

May 10, 2024

Submitted online and via email to minister.mah@ontario.ca

The Honourable Paul Calandra
Minister of Municipal Affairs and Housing
Government of Ontario
17th Floor – 777 Bay St.
Toronto, ON M7A 2J3

RE: ERO 019-8462: Review of proposed policies for a new provincial planning policy instrument.

Dear Minister Calandra,

The City of Guelph (the “City” or “Guelph”) appreciates the opportunity to comment on the Province’s proposed new Provincial Planning Statement. In this submission, you will find the overall comments and recommendations from the City of Guelph regarding the proposed policies:

Comments and recommendations:

- *Municipalities will be required to establish and implement minimum targets for the provision of housing that is affordable for low and moderate income households.*
- *The definition of ‘affordable’ and ‘low and moderate income households’ has been updated and reinstated.*

The City of Guelph supports the reinstatement of targets for affordable housing and the re-establishment of the definition for Affordable and Low to Moderate Income Households. The City asks the province for support in the delivery of affordable housing.

- *Municipalities would be required to make sufficient land available to accommodate a range of housing and land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years. This is a change from the proposed 2023 PPS where the time horizon was “at least 25 years” with no upper limit. Notwithstanding this upper limit, planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.*

The City of Guelph City supports the continued use of the approved 2051 population and employment forecasts from Schedule 3 of the Growth Plan as this forecast has been utilized for almost all of the recently updated or new infrastructure master plans in Guelph.

City Hall
1 Carden St
Guelph, ON
Canada
N1H 3A1

T 519-822-1260
TTY 519-826-9771

guelph.ca

The City requests that the Province continue to provide population and employment forecasts with a growth forecasting methodology for population and employment similar to the Land Needs Assessment Methodology for areas in the Growth Plan. This will ensure consistency between municipalities and consistency across the province, particularly where municipal services cross municipal boundaries.

- *A list of criteria has been added that municipalities shall consider when identifying new settlement areas or when allowing a settlement area boundary expansion.*

The City of Guelph supports the revisions to expand and strengthen the criteria to be considered when identifying new settlement areas and settlement area boundary expansions. Additional considerations addressing impacts to natural heritage systems and water resource systems in the planning for settlement expansions would provide a more comprehensive set of criteria for their evaluation consistent with previous direction included in the existing PPS and Growth Plan, including the development of affordable and missing middle housing.

Uncoordinated settlement area expansions, for which some municipalities will be responsible for ongoing servicing, should not be permitted to be referred to the Ontario Land Tribunal. The City is concerned that uncoordinated settlement area expansions have the potential to result in the inefficient use of land and municipal infrastructure, ultimately impacting the ability of municipalities to achieve sustainability goals.

- *A policy has been added requiring municipalities to demonstrate that the infrastructure and public service facilities are planned or available for new settlement areas.*

Staff support the revisions to expand and strengthen the criteria to be considered when identifying new settlement areas and settlement area boundary expansions. Additional considerations addressing impacts to natural heritage systems and water resource systems in the planning for settlement expansions would provide a more comprehensive set of criteria for their evaluation consistent with previous direction included in the existing PPS and Growth Plan.

The requirement for Municipal Comprehensive Reviews should remain and municipalities should be required to demonstrate the need for development boundary expansions. Maintain that municipalities may identify a settlement area or allow the expansions of a settlement area boundary only at the time of a 5-year official plan update and only where it has been demonstrated that certain conditions have been met (PPS 1.1.3.8).

- *Policies have been added requiring municipalities to have sufficient employment lands to accommodate projected growth before lands can be*

removed from employment areas.

The conversion of employment lands may have unintended consequences with a cumulative impact on the erosion of employment areas.

Comprehensive consideration of employment land conversion is required and should be limited to municipality-initiated amendments to ensure that there is not an impact to the broader business community and economic viability of large and small manufacturing uses that could result from piece-meal conversions. Therefore, the City does not support privately initiated applications for employment conversions.

- *Require municipalities to support all types of residential intensification including the development and redevelopment of underutilized commercial and institutional sites (e.g., plazas and shopping malls) for residential use.*

Many of the City's low-density commercial plazas and shopping malls have been identified as Strategic Growth Areas (SGAs) and re-designated as intensification corridors or community mixed use nodes through OPA 80 to provide opportunities for new housing supply and commercial uses and amenities with a more transit supportive and active transportation focus. As stated in the Preface, the PPS should refer to redevelopment of low-density commercial plazas and strip malls, rather than redevelopment of "underutilized" shopping malls and plazas. The proposed policy language to permit and facilitate residential development on underutilized shopping malls and plazas, has no corresponding reference for a continued mix of uses. These sites provide residents with access to services and amenities within their communities, and their loss would be contrary to the goal of building complete communities.

The City Staff requests that policies be amended to require that non-residential floor space on commercial or institutional sites be retained as part of any future redevelopment and to enact a regulation to permit the use of zoning with conditions that would enable a municipality to secure replacement of employment or commercial space as part of redevelopments proposing to convert existing commercial and institutional space.

- *Require municipalities to consider allocating or reallocating unused servicing capacity to accommodate current and projected needs for housing.*

Staff are supportive of the proposed policy as it provides an additional tool to support to municipalities in getting approved development built. However, the 2024 PPS contains some proposed policy changes that would provide greater flexibility to accommodate growth on partial services, in certain circumstances. This is a significant area of concern, given the potential risks associated with development on partial servicing, and particularly the potential cumulative environmental impacts over the longer term. As Guelph relies 100% on groundwater for drinking water, the City does not support this change.

- *Planning authorities shall collaborate with publicly-assisted post-secondary institutions, where they exist, to facilitate early and integrated planning for student housing that considers the full range of housing options near existing and planned post-secondary institutions to meet current and future needs.*
- *Planning authorities should collaborate with publicly-assisted post-secondary institutions on the development of a student housing strategy that includes consideration of off-campus housing targeted to students.*

The City generally supportive of these policy directions to collaborate with post-secondary institutions to prepare a student housing strategy.

As per the proposed amendments to the Planning Act that would exempt the undertakings of publicly assisted post-secondary institutions, a comprehensive plan is required to ensure both on campus and off-campus student housing is provided in appropriate locations (i.e., outside, or away from hazards), supported by the necessary infrastructure, and has access to community services and facilities, among other things. The City requests clarification that this exemption is for publicly-assisted post-secondary institutions owned and operated student housing and excludes for-profit student housing. There are also concerns with the unintended consequences to infrastructure, health and safety, accessibility, the natural environment and particular concern regarding the impacts to water, waste water and storm water provisions.

Closure:

We appreciate this opportunity to provide input, and trust that the comments outlined above will be given due consideration. In addition to the comments provided above, we would also like to bring to your attention the [Council Information Report](#) dated May 10, 2024, as well as the attached [summary of key policy changes and recommendations](#) which provide additional context regarding the Guelph-specific impacts of these proposed policies.

Should you have any questions, please do not hesitate to contact the City at intergovernmental.relations@guelph.ca.

Sincerely,



Krista Walkey, General Manager, Planning and Building Services
Infrastructure, Development, and Environment
City of Guelph

T 519-822-1260 extension 2395

TTY 519-826-9771

E krista.walkey@guelph.ca

Attachments:

1. [City of Guelph Council Information Report – Proposed Provincial Planning Statement, 2024](#)
2. [Attachment 1 – Proposed Provincial Planning Statement Summary of Key Policy Changes and Comments](#)