

INFORMATION ITEMS

Week Ending March 1, 2019

REPORTS

1. None

INTERGOVERNMENTAL CONSULTATIONS

1. None

CORRESPONDENCE

1. Response: Proposed Change to the Growth Plan for the Greater Golden Horseshoe and Related Regulations
2. Response – Ontario Tourism Strategy

BOARDS & COMMITTEES

1. Tourism Advisory Committee – Resignation from Kevin Schmidt
2. [Committee of Adjustment Meeting Minutes – January 10, 2019](#)

ITEMS AVAILABLE IN THE CLERK'S OFFICE

1. None

February 28, 2019

Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs
777 Bay Street
c/o Business Management, 17th Floor
Toronto ON M5G 2E5

Dear Mr. O'Hara,

**RE: Proposed Change to the Growth Plan for the Greater Golden Horseshoe
and Related Regulations**

Thank you for the opportunity to comment on the proposed changes to the Growth Plan for the Greater Golden Horseshoe (2017) and related regulations. On February 25, 2019 the Council of the City of Guelph passed the following resolution:

1. That Report IDE-2019-25 dated February 25, 2019 be approved.
2. That Attachment 1 to Report IDE-2019-25 be endorsed and submitted to the Ministry of Municipal Affairs and Housing as the City of Guelph's response to the proposed Amendment #1 to the Growth Plan for the Greater Golden Horseshoe (2017).
3. That the comments received by the City of Guelph from residents and stakeholders at or before the Council meeting be forwarded to the Province of Ontario for consideration.

The City of Guelph Council endorsed comments are attached to this letter, along with any resident and stakeholder correspondence received at the Council meeting for your consideration. The City would be happy to engage with the Province as they review comments regarding the proposed changes. Please do not hesitate to contact me if you have any questions regarding the City of Guelph's feedback.

Sincerely,



Scott Stewart, C.E.T., Deputy CAO
Infrastructure, Development and Enterprise
City of Guelph
T 519-822-1269 x 3445
E scott.stewart@guelph.ca

City of Guelph Comments on Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe and related Regulations

1. Comments on the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017

1.1 Water supply and water quality are issues that remain a potential limiting factor to growth for the City of Guelph beyond 2031.

Guelph's local growth management strategy identified limitations to growth beyond a population of 175,000. These limitations stem from the water supply capacity and assimilative capacity of the Speed River to receive additional wastewater. The feasibility, costs, and funding sources for the infrastructure upgrades required to accommodate the additional forecasted growth beyond 2031 are still not understood. At this time, the City cannot confirm that it can provide the wastewater services and supply of water to meet the 2041 projections in a locally sustainable manner.

Recommendation:

That the Province be aware that the City of Guelph has water resource limitations and that constraints to servicing growth beyond 2031 continue to remain a concern. The Province should also enhance funding for infrastructure projects that would support environmentally sustainable solutions.

1.2 The introduction of watershed planning equivalence is supported by the City of Guelph.

Basing Planning decisions on watershed planning or equivalent studies is supported by the City of Guelph. The complex nature and time required to undertake the watershed planning process has been a concern for the City of Guelph given the timeframe to achieve conformity with the Growth Plan. The explicit introduction of allowing for equivalent studies to a watershed plan increases flexibility and may reduce the amount of effort and time required to complete the municipal comprehensive review, while still achieving the intended goals of a watershed plan.

Recommendation:

That the proposed policies to allow for equivalent studies to a watershed plan are supported by the City of Guelph and should be retained in the final amendment to the Growth Plan.

1.3 The employment land policies regarding redevelopment to non-employment uses should be more flexible.

Proposed policy 2.2.5.14 states that employment lands outside employment areas "should retain space for a similar number of jobs to be accommodated on site." This is a standalone policy and appears to apply to any conversion whether

it occurs before, during or after the next Municipal Comprehensive review. As it is currently proposed, it would seem to prevent the employment lands outside of employment areas from being redeveloped exclusively for residential purposes, even through a municipal comprehensive review. Is this the intent of the proposed amendment? The policy should be revised to allow the redevelopment of these lands for residential purposes in some circumstances.

Recommendation:

That policy 2.2.5.14 be revised to ensure that a process exists to allow employment lands outside employment areas to be redeveloped for residential purposes through a municipal comprehensive review.

1.4 The proposed excess lands definition appears to have become more restrictive.

The definition of excess lands has been proposed to be modified to specify that it applies to "vacant, unbuilt but developable lands." It is unclear whether the intent of this proposed change is to place greater restrictions on the types of lands that can be identified as excess lands. Will the proposed definition continue to apply to lands with rural uses within settlement areas, such as agricultural lands with a related dwelling (i.e. these lands are not vacant and are not unbuilt)?

Recommendation:

That greater clarity be provided in the definition of excess lands, particularly on what constitutes unbuilt lands.

1.5 The Province provide an update on the status of all other outstanding supporting guidance documentation.

In March of 2018, the Application of the Intensification and Density Targets, The Municipal Comprehensive Review Process, and The Watershed Planning in Ontario guidance materials were released for public comment in draft. Clarification on the status of these guidance materials is requested. If the municipal comprehensive review process is to continue to be guided by these, or modified versions of these documents, delaying their release may result in municipal process delays.

Recommendation:

That the Province provide an update on the status of the draft guidance documents used to facilitate the municipal comprehensive review process and that any guidance documents be released in final form concurrent with or prior to finalization of Amendment 1.

1.6 The proposed minimum greenfield density target and policies provide greater flexibility and ease of implementation.

The City of Guelph is pleased that the concerns around the minimum designated greenfield area density policies of the 2017 Growth Plan were addressed in the proposed amendment. It is anticipated that the proposed greenfield policies will eliminate the need for the City of Guelph to request an alternative greenfield area density target. This will reduce the overall workload and resources required to complete the municipal comprehensive review for both the City and Ministry staff.

Recommendation:

That the Province maintain the minimum greenfield density targets and policies as they are proposed in Amendment 1 to the Growth Plan.

1.7 The proposed minimum intensification targets and policies provide greater flexibility and ease of implementation.

The supply of prime intensification sites in the City of Guelph is declining and future efforts to intensify the built-up area will become increasingly challenging. For this reason, the City of Guelph is supportive of the proposed changes to the intensification target and policies to the horizon of the plan, along with the continued ability to request an alternative target. The proposed policies provide greater flexibility for the City in terms of implementation of the intensification policies.

Recommendation:

That the Province maintain the minimum intensification target and policies as they are proposed in Amendment 1 for the City of Guelph.

1.8 The Province should consider extending the date of conformity to the Growth Plan.

It is being proposed that Amendment 1 to the Growth Plan would maintain the same timelines for upper and single-tier municipalities to bring their official plans into conformity with the Growth Plan. The City's technical staff leading the required master plan updates have requested that the date for conformity be extended to July 1, 2023, or later due to the complex nature of the required studies and uncertainty around Guelph's water supply and wastewater capacity.

Recommendation:

That the Province modify the date for conformity to Amendment 1 to the Growth Plan to be July 1, 2023, or later.

2. Comments on the Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans) made under the Places to Grow Act, 2005

2.1 The Province should clarify the status of the land needs methodology guidance documentation.

The ERO's notice for the proposed changes to O. Reg. 311/06 (ERO 013-4505), the third bullet point under the Purpose of Regulation states:

Delete the provisions that had been added to the regulation on May 4, 2018 to support implementation of a standard method to calculate the amount of land needed for development to the horizon of the Growth Plan, known as a land needs assessment.

The statement makes reference to the deletion of provisions referring to the land needs assessment that municipalities were to conduct under the 2017 Growth Plan. However, Amendment 1 to the 2017 Growth Plan continues to make reference to the Land Needs Assessment in policies 2.2.1.6, 2.2.8.2 a), 2.2.8.5 e), and 5.2.2.1 c). The ERO posting is unclear on whether municipalities will continue to be subject to the standard land budget methodology prescribed in the final Land Needs Assessment Methodology for the Greater Golden Horseshoe document, released in May of 2018. If it is proposed that modifications to the land needs methodology are to be released, it will result in delays to the municipal comprehensive review process.

Recommendation:

That the Province provide greater clarity on the status of the Land Needs Assessment and the requirement for municipalities to conform to the methodology released in May of 2018.

3. Comments on the Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plan Amendments) made under the Planning

3.1 The City of Guelph has no comment on the proposed modifications to O. Reg 525/97.

The proposed modifications to O. Reg. 525/97 deal with matters pertaining to the Agricultural System and Natural Heritage System for the Greater Golden Horseshoe, 2017. These systems as mapped by the Province do not apply to the City of Guelph and therefore the City of Guelph has no comment on the matter.

Recommendation:

None.

4. Comments on the Proposed Framework for Provincially Significant Employment Zones

4.1 The proposed Provincially Significant Employment Zones as they are mapped for Guelph should be modified to exclude employment lands in the Clair-Maltby Secondary Plan area.

The City of Guelph is generally supportive of the framework for the Provincially Significant Employment Zones (PSEZ), which aim for the long-term protection of a regional economic land base.

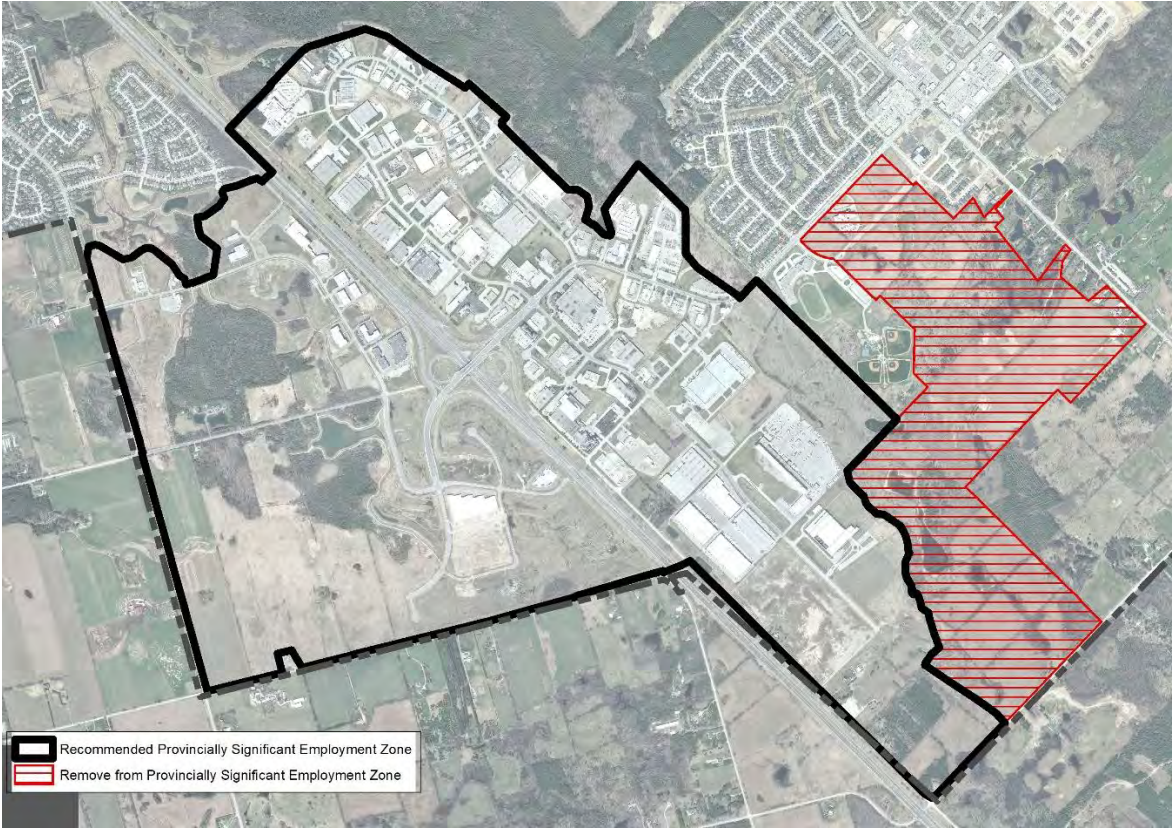
A PSEZ has identified lands designated as Industrial and Corporate Business Park in the south-west quadrant of Guelph, which includes the Hanlon Business Park, the Hanlon Creek Business Park, the Southgate Business Park and portions of lands within the Clair-Maltby Secondary Plan area. Based on our review of the proposed PSEZ policies, it would seem that the lands designated for employment within the Clair-Maltby Secondary Plan area do not meet the intent of these policies. The employment lands in the Clair-Maltby Secondary Plan are fragmented by Guelph's Natural Heritage System, creating disconnected pockets of employment lands that are isolated from other Business Parks. The fragmented nature of these employment lands constrains access to major goods movement facilities and corridors where access would only be granted via an arterial road that is proposed to become a high density mixed-use corridor through the secondary plan.

The City's Employment Lands Strategy, completed in 2010 identified that the City had a surplus of employment lands and recommended that the City pursue conversion of some of its employment lands. An employment lands inventory update completed in 2018 as background to the Clair-Maltby Secondary Plan reviewed the lands designated for employment within the secondary plan area and assessed their potential for conversion. The study determined that these lands were subject to a number of market and land-use planning challenges and recommended that they be converted to non-employment uses.

Lands within the Southgate Industrial Park have also been identified as PSEZ. Lands to the southeast of Southgate Drive are environmentally constrained by the City's natural heritage system and in the form of isolated pockets. It is also recommended that lands to the southeast of Southgate Drive be removed from the Guelph PSEZ due to the environmental constraints on these lands limiting their ability to develop for employment uses.

The City has provided a shapefile (attached) which identifies the lands that the City supports for identification as PSEZ in Guelph. Please e-mail Jason Downham directly at jason.downham@guelph.ca should you have issues with the data.

Figure 1: Recommended modifications to the Provincially Significant Employment Zone in Guelph



Recommendation:

That the employment lands in the Clair-Maltby Secondary Plan area and lands within the Southgate Industrial Park to the southeast of Southgate Drive (as identified in Figure 1 and attached shapefile), be removed as a Provincially Significant Employment Zone (PSEZ) to ensure that the PSEZ policies are applied appropriately in Guelph.



February 22, 2019

Project No. 16129

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Mayor Guthrie and Members of Council

**Re: Proposed Framework for Provincially Significant Employment Zones
Zone Number 21 – Guelph South
Environmental Registry Number 013-4506**

GSP Group represents the owners of 2021 and 2093 Gordon Street (the “Property”) with respect to land use planning matters.

We have reviewed Proposed framework for Provincially Significant Employment Zones. The Province is currently requesting comments under Environmental Registry Number 013-4506. In particular, the Province is proposing to designate a Significant Employment Zone area in the south part of Guelph. The Property lies within Zone Number 21 – Guelph South area as shown on Attachment A to this letter.

By way of background, the Property lies within the Clair-Maltby Secondary Plan area. GSP Group and our clients have been actively involved in the Clair-Maltby Secondary Plan since the commencement of the planning process in early 2016 (commencement of Phase 1). This has included attendance at public, landowner and stakeholder meetings, workshops, etc. and input into various documents and mapping. GSP Group has also submitted correspondence on several occasions throughout the planning process to date to Guelph Council/staff on the development and evolution of the land use direction for the Property and the overall Clair-Maltby Secondary Plan area.

In June 2018 after almost 2 years of technical work and consultation, Guelph Council approved a Preferred Community Structure Plan (see Attachment B to this letter) that provided general land use direction for the Clair-Maltby area.

More recently in November 2018, the City released the “Draft Directions: Framework for the Clair-Maltby Secondary Plan – Consultation Document” report which provides key policy directions and objectives for the development of the Secondary Plan. As part of the consultation document a map was prepared entitled “Proposed Neighbourhood Structure”

(see Attachment C to this letter). The Property and broader area have many natural heritage features that are currently protected. However, the majority of the Property is recommended to have various forms of residential land use, as well as being part of what is being termed as an “Urban Village Core” on either side of Gordon Street in the centre of the Clair-Maltby area. This Urban Village Core/Mixed Use area is proposed to contain high density residential, commercial, institutional and office uses.

We are in support of the general land use direction for the Property and we are currently working with City staff in relation to our comments on the Draft Directions report.

Based on our review of the current Official Plan, it appears the Province has used the current Industrial and Corporate Business Park designation in the Official Plan (see Attachment D to this letter) for land located in the Clair-Maltby Secondary Plan area to determine the boundaries of the Significant Employment Zone re: Zone Number 21 – South Guelph. In our opinion the use of the Property and adjoining land to the north that lies within the Clair-Maltby Secondary Plan area is not suitable for employment given the presence of the extensive natural heritage system, topography in some cases and vision/land use direction that has been established through the Clair-Maltby Secondary Plan process. Specifically, due to the sensitivity of the north-south natural heritage system from Clair Road to Maltby Road, no public or private road connections are being proposed thereby eliminating any vehicular road connections to the existing employment land uses to the west.

Based on the above, we would respectfully request the Province remove the Significant Employment Zone from the Clair-Maltby Secondary Plan area.

If you have any questions or would like to discuss further, please do not hesitate to contact me in our Kitchener office.

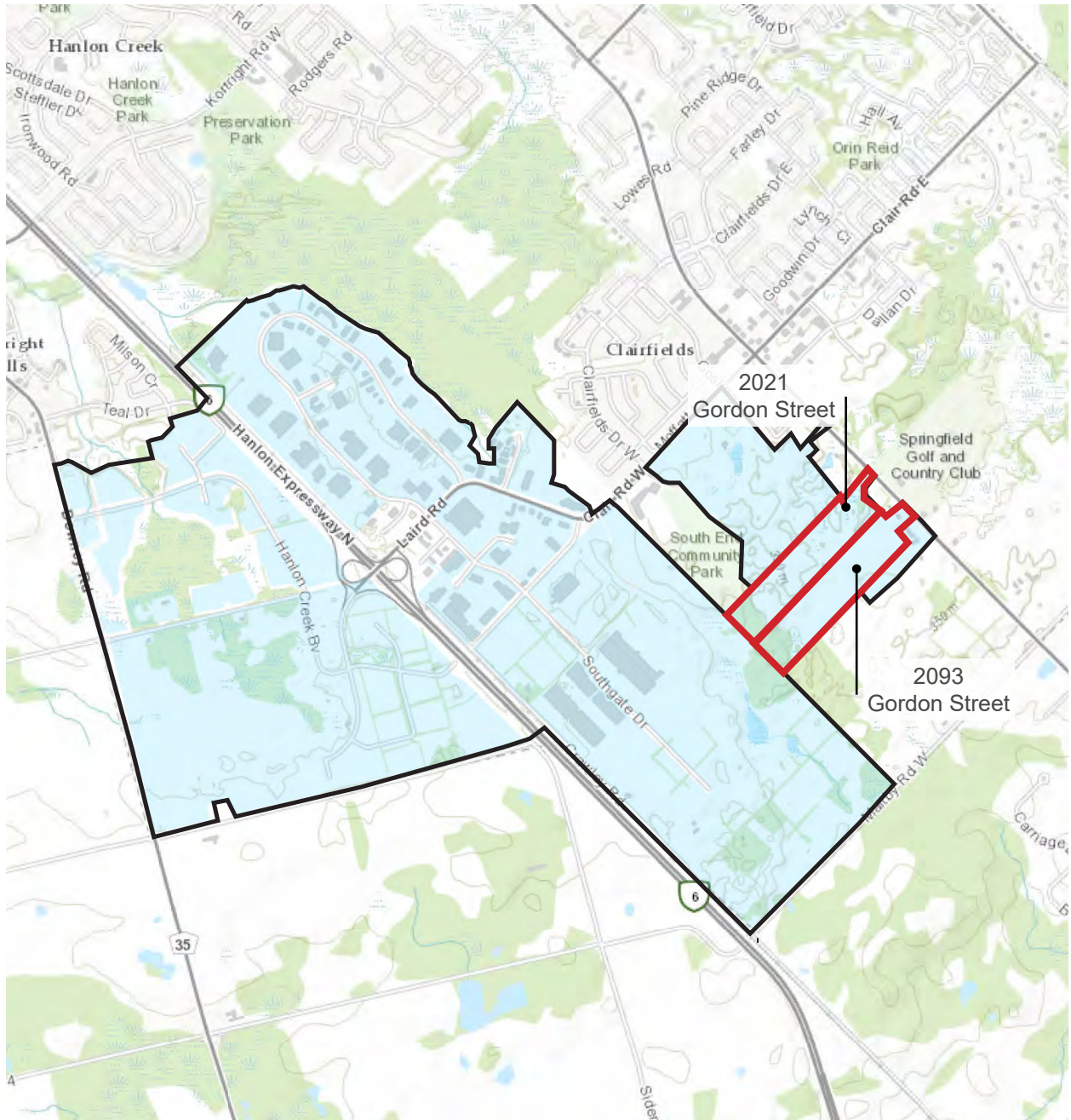
Yours very truly,
GSP Group Inc.



Hugh Handy, MCIP, RPP
Senior Associate

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cc 2021 Gordon Street Inc. and 2093 Gordon Street Inc.
Scott Snider, Turkstra Mazza Associates
Melissa Aldunate, City of Guelph
Stacey Laughlin, City of Guelph

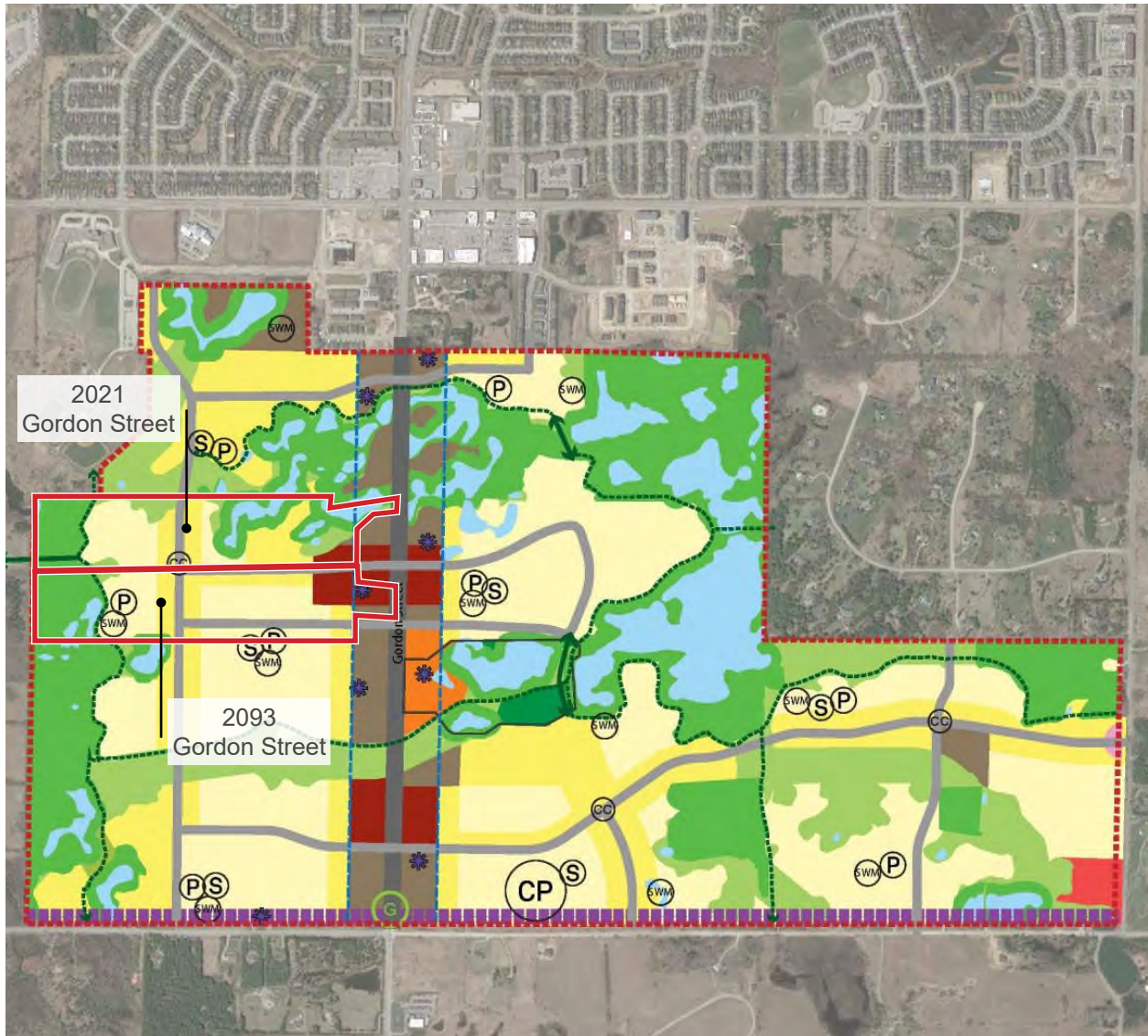


Proposed Provincially Significant
Employment Zone

Attachment

A

Source: Ontario Places to Grow Proposed Provincially Significant Employment Zones
Online Mapping (2019)



- Clair-Maltby Secondary Plan Boundary
 - Cultural Heritage Landscape
 - Urban-Rural Transition Zone
 - Gordon St. Corridor
- Streets and Trails
- Existing Street Network
 - Proposed Street and Cycling Network
 - Proposed Trail Network
 - Potential Active Transportation Link

- Parks, Schools, and Features
- Potential Neighbourhood Park
 - Potential Community Park
 - Potential Elementary School
 - Potential Stormwater Infiltration Areas
 - Convenience Commercial Area
 - Gateway
 - Cultural Heritage Resource

- Natural Heritage System
- May Permit Essential Transportation Infrastructure
 - Does Not Permit Transportation Infrastructure
 - Wetlands (MNRF 2017)

- Land Use
- Low Density (Residential)
 - Medium Density (Residential)
 - High Density (Residential)
 - Mixed Use
 - Neighbourhood Commercial
 - Service Commercial
 - Mixed Office / Commercial
 - Open Space

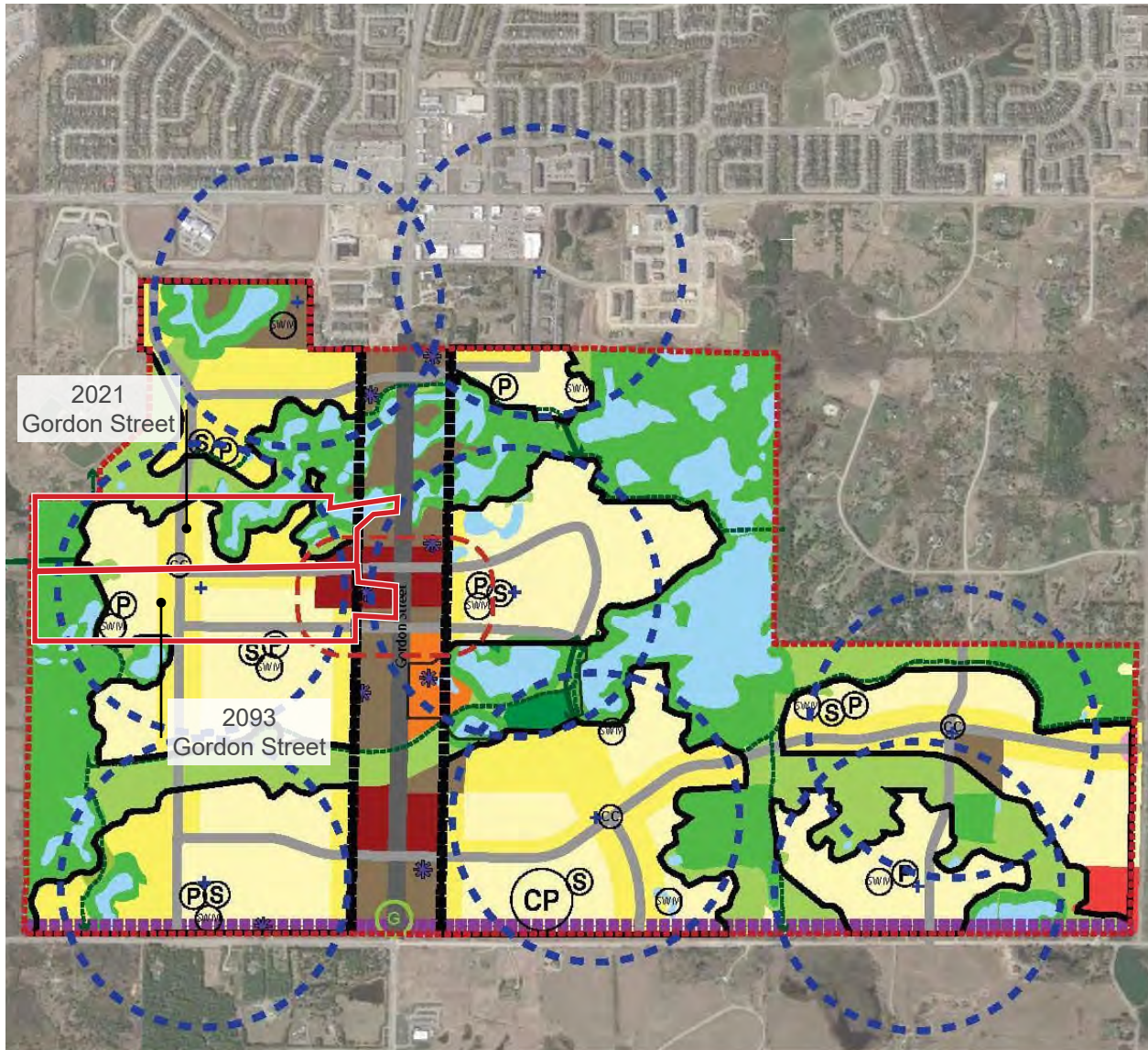


Clair-Maltby Secondary Plan - Preferred Community Structure

Attachment

B

Source: Draft Directions - Framework for the Clair-Maltby Secondary Plan, Map 2 (November 2018)



Clair-Maltby Secondary Plan Boundary

Streets and Trails

- Existing Street Network
- Proposed Collect or Road and Cycling Network
- Proposed Trail Network
- Potential Active Transportation Link

Parks, Schools, and Features

- Potential Neighbourhood Park
- Potential Community Park
- Potential Elementary School
- Potential Stormwater Infiltration Areas
- Convenience Commercial Area
- Gateway
- Cultural Heritage Resource
- Cultural Heritage Landscape
- Urban-Rural Transition Zone

Natural Heritage System

- May Permit Essential Transportation Infrastructure
- Does Not Permit Transportation Infrastructure
- Wetlands (MNRF 2017)

Land Use

- Residential Neighbourhood
- Gordon St. Corridor Neighbourhood Boundary
- 400m Residential Neighbourhood Walking Circles
- Urban Village Core



Clair-Maltby Secondary Plan - Proposed Neighbourhood Structure

Source: Draft Directions - Framework for the Clair-Maltby Secondary Plan, Map 2
(November 2018)

Attachment





Legend

- City Street
- Future City Street
- County Road
- Future Highway Interchange
- Railway
- Watercourse
- Waterbody
- Corporate Boundary
- Potential School Site

Land Use Designations

- Low Density Residential
- Low Density Greenfield Residential
- Medium Density Residential
- High Density Residential
- Mixed-Use Corridors
- Community Mixed-Use Centre
- Service Commercial
- Neighbourhood Commercial Centre
- Mixed Office / Commercial
- Industrial
- Corporate Business Park
- Mixed Business
- Institutional / Research Park

- Major Institutional
- Special Study Area
- Major Utility
- Open Space and Park
- Significant Natural Areas & Natural Areas
- Natural Areas Overlay
- Reserve Lands

Secondary Plans

- Secondary Planning Area
- Approved Secondary Plans



Provincial consultation follow up - Ontario Tourism Strategy

For your information and follow up from Intergovernmental Consultation report posted starting the beginning of February.

Provincial request for consultation – Ontario Tourism Strategy

The Ministry of Culture, Tourism and Sport has asked for visitor, student or tourism operator/stakeholder input in developing a new Ontario Tourism Strategy. They are collecting information to inform a visitor-first approach, improve the business climate, improve sector alignment, and support business and community development.

While Ontario has seen recent increases in tourism visits, there is an opportunity for Ontario to capture a larger share of international tourism growth. A new strategy will support a positive business environment that enables tourism businesses and operators to succeed while meeting consumer needs and expectations.

The anonymous on line survey was completed by staff in early February and it remains open until the end of the month. Further information can be found at <https://www.ontario.ca/page/consultation-ontario-tourism-strategy#section-1> .

Staff Response

The following is a summary of comments in the submission by staff:

- The experience of operating a tourism business in Ontario as challenging
- Identified workforce development and support, research and creating a positive business environment for growth/investment as the top roles for the provincial government.
- Identified investment in public transportation and strategic marketing as the areas for improvement
- Commented on skill gaps in the current workforce such as customer service, financial administration, project management, sales and marketing and strategic planning.
- Commented that customers are not finding authentic, indigenous tourism experiences and affordable family group travel products in Ontario and see this as an area of growth
- Suggested that supporting the small tourism operator and/or festival and event organizations that make up the majority of the tourism business in Ontario would encourage growth; as these offerings play key roles in community economic development and support vibrant, healthy communities of all sizes.

Thank you.

Danna Evans | General Manager
Culture, Tourism and Community Investment | **City of Guelph**