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The Hon. Steve Clark
Minister of Municipal Affairs and Housing
17th Floor - 777 Bay St.
Toronto, ON
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**Re: Proposed Review of A Place to Grow and Provincial Policy Statement
ERO Number 019-6177**

Dear Minister Clark,

The City of Cambridge administration is providing this submission in response to the review of A Place to Grow Growth Plan for the Greater Golden Horseshoe (the Growth Plan for the GTHA) and Provincial Policy Statement 2020 (PPS).

City staff understand that the purpose of this ERO posting is to advise that the Province is considering consolidating the PPS and the Growth Plan for the GTHA into one policy document. The understood intent of this change is to provide an overall simplified provincial policy framework and increased flexibility in applying provincial objectives, with the goal of accelerating the development of 1.5 million homes.

As a general comment, it is difficult to fully understand the scope of the proposed changes without being provided the text of the updated policy framework. It is unclear whether the policy will be considered a provincial plan or policy statement and whether Council decisions will be required to be consistent or conform with the updated policy. City staff look forward to further opportunities to provide detailed comments when the updated policy document is released for review and comment.

Please see below summary of the ERO posting followed by a staff response.

Residential Land Supply:

- Streamlined and simplified approach to boundary expansions.

Comment:

Planning staff is concerned that the potential effect of a simplification of the urban boundary expansion process will result in increased development at the fringe of urban areas. This could undermine key objectives of the Growth Plan and PPS, 2020 which seek to direct a greater proportion of development to existing built-up areas to enable transit supportive development, minimize land consumption, preserve agricultural and natural areas, utilize existing municipal infrastructure, and revitalize urban areas. The Region of Waterloo and lower tier municipalities, including the City of Cambridge, has placed a particular emphasis on these growth management objectives through the creation of a policy framework that prioritizes intensification within existing urban areas and firm urban/rural boundary limits through the policies of the Countryside Line and Protected Countryside. The Region of Waterloo has also recently completed a municipal comprehensive review including a detailed land needs assessment, based on the approved provincial methodology, which has determined that very little additional urban land is required to accommodate population growth to 2051. Planning staff therefore recommend that the existing policies of the Growth Plan, which prioritize urban boundary expansions through a municipal comprehensive review, be maintained.

- Increased flexibility for residential development in rural areas.

Comment:

Similar to the above comments regarding urban boundary expansions, Planning staff is also concerned with the potential negative implications from increased residential development in rural and agricultural areas. This could result in more unplanned development outside of the built-up area and designated greenfield areas, and the potential of increasing land consumption and land use conflicts with agricultural uses.

- Streamlined and simplified policy to enable employment conversions.

Comment:

Planning staff note that in the City of Cambridge, land zoned for employment purposes that could potentially be redeveloped for non-employment uses have already been identified in the City's Official Plan as a "regeneration area". The regeneration area policy enables certain lands currently used for employment

purposes to be redeveloped for non-employment purposes (e.g., mixed use residential) without triggering employment conversion policies of the Growth Plan. Therefore, the City's policy framework already provides flexibility to enable certain employment lands to be redeveloped for non-employment uses.

Staff also note that the current Growth Plan permits the conversion of employment land outside of a municipal comprehensive review, provided that key criteria are met, including: a demonstrated need for the conversion; continued viability of the employment area; that necessary infrastructure is in place for the employment conversion; and, that the conversion does not include any land that forms a provincially significant employment zone. These policies provide the needed flexibility to permit appropriate employment land conversions outside of a municipal comprehensive review. Staff is concerned that increasing the ease of converting employment land will result over time in the loss of dedicated employment land for the Province's growing work force and challenges in meeting complete communities, 15-minute neighbourhoods and a balanced residential and employment land base.

Attainable Housing Supply and Mix:

- Policy direction that provides certainty that a range and mix of housing options to meet market-based demand and affordable housing is available.

Comment:

Planning staff is supportive of policy direction that ensures the development of a range and mix of housing options to meet market and affordability needs of Ontarians. Market demand should be forward thinking and avoid undue emphasis on historic development patterns (e.g. primarily single detached dwellings). The overall growth management priorities of minimizing land consumption, complete communities, 15-minute neighbourhoods, intensification and transit supportive development should be maintained and not undermined based on perceived historic market demand/ development patterns.

- Policy direction to ensure that Major Transit Station Areas (MTSAs) meet minimum density targets.

Comment:

Planning staff fully support policy updates that will ensure MTSAs meet minimum density targets of the Growth Plan. The City of Cambridge is currently advancing secondary plans and implementing as-of-right zoning for the City's identified MTSAs to assist in reducing barriers to new development. Staff is concerned that the suggested simplified urban boundary expansion and rural development policies may serve to undermine other policy objectives such as minimum densities in MTSAs.

- Policy direction that enables municipalities to identify focal points for intensification.

Comment:

Staff support this policy objective. The City's Official Plan already identifies focal points for development such as the community core areas (Galt, Preston and Hespeler) and planned nodes (e.g. Main and Dundas Community Node).

Growth Management:

- Policy direction that allows municipalities to use the most current information about population and employment growth to determine housing and land needs.
- Policy direction to increase housing supply in strategic areas in both urban and suburban areas.
- Growth management policies that extend to large and fast-growing municipalities including coordination with provincial infrastructure investments.

Comment:

Staff is supportive of policy direction that will allow municipalities to use current information for growth planning, provided that the municipal comprehensive review process outlined in the current Growth Plan for urban boundary expansions is maintained. Staff fully support policy direction to increase housing supply in strategic growth areas (both urban and existing suburban) and increased coordination between the province for infrastructure investments.

Environment and Natural Resources.

- Policies that provide protection of agricultural areas while providing flexibility for residential development.
- Streamlined policy direction regarding natural heritage including offsetting/compensation.
- Streamlined policy direction for development in hazard areas.
- Streamlined and simplified aggregate policy.
- Increased flexibility for housing relating to heritage matters.

Comment:

As noted, staff is concerned with the potential increased flexibility of residential development in rural and agricultural areas due to negative consequences that could lead to unplanned development, increased land use conflict with agricultural uses and the potential to undermine other policy objectives such as directing growth to strategic urban areas like MTSA's.

Staff similarly is not in support of a streamlined policy direction that may result in development within natural/environmental and hazard areas. This concern is particularly heightened given other Provincial legislative changes that reduce the involvement of Conservation Authorities in the review of Planning Act applications and the removal of the Region of Waterloo as a planning authority.

City staff will provide comments on proposed changes to provincial aggregate policy when the details of the changes are released for review and comment. Currently only a small area in northeast Cambridge is identified as an aggregate area.

Regarding cultural heritage, please see detailed comments provided to the Minister under ERO Posting Number 019-6196.

Community Infrastructure:

- Policy direction to increase flexibility for servicing new development and encourage municipalities to undertake long-range integrated infrastructure planning.
- Policy direction that ensures school facilities are part of integrated municipal planning.

Comment:

Without being provided more context, it is difficult to comment on the impact of proposed policy changes to increase the flexibility of servicing new development.

Staff fully support policy objectives that encourage municipalities to undertake long-range infrastructure planning. Staff also support policy direction to ensure that school facilities are better integrated into municipal planning. Currently there is a significant lag between provincial funding for the construction of schools, and timing of the construction and occupancy of homes. Better coordination between the provision of school facilities and land use planning decisions, including provincial funding, are especially needed given the Province's objective of constructing 1.5 million homes over the next 10 years.

Streamlined Planning Framework:

- Less prescriptive policy direction requiring fewer studies including a straightforward approach to assessing land needs.
- Policy direction that reduces the complexity and increases the flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier.

Comment:

City staff is supportive of policy objectives that simplify the land use planning framework to enable growth and development, provided core planning principles relating to growth management, prioritizing intensification within built-up areas and environmental sustainability are maintained.

Thank you for the opportunity to comment.

Yours truly,



Lisa Prime