



Development Services
Public Works
Halton Region
1151 Bronte Road
Oakville, ON L6M 3L1

November 21, 2025

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

RE: ERO Notice #025-1099 - Consultation on simplifying and standardizing official plans

To Whom It May Concern:

Halton Region staff appreciate the opportunity to review and provide comments related to the consultation on simplifying and standardizing official plans, which is currently posted for commenting under ERO Notice #025-1099 (the "Notice"). Regional staff thank the Ministry of Municipal Affairs and Housing (MMAH) for its efforts to simplify and standardize official plans so they are shorter, easier to understand with consistency.

As an upper-tier municipality without planning responsibilities under Bill 185, Halton Region no longer has approval authority for the local official plans under the *Planning Act*. While Halton's local municipalities (Burlington, Halton Hills, Milton, and Oakville) holds the responsibility for preparing and approving their local official plans, Halton Region remains responsible for key regional services. These services include water and wastewater infrastructure, regional roads, public health, and source water protection, among others.

As the Region will continue to play an important role in the delivery of key regional services needed to support and enable local municipal growth, comments provided in this submission reflect ensuring and maintaining effective and efficient coordination between local planning and regional servicing. Comments are organized by the consultation theme areas identified in the Notice:

- A. Official plan structure and contents;
- B. Limiting the length of official plans;
- C. Creating permissive land use designations;

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- D. Transitioning to a new framework; and
- E. Submission of official plans through online portal.

Halton Region Staff Comments

A. Official plan structure and contents

Halton Region staff is supportive of the Minister's intent to standardize the official plan structure and content for clarity and consistency; however, we note that one of the purposes of official plans is to set out a municipality's vision and policies for future growth that guide decisions on land use and infrastructure development. As such, official plans provide municipalities with opportunities to address unique local and regional conditions that inform the decision-making, which could also vary by area within the municipality.

In regards to the proposed changes to the official plan structure and content, Halton Region staff recommend:

- Allow flexibility for municipalities to address unique local and regional conditions, particularly in areas within municipalities that require complex coordination with upper-tier municipalities on matters such as delivery of infrastructure and services; and
- Halton Region staff appreciates the intent to reduce duplication between upper and lower-tier official plans (i.e. regional vs. local policies), however it is noted that regional interests should be maintained and included as part of an official plan structure to ensure that the standardization does not inadvertently impact a regional municipality to plan for, deliver, and operate regional infrastructure and services.

B. Limiting the length of official plans

Limiting the length of official plans based on a threshold for a page or a word limit may result in situations where a municipalities may have to compromise on inclusion or implementation of essential policies due to the threshold.

Instead, Halton Region staff recommend:

- Consider enhanced guidance on the proposed overall official plan structure and contents to include additional directions on simplifying policies. Additional guidance on what policies to include and how to simplify the policies should be sufficient to achieve reduction of the overall length of official plans.

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C. Creating permissive land use designations

While Halton Region staff is generally supportive of the approach in principle to encourage more permissive land use designations that could help facilitate more housing development, we note that land use designations provide opportunities for municipalities to plan based on local and regional conditions such as land use compatibility, infrastructure requirements, and servicing capacity.

In regards to creating permissive land use designations, Halton Region staff recommend:

- Permissive land use designations should allow municipalities to account for local and regional conditions without compromising on issues related to land use compatibility, infrastructure requirements, and servicing capacity; and
- Permissive land use designations should account for alignment with provincial policies and directions such as density targets in the Provincial Planning Statement (PPS).

D. Transitioning to a new framework

Following Bill 185, Halton Region is an upper-tier municipality without planning responsibilities. Halton Region staff does not have any comments on the proposed changes related to transition of official plans to a new framework.

E. Submission of official plans through online portal

Following Bill 185, Halton Region is an upper-tier municipality without planning responsibilities. Halton Region staff does not have any comments on the proposed changes related to submission of official plans through online portal.

Conclusion

Halton Region staff welcome the Minister's initiative to standardize and simplify the official plans in an effort to promote consistency across municipalities and reduce the burden of developing the official plans. We recognize the value of having clear and consistent official plans that would enable all users (planners, residents, developers, etc.) to easily interpret the policies in the plans.

At the same time, it is essential that the official plans are able to accurately reflect the local and regional conditions and interests to ensure that community visions developed in consultation with local communities and stakeholders are appropriately reflected in the official plans. This submission includes a number of recommendations from Halton Region staff on the proposed changes for the Minister's consideration.

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Thank you for providing the Region with the opportunity to comment on the proposed changes to standardize and simplify the official plans. We welcome the opportunity to further discuss these comments with provincial staff should additional clarity be needed or if there is interest in continuing dialogue prior to the release of the final guidance on changes to the official plans.

Respectfully submitted,



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