



**City of Kingston
Report to Council
Report Number 25-264**

To: Mayor and Members of Council
From: Paige Agnew, Commissioner, Growth & Development Services
Resource Staff: Tim Park, Director, Planning Services
Date of Meeting: November 18, 2025
Subject: Provincial Consultation on Simplifying and Standardizing Official Plans (ERO 025-1099)

Council Strategic Plan Alignment:

Theme: 1. Support Housing Affordability

Goal: 1.1 Promote increased supply and affordability of housing.

Goal: 1.2 Promote increase in purpose-built rental housing.

Goal: 1.3 Increase supply of new-build not-for-profit and co-op housing and ensure sustainability of existing stock.

Theme: 2. Lead Environmental Stewardship and Climate Action

Goal: 2.2 Support climate action and sustainability for residents, businesses and partners.

Goal: 2.3 Maintain the City's natural heritage and environmental assets.

Theme: 3. Build an Active and Connected Community

Goal: 3.1 Expand parks and recreation opportunities and participation.

Goal: 3.2 Beautify City streets and spaces.

Goal: 3.3 Improve public transit and active transportation options.

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Goal: 3.4 Improve road condition, performance and safety.

Theme: 4. Foster a Caring and Inclusive Community

Goal: 4.1 Enhance community safety and well-being.

Goal: 4.2 Help address food insecurity and sustainability.

Goal: 4.3 Increase access to healthcare professionals and services.

Goal: 4.4 Celebrate and enable civic engagement.

Goal: 4.5 Promote and support diversity.

Theme: 5. Drive Inclusive Economic Growth

Goal: 5.1 Ensure an adequate supply of "ready-to-go" employment lands.

Goal: 5.2 Evaluate policies, programs and services to support the use of the airport.

Goal: 5.3 Diversify Kingston's economic base

Goal: 5.5 Continue to enhance Kingston as a tourist destination.

Goal: 5.6 Consider opportunities to enhance sports tourism.

Goal: 5.7 Foster culture, history, education, arts and recreation (CHEAR).

Goal: 5.8 Explore opportunities to support Kingston as a destination for the entertainment and film industry.

Goal: 5.9 Explore opportunities to develop live-work spaces for artistic professionals.

Goal: 5.10 Ensure the downtown remains vibrant.

Executive Summary:

The purpose of this report is to get direction from Council on comments in response to the Province's Environmental Registry of Ontario (ERO) posting [025-1099](#), titled "Consultation on simplifying and standardizing official plans." The posting sets out the Province's intentions to significantly reframe the structure, content, and level of detail of municipal official plans in Ontario, with an emphasis on simplification, standardization, and alignment with the provincial objective of accelerating housing and infrastructure delivery. The ERO posting proposes to standardize the content, structure, length, schedules, and land use designations of municipal official plans, to limit development standards within official plans, and to move toward a single, comprehensive plan without secondary or site-specific plans. While the ERO posting had a 60-day commenting deadline of December 22, 2025, when it was originally posted, at some point

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the ERO posting was revised without notice to a 30-day deadline of November 22, 2025. Staff originally planned to report to Council at a December meeting, but with this changed deadline, staff have rushed the timing of this report to ensure it can be considered by Council before the revised commenting deadline.

The First Draft of Kingston's new Official Plan, released in August 2025 and now under active public consultation, plans for growth from approximately 154,100 residents in 2021 to about 220,000 by 2051. It directs growth inward and upward, anchors policy in public interests such as placemaking, equity, housing for all, climate action, transportation choice and rural vibrancy, and has been integrated with the Integrated Mobility Plan and the Water and Wastewater Master Plan so that growth can be supported by well coordinated infrastructure.

Structurally, the First Draft already delivers the kind of simplification and standardization the Province is seeking, but in a more nuanced and locally responsive way. It replaces a 580-page legacy document with an approximately 250 page, plain language plan supported by fourteen maps. Policies are organized into nine coherent chapters and applied primarily through mapped Use and Form Designations, with former secondary plans and site-specific policies consolidated into standard policies. A key innovation is the two layer Use and Form system, including dual use designations, that allows extensive mixing of residential, commercial, institutional and small scale employment uses while providing clear expectations for scale and built form. Growth locations, intensities and phasing are mapped up front so that many development applications become implementation exercises rather than repeated policy debates.

Staff analysis of ERO 025-1099 concludes that Kingston's First Draft achieves the Province's stated goals of shorter, clearer, more permissive and more implementation ready official plans more effectively than the generic ERO template. It demonstrates how a single comprehensive plan can reduce duplication, streamline approvals and support housing and infrastructure delivery without sacrificing local context, climate leadership, economic diversity or rural vitality. Staff support the Province's overall intent to improve clarity, usability and digital consistency, but recommend significant flexibility in how municipal plans meet these outcomes. In particular, staff advise that strict page limits and rigid standardized land use designations could create new red tape, undermine locally innovative approaches such as Kingston's proposed Use/Form system, and impose significant financial and timing impacts on municipalities already well advanced in new official plan and infrastructure planning work.

This report recommends that Council endorse staff comments to the Province that: support a high level standardized chapter framework and mapping conventions with room for local tailoring; oppose hard page or word limits in regulation; urge reconsideration of the proposed standardized land use designations in favour of more innovative models such as Kingston's; confirm municipal discretion to include critical density and height standards where needed; recognize the need for flexible transition timelines and implementation funding; and proceed with digital submission tools in close collaboration with municipalities. Kingston is a forward-thinking and innovative partner that offers a concrete, practical example of the kind of modern, streamlined and housing supportive official plan that the Province is seeking to enable.

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Recommendation:

That Report Number 25-264 regarding Provincial Consultation on Simplifying and Standardizing Official Plans (ERO 025-1099) be received by Council and the comments endorsed; and

That Council direct the City Clerk to submit a request to the Minister of Municipal Affairs and Housing to partner with the City of Kingston on the Simplifying and Standardizing Official Plans (ERO 025-1099) initiative to help deliver an innovative framework for simplified and standardized official plans that achieves Provincial objectives; and

That Council direct the City Clerk to submit a request to the Minister of Municipal Affairs and Housing for clarity regarding planned implementation timelines on the Simplifying and Standardizing Official Plans (ERO 025-1099) initiative so that staff can advise Council on the impact of this Provincial initiative on the new Official Plan schedule and deliverables; and

That Council direct the City Clerk to submit Council's resolution and Report Number 25-264 to the Minister of Municipal Affairs and Housing, the Members of Provincial Parliament (Kingston and the Islands and Lanark-Frontenac-Kingston), and to PlanningConsultation@ontario.ca as the City of Kingston comments on [ERO Number 025-1099](#) before November 22, 2025.

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Authorizing Signatures:

ORIGINAL SIGNED BY COMMISSIONER

**Paige Agnew, Commissioner,
Growth & Development Services**

ORIGINAL SIGNED BY CHIEF

ADMINISTRATIVE OFFICER

**Lanie Hurdle, Chief
Administrative Officer**

Consultation with the following Members of the Corporate Management Team:

| | |
|--|--------------|
| Jennifer Campbell, Commissioner, Community Services | Not required |
| Neil Carbone, Commissioner, Corporate & Emergency Services | Not required |
| David Fell, President & CEO, Utilities Kingston | Not required |
| Desirée Kennedy, Chief Financial Officer & City Treasurer | Not required |
| Jenna Morley, City Solicitor | Not required |
| Ian Semple, Commissioner, Transportation & Infrastructure Services | Not required |

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Options/Discussion:**Background****1) Provincial Planning Statement, 2024**

Originally announced by the Provincial government in November of 2022, the new Provincial Planning Statement, 2024 (the PPS) came into effect on October 20, 2024. Among other matters of provincial interest, the PPS establishes that municipal official plans are the principal vehicle to implement provincial interests, emphasizing compact, mixed-use, transit-supportive growth; optimizing infrastructure and public service facilities; coordinating cross-boundary matters; and integrating environmental, economic, health, and social considerations. Decisions of Council on planning matters must be consistent with the PPS.

2) ERO Posting 025-1099 - Simplifying and standardizing official plans

On October 23, 2025, the Provincial government released an Environmental Registry of Ontario (ERO) posting 025-1099, titled "Consultation on simplifying and standardizing official plans." The posting sets out the Province's intentions to significantly reframe the structure, content, and level of detail of municipal official plans (OP) in Ontario, with an emphasis on simplification, standardization, and alignment with the provincial objective of accelerating housing and infrastructure delivery.

While the ERO posting had a 60-day commenting deadline of December 22, 2025, when it was originally posted, at some point the ERO posting was revised without notice to a 30-day deadline of November 22, 2025. Staff originally planned to report to Council at a December meeting, but with this changed deadline, staff have rushed the timing of this report to ensure it can be considered by Council before the revised commenting deadline. The following sections summarize the content of the ERO posting.

A) Official Plan Structure and Contents

Currently, the content and structure of official plans are unique to each municipality. The ERO posting states that concerns have been raised that official plans in some cases are beyond the scope of land use planning (e.g., history of the municipality, technical details of performance standards) and there is duplication between upper and lower-tier OPs. 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.

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

1. Introduction & How to Use this Plan
2. Municipal Strategic Framework (Vision, Goals, Provincial and Regional Planning Context)
3. Indigenous Engagement & Interests
4. 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)
5. General Policies Applicable to All Designations
 - a. Natural & Human Made Hazards
 - b. Cultural Heritage & Archaeology
 - c. Community Design & Complete Communities
6. Residential and Mixed Uses (range and mix, affordability, inclusionary zoning)
7. Economy & Employment (areas of employment)
8. Infrastructure, Transportation, and Public Service Facilities (transportation, corridors, compatibility, wastewater/stormwater, energy, parks/open space)
9. Natural Heritage, Water Resources, Agriculture & Mineral Resource
10. Implementation & Interpretation (processes, tools, phasing, monitoring, s. 26 update, definitions)
11. Schedules & Appendices (standardized set)

C) 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 (Oak Ridges Moraine Conservation Plan, Greenbelt, Niagara Escarpment Plan, 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.

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D) 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). 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).

E) Creating Permissive Land Use Designations

Currently, land use designations vary from one municipality to the next and some OPs have over 30 different land use designations. The Provincial government is proposing to standardize the number and type of land use designations, with a stated goal of making designations more permissive across Ontario's official plans.

1. 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).
2. 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).
3. 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.
4. 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.
5. 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.
6. 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.
7. 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

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- pipelines, industries, energy generation facilities and transmission systems, and resource extraction activities.
8. 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.
 9. 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.
 10. 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.).

F) Transitioning to a New Framework

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

- Requiring new official plans to comply with a new official plan framework at their next five 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 updating 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

G) 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.

3) Kingston's New Official Plan Project

While the City originally planned to begin the process of preparing a new OP in early 2023, the Provincial government's late-2022 announcement of the creation of the new PPS required the City to put the new OP project on hold in order to ensure that resources were not wasted preparing a new OP under an outdated Provincial policy framework. This meant that the new OP project was delayed by more than 18 months while awaiting the final PPS from the Province.

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When the new PPS came into effect in October of 2024, staff felt confident that work could begin to write a new vision for Kingston's future and began formally writing the First Draft of the new OP based on the new PPS.

As detailed in [Report Number PC-25-044](#), the new OP project is well underway and has been strategically coordinated with the new Integrated Mobility Plan project and the Water and Wastewater Master Plan project to ensure that the planned growth is well coordinated with planning for our vital infrastructure systems. The First Draft of the new OP was released in August 2025, and public engagement has been ongoing throughout the fall. Thus far, public feedback has been positive and supportive of the direction of the new OP project. Revisions and refinements are required to address ongoing public feedback in a Second Draft, but the general feedback has been generally supportive of the structure and approach overall.

Kingston is planning for substantial growth, from about 154,100 residents in 2021 to roughly 220,000 by 2051. The First Draft of the new OP provides a comprehensive framework to strategically embrace this growth. It directs growth inward and upward, protects key natural and cultural assets, and is anchored in public interests such as placemaking, equity, housing for all, complete communities, climate action, transportation choice, and protection and enhancement of the natural heritage system.

Housing, climate leadership, economic prosperity, and rural vibrancy are central themes throughout the First Draft. Housing policies broaden the definition of housing to include missing middle, supportive, Indigenous, student, and co-operative models, and support gentle intensification in established neighbourhoods. Climate action is treated as a guiding principle and is embedded across policies, including a strengthened water resource system section and a "blue belt" concept that anchors resilience in shoreline and watershed protection. Climate related policies promote compact, low carbon growth, green infrastructure, and innovation in construction. Economic policies strengthen Downtown as a mixed-use hub, establish the Western Core as a high-density centre anchored by health and life sciences, expand industrial and business lands to meet projected employment needs, and support a wider mix of uses closer to where people live as complete communities. In the rural area, the Plan encourages diversified rural housing, supports local food systems and agri business, protects prime agricultural areas, and promotes tourism and outdoor recreation, aiming to preserve rural character while fostering rural economic opportunity.

The First Draft of Kingston's new OP introduces a structural and policy framework that is significantly different from conventional municipal plans. It replaces a 580 page amalgam of legacy documents and scattered site-specific policies with a concise, plain language plan supported by a suite of fourteen maps that carry much of the regulatory weight. Policies are organized into nine chapters, from city wide vision through to area-based policies and are applied city wide or area wide via mapped designations rather than through numerous bespoke text sections. Narrative text is used to explain intent, while only numbered policies function as "the rules," and former secondary plans and site-specific policies are folded into the general policy framework.

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A core innovation is the separation of Use Designations and Form Designations into two distinct maps. The Use Map applies permissive, often dual, designations that allow a range of uses to co-exist across broad areas of the city, explicitly supporting a wider mix of housing, shops, offices, and services in complete neighbourhoods. The Form Map then controls height, massing, setbacks, and street interface through a limited set of form types such as Neighbourhood, Low rise, Mid rise, High rise, Main Street, and Industrial. This structure allows the City to “mix and match” uses and forms through mapping, rather than through long, overlapping land use sections, and makes dual use designations a deliberate, innovative tool that reduces red tape and supports broad mixes of uses.

The growth management framework is similarly modernized. Strategic Growth Areas, Protected Major Transit Station Areas, and other intensification nodes are mapped explicitly, bringing together what were previously separate secondary plans and area specific policies into a single, harmonized structure. Growth is deliberately focused along a central spine linking Downtown, Kingston Centre, Midland Crossing, Catarauqui Centre, and the Western Core around a new hospital location, with intensification targets and transit supportive densities embedded as a permeating theme rather than as isolated criteria. This approach is designed to replace reactive, site by site debates about “whether growth belongs here” with a proactive structure that supports growth.

The First Draft also introduces several mechanisms that streamline development applications and reduce the need for proponents to repeatedly justify established directions. Because form, use, and growth intent are mapped up front, the expectation is that a mid rise or high rise proposal in a mapped Mid rise or High rise Form Designation, within a Strategic Growth Area or Protected Major Transit Station Area (PMTSA), is implementing Council’s adopted framework rather than arguing for a fundamental policy shift. The transcript confirms that the intent is to make Planning Committee discussions easier by being “more directive with growth,” so that future applications are understood as fulfilling the plan rather than relitigating it. The plan also anticipates different “classes” of Official Plan amendments, where a change to the form map, in appropriate circumstances, can be processed as a simple amendment rather than a full site-specific policy package.

Finally, the structure deliberately sets the stage for a city-wide community planning permit system and other modern implementation tools. Fourteen maps include, among others, Area Specific Policies and Phasing, and Section 9C of the plan is envisioned as a home for area specific phasing and development requirement policies that tie permissions to infrastructure readiness and bundled conditions. Section 9C is intended to say, for example, that a designated expansion area cannot proceed until specified sewer projects are complete, and that future applications in that area must address a defined set of requirements. Coupled with map based area specific policies, this provides a ready made scaffold for a permit based regime in which permissions and conditions are tied to mapped areas, rather than negotiated repeatedly on a site-by-site basis through lengthy development approvals applications.

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Analysis

1) How the First Draft of Kingston's New Official Plan Better Achieves the Province's Stated Goals than the Proposed ERO Framework

The province's ERO posting on simplifying and standardizing official plans makes clear that its objectives are to create shorter, more strategic, more permissive, and more consistent official plans that are easier to understand, reduce duplication, and support faster delivery of housing and infrastructure. It proposes setting clear parameters for structure and contents, limiting page length, standardizing a small set of land use designations, moving detailed development standards out of official plans and into zoning, and potentially prohibiting secondary or site-specific plans. It also contemplates a standardized suite of schedules and overlays, and a digital first approach to submissions.

The First Draft of Kingston's Official Plan already delivers on many of these objectives in a way that is more nuanced, implementable, and locally responsive than the province's one size fits all template. It has deliberately condensed the current 580 page legacy document into an approximately 250 page, plain language plan that uses a consistent chapter structure and relies on maps as the core organizing device. The plan already functions as a single, comprehensive framework for the municipality, with former secondary plans and scattered site-specific policies integrated into general sections, rather than appended as separate complex sub plans. Importantly, the Plan has been structured to allow for future changes to occur through simple mapping updates that unlock significant permissions through general provisions, with the intent of avoiding lengthy secondary planning processes in the future. In other words, Kingston has achieved the province's goal of a singular, harmonized plan without sacrificing the ability to respond to distinct local contexts.

On land use permissions, the Province proposes a small, standardized set of broad, permissive designations, such as Residential I and II, Mixed Use Areas I and II, Rural Areas, Employment Areas, and so on, applied uniformly across Ontario.

The First Draft achieves the same outcome of flexible, permissive land uses through a more sophisticated pairing of permissive Use Designations and a separate Form Designation system. Dual use designations across large portions of the city, combined with context specific form controls, allow for extensive mixing of residential, commercial, institutional, and small scale employment uses, while still providing clear expectations for scale, massing, and street interface. This is fully aligned with the province's desire for more permissive designations and fewer narrowly defined zones, but it does so in a way that directly supports compatibility, walkability, and complete communities, rather than relying solely on generalized descriptions in the text of the plan.

With respect to process and implementation, the ERO emphasizes the need to streamline approvals and ensure official plans are strategic rather than highly detailed, while recognizing that implementation tools such as zoning, site plans, subdivisions, and community planning permit systems remain critical.

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Kingston's First Draft translates that principle into a concrete, map based framework that substantially reduces the justification burden on individual applications. By mapping where growth goes, what form it should take, and where phasing and area specific requirements will apply, the plan allows most development applications to proceed as implementation exercises rather than as repeated policy debates. The explicit intent is that questions such as "why is this tall building going here" can be answered by pointing to the adopted plan, and that some Official Plan changes can be processed as targeted form amendments rather than full, bespoke site-specific policy packages. This achieves the province's streamlining and predictability goals more effectively than a purely structural template, because it ties the simplification directly to mapped, Council endorsed decisions about growth and form.

The First Draft also anticipates and improves upon the province's direction on secondary plans and standardized schedules. Where the ERO contemplates potentially prohibiting secondary or site-specific plans and replacing them with a standardized set of schedules and overlays, Kingston has already moved in this direction by eliminating existing secondary plans and bringing them into single plan.

This approach retains the benefits of area specific guidance while avoiding the proliferation of separate documents, and is fully compatible with a digital first, portal based submission model because the maps and policies are structured in a way that mirrors the standardized overlays the province is seeking.

Finally, the First Draft provides a more robust platform for tools the province explicitly recognizes, such as community planning permit systems, by unifying permissions, conditions, and phasing in a mapped, area based framework. The combination of Strategic Growth Areas, PMTSAs, Area Specific Policies, and Section 9C phasing and development requirements is already configured to support a permit based regime in which clear, bundled rules apply within mapped areas.

Because this framework has been developed through an integrated process with transportation, water and wastewater, and natural heritage system work, it is better positioned to deliver the province's stated objectives of coordinated, growth-oriented planning than a generic structural overlay that municipalities would then need to reinterpret and retrofit.

In summary, the First Draft does not simply comply with the province's goals, it provides a concrete, locally tailored example of what a simplified, strategic, permissive, and implementation ready official plan can look like in practice.

If the Provincial government proceeds with an Ontario Regulation based on the current ERO posting, this will have an impact on the new OP project schedule and deliverables. Despite all of this, staff intend to continue with the current work plan until such time that a Provincial decision is made. Staff will report back to Council if a Provincial decision is made on this ERO posting.

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2) Staff comments on ERO Posting

A) Overall position

Staff support the Province's objective of improving clarity, usability, and digital consistency of official plans across Ontario, particularly where this can:

- Make policy frameworks clearer for residents and applicants.
- Support faster and more predictable housing and infrastructure delivery.
- Reduce duplication between official plans and technical documents.

Staff are concerned that the initiatives outlined in ERO 025-1099, if implemented without sufficient flexibility and resourcing, may:

- Limit the City's ability to reflect local conditions, community priorities, and Council's strategic directions.
- Create red tape in development approvals processes, where applicants will once again need to justify the existence of growth through protracted debates due to the lack of clarity in standardized land use designations.
- Have a significant financial impact on the City due to changes required in the ongoing Official Plan, and potential knock-on changes required to Integrated Mobility Plan and Water and Wastewater Master Plan projects.
- Have a significant timing impact on the projects identified above, which will delay the City's readiness to support growth with well coordinated infrastructure plans.
- Shift complexity from official plans into other instruments, which may reduce clarity for the public.

2. Standardized structure and content

Staff recommend that the Province proceed cautiously with a standardized high level chapter framework and list of common schedules, provided that:

- References to "Analysis of Market Needs", "Serviced Land Needs", "s. 26 Update", "Estimate of Market Need", "Serviced Land Requirement" are deleted as they are background information that is irrelevant to include in the policies and mapping of an Official Plan.
- Municipalities may tailor chapter substructure and policy emphasis to reflect local context and Council priorities.
- The framework explicitly allows integration of strategic guiding principles such as those found within the Guiding Principles section of the First Draft of Kingston's New Official Plan.
- Confirm that municipalities may retain concise site-specific policies where unique policy guidance is required to guide future development applications, such as the site-specific policies that were just approved by the Ontario Land Tribunal at 2 River Street (OLT-22-04597).

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3. Length limits for official plans

Staff recommend that the Province avoid imposing a strict page or word limit in regulation recognizing that municipalities come in many different sizes and have many different layers of policy considerations as a result of their size, geography, projected growth, infrastructure constraints, economy and unique location-specific needs. Instead, the Province should use non-binding guidance to encourage concise, outcome focused policies.

If the Province proceeds with numeric limits, allow exceptions where a municipality demonstrates that additional content is necessary to respond to complex local conditions or statutory obligations.

4. Standardized and more permissive land use designations

Staff recommend that the Province proceed cautiously with standardized land use designations.

- Rather than proceeding with the standardized designations included in the ERO Posting, staff recommend that the Province review the First Draft of Kingston's New Official Plan to understand that there are more innovative and progressive ways to achieve the stated outcomes. The Province should consider implementing an approach like that within the First Draft of Kingston's New Official Plan that:
 - Uses an innovative two-layer system of Use Designations and Form Designations, with form (height, massing, interface) mapped separately from land use, creating a clear, growth supportive form-based framework instead of one blended land use map that will require significant protracted justifications and lengthy, debated development approvals processes.
 - Enables dual use designations (for example Commercial + Business + Industrial + Institutional) to make mixed use permissions even more flexible and broad than those included in the ERO Posting.
- The Province should clarify and consider how the proposed employment and mixed-use designations will protect a broad range of economic activities. The Province should:
 - Change the terminology from "employment uses" to "industrial uses" to reflect the true intent of Provincial policy and remove the unnecessary confusion caused by the recent changes to the definition of employment areas;
 - Support business activities that are essential to local economies but do not fit a narrow industrial or commercial definition, such as those identified within the "Business Use" designation within the First Draft of Kingston's New Official Plan.
 - Support emerging sectors and knowledge based employment.
 - Support tourism.
 - Support other economic development activities in rural areas.
- Provide explicit flexibility for municipalities to introduce local sub categories or overlays where needed.

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5. Shifting detailed standards out of official plans

Staff recommend that the Province confirm that municipalities retain discretion to include certain critical standards in official plans where this is necessary to be consistent with the PPS, implement directives in the *Planning Act*, express Council's intent, protect the City's financial sustainability and to provide direction to implementing by-laws. For example:

- Density ranges to be consistent with density requirements of the PPS.
- Height and density requirements within Protected Major Transit Station Areas.
- Minimum densities to ensure urban development is fiscally sustainable over its life cycle.
- General height ranges to give guidance to what is meant by low, mid or high-rise buildings.

6. Transition timelines and resourcing

Staff recommend that the Province establish transition timelines that recognize differences in municipal capacity and current work programs, including:

- Grandfathering of municipalities that are mid way through a new official plan process or s. 26 update process or are concurrently implementing PPS 2024 and other major policy changes.
- Flexible options that allow municipalities to phase in the new framework when it can be accommodated by municipal budgets and resourcing constraints.
- Provide implementation support in the form of:
 - Funding to offset staff and consulting costs associated with restructuring plans, mapping, and data.
 - Coordinate the rollout of ERO 025-1099 with other provincial initiatives so that municipalities can budget and sequence their work and public engagement in a logical manner.

7. Digital submission

Staff support the principle of digital submission of official plans and recommend that the Province:

- Develop and test a standard digital submission platform in collaboration with municipalities and planning practitioners.
- Ensure that the platform is compatible with common municipal GIS and document management systems.
- Provide clear and stable data standards for municipalities.

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Public Engagement

Public engagement has been a central component of the City's planning work for more than a year and will continue throughout the new OP project. Engagement has gone beyond legislated requirements under the *Planning Act*, with outreach designed to reach a broad cross-section of residents, community organizations, businesses, institutions, and stakeholders through open houses, workshops, surveys, online tools, and targeted meetings. Feedback received to date has highlighted recurring themes around housing supply, transportation choice, infrastructure capacity, climate resilience, and the protection of natural and cultural heritage, and this input is shaping the ongoing refinement of draft policies and mapping.

Climate Risk Considerations

The new Official Plan and Integrated Mobility Plan projects are two of the most important climate change mitigation and adaptation projects being undertaken by the City. Land use and transportation policy directly shape how people move and where they live and, when well planned, these policies reduce emissions by concentrating daily needs close to home and providing sustainable mobility options. The policies will make it easier to deliver well-connected, complete communities that support a transition to a low carbon city by focusing growth in serviced Strategic Growth Areas, enabling compact mixed-use forms, and prioritizing transit and active transportation alongside green infrastructure and energy efficient buildings. The Official Plan embeds adaptation through watershed and shoreline management, updated hazard mapping, and resilient design expectations that address extreme heat and flooding. For the first time, the new Official Plan and Integrated Mobility Plan projects are explicitly connecting these dots: good land use and transportation policy is climate action.

Indigenization, Inclusion, Diversity, Equity & Accessibility (IIDEA) Considerations

IIDEA considerations are embedded throughout the new OP project, consistent with the City's IIDEA Strategy and Action Plan and the Multi-Year Accessibility Plan. Across all activities, the projects emphasize reducing barriers and elevating underrepresented voices. Engagement efforts are designed to provide multiple entry points for participation, offer accessibility supports, and intentionally include Indigenous people, youth, seniors, people with disabilities, newcomers, unhoused residents, and residents of both rural and urban areas. This included the selection of a Community Advisory Group using an adapted civic lottery that proportionally reflects Kingston's demographics, reduces participation barriers, and provides guidance throughout policy development.

Existing Policy/By-Law

Planning Act

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Financial Considerations

Financial impacts are unknown at this time. Depending on the outcome of the Provincial consultation on this matter, there may be financial impacts associated with needing to revisit or revise certain elements of the new OP project, which may have financial consequences on the Integrated Mobility Plan project and the Water and Wastewater Master Plan project as well.

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Other City of Kingston Staff Consulted:

None

Exhibits Attached:

None