

November 21, 2025

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

**RE: Consultation on Enhanced Development Standards**

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to provide feedback regarding the use of enhanced development standards at the lot level (ERO posing 025-1101). related to the use of enhanced development standards at the lot level.

**What is your interest in and/or experience with the implementation of enhanced development standards at the lot level (outside of buildings)?**

The City of Guelph is currently preparing a voluntary Green Development Framework (GDF), which is an action identified in the City's [Natural Heritage Action Plan](#) to assist in the evaluation of the environmental sustainability of development proposals, and is being undertaken consistent with consultation with the Ministry of Municipal Affairs and Housing. The GDF will support development proposals toward achieving the following environmental targets set in the City's master plans, which are consistent with the 2024 Provincial Planning Statement (PPS) (PPS 2.9, PPS 3.2.1 and PPS 3.6):

- Race to Zero community greenhouse gas (GHG) reduction targets, including a 63 per cent reduction against the 2018 baseline by 2030, and a net zero carbon community by 2050.
- Waste target – achieving a diversion rate of 62% by 2030 translating to annual waste generation of 250 kg of waste per household by 2030.
- Transportation target – working towards a 42 per cent non-auto trips mode share that will contribute toward an estimated 23 per cent reduction in GHG emissions by 2051.
- Support Vision Zero initiatives to enhance road safety.
- Tree canopy cover target – achieving 40 per cent canopy cover of the city's land area by 2070 by planting on a combination of public and private land.
- Water target – achieving a reduction of 9,147 cubic metres in average daily production by 2038.

**In your experience, are enhanced development standards applied consistently across municipalities? Please provide examples where possible.**

*Green Development Standards*

Most municipalities undertake a best practice review as part of preparing green development standards (GDS), which contributes to consistency in the approach, structure and content of the GDS of these municipalities.

Our evaluation of the GDS of five municipalities in the Greater Toronto Area (GTA) finds that they are generally

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consistent as they address a common set of themes and there are mostly similar criteria within each theme. However, a municipality may focus more on some criteria more than others based on matters that are of greater importance to that municipality. As such, there is certainly an opportunity to streamline and standardize GDS.

Municipalities adopt one of two approaches to GDS - a tier-based approach or a points-based approach. In our evaluation, four of the five municipalities studied adopted the tier-based approach. The GDS of four municipalities applied to draft plans of subdivision and site plans, while the GDS of one municipality applied only to site plan applications. All the GDS applied to a similar set of building types including low-rise, mid-rise and high-rise residential, commercial, institutional, and industrial. All the GDS addressed key performance criteria including building energy and embodied carbon, urban heat island, E-V charging, active transportation, water efficiency, stormwater management and construction and on-site waste management.

As such, green development is interpreted broadly as sustainable development and applied not just at lot level but also at draft plans of subdivision to address Provincial Policy Statement, 2024 (PPS) requirements for the promotion of healthy, active and inclusive communities (see PPS 3.9.1 and 2.9.1) The GDS of the four municipalities which were applicable to draft plans of subdivision included community design and mobility as additional performance criteria that address the above-noted PPS policies.

#### Other Enhanced Development Standards

The proposal lists requirements for bioswales and permeable pavement as examples of Enhanced Development Standards. The City of Guelph is a groundwater-dependent municipality and conserving and protecting source water is a driving factor behind many development standards that may be considered 'enhanced' or inconsistent with other municipalities that do not operate in the same context. Examples of lot-level standards in the City of Guelph include infiltration targets that ensure adequate groundwater recharge is achieved and that water infiltrated back into the water resource system is treated to remove or separate contaminants. This also supports the Source Protection Plan policies developed under the Clean Water Act to protect municipal drinking water supplies.

#### **What types of standards, should municipalities be allowed to apply outside of buildings and how do these requirements maintain the health and safety of the site if at all?**

Lot-level standards that should be permitted at the municipal level include those standards that are required to support the goals and objectives of the PPS. Ensuring that developments in their entirety (i.e. outside of the building and the buildings themselves) can provide required levels of stormwater management, quality and quantity of water infiltration, prevention of groundwater interference, etc. at levels appropriate for the site-specific context is crucial to ensure that the amount of land available for development is maximized while ensuring necessary protections.

The following are examples of PPS requirements that are supported through local lot-level standards:

1. PPS 2.9.1.b: Incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities;

Stormwater management is most effective and flexible when considered across large areas, such as through a Stormwater Master Plan. Stormwater management systems rely on lot-level infiltration, especially in areas where there are limited outlets or opportunities to recharge groundwater.

Without lot-level infiltration targets, it is likely that stormwater management areas will need to be larger and rely on preserving developable lands to accommodate subdivision-level stormwater management facilities due to inability to provide infiltration across broader areas by requiring lot-level infiltration targets or measures (e.g. infiltration galleries).

2. PPS 2.9.1.d: Promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality

Green infrastructure and low impact development measures, such as the planting of street trees, use of natural channels, bioswales and permeable surfaces, and heat island mitigation are most appropriately implemented at the lot scale where developments are subject to site plans.

3. PPS 3.6.8: Planning for stormwater management shall: b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads; c) minimize erosion and changes in water balance including through the use of green infrastructure; f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development;

Lot-level standards provide an appropriate and manageable scale for implementing many of the measures that address the above policies.

4. PPS 4.2.1: Planning authorities shall protect, improve or restore the quality and quantity of water by: b) minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts; e) implementing necessary restrictions on development and site alteration to: 2. Protect, improve or restore vulnerable surface and ground water, and their hydrologic functions;

As identified in the comments above, and the PPS reference specifically, there are conditions which require implementation of restrictions on site alteration in order to mitigate impacts to vulnerable surface and groundwater and their hydrologic functions.

5. PPS 4.2.2: Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches;

As noted above, alternative development measures may be required on a site-specific basis to protect water resources, which may be accomplished through the use of enhanced lot-level standards.

6. PPS Section 4.1:

Section 4.1 of the PPS identifies the need for development and site alteration in certain areas to demonstrate that there will be no negative impacts on natural features or their ecological functions.

The use of lot-level controls and standards are often relied on to ensure that development does not result in negative impacts to natural heritage features or their ecological functions, consistent with the direction of the PPS. Further, some lot-level standards can be implemented to achieve protection of natural heritage features or their ecological functions which also serve to increase or maximize the developable area of a site.

7. PPS Chapter 5 (Protecting Public Health and Safety):

PPS Chapter 5 includes policies that speak to avoidance of hazardous lands and hazardous sites, and specifically that "Planning authorities shall prepare for the impacts of a changing climate that may increase the risk associated with natural hazards". This wide lens to the protection of public health and safety offered through the PPS is applied in these comments. Lot-level targets should be considered as a reasonable municipal tool to ensure that there is no increase in hazardous lands (e.g. floodplains) as a result of development.

**Do you have any additional comments or suggestions relating to site plan control or other related subjects?**

Considerations around context are important when designing developments of all sizes. The ability for municipalities to provide flexible and context-specific development measures at the site level is a means of ensuring that impacts, such as source water and stormwater management, can be managed while accommodating development.

**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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