



City of Hamilton Report for Consideration

To: Chair and Members
Planning Committee

Date: January 13, 2026

Report No: PED26021

Subject/Title: City of Hamilton Response to Environmental Registry of Ontario Posting 025-1099 - Consultation on Simplifying and Standardizing Official Plans

Ward(s) Affected: City Wide

Recommendations

- 1) That the submissions and recommendations as provided in Report PED26021 regarding Environmental Registry of Ontario Posting 025-1099 – Consultation on Simplifying and Standardizing Official Plans, attached as Appendix A to Report PED26021 **BE APPROVED**; and,
- 2) That the Director of Planning and Chief Planner **BE DIRECTED** to confirm the submissions made to the Province attached as Appendix A to Report PED26021.

Key Facts

- On October 23, 2025, the Province made a posting on the Environmental Registry of Ontario seeking feedback on changes being considered to simplify and standardize the contents of Official Plans by imposing province-wide parameters on what can and cannot be included.
- This request for input was introduced at the same time as *Bill 60, Fighting Delays, Building Faster Act, 2025* and is part of broader efforts by the Province to streamline construction of new homes (among other matters) through making changes to the policy, legislation and regulation governing land use planning.
- The changes being contemplated by the Province to Official Plans include elimination of Secondary Plans and Area Specific Policies, a standardized table of contents and land use schedules, standardized land use designations and

land use permissions, and instituting page and word limits. If implemented, these changes would fundamentally change how both the Urban and Rural Hamilton Official Plan function.

- The deadline for comments was November 22, 2025. Given the timing, staff level comments have been submitted to the Province, which are in Appendix A.

Financial Considerations

At this time there are no immediate financial impacts associated with the recommendations contained in Report PED26021.

Background

On October 23, 2025, the Province posted on the Environmental Registry of Ontario (025-1099) seeking feedback on changes to simplify and standardize the contents of Official Plans by imposing province-wide parameters on what can and cannot be included. The deadline for comment was November 22, 2025.

Prior to this posting the Province identified in a Technical Briefing published on May 12, 2025 associated with Bill 17, *Protect Ontario by building Faster and Smarter Act, 2025* that the Ministry of Municipal Affairs and Housing would be consulting on proposed legislative/regulatory changes to establish simplified, standardized and inclusive land use designations with more permitted uses.

Analysis

An Official Plan is the central planning document to guide all land-use decisions. In addition to establishing a long-term vision (20+ years) for the municipality, an Official Plan identifies where new housing, employment areas, parks, and infrastructure will be located and addresses the impacts of development, including land use compatibility and effects on the built and natural environments. The Official Plan is described in the Provincial Planning Statement as being “the most important vehicle for implementation of the Provincial Planning Statement and for achieving comprehensive, integrated and long-term planning”.

Staff Response to the Contemplated Provincial Standardization Framework

Detailed staff level comments on each question within the Environmental Registry of Ontario posting is attached as Appendix A. These comments were submitted to the Environmental Registry of Ontario before the deadline of November 22, 2025. Following this submission staff added two additional comments which are identified in Appendix A.

Overall, staff support provincial efforts to simplify Ontario’s complex land use planning system to make it easier for everyone to understand and participate in planning matters. Staff recommend the use of Provincial guidelines instead of prescriptive legislative or regulatory requirements to achieve this objective. The benefits of guidelines include:

- Flexibility for a local planning authority to work with residents and the private sector to develop new and innovative policy solutions to address land use planning issues – including the testing of new housing forms;
- Clarity to local planning authorities on what should and should not be included in an Official Plan; and,
- Recognition that Ontario municipalities are diverse in size, geography, and population, and provides flexibility beyond a ‘one size fits all’ approach.

The Environmental Registry of Ontario posting introduces and requests input on several significant changes to how Official Plans would look and function. A summary of staff’s response to the posting’s discussion questions are included below.

1) Removing and/or Limiting Development Standards in Official Plans

The Province is considering removing or limiting the ability of Official Plans to include specific development standards like maximum building heights, densities, floor areas and lot coverages. If limited or eliminated, these development standards may still be implemented through the Zoning By-law; however, without specific Official Plan policies those Zoning By-law regulations are more open to interpretation and amendment.

The Urban Hamilton Official Plan has development standards limiting the maximum height of buildings for different land use designations and in relation to the Niagara Escarpment as well as maximum floor areas for some uses. For example, the Urban Hamilton Official Plan limits major office buildings (greater than 4,000 m²) outside the Downtown and other strategic growth areas. Development standards in the Rural Hamilton Official Plan include minimum lot areas for rural residential and agricultural lots that enable sustainable servicing and economically viable agricultural operations.

Staff Response: Staff agree that specific development standards should be used sparingly to avoid duplication with the Zoning By-law and avoid unnecessary site-specific Official Plan Amendments. However, staff do not support outright removal of these development standards and support municipalities having flexibility to determine where they are necessary. The benefits of the inclusion of specific development standards include:

- Infrastructure Master Planning - General massing policies are necessary for the City to accurately model and forecast future population, household, and employment growth for its infrastructure Master Plans.
- Zoning By-law Implementation - Official Plans play a critical role in providing direction in the introduction of new or updated zones and zoning regulations. Clear Official Plan direction provides the necessary context to enable zoning to be implemented that is contextually appropriate, consistently applied, and defensible.

2. Removing Secondary Plans and Site-Specific Policy Areas

The Province is considering prohibiting the use of secondary or site-specific plans in municipal Official Plans. For Hamilton this would result in the removal of Volume 2 and 3 of the Rural and Urban Hamilton Official Plan which contain the following:

- | Urban Hamilton Official Plan | Rural Hamilton Official Plan |
|----------------------------------|---------------------------------|
| • 31 Secondary Plans | • 20 Rural Settlement Areas |
| • 116 Site-Specific Policy Areas | • 50 Site-Specific Policy Areas |

Staff Response: Staff strongly opposes removal of both secondary and site-specific plans or policies from Official Plans. Secondary Planning is the most effective land use planning tool municipalities use to plan and deliver both residential intensification and complete greenfield communities. In addition to providing clarity and certainty to landowners and residents on where intensification is planned, Secondary Plans are adopted in conjunction with new or updated infrastructure master plans to ensure that sufficient hard and soft services are delivered to enable development. Without this coordinated investment the cost to upgrade local infrastructure can fall on individual developers which in turn can make new development not feasible. Secondary Plans are a tool to proactively make it easier and faster for new housing to be built.

In response to concerns raised by the development industry that housing delivery can be delayed by lengthy approval timelines for Secondary Plans for greenfield areas, staff recommend that the guidelines also establish a timeframe by which these secondary plans should be approved (e.g. under two years from initiation).

3. Standardization of Official Plan Table of Contents, Length, Land Use Designations and Land Use Schedules, Overlays and Data

The Province is considering standardizing how each Official Plan looks and functions including table of contents, land use designations (e.g. the same land use permissions in all low, medium and high-density residential designations province-wide) and land use schedules. The Province is also considering instituting page and word limits.

Staff Response: Staff support the Province providing guidance, not standards, on the table of contents, land use designations and schedules, overlays and data that should be required at a minimum in new or updated Official Plans. As discussed throughout the staff submission, each municipality has unique local conditions or constraints which necessitate modifications from province-wide standards to effectively manage and enable growth.

4. Transitioning to a New Framework

The Province had requested input on how municipalities can transition to a standardized Official Plan framework, including what is a realistic timeline for municipalities to update their Official Plans to comply with a standardized framework.

It is important to note that under the *Planning Act* municipalities must update Official Plans 10 years after their initial adoption and every five years after that to ensure that local Official Plans remain consistent with Provincial policy.

Staff Response: Staff commented that proceeding with standardization in the short term will likely result in municipalities delaying Official Plan reviews that are currently underway due to the risk of having to redo work already completed at significant time and expense to be aligned with new Provincial direction. This may include pausing current planning work underway to increase housing supply for planning authorities to reformat official plans.

If the Province proceeds with a standardized framework, staff recommended municipalities have the option to apply any new adopted framework to their next Official Plan review or within 5 years of adoption of the framework. Meaning that if a municipality is required to update its Official Plan in the next two years, the framework apply to the legislated review after the current review. This will enable faster updates to Official Plans to be consistent with the new Provincial Planning Statement.

Implications for Future Official Plan Reviews

The City of Hamilton has historically completed *Planning Act* mandated Official Plan reviews in phases based on topic (e.g. Urban, Rural, Natural Heritage System, Employment, etc.). The following Official Plan reviews are currently planned or underway:

- Major Transit Station Areas – Near Completion
- Employment Land Review – Underway
- Local Objectives Review (Medium & High Density Residential) – Underway
- Rural & Natural Heritage System Review – Project Scoping

As noted in the staff submission, implementing a mandatory, standardized Official Plan framework would alter the form and function of Hamilton's Official Plans. The proposed approach would constrain the City's ability to establish land use policies that respond to Hamilton's distinct geography, local conditions, and community priorities. Eliminating Secondary Plans would reduce the City's ability to engage in neighbourhood-scale planning and to coordinate delivery of infrastructure and services essential to complete communities. Furthermore, it is uncertain whether the standardized framework would permit Hamilton to retain its separate Urban and Rural Official Plans in the future.

Should the Province enact an Official Plan framework, staff will report back to Planning Committee and Council discussing the implications of the framework.

Alternatives

Council may amend the staff-level comments submitted to the Province contained in Appendix A or supplement the staff-level comments with additional comments.

Relationship to Council Strategic Priorities

Priority 1: Sustainable Economic & Ecological Development

- 1.2: Facilitate the growth of key sectors.

Priority 2: Safe & Thriving Neighbourhoods

- Increase the supply of affordable and supportive housing and reduce chronic homelessness.

Previous Reports Submitted

Not applicable.

Consultation

The Environmental Registry of Ontario posting was circulated to the Growth Management, Transportation Planning, and Economic Development Divisions, Office of Climate Change Initiatives, Building Division, Indigenous Relations, Legal Services, Housing Services, Housing Secretariat, Healthy Environments, Environmental Services, Hamilton Water, Fire and Protective Services and Financial Planning Administration and Policy Divisions for comment. All input received has been incorporated into the staff level submission provided in Appendix A.

Appendices and Schedules Attached

Appendix A: City Staff Comments on Environmental Registry of Ontario Posting 025-1099 - Consultation on Simplifying and Standardizing Official Plans

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Submitted and recommended by: Anita Fabac, Acting Director of Planning and Chief Planner, Planning and Economic Development Department