

**Ministry of Municipal Affairs and Housing**

Provincial Planning Branch  
777 Bay St  
Toronto, Ontario  
M7A 2J3

November 22, 2025

**Re: Consultation on Simplifying and Standardizing Official Plans – [ERO 025-1099](#)**

The Atmospheric Fund (TAF) is a regional climate agency serving the Greater Toronto and Hamilton Area (GTHA). We work closely with public and private partners to advance practical urban climate solutions that support affordability, equity, and resilience.

TAF appreciates the opportunity to comment on the Ministry of Municipal Affairs and Housing’s consultation regarding simplifying and standardizing official plans. We support the province’s efforts to help municipalities plan for growth and housing more efficiently through making official plans easier to understand and more consistent across Ontario.

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.

We recommend that the province preserve municipal planning autonomy in developing official plans, continue to allow for secondary plans and site-specific policies, ensure transparency in Ministerial Zoning Order (MZO) decisions and that they are consistent with the Planning Act, and refrain from restricting the use of development standards. We also recommend that the province consider an extended timeline for bringing official plans into compliance with the new framework, particularly for municipalities that have recently updated their plans.

**Part A: Official Plan Structure and Content**

In principle, we support the objective of simplifying and standardizing elements of official plans. However, it is equally important to maintain the ability to use secondary plans and site-specific policies where appropriate. These tools provide the detailed guidance needed in areas experiencing development pressure or expected to accommodate growth, ensuring planning decisions remain current and aligned with community needs.

Secondary plans map out where new roads, parks, infrastructure, amenities, and services will go, and are developed by municipalities through public engagement. When paired with pre-zoning, they allow development to proceed without negotiating public benefits on a site-by-site basis -

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avoiding delays and helping deliver housing faster. Secondary plans front-load critical planning work in growth areas, contributing to well-serviced developments with less community push back. If secondary plans, or site-specific plans, are prohibited, then the municipality must have clear authority to issue directives to developers to meet local needs and requirements without being subject to negotiations that can result in lengthy back and forth between proponents and municipalities. Importantly, it must be clear that municipalities could still pursue voluntary standards to incentivize better development processes such as rebates for storm water, energy efficiency, or other matters.

Additionally, we have concerns about MZOs being implemented without transparency via non-regulatory orders resulting from these provincial decisions. Any changes to the MZO process should be in alignment with the Planning Act and allow for meaningful Indigenous engagement.

We do not support restricting the use of development standards in official plans. “Development standards” is a broad category, and while some standards are appropriately addressed through zoning bylaws, others are not. Zoning bylaws are comparatively less flexible and slow to update - many municipalities are still operating under decades-old requirements that have not kept pace with modern planning needs. In some cases, including or referencing standards in official plans is more effective, as official plans are updated more frequently and provide greater flexibility in interpretation and implementation. Development standards included or referenced in official plans provide flexibility for municipal staff to waive or amend certain elements on a site-by-site basis. Transitioning all development standards to zoning bylaws will have the unintended consequence of significantly increasing the number and complexity of requests for site-specific zoning amendments. The zoning amendment process is a time-consuming process which delays housing development and affordability. Accelerating housing development requires reducing the frequency and complexity of zoning amendment requests, not increasing it.

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

Imposing a two-year deadline for all municipalities to adopt new official plans would create significant uncertainty for the development sector, leading to more housing projects being delayed. This would also distract municipal attention and resources from other important planning activities needed to accelerate housing development. For example, all work on liberalizing and modernizing zoning requirements would likely be paused until new official plans are approved (as zoning bylaws must conform with official plans). A more practical approach would be to consider extending timelines for municipalities that had official plans recently approved, or are currently awaiting provincial approval, rather than requiring immediate revisions across the board.

On the matter of updating to the new framework, many large municipalities have recently undertaken official plan reviews and updates. Within the region of Durham, Oshawa began a review in 2024. Pickering is currently in an official plan review, while Scugog and Ajax are both in reviews as of late 2025. For York Region, Aurora and East Gwillimbury just finished their update, while

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Newmarket, Richmond Hill, Vaughan and Whitchurch-Stouffville are mid-updates. While in Halton Region, Burlington, Milton and Halton Hills updated their plans in 2024. Many of the municipality's TAF works with have only recently completed major official plan updates. Forcing another update within two years would make much of that work redundant and disrupt ongoing municipal planning efforts. Since updating an official plan is itself a two-year process, municipalities would need to restart immediately, diverting time and resources away from streamlining housing development and ultimately slowing, rather than accelerating, the delivery of new housing.

Alternatively, the transition could be tied to the next scheduled 5 or 10-year official plan update. Frequent provincial legislative changes already force municipalities to regularly reassess their plans, making rapid, repeated updates difficult to complete efficiently.

Sincerely,  
Bryan Purcell



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## About the Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.