critical to achieving outcomes that are not only faster, but also equitable, resilient, and responsive to the needs of residents.</p> <p>Staff note that the Provincial Planning Statement already states that guidance may be issued from time to time to assist planning authorities and decision-makers with implementing provincial policy. City of Hamilton staff would support an amendment to the Provincial Planning Statement which provides specificity stating that new and/or updated Official Plans shall be informed by provincial guidance.</p>
<p>What distinctions should be made between the content of upper and lower-tier official plans? What considerations should apply in municipalities</p>	<p>No comment.</p>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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<p>where the upper-tier official plan acts as the lower-tier official plan?</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 zoning by-laws?</p>	<p>Overall, the inclusion of high-level development standards (approximate height and massing) in the Official Plan are necessary to establish a vision based on community specific characteristics, assist with meeting intensification targets, minimize impacts, ensure compatibility and provide some certainty to the community. This in turn enables clear and effective zoning by-law regulations. Specific examples of the purpose and benefit of having these high-level development standards in Official Plans include:</p> <ul style="list-style-type: none"> <li>• Infrastructure Master Planning – General massing policies are necessary in the Official Plan for the City to accurately model and forecast future population, household and employment growth at a traffic zone level which in turn is used to create/update Master Plans for both hard (water, wastewater, transportation) and soft (parks, libraries etc.) infrastructure necessary to enable development.</li> <li>• Zoning By-law Implementation - Official Plans play a critical role in providing direction in the introduction of new or updated zones and zoning regulations. Establishing land use goals, policy guidance, and high level development standards e.g. height, massing, are necessary to establish clear and effective zoning. Official Plan direction provides the necessary context to enable zoning to be implemented that is contextually appropriate, consistently applied, and defensible. Official Plan policies and the implementing zoning collectively provide accountability and transparency to the public.</li> <li>• Healthy Communities - Limiting development standards in Official Plans risks weakening their role as a policy tool for guiding healthy, complete, and equitable communities. If development standards are excluded from Official Plans entirely, municipalities may lose the ability to articulate health-supportive policy intent.</li> </ul>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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	<p>City of Hamilton staff agree that issues do arise when Official Plan policies are too prescriptive and trigger the need for unnecessary Official Plan Amendments. An example of this are Official Plan policies that apply density caps on a site-by-site basis (e.g. a low density development cannot exceed 30 dwellings per hectare). The City of Hamilton removed site specific density maximums from its Official Plans in 2022 to remove this hurdle from the land use approval process where the general form and massing of the development conforms to the land use designation.</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>Secondary Plans and site-specific policies are critical tools for addressing local context, ensuring that growth and intensification occur in a manner that supports healthy, complete, and connected communities. The proposed limitations on these policy tools could reduce the City’s ability to tailor planning decisions to neighbourhood-scale health and environmental considerations—such as access to parks, schools, active transportation routes, and community services.</p> <p>Secondary Planning is the most effective land use planning tool municipalities have to plan for and deliver residential intensification at the neighbourhood level. In addition to providing clarity and certainty to landowners and residents on where intensification is planned, Secondary Plans are adopted in conjunction with new or updated infrastructure master plans to ensure that sufficient hard and soft services are delivered to enable that intensification. Without this coordinated investment the brunt of the cost to upgrade local infrastructure can fall on individual developers which in turn can make new residential development not feasible. In essence, Secondary Plans are a tool for municipalities to proactively make it easier for new housing to be built.</p> <p>Removal of Secondary Plans and other area specific policies like Major Transit Station Areas would directly limit the ability of municipalities to achieve the desired growth and investment in Strategic Growth Areas as directed in the PPS.</p> <p>As recent example of where Secondary Planning has supported new residential construction is the Downtown Secondary Plan which was adopted in 2018. In the</p>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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	<p>seven years before the Secondary Plan was adopted (2011-2017) the City approved building permits for a total of 1,058 new dwellings, in the seven years after (2018-2024) building permits were issued for a total of 5,445 new dwellings, an increase of 414%. While broader market forces and public investments in the Downtown contributed to this growth, the Secondary Plan was critical in enabling the development from the early planning stages to building permit issuance.</p> <div data-bbox="726 521 1654 1222" data-label="Figure"> <p>The bar chart displays the number of new dwellings approved through building permits in the Downtown Secondary Plan from 2010 to 2025. The y-axis represents the number of dwellings, ranging from 0 to 2,000 in increments of 200. The x-axis shows the years from 2010 to 2025 (Oct). A vertical red line is placed at the year 2018, labeled 'Secondary Plan Approved'. The data shows a general upward trend in approvals, with a notable spike in 2023.</p> <table border="1"> <caption>New Dwellings Approved through Building Permits in the Downtown Secondary Plan 2010-2025</caption> <thead> <tr> <th>Year</th> <th>Number of Dwellings Approved</th> </tr> </thead> <tbody> <tr><td>Y2010</td><td>0</td></tr> <tr><td>Y2011</td><td>0</td></tr> <tr><td>Y2012</td><td>0</td></tr> <tr><td>Y2013</td><td>0</td></tr> <tr><td>Y2014</td><td>500</td></tr> <tr><td>Y2015</td><td>50</td></tr> <tr><td>Y2016</td><td>400</td></tr> <tr><td>Y2017</td><td>50</td></tr> <tr><td>Y2018</td><td>500</td></tr> <tr><td>Y2019</td><td>150</td></tr> <tr><td>Y2020</td><td>550</td></tr> <tr><td>Y2021</td><td>1300</td></tr> <tr><td>Y2022</td><td>600</td></tr> <tr><td>Y2023</td><td>1800</td></tr> <tr><td>Y2024</td><td>500</td></tr> <tr><td>Y2025 (Oct)</td><td>700</td></tr> </tbody> </table> </div> <p>Secondary Planning is also the most effective tool for municipalities to plan for and enable new residential development of greenfield areas. It supports:</p>	Year	Number of Dwellings Approved	Y2010	0	Y2011	0	Y2012	0	Y2013	0	Y2014	500	Y2015	50	Y2016	400	Y2017	50	Y2018	500	Y2019	150	Y2020	550	Y2021	1300	Y2022	600	Y2023	1800	Y2024	500	Y2025 (Oct)	700
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**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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	<ul style="list-style-type: none"> <li>• <b>Creation of Complete Communities</b> - Secondary planning operates at a scale where land use, connectivity, infrastructure, mobility, built form, and community services can be fully integrated into a cohesive and livable whole. It ensures that new communities include the appropriate mix of housing, employment opportunities, parks, public spaces, and other amenities needed to support residents.</li> <li>• <b>Infrastructure Planning and Delivery</b> – A core component is assessing and coordinating servicing and infrastructure requirements. This includes confirming that there is adequate hard infrastructure (e.g., water and wastewater capacity, transportation networks) and sufficient community amenities (e.g., parks, libraries, recreation facilities) to support planned growth both within the greenfield and in surrounding communities. Without secondary planning, municipalities face a significantly higher risk of underestimating infrastructure needs—leading to expensive retrofits and delays in homebuilding—or overestimating needs, which can divert limited infrastructure capacity away from other areas of the city.</li> <li>• <b>Cooperation &amp; Coordination</b> – Secondary planning requires coordinated decision-making between landowners, developers, and the municipality regarding the location, timing, and delivery of infrastructure needed to support development. This includes the location of stormwater management facilities, school sites, public parks, and major servicing corridors. Greenfield areas typically involve multiple landowners with differing timelines, expectations, and development strategies. The secondary planning process provides a structured forum to identify, resolve, and align these interests. Without having an adopted Secondary Plan, conflicts are more likely to persist at the Zoning or Draft Plan of Subdivision stage, resulting in delays in housing construction and fragmented development.</li> </ul> <p>Similar to Secondary Plans, site specific policy areas are an important tool to establish increased permissions above and beyond what is currently permitted in the Official Plan for specific land areas through collaboration between multiple landowners and/or completion of area specific infrastructure plans. This tool has been</p>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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	<p>used by Hamilton to enable and facilitate redevelopment of underutilized lands, commercial and institutional sites for residential uses.</p> <p>City of Hamilton staff acknowledge that there have been situations where Secondary Plans have been used by planning authorities to limit potential redevelopment in established neighbourhoods in response to intensification pressures. In response, City of Hamilton staff support the Province adopting guidelines on where Secondary Plans should and should not be adopted, making it clear that their primary function is to facilitate residential intensification and greenfield community planning, not limit it. For greenfield Secondary Plans, staff support Provincial guidance that these Plans be reviewed after build out to determine if amendments or a repeal is necessary to provide more flexibility for the new community to change and evolve over the long term.</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 other schedules that could help improve official plans?</p>	<p>Official Plan land use schedules, overlays and data are critical to translate planning policy intent into spatial reality. They are useful for both experts in land use planning and non-experts who may struggle with legal or policy language.</p> <p>City of Hamilton staff support the Province providing guidance on what standardized schedules, overlays and data should be required at a minimum in new or updated Official Plans. In addition, this guidance could also identify schedules that should not be included in Official Plans by providing examples. This guidance would be beneficial to all municipalities in Ontario when they undertake new or updated Official Plans as it will clearly outline the Province’s minimum expectations. Guidance could also be used by MMAH staff when reviewing and approving new or updated Official Plans.</p> <p>In considering what information should be provided on OP schedules, City of Hamilton staff recommend that readability and clarity of what information is being provided be emphasized over establishing restrictions on the maximum number of sub-schedules (e.g. Schedule A-1, A-2, A-3). For example, there are different layers</p>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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	<p>associated with OP natural heritage systems and attempting to combine them into a single schedule map can reduce readability/legibility.</p> <p>Staff recommend that any guidance or regulations enable local municipalities to establish Official Plan schedules not identified by the Province. As discussed in other sections, each municipality may have unique local conditions or constraints which necessitate a need for different type of schedules to apply policies to effectively manage and enable growth.</p>
<b>Topic: 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>City of Hamilton staff support the Province providing guidance on where and how the length of Official Plans can be reduced; however, staff do not support the establishment of maximum page numbers or word counts. Any prescribed restriction would not take into consideration the different types (e.g. upper, lower and single tier), sizes and geographies of municipalities across the Province. Clear Provincial guidance on what content should and should not be in Official Plans will help ensure that they are as lean as possible and do not include duplicate or unnecessary information.</p> <p>It is important that the Province also consider that the length of Official Plans is often a direct result of requirements of the <i>Planning Act</i>, Provincial Planning Statement, Provincial Plans and guidelines.</p> <p>It is not clear to staff whether the Province is considering limits on the sections of an Official Plan containing Secondary Plans or area specific policies.</p>
<p>Should there be different limits placed on different types of municipalities (e.g., based on population size)?</p>	<p>See comment above.</p>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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Are there other approaches that could be used to limit the length of official plans?	Provincial guidance could provide examples of where and how policy language can be communicated through plain-language charts or tables to reduce word counts and improve readability.
<b>Topic: C. 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>Building on other comments in this submission, City of Hamilton staff support the creation of Provincial guidance on land use types and designations to support municipalities creating and updating Official Plans. An example the Province can draw upon is the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas. City of Hamilton staff have found these guidelines to be helpful in reviewing and updating its agricultural policies and/or considering new proposals for on-farm diversified uses. In addition, staff were supportive of the approach taken with the proposed Projection Methodology Guidelines (ERO 025-0844) where the Province identified different options with varying levels of complexity for municipalities to consider.</p> <p>While standardizing land-use designations may improve consistency across municipalities, it risks removing flexibility to address local context and health-related priorities. Municipalities must retain the ability to define land-use categories that reflect local geography, social conditions, and community health needs. A one-size-fits-all approach could limit opportunities for mixed-use, walkable, and complete communities that support active transportation and overall well-being.</p>
Would standardized land use designations between upper-tier and lower-tier official plans improve clarity? Where are the opportunities to reduce duplication between the upper and lower-tier	No comment.

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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official plans in land use designations?	
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)?	It is most appropriate to establish any subsets of land use designations in an Official Plan through the creation of area specific Secondary Plans. As discussed in comments above, Secondary Plans are an effective planning tool to enable increased residential intensification and more compact, complete greenfield communities by both allowing land use densities and permissions that can be beyond city wide standards and to create and implement infrastructure master plans to enable the development.
Are there implications to making land use designations more streamlined and permissive?	While greater flexibility can support housing supply and more efficient approvals, streamlining designations risks reducing the ability of municipalities to guide development toward complete, context-sensitive, and healthy communities. More permissive designations may lead to incompatible land uses, erosion of transitions between built forms, and diminished consideration for elements that support public health; such as access to parks, schools, active transportation, and community facilities.
Are there land use designation terminology or descriptions that would be easier to understand?	<p>Staff recommend that any terminology in a Provincial framework be consistent with existing terminology in the Provincial Planning Statement. Where new terminology is proposed, staff recommend the Province create a clear guidance document explaining the purpose and intent of the terminology, including visual representations of the land use descriptions to improve readability. This provides a clear understanding of what the intended land use is while also providing some flexibility.</p> <p>While not its own designation, cultural heritage should be included to recognize and help ensure that local context heritage assets are maintained in a standardized system. These culturally significant sites promote place-making which is an important element of population health as it relates to the built environment.</p>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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	For example, it is not clear what the Province is referring to as “special needs housing” in the ERO posting which could be clarified through Provincial guidance.
<b>Topic: D. Transitioning to a New Framework</b>	
What is your perspective on the changes being considered to transition to a standardized official plan framework?	<p>It is not clear from the materials submitted with this ERO posting on whether the standardized Official Plan framework would be applied through an update to an existing Official Plan as required by the <i>Planning Act</i> or to the adoption of new Official Plans.</p> <p>An important consideration in any framework is that municipalities regularly break up their Section 26 five or ten year Official Plan reviews into phases (e.g. employment reviews, Major Transit Station Areas, etc.). The benefit in doing so is to allow more focused analysis and management of scope as well as to allow municipalities to undertake tailored engagement on topic specific components of the Official Plan. Also, there are instances where new Provincial policies or legislation necessitate municipalities to initiate scoped Official Plan reviews earlier than expected to ensure consistency with Provincial direction. In these situations, it would not be possible to completely rebuild an Official Plan to be consistent with a new Provincial framework and staff recommend that the full application of any framework only occur when a municipality is establishing a new Official Plan.</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,	<p>If the Province decides to proceed with a standardized Official Plan framework in the short term it will likely result in municipalities delaying/pausing Official Plan reviews that are currently initiated due to the risk of having to redo existing work at significant time and expense to be aligned with new Provincial direction. This includes delaying/pausing current planning work underway to increase housing supply for planning authorities to reformat official plans.</p> <p>As a result, staff recommend that municipalities have the option to apply any new adopted framework to their next Official Plan review. Meaning that if a municipality is required to update its official plan in the next two years, the framework apply to the legislated review after that. This will enable faster updates to municipal Official Plans</p>

**ERO 025-1099 – Consultation on Simplifying and Standardizing Official Plans**

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and statutory review requirements in your response.	to be consistent with the new Provincial Planning Statement. It will also give municipalities time to consider whether the new Provincial framework necessitates a need to prepare a new Official Plan rather than update their existing Official Plan(s).
How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?	Enable and allow Municipal Affairs and Housing staff to collaborate with and share constructive feedback (in writing) to municipalities in the updating of Official Plans throughout the process from scoping to drafting. The creation of Provincial Official Plan guidelines rather than standards would better enable this collaboration and provide flexibility for local municipalities and the Province to identify land use policy solutions that had not been previously contemplated – ultimately leading to better outcomes. The current MMAH review process allows for limited feedback on the review until the very end of the Official Plan review process when it is formally sent to MMAH for review.
<b>Topic: E. Submission of Official Plans through Online Portal</b>	
Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?	City of Hamilton staff support steps taken by the Province to make it easier for municipalities to submit Official Plans for Provincial review. Official Plans include high resolution schedules and mapping. Without knowing the details of the portal, this may be made easier by submitting online. An online submission also may improve transparency by allowing the public to track the status of the Province’s review and download all materials submitted by the municipality to the Province.
What benefits and/or risks do you foresee from transitioning to submission through an online portal?	See comments above on potential benefit. Staff recommend that if the Province moves to an online portal, both municipalities and the Province still provide an option to residents to receive a hard copy of the Official Plan under review if requested.