

Clarington

November 22, 2025

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

By email: PlanningConsultation@ontario.ca

Re: Comments on Consultation on simplifying and standardizing official plans
Discussion Questions; Environmental Registry of Ontario Posting: [025-1099](https://www.ontario.ca/025-1099)

File No: PLN 1.1.36

Thank you for the opportunity to provide comments for consideration as part of the consultation on simplifying and standardizing official plans.

Clarington staff supports the Province's efforts to (i) review how official plans are structured and used to appropriately guide development within municipalities across Ontario, and (ii) evaluate areas of improvement to housing supply in a responsible and locally appropriate way.

Staff does not support standardization (e.g. page limits) where it affects the value of the content and is concerned about the extent to which simplification could undermine the purpose of a municipal official plan, which is to set out the long-term vision for how a community sees itself growing in the context of what Council and residents value.

Staff requests that the Province continue to allow for secondary plans and maintain municipalities' ability to develop official plans in a way that celebrates the character and unique attributes of each city, town, and countryside.

Staff would support transition provisions that require official plans to conform to a new framework at the next scheduled five- or ten-year review, rather than requiring compliance with a new framework by a specified date. Compliance at the time of the next scheduled review would better enable municipalities to plan and budget for the significant resources required to undertake such an update.

Staff looks forward to working collaboratively with the Province to improve the effectiveness of official plans to continue to support provincial direction, striking a balance by increasing and diversifying Ontario's housing supply in way that recognizes local values and meets the community's needs.

For consideration, please find enclosed as **Attachment 1**: Draft staff comments on the Consultation on simplifying and standardizing official plans.

Please note these comments are subject to Council's ratification at its upcoming meeting on December 15, 2025.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Lisa', is positioned below the closing. The signature is fluid and cursive.

For:

Lisa Backus, MCIP, RPP
Manager of Community Planning, Planning and Infrastructure Services

Attachment 1: DRAFT Staff Comments on Consultation on simplifying and standardizing official plans

Item Number	ERO/ORR Number	Title of ERO/ORR Post	Section	Discussion Question	Staff Supports Change?	Staff Comments
1	025-1099	Consultation on simplifying and standardizing official plans	Official Plan Structure and Contents	What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?	Yes No	<p>Staff is open to considering opportunities to improve clarity and effectiveness of municipal official plans and finding efficiencies in official plan development and update processes.</p> <p>Staff is concerned about the extent to which standardization could undermine the purpose of a municipal official plan, which is to set out the long-term vision for how a community wants to grow, and to make sure that growth is coordinated and meets the community's needs.</p> <p>Staff does not support the standardization of official plans where standards are imposed that require each municipality's official plan to look the same and provide for the development of a standardized built community.</p> <p>Staff also does not support the elimination of secondary plans as part of the official plan. Secondary plans enable a level of specificity in planning for land use, infrastructure, and amenities that is necessary to help guide the development of complete communities.</p>
2				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?	N/A	Clarington is part of the Regional Municipality of Durham, an upper-tier municipality without planning responsibilities. Clarington has assumed the Regional Official Plan and will be consolidating the upper-tier and lower-tier official plans into one document as part of the upcoming Official Plan review.
3				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?	Neutral	<p>As part of the upcoming Official Plan review, staff is not opposed to a review of the contents to acknowledge where there may be prescriptive development standards that may be better directed to zoning by-laws (e.g. step backs, setbacks).</p> <p>The Province is requested to provide clarification as to what it considers a development standard. Many official plans began to incorporate prescriptive policies to conform to density and intensification requirements identified in the Growth Plan.</p>
4				What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies?	No	<p>Staff agrees that municipalities should have a comprehensive official plan that applies to the entire municipality.</p> <p>Staff does not support eliminating the opportunity for municipalities to develop secondary plans or site-specific policies. Many municipalities are not homogenous and benefit from community or neighbourhood specific policies and secondary plans to address matters like infrastructure and community amenities that consider a sub area's specific characteristics. Clarington, for example, is comprised of four distinct urban areas, and a large agricultural</p>

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						and rural land mass, most of which is located within the Greenbelt. Secondary plans should remain part of official plans to enable more detailed, but necessary, comprehensive planning for land use, infrastructure, and amenities, in support of municipal capital forecasting at the neighbourhood or community scale.
5				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?	Neutral	Many of the proposed standard schedules are already included in the Clarington Official Plan. However, two proposed new schedules, A1 Estimate of Market Need, A2 Serviced Land Requirement are not schedules staff are familiar with so more detail would be needed. In addition, during our last Official Plan review, the Province initially to added F1 Wildland Fire Susceptibility however eventually concluded that this type of data was not available for Clarington and therefor not applicable. Regarding B2 Wastewater and Stormwater; wastewater is the Region of Durham's infrastructure and would therefore be inappropriate to map in the Clarington Official Plan. In the case of Stormwater, pond locations are only finalized at the end of the planning process, so early identification municipal wide at the OP scale is not appropriate.
6			Limiting the Length of Official Plans	What is your perspective on the changes being considered to limit the length of official plans?	No	Staff does not support a page limit on the length of official plans. Official Plans should be developed, reviewed, and approved based on the value of the contents, not the length of the document. Each municipality's composition, growth forecasts, and needs are different. Therefore, these considerations should be at the core of the development of the official plan, rather than losing valuable policy direction at the expense of an arbitrary page limit.
7				Should there be different limits placed on different types of municipalities (e.g., based on population size)?	No	Staff does not support a standardization of length based on types of municipalities. Currently, Ontario's municipalities are unique, having different land areas, populations, natural features, agricultural systems, specific employment industries, levels of infrastructure etc. A municipality may have a small population but robust growth forecasts within the planning horizon, perhaps needing new policies to help guide this growth. Conversely, a largely populated municipality's growth may be slowing. Official plans should be reflective of each unique municipality and be comprised of policies that appropriately add value. Length should not be the focus.
8					Are there other approaches that could be used to limit the length of official plans?	Yes
9			Creating Permissive	What is your perspective on the changes being considered to standardize the number and type of land use designations?	Neutral	Staff is not opposed some standardization of the naming convention for land use designations, provided municipalities retain the autonomy to define what each designation looks like in its local context, and where each designation

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			Land Use Designations		No	may or may not be appropriate. For example, medium- or high- density residential may look different in a largely populated, urbanized municipality than in a mid-sized municipality without supportive transit infrastructure. Staff would not support requirements that reduce municipalities' ability to plan for and embrace what makes them unique, and the reasons residents and businesses might choose to locate there.
10				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?	Neutral	Clarington is part of the Regional Municipality of Durham, an upper-tier municipality without planning responsibilities. Clarington has assumed the Regional Official Plan and will be consolidating the upper-tier and lower tier official plans into one document as part of the new official plan review.
11				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)?	N/A	Rural/Countryside (including rural settlement areas) designations should be included. Employment designations that apply to lands outside of Employment Areas should also be included to ensure municipalities are able to appropriately plan for employment uses (such as population-related employment) and avoid development of residential-only communities.
12				Are there implications to making land use designations more streamlined and permissive?	No	More permissive and streamlined land use designations may make it more challenging to affect the function, look, and feel of both private and public spaces within neighbourhoods. Standardization puts at risk the individuality of each municipality. Public participation and community involvement has been an integral part of land use planning. Many of the changes to provincial legislation and policy over the last few years have made it increasingly challenging for the community to have a voice in shaping the places they have chosen to live, work, and play. Streamlining high level policy documents will further diminish the public's ability to affect how their community grows.
13				Are there land use designation terminology or descriptions that would be easier to understand?	Neutral	The proposed standard designations seem common across municipal official plans currently, and familiar to those who are familiar with land use planning and development. The naming convention however, Residential 1 and Residential 2 is quite similar to R1 and R2 – standard residential zones throughout the province.
14			Transitioning to a New Framework	What is your perspective on the changes being considered to transition to a standardized official plan framework?	Yes	Staff would support transition provisions that require new official plans to conform to a new framework at the next scheduled five- or ten-year review. This would better enable municipalities to plan and budget for the update.
					No	Staff would oppose transition provisions where compliance is required by a specified date from the time a new framework comes into effect. This approach would lack regard for the timing of municipalities' most recent

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						official plan review cycle and would put undue pressure on municipal resources and budgets by requiring another update in advance of the five-year cycle. There would be similar pressure on external consultant resources, often retained to assist municipalities with reviews, if all municipalities were undertaking updates simultaneously to comply with the same deadline.
15				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.	N/A	Staff will look to implement any new direction for official plan content as part of the upcoming official plan review, which will also consolidate the Clarington Official Plan and the Durham Regional Official Plan into one document, as directed by the Province. It is anticipated this program will take approximately two to five years to complete in consideration of the necessary background technical studies and council election cycles, and will result in the need for additional staff resources. In addition, staff will be looking to initiate a comprehensive zoning by-law review to dovetail with the Official Plan review program, enabling the relocation of prescriptive, development standard-type policies from the Official Plan into zoning to facilitate efficient development approvals.
16				How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?	N/A	The Province could support municipalities with additional resources to support Indigenous Engagement. As well, the Province could support municipalities by stabilizing the provincial framework to enable municipalities to implement these changes.
17			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?	Support	Staff is supportive of digital submission for official plans and official plan amendments that require approval by the Minister of Municipal Affairs and Housing. Clarington has recently implemented electronic submission for all Planning Act applications.
18				What benefits and/or risks do you foresee from transitioning to submission through an online portal?	Support	Benefits to transitioning to submission through an online portal could include immediate acknowledgment of a record being received by the Province, and the ability to provide real-time status updates on documents that have been submitted to the Ministry for approval.