

Community Development Department

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**Re: Review of Proposed Policies adapted from a Place to Grow and Provincial Policy Statement to form a new Provincial Planning Instrument:
ERO Number 019-6813**

Please see below comments in response to the proposed Provincial Planning Statement (PPS).

Planning staff understand that the purpose of the draft PPS is to provide an updated provincial policy document which combines certain policies and priorities under the existing Places to Grow Growth Plan and Provincial Policy Statement, 2020. 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.

Key aspects of the draft PPS are summarized below followed by a staff response.

Provincial Population and Employment Forecasts:

The current Growth Plan assigns population and employment forecasts to single tier and upper tier governments (e.g. Region of Waterloo). These forecasts are then assigned to individual lower tier/area municipalities (e.g. City of Cambridge) in the Region through a Regionally led municipal comprehensive review process.

The proposed PPS does not include population and employment growth targets. Instead, area municipalities will be responsible for preparing their own population and employment forecasts, with a requirement of having enough land designated for at least 25 years of growth. Based on the Ministry's implementation guide for the draft PPS, it is expected that area municipalities will use the current provincial growth numbers that provide population and employment forecasts to plan to 2051.

Over the long-term, City of Cambridge Planning staff is concerned with this approach of shifting population and employment growth forecasting and allocation from the Region of Waterloo to individual area municipalities. The benefit of the current process is that the Region is the overall coordinator of population and employment allocation in consultation with area municipalities. This is a collaborative process that considers both local needs and broader interests to the entire Waterloo Region. Staff is concerned that requiring seven different lower tier municipalities to develop individual population and employment forecasts will lead over time to uncoordinated and uneven development patterns across Waterloo Region. It is unclear how disagreements between individual area municipalities regarding methodology on population and employment forecasts would be resolved. This proposed change seems to further complicate the planning process which could ultimately frustrate the overall objective of building more homes faster.

Settlement Boundary Expansions and Land Needs Assessments:

Currently, a municipality may only expand its settlement boundary through a municipal comprehensive review and strict policy requirements must be met to expand a settlement boundary. A key component of the municipal comprehensive review process is the preparation of a land needs assessment, which is based on an approved provincial methodology.

The draft PPS eliminates the need of a municipal comprehensive review and completion of a land needs assessment to determine the need for a settlement boundary expansion. The proposed policy considerations for settlement boundary expansions are limited in scope and generally include the availability of infrastructure and minimizing impacts on agricultural areas.

City of Cambridge Planning staff is not supportive of policy changes that may increase settlement boundary expansions unnecessarily. This could result in the City and other area municipalities, under pressure from landowners, to further expand the urban area. Unnecessary urban expansions undermine important land use planning objectives such as developing complete communities that are transit supportive, preserving prime

agricultural and natural areas, and the logical cost-effective expansion of municipal infrastructure.

Provincial Intensification and Density Targets:

Under the current Growth Plan, there is a strong policy basis for general intensification throughout the existing built-up area including specific density targets for areas such as Urban Growth Centres (UGCs) and new greenfield areas.

Under the draft PPS there is no longer a defined built-up area, provincially required intensification targets, or minimum density requirements for new greenfield areas. The only provincial directive that remains is for Major Transit Station Areas (MTSAs). Fast growing municipalities (including Cambridge) are required to determine targets for their own strategic growth areas such as the UGC (Downtown Cambridge). For greenfield development municipalities are simply encouraged to plan to achieve a density of 50 people/jobs per hectare.

Although these draft policy changes do enable individual municipalities greater control in determining where and how growth occurs, Cambridge Planning staff is concerned with the long term implications of this change in provincial direction. Since 2006 (the inception of the Growth Plan) municipalities have been working to implement provincial requirements for intensification within built up areas, strategic growth areas and new greenfield communities. These targets were based on good planning objectives of creating complete communities, that provide a variety of housing stock that supports public transit, minimizing land consumption, which avoids costly extension of municipal services and preserving productive agricultural land. The elimination of provincial intensification and greenfield density requirements will result in inconsistent development patterns across individual municipalities and overtime lead to more land consumption and car dependent communities being developed across the Province.

Prime Agricultural Areas Rural Development

Current provincial policy requires that development is directed to existing built-up areas and designated greenfield areas. Limited rural development is permitted and lot creation in prime agricultural areas is discouraged. The City's Official Plan only permits agricultural severances under very limited circumstances.

The draft PPS will increase the flexibility of development in rural areas, including multi-lot development. In addition, the draft PPS permits prime agricultural land severances for up to three additional lots, subject to certain criteria. The policies also prohibit a municipality from containing Official Plan policies or Zoning standards that are more restrictive than the agricultural land severance policies of the PPS.

Prime Agricultural lands may only be removed for development through a settlement boundary expansion, however as discussed previously, settlement boundary expansions may occur at any time without the rigor of a municipal comprehensive review and detailed land needs assessment to justify conversion of prime agricultural land for development purposes.

These proposed policies significantly weaken protections in place to limit suburban sprawl and Cambridge Planning staff is not supportive of these changes. The City may be under increased pressure to approve development in unplanned rural and agricultural areas, which over time could result in a fragmented agricultural and rural land base, which is counter to the goals and objectives of the City's Official Plan. Increased rural development and agricultural severances will also result in more private well and septic systems in rural areas which could impact source water protection and are costly to maintain and service.

Employment Areas

Under the current provincial policy framework municipalities are required to protect employment land for the long term. This is done in part by prohibiting the conversion of employment lands to non-employment uses, except through a municipal comprehensive review process (and certain limited exceptions). A variety of different employment uses are permitted within employment areas including offices.

The draft PPS proposes to scope the definition of what constitutes an area of employment to traditional industrial operations such as manufacturing and warehousing. Offices are considered commercial uses and are not permitted in an area of employment and are instead encouraged to be in MTSA's and other strategic growth areas where transit is available.

Although municipalities are required to protect areas of employment under the draft PPS, the policies also permit the removal of employment lands at any time, subject to meeting certain policy requirements. This does provide municipalities with the flexibility to respond to changing market conditions and land needs; however, it will be important that municipalities carefully evaluate any proposal to redesignate employment lands to another land use otherwise risk the erosion of employment land supply over time. In general, Cambridge Planning staff does not object to the proposed Employment policies of the draft PPS.

Provincially Significant Employment Zones (PSEZs):

In 2019, the Province established the concept of "Provincially Significant Employment Zones" (PSEZs). The purpose of PSEZs was to identify and protect major provincially significant employment areas, and in Cambridge there are two PSEZs (PSEZ 23 in North Cambridge and PSEZ 22 located south of Highway 401, between Hespeler Rd. and Townline Rd.). The Province is no longer proposing to carry forward the PSEZs

and instead is considering protecting these areas exclusively for employment uses through other means such as section 47 of the Planning Act (Minister's Zoning Order/MZO). Cambridge Planning staff is supportive of the Province identifying important employment areas to preserve for employment uses over the long term however it is unclear what the benefit would be to pursue this objective through an MZO versus the current approach of the PSEZ. Regardless of the approach used to preserve these strategic employment areas it is important that the Province works closely with municipalities to determine the location of lands intended for this higher order provincial protection to ensure that lands are not unnecessarily restricted. For example, land within North Cambridge (northeast corner of Middle Block Rd. and Fountain St. N.) is intended to be developed for mixed use through the ongoing review of the North Cambridge Secondary Plan; however, these lands are currently identified as a PSEZ area. It is important that lands such as these are not restricted further through any future provincial process such as an MZO. Therefore, Cambridge Planning staff requests that the Province engage closely with the City to determine the boundaries of any future provincial employment area.

Affordable Housing:

Under the current provincial planning framework municipalities are required to establish affordable housing targets and the current PPS includes a definition of affordable housing as a benchmark. These policies give municipalities direction to actively promote the construction of affordable housing within communities (e.g. inclusionary zoning). The draft PPS does not include either the policy requirement for affordable housing targets or a definition of what is considered affordable housing. These changes suggest that municipalities are no longer required to actively plan through policy and other means the development of affordable housing units. Planning staff believe that provincial policy should continue to require municipalities to plan and provide for affordable housing, given the current state of housing affordability in Ontario.

Cultural Heritage:

Generally, some of the changes proposed within the draft PPS strengthen the cultural heritage policy framework; however, most of the changes weaken and narrow it. The following is a summary:

- There is stronger and more direct language within the draft PPS on consultation with Indigenous communities. The proposed direction is that municipalities "shall" consult "early" and the scope of consultation is broadened to include more than simply archaeological matters, including built heritage, cultural heritage landscape and heritage master plans.
- The draft PPS also includes direction to municipalities to be more proactive in developing strategies to identify properties for evaluation

under the Ontario Heritage Act. This change is in line with the direction provided by the Province through Bill 23 for early identification.

- Despite these inclusions, many sections within the draft PPS referring to cultural heritage have been either shortened, weakened, or removed entirely. The updates remove all references to “significant” built heritage resources, archaeological resources and cultural heritage landscapes. The updates also remove the section linking cultural heritage conservation with long term economic prosperity. They amend the definitions to narrow the scope of what constitutes heritage resources and their features. The definitions for “built heritage resources” and “cultural heritage landscapes” remove reference to their status under the Ontario Heritage Act and provide more general definitions referencing their cultural heritage value.
- The most concerning modification is the proposed definition of a “heritage attribute”. The new definition substantially narrows the scope of what constitutes a heritage attribute. Historically, heritage attributes could include non-physical elements such as landscape features, water features, natural landforms, vistas, and views. These elements have been maintained within the definition of cultural heritage landscapes, but the new definition of a heritage attribute is limited solely to the attributes of buildings or structures on real property. Staff are of the opinion that a view that focuses solely on built heritage attributes misses important elements of cultural heritage and fails to see it holistically. This approach ignores the broad, multicultural nature of cultural heritage that extends beyond Euro-Canadian built heritage and encompasses elements such as Indigenous landforms and geographical features.
- Staff are also concerned with the impact of broader draft PPS policies on the retention and conservation of heritage properties. The inclusion of policies that encourage settlement area expansions and the expansion of built boundaries will have an impact on heritage properties in Cambridge. It is expected that the changes may result in the demolition or removal of more heritage structures and more incompatible development within heritage neighbourhoods.

Thank you for the opportunity to comment.



Lisa Prime, Chief Planner