

**Council Meeting
November 17, 2025**

Report #PD-2025-30

Bill 60 - Fighting Delays, Building Faster Act, 2025 & Update to Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025

Recommendation

Be It Resolved That Report #PD-2025-30 be received;

And Further That the comments contained in Report #PD-2025-30 be forwarded to the Provincial Government for the purposes of consultation on Bill 60, *Fighting Delays, Building Faster Act, 2025* through the Ontario Regulatory Registry and / or Environmental Registry of Ontario as appropriate;

And Further That Town staff continue to monitor the release of further regulations and legislation related to Bill 60, *Fighting Delays, Building Faster Act, 2025*, and continue to explore implications arising from such regulations and legislation and report to Council as appropriate.

Executive Summary

Purpose of Report

The purpose of this report is to provide Council with an overview of the changes introduced through Bill 60, the *Fighting Delays, Building Faster Act, 2025*, and a brief analysis of its potential impacts on the Town. This report will also provide a brief update to regulations that are now in effect as a result of the *Protect Ontario by Building Faster and Smarter Act, 2025* that was given Royal Assent through Bill 17 on June 5, 2025.

Whilst the Town generally supports efforts to streamline approvals, these bills, acts, regulations and consultations are part of a series of complex and unprecedented legislative changes that have introduced significant uncertainty for municipalities and continue to place considerable demands on staff time and resources. Staff will continue to closely monitor emerging legislative changes and regulatory updates recognizing that ongoing provincial reforms are likely to persist and will require continued analysis and implementation.

Key Findings

- The primary objective of Bill 60 and its related consultations is a focus on streamlining development processes and promoting standardized approaches across the Province.

- Generally, the Town supports efforts to streamline approvals and development processes however emphasizes the need for clear implementation guidance, protection of municipal autonomy and balanced development standards.
- Proposed changes to the Planning Act would result in planning decisions made by the Minister of the Ministry of Municipal Affairs and Housing would no longer need to align with the Provincial Planning Statement which raises concerns about transparency, accountability and long-term planning decisions.
- Proposed changes to the Development Charges Act aim to improve consistency and streamline the framework but the rapid pace and volume of reforms are creating uncertainty for municipalities with concerns about implementation, reduced collections and potential cash flow impacts.
- Staff will continue to monitor the Environmental Registry of Ontario (ERO) and the Ontario Regulatory Registry (ORR) for new consultations and updates to existing consultations, and will report back to Council as appropriate.

Background

The Provincial government is seeking public feedback on proposed legislative and regulatory changes under Bill 60, the Fighting Delays, Building Faster Act, 2025 to streamline the construction of new homes and infrastructure (e.g. water, wastewater, roads, transit), reduce gridlock, enhance community safety, and improve landlord-tenant frameworks. Through the introduction of this Bill, the Provincial government has released a number of consultations on the Environmental Registry of Ontario (ERO) and the Ontario Regulatory Registry (ORR). These consultations primarily focus on streamlining development processes and promoting standardized approaches across the Province.

This report will provide an overview of the changes introduced through Bill 60 and a brief analysis of its potential impacts to the Town. The majority of these consultations were posted for a period of 30 days and close on November 22, 2025. This report will also provide a brief update to regulations that are now in effect as a result of the Protect Ontario by Building Faster and Smarter Act, 2025 that was given Royal Assent through Bill 17 on June 5, 2025.

Comments and Considerations

Bill 60, the Fighting Delays, Building Faster Act, 2025

Legislative changes proposed through Bill 60 and the proposed regulations represent substantial changes to municipal approaches and policies. The Province has released a number of consultations which overall seek to streamline and standardize processes and policy documents. The following sections provide a high-level review of the proposals that are relevant to the Town and their potential impacts.

Schedule 2 - Construction Act, R.S.O. 1990

Changes proposed through Bill 60 will make various amendments to the Construction Act which went through a significant update in 2021. The proposed amendment to various sections introduces clearer guidelines for notices related to lien rights, payment timelines and dispute resolution. Additionally, this amendment will require statutory holdback releases to be issued annually rather than at completion of a project or identified phase. Staff are supportive of these amendments as it is expected to enhance transparency and efficiency by navigating the Act more confidently, reducing disputes and improving compliance.

Schedule 3 - Development Charges Act, 1997, S.O. 1997

Responses to ORR 25-MMAH018: Changes to the Development Charges Act, 1997 to Enhance Standardization and Streamlining of the Development Charge (DC) Framework & ORR 25-MMAH030: Implementing Reforms to the Development Charges Framework

This schedule proposes several changes to the Development Charges Act including the addition of a separate service class for land acquisitions, a requirement for municipalities to put in place a Local Service Policy (LSP) for each Development Charge (DC) service category, and enhanced transparency around reporting DC-related information. The Ministry is also assessing whether legislative changes are necessary to enhance the rules governing DC rate freezes.

The intent of a Local Service Policy is to outline the Town's criteria on Development Charges and funding for local services related to highways, stormwater management, parkland development, pumping stations and underground services (including water, sanitary and storm services). The LSP will define the criteria for when infrastructure is to be considered local services which are not to be funded by Development Charges in accordance with Bill 60. The Town will develop a LSP in conjunction with the upcoming DC-Bylaw background study which is scheduled to be updated in 2026.

In addition, ORR 25-MMAH30 was posted for comments on October 24, 2025, proposing additional refinements to the Development Charges Act such as the merging of water supply and wastewater services for the purpose of DC credits, making benefit-to-existing allocations and land values more transparent in DC studies, and making Development Charges financial statements more transparent and easily accessible.

In general, many Development Charges rules are being shifted from the Development Charges Act to regulations which would allow changes and updates to be made faster. The volume of changes being made and the rapid turnaround time for commenting on these changes creates a great deal of uncertainty for municipalities.

The rationale and method for the proposed changes are still unclear and ambiguous which causes concern for implementation by municipalities. Some of the changes will

ultimately result in cash flow challenges and/or reduced Development Charges collections that may need to be offset by property taxes.

Schedule 8 - Ontario Water Resources Act, R.S.O. 1990

ERO 025-0872 - Streamlining environmental permissions for sewage works servicing on-farm worker housing & ERO 025-0899 - Policy proposal to regulate additional sewage systems under the Building Code to support construction of on-farm worker housing

From the perspective of administering the Ontario Building Code (OBC), the proposed legislative changes outlined in ERO 025-0872 do not raise significant concerns. The most notable amendment is the increase in the allowable daily sewage flow on agricultural properties from 10,000 litres to 50,000 litres. This change will expand the scope of systems regulated under the OBC but is not expected to have a substantial impact on the Town of New Tecumseth. The environmental risk associated with these systems remains low due to the typically low density of sewage systems on agricultural properties. The proposed change simplifies the process for farmers and reduces regulatory burden. This amendment is mainly relevant to housing for seasonal agricultural workers. The increase to the threshold for sewage works for servicing on-farm worker housing would remain within the scope of approval process of the Chief Building Official.

Schedule 10 - Planning Act, R.S.O. 1990

ERO 025-1097: Proposed Changes to the Planning Act (Schedule 10 of Bill 60 - the Fighting Delays, Building Faster Act, 2025)

Schedule 10 of Bill 60 proposes a number of amendments to the Planning Act. A full response to this ERO consultation is provided in Attachment No. 1

The proposed changes would exempt most Ministerial decisions from the requirement to align with the Provincial Planning Statement (PPS) with the exception for those affecting Greenbelt lands. This exemption risks undermining long-term planning objectives, creates uncertainty for municipalities and risks eroding public trust in the planning process. The Town recommends a transparent oversight framework with clear criteria and appeal mechanisms to maintain accountability.

Bill 60 furthers changes introduced through Bill 17 by proposing as-of-right variances to zoning provisions such as height and lot coverage using an as-of-yet undefined prescribed percentage. While this may reduce minor variance applications and streamline approvals, further clarity is needed for effective implementation and documentation to avoid future compliance issues.

Changes to the Minister's Zoning Order process include removing regulatory requirements of the Legislation Act and allowing the orders to simply be posted on a government webpage. Changes also include allowing municipalities to delegate the authority to enter into development agreements for Minister's Zoning Orders and granting the Minister expanded powers to set timelines and resolve disputes. These changes aim to expedite development but raise concerns about transparency and municipal autonomy.

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

The Ministry of Municipal Affairs and Housing is consulting on a proposal to set clear parameters for municipal official plans with the aim of increasing consistency across all Ontarian municipalities while also reducing the burden of developing these plans. A full response to this ERO consultation is provided in Attachment No. 2.

The Town of New Tecumseth supports the Province's intent to simplify and standardize Official Plans to enhance clarity and consistency across municipalities. While generally supportive of a streamlined structure, strategic-level policies and consistent land use designations, the Town emphasizes the importance of retaining policy tools to manage long-term growth in alignment with local planning objectives. The proposed removal of Secondary Plans and site-specific policies raises concerns particularly for municipalities experiencing significant growth. These tools are essential for ensuring that new development areas are planned as complete, integrated and compact communities that support infrastructure delivery, connectivity, and livability. These tools, while capable of being streamlined, remain essential for supporting transparent and coordinated community-building processes.

Staff envision that if these changes come into effect, there will be a need to completely re-write the Town Official Plan within any prescribed timelines set out by the Province.

ERO 025-1100: Consultation on Minimum Lot Sizes

The Ministry is seeking feedback to better understand the linkage between minimum lot sizes on urban residential lands and increased housing options and affordability. A full response to this ERO consultation is provided in Attachment No. 3.

The Town supports the goal of increasing housing supply and affordability through gentle density increase and infill and has already reduced minimum lot sizes in its 2021 Zoning By-law update. However, further reductions or removal of lot size requirements must be carefully balanced with infrastructure capacity and practical considerations including stormwater and snow storage needs, parking limitations and neighbourhood compatibility. To ensure that development remains livable and creates high-quality urban areas, additional standards may be required to provide appropriate safeguards that protect both the quality of life for residents and the integrity of the built environment.

ERO: 025-1101 Consultation on Enhanced Development Standards - Lot Level (outside of buildings)

The Ministry is seeking input on the use of enhanced development standards at the lot level, specifically outside the building envelope. According to the ERO consultation, these standards such as bioswales, permeable pavement, and native tree planting are currently applied inconsistently across municipalities thereby creating variability in requirements and added complexity for developers. A full response to this ERO consultation is provided in Attachment No. 4.

While the Town of New Tecumseth does not currently have Green Development Standards in place, it recognizes their importance in advancing climate resilience and meeting the goals of its Community Climate Action Plan. The Town recommends either a standardized regional approach or leveraging existing certification frameworks like LEED, Energy Star, and Net Zero Ready to ensure consistency. Enhanced standards such as permeable surfaces, tree planting, and low-impact stormwater management are vital tools for climate adaptation and mitigation. However, successful implementation will require additional staff capacity and enhanced knowledge to administer these programs. Overall, the Town supports consistent application of these standards across municipalities with room for flexibility to address local context.

Update to the implementation of the Protect Ontario by Building Faster and Smarter Act, 2025 (Bill 17)

The following sections provide an overview of implementation of status for various proposals introduced through the Building Faster and Smarter Act, 2025 (Bill 17) which was given Royal Assent on June 5, 2025.

Schedule 4 - Development Charges Act, 1997, S.O. 1997

Through Protect Ontario by Building Faster and Smarter Act, 2025 (Bill 17), the Province has brought changes into effect to standardize the provisions in the Development Charges Act, 1997 and enhance cost predictability for new developments.

1. A new regulation-making authority that authorizes the Lieutenant Governor in Council (LGIC) to merge service categories for the purpose of development charge (DC) credits.
2. A new regulation-making authority that authorizes the LGIC to prescribe what constitutes a local service for which DCs may not be charged, but which may be secured through agreements as a condition of land division.
3. Changes that provide for payment of DCs for non-rental residential developments to be made in full at the earlier of the date an occupancy permit is issued and the date a development is first occupied.

Further consultation is taking place as part of Bill 60 as outlined in the earlier sections of this report on additional changes to the Development Charges Act, 1997.

Schedule 7 – Planning Act, R.S.O. 1990

Schedule 7 introduced several changes to the Planning Act, including:

- Prohibiting official plans and zoning by-laws from restricting elementary or secondary schools on urban residential land.
- Requiring Ministerial approval for certain amendments to official plans.
- Establishing minimum setback distances for buildings on specified lands.
- Removing timing restrictions for placing portable classrooms on school sites.
- Granting the Minister authority to impose conditions on land use and building placement through specific orders.

The following ERO consultations are still pending decisions to bring into effect the following regulations:

- ERO 025-0462 - Proposed Regulations– Complete Application
- ERO 025-0463 - Proposed Regulation– As-of-right Variations from Setback Requirements

Staff will continue to monitor the Environmental Registry of Ontario (ERO) and the Ontario Regulatory Registry (ORR) for updates and will provide updates to Council where appropriate.

Alternative Options

Not applicable.

Financial Considerations

The proposed amendments to the Development Charges Act aim to enhance transparency and streamline the framework by introducing a separate service class for land acquisitions, requiring municipalities to establish Local Service Policies (LSPs) for each service category and improving access to DC-related financial information. The Town will develop its LSP alongside the 2026 DC By-law update to clarify funding responsibilities for local infrastructure. Additional proposed refinements include merging water and wastewater services for DC credits and increasing transparency in benefit-to-existing allocations and land valuations. While shifting many rules from legislation to regulation may allow for quicker updates, the volume and pace of changes are creating uncertainty for municipalities. The lack of clarity around implementation methods and potential reductions in DC collections could lead to cash flow challenges and increased reliance on property taxes.

Communication Plan

Staff will continue to monitor the Environmental Registry of Ontario (ERO) and the Ontario Regulatory Registry (ORR) for updates and will provide updates to Council where appropriate.

Strategic Plan

[Click here for strategic plan](#)

Not Applicable

Relevant Information

[Bill 60, Fighting Delays, Building Faster Act, 2025](#)

[Technical Briefing - Bill 60, Fighting Delays, Building Faster Act, 2025](#)

Environmental Registry of Ontario (ERO) and the Ontario Regulatory Registry (ORR) consultations relating to Bill 60, Fighting Delays, Building Faster Act, 2025:

Date posted	Reference	Title	Consultation deadline
October 23, 2025	025-0899	Policy proposal to regulate additional sewage systems under the Building Code to support construction of on-farm worker housing	December 7, 2025
October 23, 2025	025-0872	Streamlining environmental permissions for sewage works servicing on-farm worker housing	December 7, 2025
October 23, 2025	025-1097	Proposed Changes to the Planning Act (Schedule 10 of Bill 60 - the Fighting Delays, Building Faster Act, 2025)	November 22, 2025
October 23, 2025	025-1099	Consultation on simplifying and standardizing official plans	November 22, 2025
October 23, 2025	025-1100	Consultation on Minimum Lot Sizes	November 22, 2025
October 23, 2025	025-1101	Consultation on Enhanced Development Standards – Lot Level (outside of buildings)	November 22, 2025
October 23, 2025	25-MMAH018	Changes to the Development Charges Act, 1997 to Enhance Standardization and	November 22, 2025

October 23, 2025	25-MTO019	Streamlining of the Development Charge (DC) Framework Bill 60 - Fighting Delays, Building Faster Act, 2025 - Modern Transportation - Prohibiting Vehicle Lane Reduction for New Bicycle Lanes	November 22, 2025
October 23, 2025	025-1140	Bill 60 - Fighting Delays, Building Faster Act, 2025 – Supporting the Harmonization of Municipal Road Construction Standards	November 22, 2025
October 24, 2025	25-MMAH030	Implementing Reforms to the Development Charges Framework	November 23, 2025

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Attachments:

- [Attachment No. 1 - Response to ERO 025-1097](#)
- [Attachment No. 2 - Response to ERO 025-1099](#)
- [Attachment No. 3 - Response to ERO 025-1100](#)
- [Attachment No. 4 - Response to ERO 025-1101](#)

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Status:

Approved - 06 Nov 2025

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Approved - 06 Nov 2025

Attachment No. 1:

Response to ERO 025-1097: Proposed Changes to the Planning Act (Schedule 10 of Bill 60 - the Fighting Delays, Building Faster Act, 2025)

Comment period: October 23, 2025 - November 22, 2025 (30 days)

The government is seeking public feedback on proposed legislative and regulatory changes under the Fighting Delays, Building Faster Act, 2025 to streamline the construction of new homes and infrastructure (e.g., water, wastewater, roads, transit), reduce gridlock, enhance community safety, and improve landlord-tenant frameworks.

Schedule 10 of Bill 60 outlines several proposed amendments to the Planning Act. This comment letter provides the Town's feedback on those proposed changes with a focus on their potential implications for local planning processes and the Town.

Policy Statements and Minister's Decisions

The proposed new subsection 3(5.1) of the Planning Act would exempt all Ministerial decisions, except those affecting lands within the Greenbelt Area, from the requirement to be consistent with the Provincial Planning Statement. Currently, only Minister's Zoning Orders (MZOs) are exempt from this consistency requirement. This change would significantly broaden the scope of exemptions, allowing all Ministerial decisions on land use planning matters to proceed without alignment to the Provincial Planning Statement (PPS).

The Provincial Planning Statement provides planning policy direction on key planning principles, including land use compatibility, environmental protection, infrastructure coordination, and climate resilience. Removing the requirement for consistency risks undermining long-term planning objectives set out in the Provincial Planning Statement and in local planning documents (i.e. Official Plans and Zoning By-laws). It may create uncertainty for municipalities in making land use, infrastructure, and servicing decisions. This uncertainty may also affect alignment with long-term municipal master plans and strategic objectives which are critical for guiding financial planning and investment decisions. Furthermore, removing this consistency requirement could erode public trust in the planning system by reducing transparency and accountability in decision-making.

To uphold transparency and accountability in the land use planning process, any expansion of Ministerial discretion should be supported by a clearly defined and publicly accessible oversight framework. This framework should establish transparent criteria for decision-making and incorporate mechanisms for appeal or independent review. Such measures are essential to ensure that Ministerial decisions remain aligned with the broader public interest and maintain the integrity of Ontario's planning system. Registered Professional Planners (RPPs) must work in the public interest and so municipal planners provide their best professional advice and recommendations to their municipal councils. Although the planners are not the decision makers, transparency and accountability are inherent in the process. Ministerial decisions not aligned with the direction of the provincial planning policies will undermine the professional planning system.

Minor Variances (As-of-right Variations from Performance Standards)

These changes build upon the framework established by the Protecting Ontario by Building Faster and Smarter Act, 2025 (Bill 17) which though not yet implemented would enable the Minister to authorize as-of-right variances for proposals that fall within a prescribed percentage (e.g., 10%) of existing zoning provisions. This approach is intended to reduce reliance on minor variance applications and streamline the development approval process. Bill 17 specifically addressed setback requirements and would allow for limited variations on specified lands such as urban residential areas when implemented however regulations are yet to come into effect.

Proposed amendments to the Planning Act, through new subsections 34(1.3.1) to (1.3.3), introduce provisions that would allow for the reduction of minimum standards and the increase of maximum standards in zoning by-laws by a prescribed percentage enacted under section 34. Subsection 34(1.5.1) outlines the associated transition rules. These as-of-right variations would not apply to lands on prescribed lands such as within 300m of a railway.

The Town comprehensively updated its Zoning By-Law in 2021 to be more supportive of intensification and infill projects through the maximization of height and lot coverage, and minimizing setbacks and lot size. The standards applied would be two-fold; in the case of a building or structure which was issued a permit under the Building Code Act (1992), the standards in effect at the time of building permit issuance would be applicable whereas if no building permit was issued under the relevant Act, the standard that applies is the one in effect on the day the lawful use of the building, structure, or land was established.

Staff have the following comments with regards to the proposed legislative amendments:

- Clarity is needed on whether the reductions to minimum standards would apply to the principle building or would also be applicable to accessory buildings.
- Clarity on whether this would be considered applicable law for a Building Permit. At present, the Town's Zoning By-law will need to be updated to align with the requirements of the proposed changes when in effect to be considered applicable law.
- This is likely to introduce additional administrative burden as staff would need to go through a range of calculations to apply this prescribed percentage reduction to minimum standards or increases to maximum standards. Staff would also need to establish a method for tracking and monitoring reductions or increases applied under the legislation. Without proper documentation, property owners may face challenges in demonstrating legal non-compliance in the future.
- It is difficult to determine the impacts of the proposed changes given an example prescribed percentage is provided (10%) rather than a definitive percentage. If the prescribed percentage is indeed 10% then the proposed changes to legislation allowing as-of-right variations minimum and maximum standards by the prescribed percentage are unlikely to significantly impact the Town. However, it should be noted that the variances would apply to the zoning provisions that were in effect at the time of Building Permit issuance, or to those in effect on the day the lawful use of the building, structure, or land was established. This may result in inconsistent variations across the three Settlement Areas leading to inconsistent outcomes.

- Currently few Minor Variance applications are received for such small-scale adjustments. The Town's current progressive Zoning By-law typically results in Minor Variance applications for more substantial deviations from minimum standard requirements.

A more effective and holistic approach to streamlining development would be to support municipalities in adopting Community Planning Permit Systems (CPPS). These systems consolidate zoning, site plan, and minor variance processes into a single and streamlined approval framework which offers a potentially more meaningful path to accelerating development while maintaining local oversight.

Minister's Zoning Orders

New subsections 47(1.0.0.1) and (1.0.0.2) of the Planning Act propose that Minister's Zoning Orders (MZOs) issued after the effective date will no longer be considered regulations under Part III of the Legislation Act, 2006, unless they amend or revoke an earlier order. Similar amendments are proposed to the Ontario Planning and Development Act, 1994, with subsection 80.1(2) of the Legislation Act updated accordingly.

While this change may expedite approvals by allowing MZOs to be issued as non-regulatory instruments and published solely on a government website, it raises concerns about reduced transparency and public accessibility. Although MZOs will retain their legal effect, removing them from the regulatory framework eliminates formal publication through e-Laws and associated procedural safeguards. To maintain public trust and accountability, MZOs should continue to be subject to clear publication requirements and oversight mechanisms.

The Minister currently has the authority to require landowners subject to a Minister's Zoning Order (MZO) to enter into agreements with municipalities. The proposed amendments would expand this authority by allowing the Minister to set timelines for entering into such agreements, deem disputed provisions to be of no force or effect, or refer unresolved matters to the Ontario Land Tribunal for final determination. These changes introduce new procedural powers that may expedite implementation but also raise concerns regarding a municipality's ability to manage matters that affect the Town.

Protected Major Transit Station Areas

The proposed exemption from Ministerial approval for Official Plan Amendments that permit residential uses across all lands within a PMTSA would accelerate implementation. Although the Town does not currently have any designated Protected Major Transit Station Areas (PMTSAs), extending a similar approach to Strategic Growth Areas may further streamline approvals and support intensification objectives.

Community Improvement Plans

The proposed amendments to Section 28 of the Planning Act expand the authority of upper-tier municipalities regarding Community Improvement Plans (CIPs). The Town welcomes these changes as they appear to provide greater flexibility for upper-tier municipalities to initiate and support community improvement initiatives particularly in the context of recent municipal restructuring.

Attachment No. 2:

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

Comment period: October 23, 2025 - November 22, 2025 (30 days)

Thank you for the opportunity to provide feedback on the proposed changes to simplify and standardize municipal Official Plans in Ontario. The Town of New Tecumseth recognizes and is generally supportive of the intent to streamline processes and improve clarity and provides the following comments and considerations.

A: Official Plan Structure and Contents

Currently, the content and structure of official plans are unique to each municipality. Concerns have been raised that Official Plans cover subjects that are beyond the scope of land use planning (e.g., history of the municipality, technical details of performance standards) and that there is duplication between upper and lower-tier official plans.

- The government is seeking feedback on a proposal to:
- simplify and standardize the structure and contents of official plans across Ontario, see proposed structure and schedules listed below,
- limit development/zoning standards (e.g., building heights, lot sizes and density) in official plans and requiring existing development standards in official plans (e.g., in site specific policies) to be incorporated into zoning by-laws, and
- require official plans to be a singular, comprehensive document for the entire municipality, including potentially prohibiting the use of secondary or site-specific plans.

Proposed Standard Chapter Order (Mandatory Titles/Order) for Official Plans

- Introduction & How to Use this Plan
- Municipal Strategic Framework (Vision, Goals, Provincial and Regional Planning Context)
- Indigenous Engagement & Interests
- Settlement Area Structure & Growth Needs and Management (Analysis of Market Needs, Settlement Area Boundary Expansions, Serviced Land Needs, Intensification, Strategic Growth Areas, and 20–30 year land horizon)
- General Policies Applicable to All Designations
- Natural & Human Made Hazards
- Cultural Heritage & Archaeology
- Community Design & Complete Communities
- Residential and Mixed Uses (range and mix, affordability, inclusionary zoning)
- Economy & Employment (areas of employment)
- Infrastructure, Transportation, and Public Service Facilities (transportation, corridors, compatibility, wastewater/stormwater, energy, parks/open space)
- Natural Heritage, Water Resources, Agriculture & Mineral Resources
- Implementation & Interpretation (processes, tools, phasing, monitoring, s. 26 update, definitions)
- Schedules & Appendices (standardized set)

Standardized Schedules, Overlays and Data

- A1 Estimate of Market Need
- A2 Serviced Land Requirement
- A3 Land Use Designations
- A4 Settlement Boundaries, Urban/Rural Structure, Provincial Plans (ORMCP, Greenbelt, NEP, etc.)
- A5 Strategic Growth Areas & Intensification Areas
- B1 Transportation & Corridors (Highways, Railways, Airports, etc.)
- B2 Wastewater & Stormwater
- C1 Natural Heritage System
- C2 Natural and Man-made Hazards
- C3 Human-made Hazards (pits and quarries, mineral aggregate resource deposits)
- C4 Agricultural System & Minimum Distance Separation (MDS), Agri-Food Network
- C5 Water Resources (drinking water source protection areas, etc.)
- D1 Cultural Heritage Resources
- E1 Community Facilities, Parks & Open Space
- F1 Wildland Fire Susceptibility
- Schedules and overlays should use standardized naming (e.g., NHS-1 Significant Woodland; HZ-F Floodplain; EMP-AE Area of Employment). Metadata must include layer naming conventions, sources and dates, and link to provincial datasets.

Discussion questions:

1. What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?

Overall, staff are supportive of the proposal to standardize Official Plans. Official Plans should act as a strategic planning policy framework to guide land use development decisions and Planning Act approvals. Official Plans should act as signposts to further implementation detail such as Zoning By-Laws and other documents that provide guidance and requirements for Planning Act approvals. Some flexibility should be retained to address local context where necessary however policies should largely remain at a high-level. In general, the order and standardization of chapters appear reasonable.

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?

In the context of Town of New Tecumseth, the County of Simcoe is the upper-tier planning authority. The County's Official Plan should focus on strategic guidance on regional systems and coordination (e.g. servicing, growth, natural heritage systems), while lower-tier plans should address local implementation. The upper-tier Official Plan could contain policies on Land Use Designations when it is the only Official Plan in effect otherwise it should simply defer to the details on land use designation at the lower-tier Official Plan level. The upper-tier OP should focus on matter of their jurisdiction (i.e. waste management, transportation, transit and broader systems such as natural heritage) and laying out the coordination required between municipalities. As described below in response to question #2 in Section C: Permissive Land Use Designations, the upper tier Official Plan could eliminate land use designations and be a

policy document that describes systems and provides direction. Duplication should be minimized through clearer delineation of responsibilities.

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?

Official plans at the local level should retain high-level policy direction to guide zoning and other implementation documents. Zoning By-Laws and other documents such as Urban Design Guidelines documents are the most appropriate tool for detailed development standards. The Zoning By-Law is considered Applicable Law in the Ontario Building Code along with specific sections of the Planning Act. However, it should be cautioned that removing all standards from Official Plans may risk disconnecting strategic vision from implementation.

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?

The proposed prohibition on secondary plans and site-specific policies as part of the streamlining of Official Plans raises concerns for municipalities with large amounts of growth in Settlement Area Boundary Expansions like the Town of New Tecumseth. While the intent to simplify planning frameworks is understood, the removal of these tools could undermine the ability to manage and coordinate growth effectively and responsively, especially related to servicing and elements of community building.

The Town's Growth Management Study resulted in draft Official Plan Amendment #5, including recommended Settlement Area Boundary Expansions, and incorporated a policy framework designed to support long-term and coordinated growth. Secondary Planning policies were a key component, intended to guide the development of complete communities in future growth areas. This approach is particularly important given the Town's historical experience with fragmented and piecemeal subdivisions and settlement expansions since amalgamation in 1991 which have contributed to poor connectivity between the existing community and increased reliance on private vehicles.

Through Draft OPA #5, the Town proposed to proactively designate land uses within the Settlement Area Boundary Expansions. Therefore, Secondary Planning would have been more closely aligned with high-level master planning or block planning. This would allow for the creation of healthy, complete and connected communities that integrate with adjacent development and provide a mix of land uses and community services. For larger growth areas, a holistic approach is essential to address connectivity, transportation, infrastructure, servicing, and community amenities. While smaller-scale expansions may not require full secondary plans, integration with the existing community remains critical.

The Town's draft Official Plan Amendment #5 also included policies to phase development both within and between Settlement Areas. These policies are critical to managing growth in a fiscally responsible manner and ensuring the logical and efficient delivery of infrastructure and services. Phasing would be implemented through the findings of the Master Servicing Plan (MSP), which is intended to identify a practical and feasible approach to infrastructure delivery that aligns with growth sequencing. This ensures that development occurs in a coordinated fashion, supported by adequate servicing capacity and transportation networks.

To effectively implement phasing policies and MSPs, it is imperative that an approved Official Plan is in place. Initiating secondary planning or servicing strategies without this foundational policy framework risks misalignment with fiscal strategies and inefficient use of municipal resources. An approved Official Plan Amendment would provide the necessary direction and certainty to guide subsequent planning and infrastructure investment decisions.

Secondary Planning could be repurposed as a scoped or tiered exercise, particularly where lands have been designated for future development. However, without the ability to apply secondary plans, such proactive planning efforts may be constrained, thereby limiting the Town's ability to ensure cohesive and integrated development.

A potential solution could be the introduction of thresholds for when secondary planning is required e.g. based on the size or complexity of the area rather than applying it to individual parcels. Whereas development within existing settlement areas could be guided by overarching principles in the Official Plan therefore reducing the need for site-specific policies whilst maintaining strategic alignment.

It is also important to retain the ability for landowner groups to form for cost-sharing and to achieve the holistic aims of integrating individual development into a wider complete community/plan. Clarification is needed on whether the proposed changes would apply to exception areas, such as site-specific Official Plan Amendments or special policy areas that require tailored approaches due to site specific constraints e.g. environmental features or drainage concerns.

In summary, while streamlining is a worthwhile goal, the complete removal of secondary plans and site-specific policies may hinder municipalities' ability to plan effectively for growth. A more nuanced approach, such as scoped secondary planning, thresholds for applicability, and retention of special policy areas only where necessary, would better balance efficiency with the need for strategic and place-based planning.

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?

The proposed list appears to be comprehensive. The following considerations should be applied:

- Clarity on the information Schedule A1 "Estimate of Market Need" is intended to show.
- A5 Strategic Growth Areas & Intensification Areas – this should include Protected Major Transportation Station Areas (PMTSAs)
- Land Use Compatibility e.g. D4 and D6 assessment areas.
- C5 Water Resources (drinking water source protection areas, etc.) – this should include source water protections, wellhead protection areas and highly vulnerable aquifers.

However, municipalities should have the ability to include additional schedules where needed. Metadata requirements are a positive step toward transparency and interoperability.

B. Limiting the Length of Official Plans

Currently, the length of official plans varies across municipalities (e.g., from around 150 pages to over 600 pages). Ontario municipalities' official plans also tend to have higher page counts than

official plans in other provinces. The government is proposing to limit the length of official plans, for example, by setting a page limit (e.g., 250 pages) or a word limit (e.g., 65,000 words).

Discussion Questions:

1. What is your perspective on the changes being considered to limit the length of official plans?

Limiting the length of official plans could be a positive step toward more accessible and strategic documents. Overly lengthy documents can be difficult for the public, stakeholders, and even municipal staff to navigate, potentially hindering transparency and effective policy implementation. A more concise and standardised plan may help to focus priorities, streamline decision-making, and improve alignment with Provincial policy objectives. However, some flexibility should be provided to address local issues.

2. Should there be different limits placed on different types of municipalities (e.g., based on population size)?

It may be reasonable to consider differentiated limits based on factors such as population size, geographic area, and different challenges to planning complexity. A flexible framework that allows for proportionality would help ensure that the intent of limiting length does not inadvertently constrain necessary content.

For example, the Town of New Tecumseth is experiencing significant growth, which requires comprehensive policies to manage long-term development particularly in Settlement Area Boundary Expansions such as phasing strategies which can be aligned with infrastructure capacity. In such cases, relevant strategic policies to guide new development to create complete communities is essential to ensure growth is well-managed, fiscally responsible and sustainable. Applying a strictly one-size-fits-all limit could undermine the ability of rapidly growing municipalities to address their planning needs effectively.

3. Are there other approaches that could be used to limit the length of official plans?

Ultimately, the goal should be to enhance the usability and effectiveness of official plans rather than simply a reduction in length. Rather than imposing strict page or word limits, alternative approaches could include:

- Encouraging strategic policies which are concise with supplementary detail provided in supplementary planning documents e.g Zoning By-Laws
- Standardizing structure and formatting which can reduce redundancy, accessibility and improve clarity.
- Standardizing interpretation to align with Planning Act and how it is intended to be used
- Using digital tools and hyperlinks to connect related content without duplicating it.
- Promote cross-referencing to remove duplication as often policies are duplicated in various sections.
- Eliminate and/or prohibit duplication and repetition of policies
- Delete Definitions sections and rely upon standard definitions established by the Province, or only provided in Zoning B-laws
- Provide templates and training for municipal staff to streamline preparation and delivery.

C. Permissive Land Use Designations

Currently, land use designations vary from one municipality to the next and some official plans have over 30 different land use designations. The government is proposing to standardize the number and type of land use designations, as well as make designations more permissive across Ontario's official plans.

Residential I: Designated for low-rise/density residential buildings. Permits special needs housing, small-scale commercial uses (e.g., home businesses, neighbourhood convenience stores) and institutional uses (e.g., schools, places of worship, libraries, recreation centres)

Residential II: Designated for mid-rise/density residential buildings. Permits special needs housing, commercial uses and institutional uses (e.g., schools, colleges and universities, hospitals, places of worship, libraries, recreation centres)

Mixed Use Areas I: Designated for low/mid-rise/density buildings, including village or neighbourhood centres (local-scale mixed uses). Permits residential, special needs housing, commercial uses (e.g., offices, retail, hotels) and institutional uses (e.g., schools, colleges and universities, and hospitals, libraries, recreation centres) and industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects

Mixed Use Areas II: Designated for high-rise/density buildings, including urban centres, transit station areas. Permits residential, special needs housing, commercial uses (e.g., offices, retail, hotels, entertainment) and institutional uses (e.g., schools, colleges and universities, and hospitals, libraries, recreation centres) and industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects

Rural Areas: Designated for low-rise/density rural and related uses and small-scale employment/industrial uses. Permits low density residential, small-scale commercial uses (e.g., home businesses/ industries), small-scale employment/industrial uses, agricultural and agricultural-related uses, tourism, resource uses, cemeteries, etc.

Employment Areas: Designated for clusters of buildings and lands for business and economic uses that may require separation from some sensitive uses. Permits business and economic uses, including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities

Major Facilities: Designated for industrial and infrastructure land uses (other than employment areas) that require separation from sensitive uses. Permits uses including manufacturing, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries, energy generation facilities and transmission systems, and resource extraction activities

Parks and Open Space: Designated for recreation and public open space. Permits recreation uses, public realm amenities including active parks, passive open space, and waterfront parks

Natural Heritage: Designated for the conservation of ecological features and functions, including core natural areas and linkage areas. Permits environmental protection areas, and identifies areas where development is not permitted, such as natural hazards

Agricultural Areas: Designated for agriculture and agriculture-related uses to preserve farmland and support the agricultural system, including prime agricultural lands. Permits agricultural and agriculture-related uses, as well as on-farm diversified uses (agri-tourism, value-added products, etc.).

Discussion Questions:

1. What is your perspective on the changes being considered to standardize the number and type of land use designations?

Standardizing land use designations would provide consistency, clarity, and alignment with provincial policy frameworks. General land use categories would support interpretation and reduce complexity across municipalities. However, where necessary, definitions should be clearly articulated and allow for flexibility particularly where uses are described in broad terms.

Each designation should convey a clear and purposeful intent. This clarity supports flexibility, enables professional judgment in cases where land uses may be ambiguous or not explicitly defined, and encourages innovative approaches to land use planning. Consideration should also be given to streamlined policy frameworks for specific uses for example mid-high rise residential uses, institutional and public service facilities are usually located on arterial roads.

Some uses may be permitted in an Official Plan but not in the Zoning By-Law in order to trigger a Zoning By-Law Amendment which would require a policy framework of policy tests to be met to assess and prepare a professional planning recommendation. These policy tests should be scoped to assess the impacts that are relevant to the use as this will inform submission requirements. These are typically uses that are largely outside of the Settlement Area, examples in the Town's Official Plan include: commercial animal kennels, cemeteries, small-scale industrial / commercial uses where the Town would need to understand the potential impacts of a use to determine its appropriateness in the proposed location.

Clarification is also needed regarding which uses are permitted across multiple designations. In certain cases, a sequential testing approach may be appropriate. For example, public service facilities could be directed to preferred locations first with alternatives considered only where the preferred locations are not viable or practical.

The standardization of land use designations has the potential to be beneficial in improving consistency across municipalities. To be effective each designation must be accompanied by a clearly articulated intent. This clarity is essential to ensure sufficient flexibility in interpretation, support professional judgment and enable innovative approaches to land use planning that respond to local context and emerging needs without the need to amend Official Plans.

2. 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?

One potential approach could be to eliminate Land Use Designations from the upper-tier Official Plan altogether. If lower-tier municipalities adopt standardized Land Use Designations, duplicating them at the upper-tier level may be unnecessary. Instead, the upper-tier Official Plan could focus on establishing a broad, coordinated framework for land use planning, offering strategic direction aligned with the Provincial Policy Statement (PPS). Rather than including a

detailed land use designation schedule, the upper-tier plan could feature a general land use structure schedule and concentrate on overarching policy guidance.

Standardizing land use designations between upper-tier and lower-tier official plans has the potential to significantly improve clarity, reduce duplication and enhance coordination across regions. To achieve this, the following should be considered:

Upper-tier municipalities should establish overarching policy directions, while lower-tier municipalities provide detailed implementation based on local context. This would ensure consistency while preserving local autonomy.

The County of Simcoe already delegates certain Official Plan Amendment approvals to lower-tier municipalities therefore a strategic level framework would reduce duplication and provide necessary direction to lower-tier municipalities.

Uses and functions that require regional level co-ordination, such as Natural Heritage Systems, agricultural land use mapping and policies, and watershed planning, should be addressed strategically at the upper-tier level to ensure consistency across municipalities and effective resource management.

Establishing uniform definitions and land use categories across tiers would reduce interpretation challenges and support a more cohesive planning framework across the County.

While standardization offers many benefits, it is important that municipalities retain the flexibility to refine permitted uses within designations to reflect local planning objectives and community needs. A balanced approach that promotes consistency while allowing for local nuance will be key to successful implementation.

3. 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)?

Despite the standardization of land use designation categories, it is assumed that municipalities still have the discretion to refine which broad land use categories are permitted as this may be context specific. Clear articulation of the intention for each designation is essential to supporting flexibility and innovation.

The following additional uses or clarification may be considered:

- Specific commercial designations such as Downtown Core Commercial to preserve the character and function of main street areas.
- Major recreational facilities e.g. golf course, cross-county and downhill ski facilities, mountain bike facilities. Usually, these facilities require an Official Plan Amendment and a policy framework to guide where these facilities should be located and what tests need to be satisfied.
- Hamlets and Country Estate Residential designations which are usually on private services and limited new development occurs such as home businesses and accessory structures including accessory residential units.
- Mixed Use Areas could act as buffers between sensitive land uses and can support commercial and employment uses that do not fit into the Employment Area definition as provided in the Provincial Planning Statement (2024).

- Provide clarification on uses that are permitted in all designations such as Public Service Facilities and Infrastructure.

Further comments to streamline or enhance land use categories:

- Residential I and II seem to be largely aligned and could be consolidated. Municipalities should retain discretion to determine appropriate building typologies such as mid- or high-rise development based on local context.
- Mixed Use Areas I and II seem to be largely aligned and could be consolidated with flexibility for municipalities to delineate areas requiring commercial at grade is necessary for example Downtown Core Areas to maintain the primary function of main streets.
- Mixed Use Areas I and II should contain uses that do not affect land use compatibility and promote commercial and employment uses that can provide a buffer between these uses and designated Employment Areas.
- Employment Area and Major Facilities could be combined as these are largely subject to similar land use compatibility issues and are likely to be closely connected.
- Agricultural Areas should include farm worker dwellings which should be subject to a straight-forward development agreement rather than needing a Zoning By-Law Amendments.

Overall supportive of standardizing land use designations whilst leaving room for municipalities to determine locally sensitive issues and providing high-level policy requirements to guide further planning act approvals.

4. Are there implications to making land use designations more streamlined and permissive?

While streamlining land use designations would support consistency across municipalities, municipalities should retain the ability to provide clear policy direction to guide the location of some land uses. For example, municipalities should be able to direct institutional and community uses, such as schools or recreational facilities, to preferred locations like arterial roads.

To support this, a sequential policy framework could be applied within certain designations, allowing municipalities to identify preferred development locations (e.g., arterial roads) while permitting alternatives only where it can be demonstrated that no adverse impacts would result.

To apply the Natural Heritage System designation, differentiation should be made between lands located within Settlement Areas and those outside. Within Settlement Areas, lands are typically designated and zoned for development with the principle of development established. Outside Settlement Areas, policy should consider the status of vacant lots of record for single-detached dwellings and permitted existing residential uses while restricting expansion into environmentally sensitive areas. Clarity within the policy framework will be necessary to guide this approach.

5. Are there land use designation terminology or descriptions that would be easier to understand?

Define compatible / compatibility outside of land use compatibility to support mixed use area implementation e.g. means development or redevelopment which may not necessarily be the

same as or similar to the existing development in the vicinity, but shall enhance the character of the community, while not creating any undue, adverse impacts on adjacent properties.

Define home business and home industry to provide clear distinction of scale and broad examples of uses this could include to encourage innovation and flexibility whilst ensuring that uses are compatible with other land uses.

Where reference is made to "local-scale," a clear definition or qualification should be established to ensure consistent interpretation.

D. Transitioning to a New Framework

In some instances where new land use planning rules are enacted, provisions are included to facilitate an orderly transition to the new rules. The government is considering approaches to transition including:

- Requiring new official plans to comply with a new official plan framework at their next 5- or 10-year update, as required by the Planning Act,
- Requiring that lower-tier municipalities wait until the upper-tier municipality with planning responsibilities have completed their transition before they update theirs,
- Setting a date for official plans to comply with a new official plan framework, for example, within 2 years of a new framework coming into force, or
- Requiring large and fast growing to update their official plans within 2 years of a new framework and allowing smaller and rural municipalities to update their official plan at their next 5- or 10- year update.

Discussion Questions:

1. What is your perspective on the changes being considered to transition to a standardized official plan framework?

The Town supports a structured and phased approach to transitioning to a standardized official plan framework. A clear transition process is essential to ensure municipalities can effectively align work plans, staff capacity and financing with new requirements. Flexibility should be built into the transition model to account for varying levels of municipal capacity and complexity.

Requiring updates at the next statutory 5- or 10-year review aligns well with existing Planning Act requirements and allows municipalities to integrate changes within established planning cycles. However, for fast-growing municipalities an accelerated timeline may be appropriate. Coordination between upper- and lower-tier municipalities is critical to avoid misalignment and duplication and a staged approach that prioritizes upper-tier transitions first is reasonable.

2. 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.

A clear distinction should be made between the roles of upper- and lower-tier Official Plans to reduce duplication and complexity. The upper-tier Official Plan should focus on strategic guidance and coordination of regional systems while eliminating detailed land use designations. A defined timeline should be established for updating upper-tier official plans, e.g. within 2–3

years, which would allow lower-tier municipalities to proceed with their own updates in parallel and reference the upper-tier for strategic direction. This approach would streamline planning frameworks, eliminate unnecessary complexity, and enable more focused and responsive planning at the lower-tier level.

It would be beneficial for the Town to be able to progress draft Official Plan Amendment #5 to provide a clear direction for growth and framework to manage growth and phase development according to infrastructure upgrades. A streamlined Official Plan could then be prepared to strategically guide development over the coming planning horizon.

At present, updates to land use mapping will require coordination with regional and provincial data sources. This may also require consultant input for example Natural Heritage identification and mapping. This will require the County Official Plan to be approved prior to the approval of the Town's Official Plan for consistency.

Meaningful and inclusive consultation which goes beyond statutory requirements. This should include residents, local businesses, the development industry and Indigenous communities to shape an effective Official Plan. Engaging a diverse range of participants ensures that the policies reflect local priorities, whilst fostering transparency and trust in the planning process.

The Province's decision to pause the Growth Management Study and the associated Official Plan Amendment #5 in the Town of New Tecumseth has introduced considerable uncertainty into the Town's planning work program and budget planning processes. This unexpected shift has disrupted established priorities, resulted in missed opportunities to secure additional staffing resources and created ambiguity around future budget requirements. In light of these impacts, the Town will require time to reassess its resourcing needs, reallocate internal capacity and re-establish planning priorities in alignment with the revised provincial direction.

Consideration should also be given to timing and upcoming municipal election processes with potential for lame duck periods.

3. How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?

To support a successful transition, the following could be considered:

- Clarifying the applicable section of the Planning Act under which new Official Plans are to be prepared. If updates are to proceed under Section 26, municipalities would benefit from exemption from Ontario Land Tribunal (OLT) appeals, allowing plans to come into effect more efficiently. Without this clarity, there is a risk that new plans could be delayed due to appeal processes.
- Provide list of what is permitted/required for complete application for all types of applications
- Providing standardized templates, model policies, and formatting guidance to reduce administrative burden and ensure consistency.
- Providing support for municipalities on specific and technical planning policy issues for example, Natural Heritage Systems and addressing the policy gap for species protection created through the change of remit to Conservation Authorities through Bill 23.
- Hosting workshops, webinars, and peer learning sessions to support municipal staff in understanding and applying the new framework.

- Ensuring timely and transparent communication about expectations, deadlines, and available supports.

E. Submission of Official Plans through Online Portal

Regulations under the Planning Act specify the way information and material can be submitted to the Ministry of Municipal Affairs and Housing as part of a planning matter (e.g., by personal service, mail, fax or email). In line with the digital-first approach, the government is considering regulatory changes to allow the submission of official plan information and documents to the Ministry of Municipal Affairs and Housing through an online portal.

Discussion Questions:

1. Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?

The Town strongly supports this move as it aligns with modern practices and improves efficiency, tracking, transparency and standardization.

2. What benefits and/or risks do you foresee from transitioning to submission through an online portal?

It will be important to ensure robust cybersecurity, user training, and contingency plans for technical issues. Alternative submission methods and technical support should be available during transition.

Attachment No. 3:

Response to ERO 025-1100 – Consultation on Minimum Lot Sizes

Comment timelines: October 23, 2025 - November 22, 2025 (30 days)

The Ministry of Municipal Affairs and Housing (the Ministry) has initiated a public consultation under the Environmental Registry of Ontario (ERO 025-1100) to explore the relationship between minimum lot size requirements on urban residential lands and their impact on housing options, affordability, and access to homeownership. This consultation is part of the broader legislative and regulatory review associated with the *Fighting Delays, Building Faster Act, 2025*.

The Ministry is seeking feedback to better understand the linkage between minimum lot sizes on urban residential lands and increased housing options and affordability. The Ministry is seeking input to the following questions:

1. What are your thoughts on the benefits and/or risks associated with reducing or removing minimum lot size requirements in low-density urban residential areas to encourage gentle density, increase housing supply, broaden housing options and encourage home ownership?

To support increased housing supply, diversify housing options, enhance affordability, and promote intensification, the Town of New Tecumseth passed a comprehensive update to its Zoning By-law in 2021. As part of this review, minimum lot size requirements were reduced to the lowest feasible size. These reductions were considered in the context of municipal servicing capacity, stormwater management, snow storage and local parking needs.

The updated Zoning By-law permits, as-of-right, a range of low-rise residential uses (provided in Appendix A). Through a later house-keeping amendment, the Zoning By-Law has been aligned with the Planning Act provisions for Additional Residential Units (ARUs).

Further reductions or the complete removal of minimum lot sizes would need to consider the following:

- Existing infrastructure and servicing capacity;
- Landscaped Open Space is critical for drainage and snow storage and a reduction may result in adverse impacts to stormwater management and storage availability;
- Limitations on driveway dimensions and parking availability may exacerbate existing street parking challenges particularly in the context of the Parking and Traffic By-Law which restricts overnight parking during the winter for the purposes of snow removal;
- Compatibility concerns with existing neighbourhood character e.g. the Beeton Heritage Conservation District;
- Without appropriate safeguards and standards, such changes could lead to a reduction in privacy and amenity space, overdevelopment and a diminished quality of life for residents.

Overall, the Town of New Tecumseth is supportive of the objectives outlined in Provincial Planning Statement of creating complete communities and the promotion of compact built form. However, any consideration of reducing or removing minimum lot size requirements must be balanced with practical implementation challenges including servicing capacity, infrastructure limitations and the need to maintain neighbourhood character, livability and quality of life.

A better approach might be to encourage municipalities to remove the zone categories of urban residential zones that split housing into different categories by density or built form. Instead, the Province should encourage more uniform zoning across the urban areas to allow for housing in relevant zones and simply add some parameters to help guide where high-rise buildings should be located. In all other cases, require a range and mix of housing types to be provided so we no longer have homogenous residential neighbourhoods.

2. What are best practices observed in other jurisdictions that have introduced minimum lot size reforms?

The Town has already minimized lot size requirements for Low-Rise Residential Zone (as provided in Appendix A) in addition to permitting as-of-right the Additional Residential Units as provided in the Planning Act. A number of building types are permitted within the Low-Rise Residential Zone which are applicable to the relevant provision of the zone.

The Town has also adopted Urban Design Guidelines which provides high-level guidance on infill and intensification which maintain practical considerations whilst supporting high-quality urban development. Best practices for planning should align lot sizes with servicing capacity and infrastructure availability whilst also integrating high-level urban design principles, quality of life considerations, and practical elements such as drainage, snow storage, and parking.

There are significant opportunities for intensification through the identification of Strategic Growth Areas. These areas can benefit from a streamlined development approvals framework e.g. the use of Community Planning Permit Systems (CPPS) to facilitate higher-density and compact built forms. Supporting municipalities in identifying these areas and assessing servicing capacity would be key to enabling efficient development and use of land.

3. Are there any circumstances where having established minimum lot sizes in municipal zoning by-laws for low-density urban residential parcels are absolutely necessary with respect to the provision of transportation, infrastructure, or upholding public health and safety?

Minimum lot sizes remain essential in certain contexts to uphold public health and safety as well as other practicalities and requirements. These include:

- Ensuring sufficient landscaped open space for snow storage and stormwater drainage;
- Providing adequate driveway width and on-site parking as to not exacerbate street-parking issues particularly where public transit is not available and overnight parking by-laws are in effect;
- Providing sufficient land to mitigate on-site hazards including flood hazards and erosion hazards;
- Providing sufficient land to mitigate impacts to Natural Heritage System features and the Environmental Protection (EP) zone;
- Ensuring sufficient amenity space for health and wellbeing including cash-in-lieu of parkland to establish parks of a sufficient size to provide common open space for residents in areas where they have little to no outdoor space.

4. Given the Ontario context and the government's permissions for additional residential units, what do you suggest should be the smallest size urban residential lot in terms of lot area, frontage or depth (i.e. six metre frontage, 200 square metre area, etc.) What would be the opportunities and limitations? How would these standards work together?

Two examples of a 200 square metre lot overlaid in a blue box with existing residential developments within the Town are provided for reference in Figures 1 and 2.

Based on the Town's experience, Additional Residential Units within Low-Rise Residential Zones are most commonly developed as basement apartments with some Additional Residential Units as detached units where lot sizes are larger. To support safe and functional intensification, minimum lot dimensions should consider:

- Adequate access for emergency services. The Town currently requires an unobstructed walkway of 0.6m to allow access for emergency services. This provision was developed in collaboration with the Town's Emergency Services;
- Compliance with Ontario Building Code (OBC) standards and encouraging new developments to create basements that already meet the OBC requirements for Additional Residential Units for example access and egress to reduce the onus and cost on homeowners;
- Sufficient space for driveways and parking, especially in areas without public transit and municipalities that restrict overnight parking during the winter for the purposes of snow removal. Consideration could be given to communal parking areas for new developments or using under-utilized community uses during off peak hours.
- A supportive framework for laneway housing including supporting municipalities with the challenges for implementation e.g. laneway maintenance and emergency services access.

Promoting Urban Design Guidelines can be an effective tool to guide infill development, provided they are not overly prescriptive such as the [Town's Urban Design Guidelines](#). A balanced approach should be taken to the high-level application of urban design principles to allow flexibility for innovation while addressing practical considerations such as servicing, parking and access. This could be considered under a CPPS-style framework.

Clarity on studies and requirements for developments located in prescribed areas as specified in O. Reg. 254/23: PRESCRIBED AREAS - SECTION 41 OF THE ACT, e.g. within 300 metres of a railway line. This applies to developments with ten or fewer residential units. In these prescribed areas, relevant studies, e.g. noise and vibration assessments, may be required through a scoped development agreement or a streamlined site plan approval process rather than full site plan approval. Greater clarity and consistency in the application of these requirements would help municipalities and applicants navigate the process more effectively and streamline the development approvals process.

5. What other zoning requirements or performance standards could be needed to support any reduction or removal of minimum lot size requirements on low-density urban residential parcels (i.e., additional residential units, multiplexes, parking requirements, lot coverage, height and density etc.)?

To support reduced or removed minimum lot size requirements, the following zoning and performance standards should be considered:

- A clear definition of Overdevelopment in the Provincial Planning Statement and any implementing regulations;
- Lot coverage limits to prevent overbuilding e.g. 50% would maintain open space and driveway standards;
- Height provisions that reflect the Low-Rise Residential character e.g. up to three storeys;
- Setback requirements to ensure residential amenity, privacy and access to light;
- Parking standards tailored to transit availability, active transportation and overnight parking by-law;
- Minimum landscaped open space to support drainage, snow storage and amenity;
- High-level Urban Design Guidelines for infill and multiplex development to ensure compatibility and high-quality neighbourhoods;
- Parkland dedication standards to offset reduced private outdoor space and facilitate larger parkland areas within the first stages of a development;
- Standards relating to urban tree canopy in residential areas as relying on parks and right-of-way planting may not create a cohesive canopy;
- Support for intensification and Strategic Growth Areas including implementation support of CPPS frameworks.

These standards will help ensure that intensification contributes to complete communities and a compact built form.

Figures

Figure 1:



Figure 2:



SECTION III ZONES

3.1 Urban Residential Zones

The urban residential zones have the following permitted uses:

LR Low-Rise Residential Zone

Permitted Uses:

- Additional Residential Units
- Bed and Breakfast Facilities
- Block Townhouse Dwellings
- Boarding Houses
- Duplex Dwelling
- Existing Residential Uses
- Fourplex Dwellings
- Semi-Detached Dwellings
- Single Detached Dwellings
- Special Needs Housing, in a built form otherwise permitted in this zone
- Stacked Townhouse dwellings
- Street Townhouse Dwellings
- Triplex Dwellings

MR Mid-Rise Residential Zone

Permitted Uses:

- Apartment Buildings
- Back-to-Back Townhouse Dwellings
- Block Townhouse Dwellings
- Boarding Houses
- Park Space
- Restaurants, but not including Drive-Through Service Facilities, where located on the main floor of a mixed use building
- Retail Uses, where located on the main floor of a mixed use building
- Service Commercial Uses, where located on the main floor of a mixed use building
- Special Needs Housing, in a built form otherwise permitted in this zone
- Stacked Townhouse Dwellings

HR High-Rise Residential Zone

Permitted Uses:

- Apartment Buildings
- Park Space
- Restaurants, but not including Drive-Through Service Facilities, where located on the main floor of a mixed use building
- Retail Uses, where located on the main floor of a mixed use building
- Service Commercial Uses where located on the main floor of a mixed use building
- Special Needs Housing, in a built form otherwise permitted in this zone

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LR Low-Rise Residential					
Single detached / Duplex dwelling	Semi-detached dwelling	Triplex dwelling, fourplex dwelling	Street townhouse dwelling	Block townhouse dwelling	Stacked townhouse dwelling

LOT SIZE/BUILDING HEIGHT	Minimum lot area	270 m ²	270 m ² per dwelling unit	465 m ²	225 m ² per dwelling unit	200 m ² per dwelling unit	130 m ² per dwelling unit
	Minimum lot frontage	10.0 m	9.0 m per dwelling unit, except for a corner lot where the minimum lot frontage is 12.0 m	15.0 m	6.0 m per dwelling unit, 7.2 m for an end unit abutting an interior side yard, and 9.0 m for an end unit abutting an exterior side yard maximum 8 units per row	30.0 m	30.0 m
	Lot coverage by all buildings	Maximum of 50%					
	Maximum building height	3.5 storeys, or 11.0 m, whichever is less					

YARDS	Front yard setback	<i>Build-within zone</i> - 4.5 m to 7.5 m; except for an attached garage where the minimum <i>front yard setback</i> for the garage is 6.0 m Alternatively, a dwelling built between two (2) existing dwellings, within 60.0 metres of each other on the same side of the <i>street</i> and within the same block, may be built with a minimum <i>front yard</i> equal to the average of that of those adjacent dwellings, to a minimum of 3.0 m.
	Interior side yard	Minimum 1.2 m, however one interior side yard may be reduced to 0.6 m
	Exterior side yard	<i>Build-within zone</i> - 3.0 m to 4.5 m
	Rear yard	Minimum 7.5 m

PARKING/OPEN SPACE	Width of garage	Maximum of 50% of the width of the lot, measured 6.0 m from the <i>front lot line</i>
	Garage projection	No garage shall project beyond the <i>main front wall</i> of the dwelling.
	Landscaped open space	Minimum of 50% of the <i>front yard</i> and <i>exterior side yard</i> shall be <i>landscaped open space</i>



		MR Mid-Rise Residential			HR High-Rise Residential
		Block townhouse dwelling	Stacked/back-to-back townhouse	Apartment building	
LOT SIZE/BUILDING HEIGHT/GFA	Minimum lot area	200 m ² per dwelling unit	130 m ² per dwelling unit	100 m ² per dwelling unit	85 m ² per dwelling unit
	Minimum lot frontage	30.0 m			30.0 m
	Lot coverage by all buildings	Maximum of 50%			Maximum of 50%
	Building height	Maximum 6 storeys, or 20.0 m, whichever is less. However, buildings taller than 11.0 m shall be subject to the application of an angular plane where the property abuts the LR zone. No building shall exceed the height as defined by the angular plane.			Minimum 6 storeys, or 20.0 m, whichever is greater Maximum 12 storeys, or 36.0 m, whichever is less. However, buildings taller than 20.0 m shall be subject to the application of an angular plane. No building shall exceed the height as defined by the angular plane.
	Angular plane requirement	An angular plane is 45 degrees, measured 7.5 m above any rear lot line and any interior side lot line that abuts a LR Zone.			An angular plane is 45 degrees, measured 7.5 m above any rear lot line and any interior side lot line that abuts a LR or MR Zone.
	Gross floor area	All Retail Uses and Service Commercial Uses shall have a maximum gross floor area of 350 m ² . All Restaurants shall have a maximum gross floor area of 100 m ² .			All Retail Uses and Service Commercial Uses shall have a maximum gross floor area of 350 m ² . All Restaurants shall have a maximum gross floor area of 100 m ² .
YARDS	Front yard setback	Build-within zone - 4.5 m to 7.5 m; except for an attached garage where the minimum front yard setback for the garage is 6.0 m.			Build-within zone - 4.5 m to 7.5 m
	Interior side yard	Minimum 3.0 m			Minimum 4.5 m
	Exterior side yard	Build-within zone - 3.0 m to 7.5 m			Build-within zone - 4.5 m to 7.5 m
	Rear yard	Minimum 7.5 m			Minimum 12.5 m

PARKING/OPEN SPACE	Location of parking area	May not be located in the front yard , except for a lane or driveway	May not be located in the front yard , except for a lane or driveway
	Width of garage	Maximum of 60% of the width of the dwelling unit, measured 6.0 m from the lot line	-
	Garage projection	No garage shall project beyond the main frontwall of the dwelling.	-
	Landscaped open space	Minimum of 7.5% of site area	Minimum of 7.5% of site area
		Minimum of 50% of the front yard and exterior side yard shall be landscaped open space	Minimum of 50% of the front yard and exterior side yard shall be landscaped open space
	Amenity space	Lots with fewer than 5 dwelling units – n/a	Lots with fewer than 5 dwelling units – n/a
Lots with 5 or more dwelling units - a minimum of 3.0 m ² per dwelling unit plus 2.0 m ² for the second bedroom and each additional bedroom in the dwelling unit		Lots with 5 or more dwelling units - a minimum of 3.0 m ² per dwelling unit plus 2.0 m ² for the second bedroom and each additional bedroom in the dwelling unit	
Landscaped buffer	Required along any rear lot line and any interior side lot line abutting a LR zone	Required along any rear lot line and any interior side lot line abutting a LR or MR zone	

Attachment No. 4:

Response to ERO number 025-1101: Consultation on Enhanced Development Standards – Lot Level (outside of buildings)

Comment period: October 23, 2025 - November 22, 2025 (30 days)

As part of legislative and policy changes under the Fighting Delays, Building Faster initiative, the Ministry of Municipal Affairs and Housing (MMAH) is seeking input on the use of enhanced development standard at the lot level, specifically outside the building envelope. For example, this could apply to green development standards that are required by only some municipalities, and not in a consistent manner. This consultation aims to better understand current municipal practices, and assess what future policy guidance, regulatory or legislative changes are needed to streamline, standardize, and prohibit the mandatory use of enhanced development standards while continuing to ensure health and safety.

While there is no definition of enhanced development standards in the Planning Act or the Provincial Planning Statement 2024, these matters may include: requirements for features such as bioswales, permeable pavement, and other vegetative elements, and direction around matters such as native tree planting and soil volume, and bicycle parking but are not limited to such items.

Enhanced development standards at the lot level can vary across jurisdictions, which may result in inconsistent requirements, added costs, and complexity for builders working in multiple municipalities.

The government is seeking feedback on the following questions:

1. What is your interest in and/or experience with the implementation of enhanced development standards at the lot level (outside of buildings)? For example, are you a municipal staff member, homebuilder, planner, Indigenous representative, or member of the public?

These comments are submitted on behalf of the Town of New Tecumseth, a lower-tier municipality within the County of Simcoe.

2. In your experience, are enhanced development standards applied consistently across municipalities? Please provide examples where possible.

The approach to Green Development Standards is varied across municipalities. The Town does not currently have Green Development Standards in effect. However, in order to fulfill the objectives of the Community Climate Action Plan to reduce greenhouse gas emissions and address the impacts of a changing climate, the Town has considered the implementation of Green Development Standards.

Those standards could be applied more consistently when applied at the regional level of planning whilst allowing flexibility to accommodate local contexts. Existing certifications such as LEED, Energy Star, and Net Zero Ready offer recognizable frameworks that could be more actively promoted. However, verifying these credentials and managing their implementation may place additional demands on municipal resources.

The Province could standardize a green development program to address the impacts of a changing climate which is a requirement for municipalities under Section 2.9 of the Provincial Planning Statement. This would be particularly helpful for municipalities with limited resources. Leveraging existing certification systems could streamline implementation and reduce administrative burden.

The parameters of the template could be largely applied across municipalities whilst leaving scoped opportunities to address local contexts that may require a more tailored approach. Support for innovation and emerging technologies should also be prioritized to ensure the standards remain forward-looking and adaptable.

3. What types of standards, should municipalities be allowed to apply outside of buildings and how do these requirements maintain the health and safety of the site if at all?

Section 2.9 of the Provincial Planning Statement provides policy direction that planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate, including through approaches that promote green infrastructure, low impact development, and active transportation.

The building sector is a significant contributor to greenhouse gas emissions and urban environmental impacts. Lot-level standards such as tree planting, urban canopy cover, permeable surfaces, and low-impact stormwater management are essential tools for climate adaptation and mitigation and should be able to apply.

4. Do you / your organization have information about the short- and long-term costs of enhanced development standards at the lot level?

This question has been considered in the wider context of climate change and reducing greenhouse gas emissions. When investing in climate action, the costs of action versus inaction need to be weighed. The increased costs of climate change present a serious fiscal and logistical challenge for municipalities, particularly for those with limited budgets and capacities. However, without immediate action, these costs will only increase, and threaten funds and resources needed for maintaining and operating critical services and addressing existing and emerging priorities. Investing in reducing GHGs, mitigating and adapting to climate change will reduce long term costs and expensive retrofitting for residential, commercial and municipal buildings in the future.

Rising cost of living is likely to shift the market towards homes that prioritise energy efficiency and cost savings such as micro-generation technology and high-efficiency HVAC systems. Building to certifications such as LEED, Energy Star and Net Zero Ready are likely to become desirable selling points. Homes built to green standards are increasingly seen as future-proof investments by buyers, and market interest in these features is growing across Ontario.

Enhanced development standards represent a strategic investment and support municipalities to protect public health and ensure long-term affordability and livability. We encourage the Province to support a template approach or standardized and technical guidance to municipalities and the development industry to ensure their successful implementation.

5. Do you have any additional comments or suggestions relating to site plan control or other related subjects?

The Town supports the Provincial aim to streamline development approvals process and standardize application requirements. With this in mind, the Town recognizes the value of enhanced standards in achieving long-term resiliency for new developments and mitigating the long-term costs associated with adapting to climate change in the future and responding to extreme weather events. The Province should consider supporting municipalities with guidance and funding to implement these standards effectively including relying on existing certification programs.