



Friday, December 23, 2022

**To be sent via email to [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca),  
[minister.mah@ontario.ca](mailto:minister.mah@ontario.ca) and the Environmental Registry of Ontario**

The Honorable Steve Clark  
Minister of Municipal Affairs and Housing  
Government of Ontario  
777 Bay Street  
Toronto, Ontario M7A 2J3

Dear Minister Clark,

**RE: Review of A Place to Grow and Provincial Policy Statement (ERO # 019-6177)**

The City of Guelph Planning Staff ("the City of Guelph") appreciates the opportunity to provide comments on the integration of the Provincial Policy Statement ("PPS") and A Places to Grow: Growth Plan for the Greater Golden Horseshoe ("the Growth Plan") into a new province-wide planning policy instrument. The City of Guelph acknowledges the need for more attainable and affordable housing and is generally in agreement with the objective to build more homes faster.

The City of Guelph also acknowledges that the Province is updating the PPS and Growth Plan to reflect the priorities of the current provincial government. Although the Growth Plan does contain targets and forecasts municipalities need to plan to achieve, the PPS does not. Therefore, the City of Guelph is supportive of additional clarity on how targets and forecasts will be incorporated into the new consolidated policy instrument. Further guidance and tools for municipalities from the Province would be beneficial in this regard.

The City of Guelph requests that a balanced tone be presented when integrating the two documents. The PPS is an outcome-focused document that provides greater flexibility and is less prescriptive than the Growth Plan. The City has been in a constant review cycle over the past five (5) years as the province has updated and released multiple amendments and/or updates to A Place to Grow, modified planning horizons and population targets and released a new Provincial Policy Statement in 2020. Staff are supportive of reducing duplication, removing potentially conflicting policy directions, and providing clarity on matters of provincial interest. A Place to Grow is a prescriptive plan that is challenging for municipalities because it presents one approach to planning for a large geographic area and sets growth targets without consultation with municipalities. Staff would be supportive of greater local autonomy through a combined provincial planning framework that respects local growth constraints and fiscal impacts.

The City of Guelph consistently plans for housing supply that meets or exceeds the requirements of the PPS and the Growth Plan for the supply of readily available, serviced, and zoned land for residential units. The City of Guelph continues to support the vision that municipal official plans are the most important tool for implementing provincial policy at the local level and for achieving comprehensive, integrated, and long-term planning that also accounts for local priorities and circumstances. This includes planning for, and building, housing that meets the needs of the local community.

Policy support from the Province to increase local autonomy in the approval and development system is encouraged. This includes empowering local decision-makers to bring lands online more quickly that have already gone through a secondary planning process by exempting these plans from appeal. For example, the City of Guelph is accounting for lands in the Clair-Maltby Secondary Plan to achieve its minimum population forecasts and maintain a consistent supply of housing to 2051. However, this secondary plan, that underwent a multi-year planning process with extensive community consultation, is now under appeal, resulting in costly litigation and delays in homes being built. This secondary plan includes planning for a substantial number of “missing middle” housing developments.

The new planning policy instrument should continue to recognize the importance of an integrated approach between land use planning and infrastructure investment in a manner that is fiscally responsible. Development should remain orderly and proceed in a logical manner that is in direct conjunction with infrastructure capacity and availability so that growth is guided by local decision-making and policy.

The City of Guelph requests that the Province of Ontario consult with municipalities directly on the proposed changes and draft document. In addition, to achieve the objectives of increasing housing supply, the Province of Ontario should aim to review and approve municipal Growth Plan conformity amendments quickly so municipalities can start to achieve their 2051 targets. If more conformity policies are introduced through this new planning policy instrument, this may lead to more procedural requirements and result in more time required before implementation, which could delay new housing.

The Growth Plan’s vision to support the achievement of complete communities should be maintained and guided by local decision-making. A “one size fits all” approach to land use and policy planning across the Province does not recognize municipal variation and could create mismatched land use planning tools to meet the objective of increasing affordable housing supply and complete communities. Cultural heritage, the natural heritage system, and local urban design guidelines add value to the planning process by creating distinct communities that recognize their history while adapting for the future. We would welcome the opportunity to further consult with Ministry staff directly to discuss this new planning policy instrument and to provide additional comments.

In addition to the above comments, the City of Guelph has several questions for the provincial government to consider:

1. How will the new 2031 housing targets fit into this new planning policy instrument? How will the Growth Plan population and employment targets relate to this housing target?
2. Will the Province provide more defined terms in the new planning policy instrument? For example, Policy 1.4.3 of the PPS states that planning authorities shall meet projected market-based needs through an appropriate housing mix but does not define market-based needs.
3. Will the Province require municipalities who have recently completed growth conformity amendments to amend or re-do this work?
4. Will policies for existing Special Policy Areas be maintained?
5. When will municipalities be required to conform or align to the new planning policy instrument?

### **Response to Questions**

1. What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?

As part of the review of the PPS and the Growth Plan, the Province of Ontario has released several core elements and included approaches that would make up this new planning policy instrument. This question response will address each of these approaches that may affect the City of Guelph.

The City of Guelph is concerned that streamlining the boundary expansion process risks additional loss of agricultural lands, including the loss of Prime Agricultural Areas. The average daily loss of farmland, according to data from the latest Census of Agriculture, shows that the Province of Ontario is losing 319 acres of farmland every day. This farmland cannot be recovered. When looking for opportunities to streamline the boundary expansion process, existing settlement area boundary expansion tests should be further strengthened to discourage unnecessary boundary expansions that threaten the Province's agricultural lands. The emphasis on optimizing the use of land within existing urban boundaries through an intensification-first approach should be maintained and will help to preserve agricultural lands.

The City of Guelph requests that the protection and tests for the conversion of Employment Areas contained in the Growth Plan be maintained, including employment lands within the strategically located Provincially Significant Employment Zones. The City of Guelph is concerned that by streamlining the conversion of Employment Areas, it will limit environmental remediation, the separation or mitigation of sensitive land uses, and the long-term operational and economic viability of planned uses in Employment Areas.

The City of Guelph continues to be supportive of municipalities establishing an appropriate range and mix of housing options and densities to meet both market and affordable demand. The City of Guelph is also supportive of greater clarity in how housing mixes could be achieved in partnership with the development community. The City of Guelph requests that municipalities continue to be able to define their own housing mixes. To achieve an appropriate diversity of housing options and densities, the focus should continue to be on supporting intensification and missing middle housing rather than ground-related housing. To ensure a

diverse mix of housing options and densities to meet community housing needs, municipalities should continue to be directed to consider the proportions of their existing housing stock in their future planning.

The City of Guelph has one Major Transit Station Area (“MTSA”) and Urban Growth Centre (“UGC”): our Downtown. The City of Guelph is supportive of additional tools for municipalities to achieve their growth targets and planned housing mixes in UGCs and MTSA. This may include new provincial policy on minimum parking requirements in UGCs and MTSA. The City of Guelph requests that the Province continue to recognize the existing prescribed MTSA densities and their relationship to the transit hierarchy throughout the Greater Golden Horseshoe. In addition, the City of Guelph requests that the Province respect current plans in UGCs that plan to achieve the targets and densities of the Growth Plan. For example, the City of Guelph has several cultural heritage resources in our Downtown which are anchored by the Basilica of Our Lady. The maximum heights in our Downtown Secondary Plan recognize the Basilica’s status as a landmark that is designated a National Historic Site of Canada. The City of Guelph can plan for its targets and densities while considering designated cultural heritage structures and local character.

The City of Guelph has expressed concern in previous commenting periods that planning for minimum growth forecast can create uncertainty with long range planning for land supply and infrastructure and could result in the over-designation and over-development of lands within certain municipalities. The City of Guelph is supportive of exploring new methodologies to determine the most reliable information regarding current and future population and employment. If changes are made to growth forecasts, the City of Guelph requests that the Province consider that bringing Official Plans, Master Plans, Secondary Plans and Zoning By-laws in conformity and alignment with these changes will take time, delaying the provision of housing. If the Province makes changes without consulting with municipalities, staff resources will be continuously catching up to new requirements, stalling development further.

To support the growth prescribed by A Place to Grow, the City of Guelph has completed several infrastructure-related master plans, with work for the Water and Wastewater Servicing Master Plan ongoing. These master plans have revealed that 38% of the City of Guelph’s infrastructure assets are in “poor” or “very poor” condition. The City of Guelph is already aligning capital planning activities with asset needs. These activities are contingent on the growth for which we have been planning. The City of Guelph would encourage the provincial government to consult with their municipal partners to ensure that infrastructure is ready to keep pace with growth.

To assist with the implementation of the new planning policy instrument, the City of Guelph requests that the Province consult with municipalities to produce guidance documents. In March 2018, the Province invited the public to comment on the following two proposed guidance documents: “Draft Guidance to Support Implementation of the Growth Plan for the Greater Golden Horseshoe, 2017: Intensification and Density Targets” and “Draft Guidance to Support Implementation of the Growth Plan for the Greater Golden Horseshoe, 2017: The Municipal Comprehensive Review Process”. The City of Guelph would encourage the

provincial government to update these guidance documents to align with the new Plan and provide more clarity to municipalities, especially large and fast-growing municipalities.

The City of Guelph supports an environment-first approach to land use planning and is committed to protecting, maintaining, enhancing, and restoring natural features and areas and associated water quality and quantity. To continue to protect the environment, robust natural heritage policies must be included in the new planning policy instrument, including the identification and protection of natural heritage systems. The City of Guelph also requests that water resources and watershed planning be included in the new planning policy instrument. The City of Guelph has recently resumed its sub-watershed study program with a particular emphasis on study areas that have undergone significant land use changes. This program and resulting studies are critical to the City's drinking water supply and the protection of our natural environment.

The City of Guelph supports empowering local decision-making with respect to natural heritage. The City of Guelph has significant concerns with the proposed updates to the Ontario Wetland Evaluation System that remove existing wetland protections and prevent oversight of wetland evaluations and boundary delineations. The City of Guelph requests that the new planning policy instrument include transition provisions to maintain current municipal policies and oversight. The City of Guelph supports more options to reduce development impacts, including the newly proposed Low Impact Development Stormwater Management Guidance Manual.

The City of Guelph is concerned with the policy direction for cultural heritage resources. Heritage conservation requires identification through evaluation and study. An approach that requires fewer studies will hinder the ability of municipalities to identify significant cultural heritage resources. Furthermore, a streamlined approach to preserving archaeological resources could result in the unnecessary destruction of archaeological sites. Avoidance and protection of archaeological sites is the preferred mitigation strategy, not the removal of archaeological resources. However, development applications force the full excavation of archeological sites as opposed to conservation. Further pressure to develop areas close to potable water will result in the loss of archaeological resources that could have alternatively been conserved in situ.

The City of Guelph is supportive of continued major provincial investments in roads, highways, and transit. The City of Guelph requests that the Province review Ontario's Long-Term Infrastructure Plan to align investments in provincially owned assets such as schools, hospitals, and transit to municipal growth targets.

The City of Guelph is also supportive of less prescriptive growth policy direction from the Province for municipalities and more provincial policy stability once this new planning policy instrument is in place. More conformity policies will result in more procedural requirements that may result in more time rewriting official plans and zoning by-laws and less time building homes faster. The Province has amended the Growth Plan three times in the past five years. Providing a period of policy stability will allow municipalities to adapt to the new provincial land use framework.

However, the City of Guelph is concerned that policy direction that allows for increased development flexibility may not result in improved timing in policy implementation. For example, the development of an ecological offsetting policy could slow development approvals while the mitigation hierarchy is debated and, when offsetting is approved, the location and design details are addressed. Additionally, the possibility of cash-in-lieu for offsetting would also slow development approvals further as new policies would need to be created. The City of Guelph requests that if an ecological offsetting policy is incorporated into the new planning policy instrument, municipalities should be able to tailor its implementation to their local context based on the best available science, knowledge, and other considerations.

2. What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?

The planning and development system already includes several planning policies and tools where implementation could be improved to better achieve the objectives of the Ontario Housing Supply Action Plan. This includes inclusionary zoning and a community planning permit system. Specifically, the Province of Ontario should prepare a detailed guideline document that includes best practices from municipalities that have implemented a community planning permit system and full implementation funding. The use of inclusionary zoning should also be expanded to include all Strategic Growth Areas in addition to MTSAs.

In addition, the City of Guelph is currently in the process of a Comprehensive Zoning By-law Review which, among other changes, will align with provincial legislation to end exclusionary zoning. This Comprehensive Zoning By-law Review has also pre-zoned lands to assist in increasing the speed at which housing can be constructed. Exempting the Comprehensive Zoning By-law from appeal will allow the City of Guelph to deliver housing faster through the Site Plan Approval process.

Municipalities should be provided with stronger tools to require approved developments to be built within a certain timeframe to increase the speed of housing construction. For example, in the City of Guelph, there are lands that have been zoned for development since the 1980s that continue to remain vacant. If development does not proceed in a timely manner, the ability to sunset approvals to allow for the allocation of servicing capacity should be introduced. An opportunity to consider is to have development community organizations, such as the Guelph & District Home Builders' Association, commit to requesting building permits within one year of approval through the creation of the new Municipal Housing Pledge.

With respect to social and affordable housing costs, the City of Guelph continues to ask the government to share social housing responsibilities. The City of Guelph encourages the Province of Ontario to invest in social housing developments and would welcome increased partnership with the Provincial government to address homelessness through a housing-first approach. More social housing developments will ensure that all people are housed across the housing affordability continuum.

Finally, the City of Guelph requests that the Province support and strengthen municipal authority over our existing housing stock. The Demolition Control provisions of the Planning Act should be strengthened to prevent demolition by way

of neglect. To assist with the goals of the Ontario Housing Supply Action Plan, increased penalties should be considered to further prevent premature demolition and properties remaining vacant if the new building is not constructed within the two-year legislated timeline. Simultaneously, the Provincial government should update the Ontario Heritage Toolkit to encourage more flexibility in the alteration of designated properties to encourage adaptive re-use.

3. How should the government further streamline land use planning policy to increase the supply of housing?

There are several avenues available to the provincial government to streamline land use planning policy to increase the supply of housing. As stated above, much of the City of Guelph's future housing supply is contained within secondary plans, especially the Clair-Maltby Secondary Plan. Shielding these secondary plans from appeals would help to ensure a stable supply of future housing and help Guelph achieve the updated target of 18,000 units by 2031. In addition, the Province should protect new Comprehensive Zoning By-laws, especially those that implement Growth Plan Conformity Amendments, from appeal. By allowing appeals to Zoning By-law Amendments, this limits municipalities' ability to meet Growth Plan population and employment targets, as well as the new municipal housing targets.

To provide greater certainty to the development community, municipalities could be required to provide Terms of Reference for required submission materials. For example, the City of Guelph is currently developing several Terms of Reference for various planning and urban design requirements. This is in addition to existing Urban Design Guidelines, Development Engineering Manuals, and other technical checklists that can be reviewed at any time by applicants. In addition, the Province should ensure that required development submission materials are reviewed and signed by accredited professionals with appropriate expertise.

The City of Guelph would also be supportive of the provincial government providing additional funding to support technological improvements to the development process. Some municipalities have used past funding initiatives to update zoning by-laws, create online submission portals, and hire additional staff. The City of Guelph also supports ongoing efforts to properly resource and staff the Ontario Land Tribunal ("OLT"). One of the challenges of the OLT hearing process are the long timelines it takes to schedule and conduct hearings as well as the broad criteria to be considered a party before the tribunal. Adequate staffing and resourcing will provide shorter timelines for decisions and therefore deliver more housing to the market faster. The City of Guelph also supports ongoing reform to the OLT hearing process, including eliminating third party appeal rights.

4. What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new policy document?

The City of Guelph supports maintaining several existing principles and policies from the PPS and the Growth Plan to ensure there is a sufficient supply and mix of housing. Overall, The City of Guelph is supportive of the vision of complete communities with access to transit networks, protected employment zones and

enhancing the diversity of housing stock to meet the needs of the community. The City of Guelph continues to support the need for sustainable development that makes all municipalities more resilient to a changing climate. All land use must continue to be well managed.

The City of Guelph supports maintaining Section 1.1.3, specifically, 1.1.3.2 of the PPS. This policy promotes an efficient and cost-effective form of orderly development that aligns with the vision of complete communities. This policy also promotes redevelopment of underutilized sites. It also requires development in settlement areas to use land and resources wisely and consider opportunities for intensification and redevelopment.

The City of Guelph supports maintaining Section 1.4 Housing of the PPS and 2.2.6 of the Growth Plan. Specifically, the City of Guelph is supportive of:

- Policy 1.4.1 of the PPS and Policy 2.2.6.4 of the Growth Plan which requires municipalities to maintain a minimum three-year housing supply. The City of Guelph is supportive of strengthening and expanding this policy to direct development to these lands within a certain timeframe;
- Policy 1.4.3 of the PPS and sub policies direct municipalities to provide for an appropriate range and mix of housing options and densities and provides additional direction on the types of housing and densities that need to be provided to meet the housing needs of communities and support complete communities; and,
- The City of Guelph is also supportive of strengthening sub-policy 1.4.3 f) and requests that the Province produce a residential intensification guideline document that outlines what standards should be included.

The Cultural Heritage and Archaeology policies outlined in Policy 1.7.1 e) and 2.6 of the PPS should be maintained. The conservation of built heritage resources in the City of Guelph, especially evident in our Downtown, encourages a meaningful sense of place. In addition, the conservation of heritage resources highlights the shared history of Indigenous peoples and Settlers in Ontario, which should guide the future growth of Ontario's communities.

The City of Guelph supports Policy 5.2.2 c) of the Growth Plan which states that the Minister will prepare a standard methodology for Land Needs Assessment. A Land Needs Assessment is required as part of the Growth Plan conformity work to determine the amount of land that would be required to achieve the growth forecasts.

The City of Guelph also requests that the Province maintain Policy 2.2.6 c) of the Growth Plan in full. This policy requires municipalities to consider the range and mix of housing of the existing housing stock while planning for a diverse future housing stock. Our existing housing stock should continue to be captured and utilized as part of a comprehensive planning policy framework.

The City of Guelph requests that Section 2.1, and particularly, Policy 2.1.8 of the PPS be maintained in full. This section states that development and site alteration shall be permitted in specific natural features, areas, and adjacent lands. The specific tests for determining negative impacts should also be maintained. These policies are critical to protecting the natural heritage system across Ontario and for



evaluating the specific delineation of natural features and areas. In addition, the Natural Heritage Reference Manual should be maintained to implement the natural heritage policies of the PPS.

The City of Guelph requests that Section 4.2.9 and 4.2.10 of the Growth Plan be maintained in full. These sections contain policies that support natural heritage system protection directly (including the importance of watershed planning, protection of the natural heritage system, incorporating green infrastructure and low impact development, excess soil re-use, and requiring integrated waste management) or indirectly (including promoting complete communities, reducing dependence on the automobile, promoting energy conservation and air quality). To ensure an environment-first approach to land use planning and associated human health and well-being, these policies should not be lost in a new planning policy instrument.

Guelph is a groundwater dependent community. As a result, the City requests that policies in Section 1.6 of the PPS be strengthened to recognize the capacity limitations that exist and that long term solutions must be environmentally and fiscally responsible and sustainable. The policies must also ensure that growth rates and the accommodation of new housing does not exceed the capacity of the environment to sustain it.

Finally, the City of Guelph is supportive of Policy 5.2.6.2 of the Growth Plan. Each year, the City of Guelph releases the Growth Management and Affordable Housing Monitoring Report. This report provides details towards the achievement of Official Plan policies which implement the Growth Plan and provide information on monitoring of development activity and housing supply in accordance with the PPS. This Monitoring Report is key to informing how the City of Guelph is moving towards the achievement of its growth targets and vision. The City of Guelph is supportive of the requirement for municipalities to monitor their progress towards implementation of the Growth Plan. The City of Guelph would also support the reporting on a standardized set of performance indicators as indicated in Policy 5.2.6.1 of the Growth Plan.

5. What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?

The new policy document should remove any policy duplication, repetition and/or policy conflict between the PPS and the Growth Plan. By removing duplication and/or repetition, this would make the review of provincial policy much more efficient.

Policy 1.1.1 d) of the PPS should be reworded. Although boundary expansions may be necessary, they should be discouraged, and growth should continue to be accommodated through intensification. Policy 1.1.1 d) should reinforce the existing tests and policies to expand municipal boundaries. Policy 1.1.3.8 and Policy 1.1.3.9 of the PPS should be streamlined so that settlement area boundary expansions are only permissible at the time of a comprehensive review. By permitting settlement area boundary expansions outside of a comprehensive review, these risks creating an ad-hoc approach to efficient and orderly development. By limiting settlement area boundary expansions, municipalities can better implement provincial policy


and direction, at the time of growth plan conformity exercises, that result in provincial oversight and review.

Policy 1.1.3.6 in the PPS states that new development taking place in designated growth areas should occur adjacent to the existing built-up area. The City of Guelph requests that the Province revise this language to state that new development in designated growth areas shall occur adjacent to the existing built-up area.

The City of Guelph supports streamlining Section 2.2 of the PPS and Section 4.2.1 of the Growth Plan into one water resource system framework. The Growth Plan provides more prescriptive policies, such as vegetation protection zone widths that should be maintained in the new planning policy instrument.

The City is grateful for the opportunity to provide input on this important matter. If you have any questions, please feel free to contact us.

Sincerely,



**Krista Walkey**, General Manager, Planning and Building Services  
Planning and Building Services, **Infrastructure, Development and Enterprise Services**  
**Guelph City Hall**

**T** 519-822-1260 extension 2395

**TTY** 519-826-9771

**E** Krista.Walkey@guelph.ca

guelph.ca