



Thursday, April 1, 2021

Sent via email to: planningconsultation@ontario.ca

Provincial Planning and Policy Branch
Local Government and Planning Policy Division
Ministry of Municipal Affairs and Housing
College Park 13th Flr, 777 Bay St
Toronto, ON M7A 2J3

RE: ERO#019-3233 Proposed Changes to Minister's Zoning Orders and the Planning Act

The City of Guelph (the City) welcomes the opportunity to provide input on the Ministry of Municipal Affairs and Housing's consultation on changes to ministerial zoning orders (MZOs) and the Planning Act that are proposed in Bill 257, the Supporting Broadband and Infrastructure Expansion Act, 2020.

The City supports Section 3 of the Planning Act which requires decisions of the approval authority, including the City of Guelph and the Minister, to be consistent with the Provincial Policy Statement (PPS). The PPS is a critical provincial document, created through extensive consultation with municipal governments and the public, that helps the City protect its built and natural environment, while promoting best planning practices and advancing public health and safety.

The City of Guelph therefore has significant concerns with the proposal to enable MZOs to override the Provincial Policy Statement, including retroactively, in lands outside of the Greenbelt, as per new proposed authorities in Bill 257. Given extensive work currently underway at the City through the [municipal comprehensive review process](#) to ensure compliance with the PPS, it is also challenging to support a policy that would exempt the Minister from directions the City and all municipal governments are bound by.

While MZOs are an important tool in the provincial toolkit, it is the City's position that they should only be used strategically and sparingly in exceptional circumstances and to advance the public interest. As well, it is the City's position that MZOs should only be used with the support of the affected local government and in a way that is consistent with the overarching framework created by the PPS. This ensures province-wide consistency while also safeguarding key principles and objectives informing the PPS: namely healthy, livable, and safe communities, a clean and healthy environment, safe drinking water and a well managed land use system focused on long-term prosperity, our collective wellbeing and best planning practices.

Rather than work around the PPS, the province and municipal governments should continue to ensure planning decisions are consistent with the directives and principles contained in this key document. The City therefore urges the province to reconsider Section 3 of Bill 257 which contains these proposed Planning Act



amendments. To ensure public confidence in our land use planning system, it is imperative that Ontario lead by example through decision-making that is consistent with the PPS. MZOs are and will remain a potent tool without further expansions in this provincial authority.

The City of Guelph appreciates the opportunity to provide input on important provincial decision-making. We encourage the province to reach out if there are any further comments, questions, or opportunities for municipal feedback.

Sincerely,

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