



November 21, 2025

Submitted online and via email to [PlanningConsultation@ontario.ca](mailto:PlanningConsultation@ontario.ca)

**RE: Consultation on simplifying and standardizing official plans**

The City of Guelph (the “City” or “Guelph”) appreciates the opportunity to provide feedback regarding the Ministry of Municipal Affairs and Housing (the Ministry) proposal to standardize and simplify municipal official plans. Below, you will find the City’s responses to the Ministry’s discussion questions as provided in the [Ministry’s Environmental Registry of Ontario posting](#) and overall recommendations regarding this proposal.

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**Standardizing Official Plan Structure and Contents:**

As part of this consultation, the Ministry has proposed a standardized structure for official plans, including the mandatory titles/order of chapters, and additional schedules and data to be included. The City’s comments are provided below:

*What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?*

The City of Guelph is broadly supportive of efforts to make official plans approachable and accessible for citizens. The City of Guelph has recently undertaken an Official Plan Update, which has included a review of policy language to improve the readability and accessibility of policy language.

The City would like to note that the structure of the City of Guelph Official Plan broadly follows the proposed standard chapters, with some variation. The City of Guelph also agrees that a shared structure across municipalities could improve the predictability of development. In many ways, this standardization is already enforced through s.2 and s.3 of the Planning Act requiring Official Plans to be consistent with the Provincial Planning Statement, 2024 (“PPS”). For example, all planning authorities in Ontario identify settlement areas under Section 2.3 of the PPS, employment areas under Section 2.8 of the PPS, Strategic Growth Areas under Section 2.4 of the PPS, and Major Transit Station Areas under Section 2.4 of the PPS in accordance with the policy requirements in the Provincial Planning Statement. While exact land-use permissions can differ from municipality to municipality, this framework already sets a predictable, standard growth structure for development in Ontario.

However, the City of Guelph is concerned that the proposed changes will have detrimental effects on local planning that the Province should carefully consider. Requiring the standardization of official plan content may make official plans less adaptable to municipalities with unique geographic, environmental, cultural, or historical contexts. Therefore, official plans may also not be able to reflect unique local circumstances in different municipalities across the province. Standardization risks erasing local priorities and nuanced planning solutions tailored to community needs. For example, the City of Guelph is a single-tier urban municipality, surrounded by the County of Wellington, an upper-tier rural municipality, with which it shares municipal service delivery obligations. Furthermore, the City of Guelph relies solely on groundwater for its water supply, making it the largest city in Canada to do so. Part of the Paris-Galt Moraine is also within the City of Guelph, which provides essential recharge, discharge, and storage area in the Grand River Watershed. This unique context requires unique policies to be included throughout the City of Guelph Official Plan.

The City of Guelph would also appreciate clarity that through the standardization and simplification of official plans, municipalities can still go beyond the minimum standards of the Provincial Planning Statement “to address matters of importance to a specific community”, especially as it relates to Natural Heritage System planning. The City of Guelph’s Natural Heritage System does go beyond the minimum standards in the Provincial Planning Statement because of the variety of natural heritage features present in the City of Guelph as well as the community’s vision and support for the Natural Heritage System in the City of Guelph.

The City of Guelph would also appreciate clarification on if a land use designation or feature were not located in a municipality, would it still need to be included in an official plan. For example, the City of Guelph does not have Agricultural Areas within the City of Guelph boundary. Would Agricultural Area policies need to be developed for the City of Guelph?

Furthermore, comprehensive community engagement is a critical part of the planning process. Members of the public participate in this process because it gives them the opportunity to define planning priorities for their community. Limiting flexibility in crafting planning policy can weaken community support for new neighbourhoods and growth. It can also reduce transparency, accountability and trust that residents have in their public agencies. In the City of Guelph’s experience, we see more support for community change when members of the public have an opportunity to understand and shape that change.

Finally, standardizing official plans may lead to fewer opportunities to pilot innovative planning solutions. Best practices can often be overlooked in favour of more uniform approaches.

*What is your perspective on limiting development standards in official plans? To what extent should development standards be set out in official plans vs in zoning by-laws?*

A municipal official plan is a legal statement of goals, objectives and policies intended to guide future land use, physical development, growth and change. An official plan communicates certainty by clearly articulating the relationship

between growth and built form in a municipality. This includes the certainty on when, and in what order, parts of the community will grow and change.

Furthermore, oversimplification of the planning process could lead to gaps in policy coverage, creating ambiguity and legal uncertainty. The City of Guelph has repeatedly heard from the local development community that specificity in policy creates certainty. That includes specific development standards. Without development standards such as height and density in an official plan, directing and communicating that change becomes more difficult.

Development standards speak to broader future planning objectives of a municipality and are appropriate to include in official plans. The City of Guelph believes that these development standards would include permitted uses, height, and density. For example, much of Guelph's growth is expected to occur through intensification which means that permitted uses and densities differ from what currently exists on-the-ground. It is essential to provide a coordinated policy document to demonstrate how Guelph is planning to facilitate growth as directed by provincial policy.

The City of Guelph would also appreciate clarity on how removing development standards would work with the proposed designations as part of this consultation. It appears that some development standards are intended to be inherent to the proposed designation (i.e. Residential I is for "low-rise/density residential buildings", Mixed Use Areas II is for "high-rise/density buildings"). If the ability to include development standards in official plans are removed, it begs consideration to understand how the differences between these designations would be communicated in the official plan.

The City of Guelph is also concerned that this proposed change would result in zoning by-laws becoming longer and more difficult to utilize if it were necessary to include development standards under this particular municipal tool. Official plans and zoning by-laws serve different purposes as municipal planning tools in each specific municipality. Official plan policies can provide more flexibility and adaptability for development than standards in a zoning by-law, and official plans are a planning vehicle to demonstrate broader future goals for overall planning objectives. Alternatively, zoning by-laws are more specific in their use and enforcement. The City of Guelph has also seen restrictions on the standards that can be included in the zoning by-law. As discussed in later sections, the City of Guelph would also have to comprehensively update its zoning by-law, which would be subject to appeal in order to implement these new designations. This would result in an immense administrative burden on municipalities, and in disjointed zoning by-laws that would be difficult to implement and interpret in each individual municipality.

The development standards, such as height and density that are set out in an Official Plan which is a long-range planning horizon, also serve as the basis for Master Planning including water, waste water, parks, transit and transportation. These master plans then in turn form the basis of capital plans and long term capital forecasts. Without having clear parameters established in the Official Plan, Cities will not be able to plan for growth or accommodate infrastructure growth in areas that will be needed, when it is needed.

*What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies?*

The City of Guelph is not supportive of changes proposed to remove secondary plans and site-specific plans.

In the City of Guelph, areas subject to secondary plans or site-specific plans are either planned for different kinds of growth than the rest of the municipality (i.e. Downtown Guelph or the Guelph Innovation District), have unique physical characteristics that make development particularly challenging and different from the rest of the City (i.e. the former Dolime Quarry or the Clair-Maltby lands), or both. Secondary plans allow municipalities to build from policies in the parent official plan to provide more specific direction for a unique area of a municipality while also providing a benefit to the development community. These plans are also critical to future infrastructure planning & financial planning in a municipality. Through secondary plans, municipalities and the development community can plan for the infrastructure that will be needed and who will pay for that infrastructure, at the appropriate time. The City has worked with the development community, to great success, to plan the long-term vision for secondary plan areas.

For example, the Clair-Maltby lands in the City of Guelph are located on the Paris Galt Moraine, and as such, have significant hummocky, rolling topography and have no localized outlets for stormwater to drain. Therefore, the City of Guelph had to create a unique planning framework for this area that would address the protection of the Natural Heritage System while still permitting development to occur. This includes the unique usage of stormwater management capture areas as “dry” stormwater ponds that exclusively rely on infiltration, which is unlike any other stormwater management strategy in the City of Guelph. The Clair-Maltby Secondary Plan also has an accompanying Master Environmental Servicing Plan, completed as an Environmental Assessment, to appropriately dictate and phase the infrastructure requirements to service the Clair-Maltby lands. This Master Environmental Servicing Plan, also plans for the timing of city services, including roads, water towers and pumping stations. Without a secondary planning process, the ultimate servicing needs would not be planned and accommodated in the 10 year capital forecast to allow growth to occur, thus substantially delaying projects for decades.

In addition, the City of Guelph’s Downtown Area is already prescribed as an area subject to different provincial policy requirements as it is the City’s only Protected Major Transit Station Area (PMTSA). A secondary plan for the Downtown allows it to be planned for the minimum density targets within the Provincial Planning Statement, 2024 which are much different than any other area of the City. Furthermore, the City of Guelph’s Downtown has a unique concentration of considerations from heritage assets, to servicing constraints, the mobility system, etc. which also differentiate it from any other area of the City.

In the City of Guelph, site-specific plans are used for lands undergoing a significant change, such as the Silver Creek Junction lands which are a former brownfield site. The Silver Creek Junction has unique infrastructure requirements that need to be accounted for in separate official plan policy.

A secondary plan also allows the public to provide focused engagement on a particular area of the City. All of the City of Guelph's Secondary Plans were built with multiple years of public engagement that provided clarity and certainty to all Guelph residents on how these areas of the City would change. Secondary plans and site-specific plans must conform to parent official plans, and therefore, are already treated as a singular comprehensive document. As well, removal of secondary plans or site-specific plans could also impact development rights for several landowners in the City of Guelph and could stall development as City staff incorporate secondary plan policies and permissions into the parent official plan.

Lastly, secondary plans and their associated planning tools give essential information to ensure that planning objectives are clearly communicated to the local community, ensure responsible planning and capital budgeting, and are legally enforceable when implemented.

The City of Guelph would appreciate clarity on how the removal of secondary planning would operate in conjunction with the PMTSA legislative changes proposed as part of Bill 60.

Overall, the City of Guelph strongly recommends that the Province of Ontario maintain the ability for municipalities to establish and maintain secondary plans and site-specific plans.

*What is your perspective on the number and types of standardized schedules, overlays and data proposed to be required? Should any be removed, or are there any other schedules that could help improve official plans?*

Overall, the proposed schedules align with some of the current schedules in the City of Guelph Official Plan. However, the City of Guelph would appreciate clarity and/or flexibility from the Province in implementing these schedules. For example, including a large amount of features or data in one singular schedule can result in that schedule becoming overwhelming and confusing to follow. As well, from a data storage and data management perspective, there can be technical capacity issues in GIS due to the large volume of information and layers. In the City of Guelph's experience, multiple schedules denoting specific features of an entire system are more accessible and user-friendly. For example, a municipality could have multiple Natural Heritage System schedules, with each schedule focusing on a specific Natural Heritage feature.

The City of Guelph requests clarification that municipal data and municipal mapping will need to align with Provincial datasets and Provincial mapping. The City would require clarification to understand if all municipal data and mapping will become Provincial data and provincial mapping. This would be a lengthy process to implement, and result in extreme administrative burdens of approximately 2 years or more.

The City of Guelph also recommends that the Province provide technical guidance and assistance for municipalities to digitize their official plan schedules. This would improve data access and mapping accuracy with toggleable and downloadable layers.

In terms of the specific proposed sections, the City of Guelph has the following clarification questions:

- What is “Estimate of Market Need”? Would this be included in the body of the official plan?
- Would “Serviced Land Requirement” just be included in the body of the official plan?
- What is “Wastewater and Stormwater”? Would this be included in the body of the official plan?
- If a municipality does not have an identified Agricultural System, is this schedule required?
- What is “Wildland Fire Susceptibility”? Is this schedule required for urban municipalities?

The City of Guelph would also recommend that proposed Schedule B1 Transportation & Corridors be broadened to include the overall municipal mobility system including road classifications, the active transportation network, etc.

Overall, the City of Guelph requests that the framework to be developed permit municipalities to add additional schedules using the proposed labelling scheme.

### **Limiting the Length of Official Plans:**

As part of this consultation, the Ministry is proposing to limit the length of official plans by implementing a page or word limit.

#### *What is your perspective on the changes being considered to limit the length of official plans?*

The City of Guelph appreciates that official plans in Ontario have become longer over time. The City of Guelph does note that without secondary plans and schedules, the City of Guelph’s Official Plan does fall below the 250-page limit contemplated by the Province of Ontario.

The City of Guelph is concerned that imposing a page or word limit could affect the municipalities' ability to create a document that is compliant with the Accessibility for Ontarians with Disabilities Act (AODA), 2005. In the City of Guelph’s experience, achieving AODA compliance for documents is often more page intensive. This would not comply with essential legal requirements under applicable legislation, and put municipalities at risk of non-compliance.

As well, the complexities and demands of municipal planning in Ontario have also increased, with good reason. For example, climate change has become a significant consideration in municipal planning in the past few years, requiring policy changes to land use, engineering standards, urban design, natural heritage system planning, and more. Page or word limits on official plans could oversimplify complex issues like climate change, or worse, limit municipal policy in addressing these issues. For example, if engineering standards were removed from official plans, they could then be moved to by-laws, like a zoning by-law or sewer by-law, resulting in the development community having to become familiar with more documents. Therefore, the City of Guelph does not believe that limiting the length of official plans will address the issues of preparing and reviewing official plans. Furthermore, shorter official plans may increase reliance on interpretation, leading to increased litigation and the inconsistent application of policy.

As an example, the Province is proposing a Standard Chapter Order with a total of 11 chapters. This would mean each chapter couldn't exceed more than 22 pages, with some variance depending on the number of pages used for other chapters. Chapter 10 of the proposed Standard Chapter Order is proposed to include processes, tools, phasing, monitoring, Section 26 update, and definitions. The Provincial Planning Statement's own definition section is 18 pages. Even if municipalities used the exact same number of pages to cover their respective definitions, that would leave only 4 total pages to address tools, phasing, monitoring, and Section 26 updates.

The City of Guelph is also asking for clarity on how adding site-specific policies to an official plan would operate with a page or word limit. For example, if several recent site-specific official plan amendments were approved and to be consolidated into the official plan, would municipalities have to remove existing policies in order to maintain a 250-page limit.

*Should there be different limits placed on different types of municipalities (e.g., based on population size)?*

As mentioned above, the City does not believe that hard limits would be conducive to easier official plan interpretation. Should the province move forward with imposing various official plan size limits on different types of municipalities, they should be based on physical and/or planning characteristics of the municipality rather than population size.

There can be vast differences in land use types and considerations in a municipality. For example, a municipality could simultaneously have a densely populated Downtown Urban Centre along with agricultural land at its periphery. Municipal official plans must have policies that speak to both land use types. Some municipalities with a larger population size or geographic size may have less variation in land uses or could have less development constraints that need to be addressed through official plan policy.

*Are there other approaches that could be used to limit the length of official plans?*

Rather than focus on limiting the length of official plans, the City of Guelph recommends that the Province focus on providing guidance materials to municipalities on policy writing and plain language to make official plans more effective and accessible to the public.

### **Creating Permissive Land Use Designations:**

As part of this consultation, the Ministry is proposing to implement ten (10) standard land-use designations that would apply across all municipal official plans. Details of these new designations can be found on the [Ministry's Environmental Registry of Ontario posting](#).

*What is your perspective on the changes being considered to standardize the number and type of land use designations?*

Across Ontario, various municipalities are already undertaking projects to simplify designations as per their own needs within the scope of their municipal

authority. The City of Guelph believes that this remains the best approach to ensure that designations continue to reflect local context and public input.

The City believes that standardizing land use designations across the province would not be practical, feasible, or effective. Every property would need to be evaluated individually to apply new designations to ensure that no property rights are lost, which would be almost guaranteed to occur for existing designations that don't neatly fit into the proposed standard designations, and for site specific permissions. The administrative cost of applying all new designations would be enormous and would increase uncertainty for developers in the short and long-term. The City of Guelph would also appreciate clarity on where these designation policies would be located in the proposed chapter order.

In the interest of improving consistency and to reduce administrative burden on municipalities, developers, and the Province, the City might support the Province creating designations with built-in policies that municipalities can adopt into their official plans, provided that there is flexibility on how municipalities adopt them as appropriate and over the long-term.

*Are there additional designations that would be required? Are there opportunities to streamline or further combine some of the proposed designations (e.g. Residential I and II, and Mixed Use I and II)?*

From the perspective of the City of Guelph, additional designations would be required. For example, the City of Guelph is home to the University of Guelph which contains numerous land use and building types. Under these proposed designations, the University of Guelph could be split designated Residential I, Residential II, Mixed Use I or Mixed Use II. It is not clear from the designations what would distinguish the application of these designations on university land. It would be more appropriate for there to be an "Institutional" designation that could specifically speak to the unique characteristics of university or college land.

The City of Guelph would also appreciate clarity on some of the proposed land uses within these designations. For example, in the proposed Mixed Use designations, industrial, manufacturing and small-scale warehousing uses would be permitted as long as those uses "could be located adjacent to sensitive land uses without adverse effects."

Finally, the City of Guelph does have the following specific comments and questions of clarification:

- Can examples of these uses be provided to municipalities?
- Would municipalities have any discretion in determining if these uses are appropriate next to sensitive land uses?

Blanket permissions could result in municipalities having to accept development applications even if the proposed use doesn't meet necessary requirements (i.e. health and safety) and could place municipalities at significant risk. As well, these permissions could also make it more difficult for municipalities to mitigate adverse effects from noise, odour, and other contaminants, resulting in additional risks.

*Are there implications to making land use designations more streamlined and permissive?*

There are a number of implications to making land-use designations more streamlined and permissive. To start, making land use designations more permissive can have infrastructure implications, especially if that permissiveness results in more intensive forms of development that require increased infrastructure capacity than what was originally planned. For example, the City of Guelph continues to promote gentle densification in its existing neighbourhoods, but has found that existing water servicing pipes are not large enough to accommodate even a single additional residential unit without significant effect on water capacity. This means that the landowner must hire a contractor to replace this pipe at a significant cost. More development permissions may require the City to plan for more infrastructure upgrades (at a significant cost to the municipal taxpayer) or raise development charges (at a significant cost to the individual landowner).

Consolidating designations may also remove some landowner's development rights, especially on parcels that have site-specific policies and permissions. This might have the unintended consequence of limiting development potential, and result in less housing. Furthermore, while official plans may be exempt from appeals through a Section 26 amendment, municipalities would also need to update their zoning by-laws to conform to these new official plans, which could be subject to lengthy and costly appeals, further reducing development potential. Consolidating designations could result in the difficulty to determine which designation to conform to, causing legal uncertainty, and further increasing the risk of appeals.

*Are there land use designation terminology or descriptions that would be easier to understand?*

The City of Guelph would encourage the Province to utilize land-use designation terminology & descriptions that incorporate development standards to assist with differentiating between land use designations. For example, the Province could consider the following residential land use designations: Low Density Residential, Medium Density Residential, and High Density Residential.

The Province might also consider standardizing certain defined terms and uses so that there is consistency between municipalities and other metrics of those uses. For instance, Statistics Canada counts single detached dwellings, semi-detached dwellings, and duplex dwellings, but these definitions rarely align with how municipalities define them. Please see the following link for more information: [Type of Dwelling Reference Guide, Census of Population, 2021](#). This would also apply to Additional Residential Units, which have significant overlap with other low-density residential housing types, such as duplexes, triplexes, and fourplexes.

**Conditions for Transitioning to the New Official Plan Framework:**

As part of this consultation, the Ministry is considering rules that would govern the transition to the new official plan framework, which include setting out timelines for transition which would vary by municipality size.

What is your perspective on the changes being considered to transition to a standardized official plan framework?

As the City of Guelph is a large and fast-growing municipality, the Province is proposing to require the City of Guelph to update its official plan within 2 years of a new framework coming into place. The City of Guelph strongly believes that this timeline is not feasible. Overall, the City of Guelph believes that compressed timelines without additional resources may lead to rushed, incomplete plans, undermining long-term growth management.

Municipalities have struggled to retain and train new municipal planning staff over the past few years, despite increased expectations on municipalities, strained municipal budgets, numerous provincial legislative and policy changes, the removal of key financial tools to implement municipal infrastructure, and various housing initiatives and targets from both the Federal and Provincial governments.

Delivering a new official plan that implements this new framework would require our planning department to stop work on almost all other planning projects and potentially impact development review timelines as well. It would also impact other departments at the City of Guelph, which include increasing the potential for appeals. For example, to implement the proposed designations, municipalities may need to do a property-by-property review to ensure that the proposed designation is appropriate. Municipalities would then need to update their zoning by-laws to conform to these new official plans. This would also require significant time and resources.

In addition, municipalities often use various consulting firms to subsidize staff capacity. If all 29 large and fast-growing municipalities are required to update their official plans at the same time, municipalities will face significant competition in securing these resources at significant cost to municipal taxpayers.

Lastly, the City of Guelph is concerned that this will significantly limit our ability to coordinate growth with surrounding municipalities. The City of Guelph works closely with the municipalities in the County of Wellington. Under the proposed Provincial Planning Statement growth projection methodology and the Ministry of Finance population projections, the City of Guelph's population projections are not disaggregated from the County of Wellington's. Therefore, the City of Guelph must work with the County of Wellington to assign growth and update official plans. If these timelines are not aligned, we risk losing the ability to coordinate that growth appropriately.

What is a realistic implementation timeline for your municipality to update its official plan to comply with a standardized framework (e.g., structure, land use designations, page/word limits), and why? Please consider staffing, council cycles, data/mapping updates, public engagement, and statutory review requirements in your response.

At a minimum, the City of Guelph would estimate 5-7 years to implement this new framework and potentially require provincial funding to do so. The City of Guelph's latest Comprehensive Zoning By-law, as a comparative planning project

with a similar scope, was initiated in January 2019 and received Council approval in April 2023. The Comprehensive Zoning By-law was subsequently appealed, stretching the actual completion date to at least 2026. This project involved staff from across the City of Guelph, including, but not limited to, Planning and Building Services, Engineering & Transportation Services, Legal Services, Strategic Communications and Community Engagement, and Parks. A similar if not higher staffing commitment would be required for implementing this standardized framework. Many of these staff are already engaged in various projects responding to previous provincial changes.

The City of Guelph also relies on the Canadian census to provide data to inform planning decisions. The next Canadian census is scheduled to occur in May 2026. However, some data pieces, especially on employment, from the census are not available until 18 months after the census has occurred. A two-year implementation timeline risks losing out on that critical information.

Furthermore, a Section 26 amendment requires several additional statutory Council touchpoints and public engagement opportunities compared to a Section 17 amendment, which would need to be planned for. Community engagement would require a high level of coordination and planning, with at least six public engagement opportunities (both in-personal and virtual options with opportunities at project initiation, draft, and final, at a minimum) required throughout the project. With a project of this size and importance to the community, a project-specific advisory committee or panel may be created, which would meet on a more frequent basis. City staff would also have to present updates to advisory committees of council. For Guelph this includes, but is not limited to the Planning, Environment, and Water Advisory Committee, the Heritage Advisory Committee, the Economic Development and Tourism Advisory Committee, the Transportation Advisory Committee, and the Downtown Guelph Business Association. Staff would also have to account and plan for various Indigenous engagement touchpoints.

Once a draft is available and a public notice has been published, the City of Guelph could receive comments from the following external agencies that would need to be worked through:

- Bell Canada;
- Canada Post;
- The County of Wellington and surrounding townships;
- Various school boards;
- The Grand River Conservation Authority;
- Alectra Utilities
- Hydro One; and
- Various Provincial Ministries.

City of Guelph Council could also direct staff to do increased engagement with a specific group or property owner or additional review on a specific topic area.

Depending on the final structure, content, designations, data requirements, overlays, and schedules, the City of Guelph may need to upgrade its mapping software, data storage software, and property information software, requiring further time and budget.

Following adoption of the official plan or official plan amendment, City staff may need to prepare to respond to and implement Ministry changes. The City's latest Growth Management Strategy was initially adopted by City of Guelph Council in July 2022 but because of Ministry modifications, reversal of those modifications, and then reinstatement of some modifications, complete clarity was not available until Bill 162 received royal assent, almost a full two years following Council adoption.

Overall, the City of Guelph highly recommends that the Province maintain the current Planning Act timelines for updating an official plan, if not extend these timelines, considering this would be the first time municipalities are implementing this framework.

In addition, the City of Guelph requests that the Province develop guidance documents and methodologies for each required chapter and schedule.

Finally, for large and fast-growing municipalities, the Province should assign a Ministry of Municipal Affairs and Housing caseworker who would be readily available to work with municipalities in addressing implementation questions.

*How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?*

If this proposed change is pursued, no further changes should be made to any planning-related legislation or planning policy during this transition period. This would include, but not be limited to, the Planning Act, the Development Charges Act, the Ontario Heritage Act, the Provincial Planning Statement, any associated regulation, and any supporting guidance materials or methodologies. During the City's last Growth Management Strategy, the Province of Ontario changed the planning horizon from 2041 to 2051, which added significant time and cost to that project timeline.

Furthermore, the City of Guelph would also require a commitment that a Minister's Decision on any new official plan or official plan update to implement this framework be issued within 6 months from the date of submission. This would demonstrate the Province's commitment to providing clear planning outcomes. Lastly, if the Minister wished to make changes to municipal official plans or official plan updates, all changes should be discussed with municipal staff before a decision is published.

**Requiring Submission of Official Plans through an Online Portal:**

*Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?*

Overall, the City of Guelph is supportive of submitting official plan information and documents through an online portal. This would save municipal staff time in compiling submission materials, protect data during transfer, and reduce errors and omissions. Online portals can also reduce potential for human error and lessen the environmental impact from a physical submission.

*What benefits and/or risks do you foresee from transitioning to submission through an online portal?*

Some risks that the Province should be aware of include potential technical issues such as website outages, upload errors, or incompatible file formats that can delay or block submissions. The Province should publish clear submission instructions and thoroughly test this online portal. As well, the Province should ensure that this portal is not vulnerable to data breaches.

As well, municipalities have a contact person at the Ministry who is available for questions regarding submission. An online portal could make it more difficult for municipalities to connect with the Province. The City of Guelph would recommend that the Province still make Ministry staff available if municipal staff have questions or concerns.

**Closure:**

We appreciate this opportunity to provide input on this proposal. Should you have any questions about the feedback provided, or require additional details please do not hesitate to contact the City at [intergovernmental.relations@guelph.ca](mailto:intergovernmental.relations@guelph.ca).

Sincerely,

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