



November 22, 2025

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

Re: Conservation Ontario's comments on "Consultation on simplifying and standardizing official plans" (ERO#025-1099)

Conservation Ontario is the voice of Ontario's 36 Conservation Authorities (CAs). We offer the following comments further to CA mandatory programs and services, including natural hazard management and drinking water source protection.

The Ministry of Municipal Affairs and Housing ("the Ministry") is seeking feedback on a proposal to simplify and standardize the structure and contents of municipal official plans (OPs) in Ontario and to make OPs more permissive.

Conservation Ontario offers the following comments on select aspects of this proposal:

1. Use of Secondary Plans or Site-Specific Plans

The Ministry is considering requiring OPs to be a singular, comprehensive document, including "potentially prohibiting the use of secondary or site-specific plans".

Secondary plans establish more detailed policies within a particular area of a municipality, typically to guide growth in areas planned for significant growth, in accordance with the official plan.

Conservation Ontario acknowledges the importance of secondary planning in Ontario's land use planning framework to guide comprehensive planning in areas experiencing significant land use changes and growth.

- As Ontario's communities plan for growth and intensification, local/neighbourhood scale plans such as Secondary Plans will help ensure appropriate development sequencing, servicing, and access to community facilities such as greenspaces.

- **Conservation Ontario recommends municipalities retain the ability to develop Secondary Plans in areas planned for significant growth.** Secondary planning allows municipalities to ensure new development is coordinated, supported by appropriate servicing, and considers the broader water resource system (including natural hazards and sources of drinking water), helping to strategically plan for safe and sustainable communities.
- Watershed / subwatershed plans/studies are encouraged for all municipalities and required for large and fast-growing municipalities to better inform planning for sewage and water services and stormwater management¹. Secondary planning is informed by subwatershed plans/studies, supporting municipal decisions on growth allocations, water/wastewater planning, and water resource identification.
- To ensure Secondary Plans are supported by the best available technical information, **Conservation Ontario recommends that the Province finalize the draft 2022 “Subwatershed Planning Guide” to help communities better plan for water / wastewater / stormwater service, water resources, drinking water source protection, and climate change resilience.**

2. Standardized Chapters, Schedules, Overlays and Data

The Ministry is proposing a standardized structure and contents for municipal OPs, including potentially limiting the length of OPs.

The proposed structure includes a standard chapter order, as well as standardized schedules, overlays and data for all municipal OPs.

- Conservation Ontario is supportive of the proposal for policies related to “natural and human made hazards” to be considered general policies applicable to all land-use designations. This will help ensure that appropriate measures are in place to protect people, property and infrastructure from natural hazard impacts.
 - **Conservation Ontario recommends that policies related to Water Resources** (currently proposed in the “Natural Heritage, Water Resources, Agriculture & Mineral Resources” chapter) **be similarly included as “General Policies Applicable to All Designations”**. This change reinforces requirements for protecting all municipal drinking water supplies, planning for efficient and sustainable use of water resources and watershed planning.
- As proposed, OPs would include a standard schedule for “Natural and Man-made Hazards”. As required in section 5.2 of the Provincial Planning Statement, 2024 (PPS), planning authorities work in collaboration with Conservation Authorities (where they exist) to identify hazardous lands and sites, and manage development in those areas. To ensure consistency with the PPS, 2024, **Conservation Ontario**

¹ Provincial Planning Statement (2024). Section 4.2 (Water).

recommends this schedule be categorized as “Natural and Human-Made Hazards”.

- Conservation Authorities regularly review and update mapping resources to support their mandatory natural hazards programs and services, further to site specific investigations and studies. Given the potential for updates to these resources, **Conservation Ontario recommends that municipal OPs contain language allowing for minor updates to natural hazard mapping included as a standard schedule or overlay.** Such language will allow for timely updates to these resources, better supporting safe community planning and decision-making based on the best available technical information. In the event of a discrepancy between the “Natural Hazards” schedule or overlay and the policies of the OP, the policies must take precedence.

3. Permissive Land Use Designations

The Ministry is proposing to standardize the number and type of land use designations in municipal OPs, as well as make designations more permissive.

In total, 10 land use designations are proposed for consideration.

- Conservation Ontario **recommends that clarification be provided to ensure proposed permissive land use designations do not have the effect of facilitating development in areas incompatible with the proposed use (e.g., areas subject to natural hazards or designated vulnerable areas).**
 - Clarification should be provided to confirm that the proposed schedules, including “Natural and Man-Made Hazards” and “Water Resources”, prevail, despite more permissive land use designations. This will ensure conflicts are avoided, for example, regarding requirements for municipal OPs to conform with the significant threat policies and designated Great Lakes policies set out in the source protection plan.
- The proposal captures natural hazard areas under the “Natural Heritage” designation. To ensure municipalities, development proponents, and members of the public have a fulsome understanding of hazard features and associated policy requirements, **Conservation Ontario recommends “Natural Hazards” be included as a separate land-use designation.**
- The proposed land use designation criteria should include (and be limited by) connections to available municipal water and wastewater treatment systems where development is proposed to occur. The current proposal may inadvertently promote development where there is a lack of available servicing.

Thank you for the opportunity to review and provide comments on the "Consultation on simplifying and standardizing official plans" (ERO#025-1099). We would be pleased to further discuss these comments at your convenience.

Sincerely,

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c.c. All CA CAOs/GMs