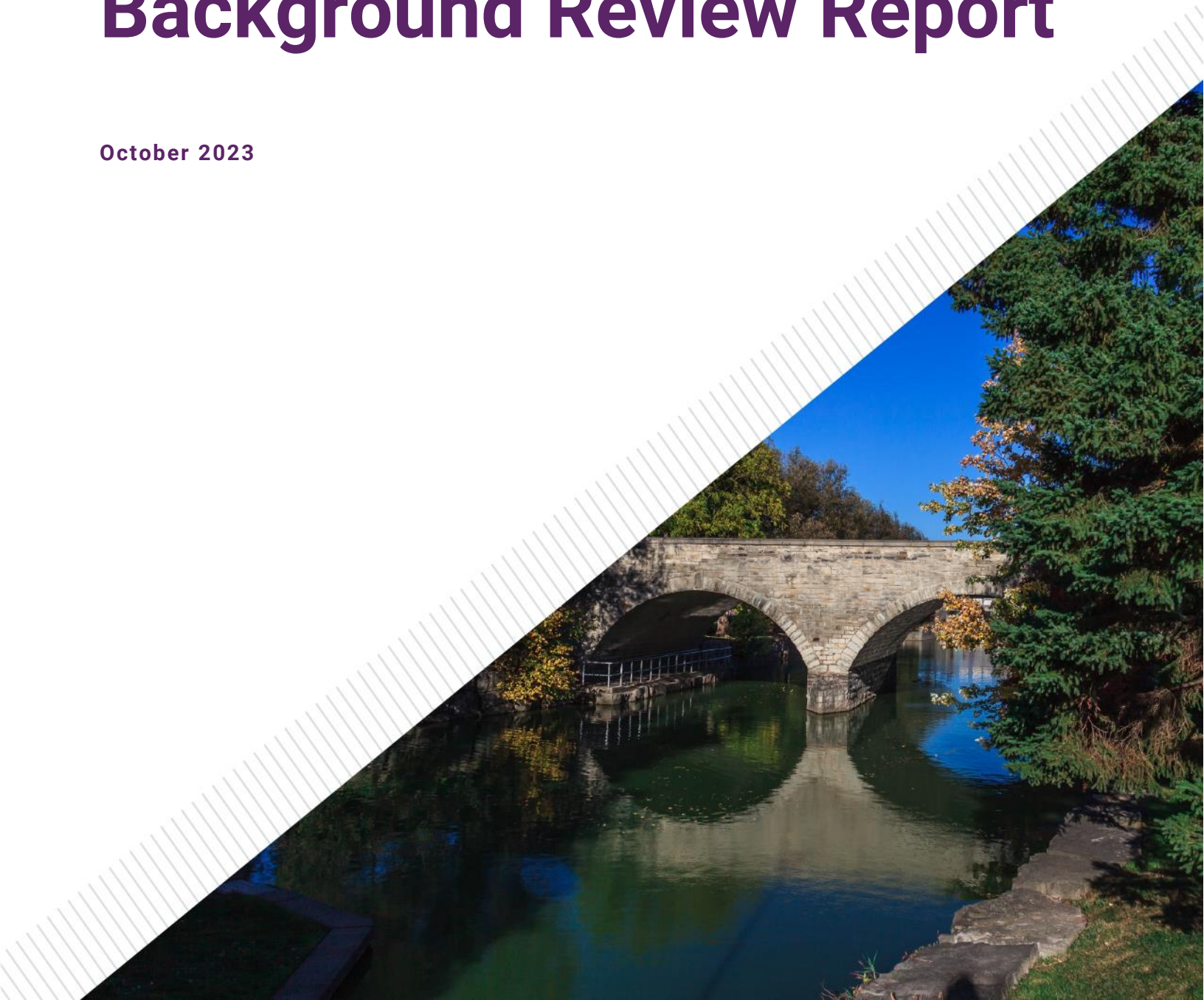


City of Stratford Official Plan Review

# Background Review Report

October 2023



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# 1 Introduction

As Stratford looks to the future of growth and development in the community, the City has begun the process of reviewing its local land use planning policy document called an Official Plan. The City's current Official Plan has been in place since it was first adopted in 1993 and most recently updated in 2015. Stratford now needs to review its Official Plan to be more strategic and forward-thinking. The process of reviewing an Official Plan is about making choices together as a community, while equipping the City to plan for future change. The Official Plan Review will work to answer several questions towards implementing new policies to support growth:

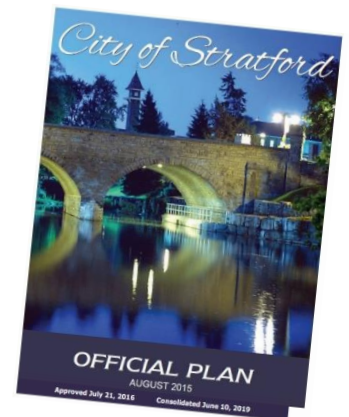


- **How have we grown?**
- **How and where will we grow?**
- **How will the Official Plan guide future growth?**

In Ontario, land use planning involves the process of managing land and resources and guides the City's decisions about where homes, jobs, schools, parks, sewers, and transportation infrastructure are built. The policies contained within an Official Plan define a vision for the future of the City and are used to inform more specific implementation tools such as Zoning By-laws and Community Improvement Plans. They are also informed by other initiatives and Master Plans that the City develops, such as the Transportation Master Plan.

## 1.1 Background

Stratford's Official Plan contains a series of goals, objectives, and policies that work together to shape development and guide land use planning decisions. In Ontario, the basis for land use planning is established by the Province of Ontario – principally through the *Planning Act* and Provincial Policy Statement. The City is required to conform to or be consistent with the different types of Provincial policies and legislation. Stratford is a single-tier municipality which means that the Province is responsible for approving the City's Official Plan to confirm that it does not conflict with and supports Provincial requirements.



The City of Stratford has retained WSP, in association with Watson & Associates Economists, to complete the Official Plan Review (OPR). The City's last Comprehensive Review was achieved through the approval of OPA 21 that was adopted in December 2015 and approved by the Ministry of Municipal Affairs and Housing in June 2016. The *Planning Act* requires that municipalities regularly revise their Official Plans to reflect changing planning legislation and policy. This review also presents an opportunity to address new growth pressures and land needs while considering forward-thinking policies to set the stage for the future of the community.

## 1.2 Approach & Purpose of this Report

The City's Official Plan Review is a multi-year initiative that began in May 2023 and will span across four phases of work. This Background Report is the first major deliverable in Phase 1 of the Official Plan Review to:

- Review current and emerging Provincial policy direction and legislation that guides land use planning in Ontario;
- Identify key changes and other initiatives completed by the City that will inform updated policies in Stratford;
- Inventory existing policies and key considerations that will inform the project; and
- Document how the City's Official Plan will be reviewed.



Figure 1 - Official Plan Review Thematic Areas

**To guide the Official Plan Review, a series of thematic areas have been established based on key areas of change and importance in Stratford. As the project continues, input from the community will inform specific recommendations for each thematic area.**

Each phase of the OPR will build on the input received from the community and the technical analyses being undertaken in Phases 1 and 2.

## Project Phase

## Deliverables & Intended Outcomes

### Phase 1

How have we grown?

#### Background Review Reports

- Develop awareness of the OPR;
- Seek input on the vision and guiding principles;
- Identify a series of ‘big questions’ for the OPR;
- Provide intensification and growth trends, community profiles, and land supply analysis; and
- Document background information and policy gaps.

### Phase 2

How will we grow?

#### Land Needs Assessment & Growth Forecasts

- Determine where and how the City will grow; and
- Identify how many new residents, homes, and jobs need to be planned for by 2048.

### Phase 3

How will the Official Plan guide future growth?



#### Policy Direction Discussion Papers

- Develop policy directions for each thematic policy area based on input received; and
- Propose local solutions to key questions.

### Phase 4

Preparing a new Official Plan

#### Draft & Final Official Plan

- Prepare new Draft Official Plan;
- Complete consultation and engagement to confirm policy changes and directions; and
- Refine the new Official Plan based on input received, prior to bringing changes forward to City Council.

## 1.3 Engaging the Community

Engagement and consultation will be critical to crafting Stratford’s new Official Plan – one that reflects the aspirations and ideas for the future of Stratford and embraces creative solutions to address local priorities. The following provides an overview of key engagement milestones in each Phase of the OPR.

## Project Phase

## Engagement Milestones

### All Phases

#### Engage Stratford Webpage

The Engage Stratford webpage will serve as the central location for all information, updates, and documents related to the OPR. Online surveys and other virtual commenting and input opportunities will be hosted on Engage Stratford throughout the OPR.

### Phase 1

How have we grown?

#### Topic: Background Review Reports

- Section 26 Special Meeting of City Council
- Online Visioning Survey / Questionnaire
- City Council Meeting / Workshop

### Phase 2

How will we grow?

#### Topic: Land Needs Assessment & Growth Forecasts

- Online Questionnaire
- City Council Presentation

### Phase 3

How will the Official Plan guide future growth?



#### Topic: Policy Direction Discussion Papers

- Two In-Person Public Open Houses
- City Council Presentations
- Online Questionnaire / Commenting Tool

### Phase 4

Preparing a new Official Plan

#### Topic: Draft & Final Official Plan

- In-Person Statutory Public Open House
- Online Questionnaire / Commenting Tool
- Statutory Public Meeting (City Council)
- Council Adoption

In addition to engagement with the community and stakeholders, consultation with Indigenous communities will play a critical role in shaping the OPR. The OPR presents an opportunity advance reconciliation efforts at the City of Stratford. In Phase 1, the Project Team will conduct outreach to confirm how Indigenous communities want to participate in the OPR in future Phases of the project.



## 2 Background Review

### 2.1 Overview

In Ontario, Official Plans are the primary policy tool that municipalities use to shape the land use and form of their communities. The City of Stratford is a single-tier municipality – which means that it is not required to conform to the policies of an upper-tier Official Plan. The policies within the City’s Official Plan are the primary tool for applying Provincial land use legislation and policies. The Official Plan is also informed by other studies (e.g., attainable housing and municipal servicing studies) and functional master plans (e.g., parks and recreation and transportation master plans), and give authority to implementation measures such as the Zoning By-law and community improvement plans.

The purpose of this Section is to identify key Provincial and Local planning documents that will need to be considered in updating Stratford’s Official Plan. Section 3 of this Report then identifies key policy gaps, conflicts, and opportunities that will need to be addressed in response to the matters outlined in this Section.

### 2.2 Provincial Context

Provincial planning legislation and policies directly influence planning policies in Stratford. This Section outlines these key considerations, as well as key changes to Provincial legislation and policies since the City’s Official Plan was last updated.

#### 2.2.1 Planning Act

The *Planning Act* is the central governing statute for land-use planning in the Province of Ontario, and provides the legal basis for, among other things, the preparation and updating of municipalities’ official plans. Much of what the *Planning Act* governs regarding Official Plans is procedural such as timelines for approval and consultation requirements, but it does prescribe certain components that must be incorporated into an official plan. The *Act* also stipulates that all planning decisions in a municipality, including preparing and updating Official Plans (Section 26), must be consistent with the Provincial Policy Statement and shall have regard for a list of Provincial interests. These interests include, but are not limited to, the protection of natural heritage, adequate and efficient provision and use of water, transportation, and energy infrastructure, accessibility, and adequate supply of employment and housing.

Since 2015, when the Stratford Official Plan was last updated, the *Planning Act* has been amended multiple times through different pieces of legislation. These key changes include the following:

- **Smart Growth for our Communities Act, 2015 (Bill 73):** made significant amendments to the *Planning Act*, along with changes to the *Development Charges Act*. In broad terms, the reforms introduced by Bill 73 were intended to improve citizen engagement

and the appeals process. Other changes were meant to give municipalities more tools to fund community services and growth.

- **Promoting Affordable Housing Act, 2016 (Bill 7):** amended the *Planning Act*, authorizing official plans to contain policies for inclusionary zoning, as well as adding various subsections guiding the implementation, assessment, and appeal of inclusionary zoning.
- **Building Better Communities and Conserving Watersheds Act, 2017 (Bill 139):** significantly reformed the planning appeals process, replacing the Ontario Municipal Board with the Local Planning Appeal Tribunal and putting more emphasis on the decisions of planning authorities. Many changes made by Bill 139 were subsequently amended by Bill 108 (see below). Bill 139 also modified Community Planning Permit legislation, which set out an alternative approach to development approval processes in place of zoning and site plan control.
- **More Homes, More Choice Act, 2019 (Bill 108):** amended the *Local Planning Appeal Tribunal Act* to change the appeals process, and amended the *Planning Act* regarding additional residential units, development charges, and Community Benefits Charges (formerly known as Section 37 Benefits).
- **COVID-19 Economic Recovery Act, 2020 (Bill 197):** expanded, in part, the scope of a Minister's Zoning Order to allow the Minister to make decisions as it relates to site plan control and inclusionary zoning (affordable housing).
- **Supporting Broadband and Infrastructure Expansion Act, 2021 (Bill 257):** amended, in part, the *Planning Act* so that a Minister's Zoning Order does not have to be consistent with the Provincial Policy Statement. In addition, the changes provide that any existing Minister's zoning orders, never had to be consistent with the Provincial Policy Statement. The overall purpose of the *Act* is to remove barriers to help ensure the deployment of high-speed broadband infrastructure.
- **More Homes for Everyone Act, 2022 (Bill 109):** made significant amendments to the *Planning Act*. New subsections were added that introduce a refunding regime for planning application fees if municipalities fail to render a decision on an application within certain timeframes. This bill also introduced a new ministerial zoning tool known as the 'Community Infrastructure and Housing Accelerator (CIHA).
- **More Homes Built Faster Act, 2022 (Bill 23):** introduced broad changes to the land use planning regime in Ontario, with immediate amendments to the *Planning Act*, *Development Charges Act*, *Conservation Authorities Act*, *Ontario Land Tribunal Act*, and the *Ontario Heritage Act*, as well as proposals and direction for making further changes to natural heritage policies, developing a new Provincial planning policy framework, and the development of standardized tools for zoning.
- **Helping Homebuyers, Protecting Tenants Act, 2023 (Bill 97):** amended the definition of "area of employment" in the *Planning Act* to include lands designated for



manufacturing, warehousing and ancillary uses, but to exclude institutional, retail, and office uses. The intent of this change is to preserve employment lands for those uses that are unable to locate in the community area – while encouraging compatible uses such as office and institutional to integrate into the community area.

While some of these recent changes do not directly affect the policies to be included in an Official Plan, they provide important context related to planning and development in Ontario and should be considered as the Stratford Official Plan is reviewed and updated.

### 2.2.2 Provincial Policy Statement (2020) and Proposed Provincial Planning Statement (2023)

While the *Planning Act* defines matters of provincial interest, the Provincial Policy Statement, 2020 (PPS 2020) provides policy direction on these matters. The PPS 2020 sets the foundation for Ontario's policy-led planning system and its direction is implemented through municipal Official Plans. Since 2015, when Stratford's Official Plan was last updated, the Provincial Policy Statement has been revised two times. The PPS 2020 is currently in-effect, but it is anticipated to be replaced by a new "Provincial Planning Statement" (PPS 2023) in late 2023 or early 2024. The preliminary implications of the Provincial Planning Statement have been considered in the context of this Report. The ultimate implications of the approved Provincial Planning Statement will be reviewed and considered as the Official Plan Review progresses.

The following key changes were introduced in the PPS 2020, and are proposed to be kept in the proposed PPS 2023:

- **Land Supply:** municipalities are required to plan for a 25-year horizon, instead of 20 years.
- **Housing:** municipalities are required to plan for accommodating residential growth for a minimum of 15 years, instead of 10. There is a new requirement for transit-supportive development in proximity to transit corridors and stations.
- **Intensification:** there is an increased emphasis on planning for intensification and transit supported development to achieve cost-effective growth.
- **Servicing:** stormwater planning is to be integrated with water and sanitary service planning, and impact of individual on-site servicing to be reviewed at the time of an Official plan update.
- **Employment and Land Use Compatibility:** strengthening of policy language guiding the development of major facilities and sensitive land uses, and the addition of policies to protect existing and planned industrial and manufacturing uses from encroachment.
- **Flexibility around Comprehensive Reviews:** the in-effect PPS 2020 allows for conversions of employment areas to non-employment *outside* of a comprehensive review under certain circumstances. The proposed PPS 2023 would go further and entirely remove the requirement for employment conversions to occur at the time of the comprehensive review.

- **Settlement Area Boundary Expansions:** The PPS 2020 allowed municipalities to adjust settlement area boundaries outside of a comprehensive review, under certain circumstances. The proposed PPS 2023 would go further and allow settlement area boundary expansions to occur at any time.
- **Indigenous consultation:** planning authorities are required to engage meaningfully with Indigenous communities on land use planning matters and build cooperative relationships to share knowledge in land-use planning processes.

### 2.2.3 Supplementary Agricultural Guidelines to the Provincial Policy Statement

In 2016, the Province published two sets of guidelines to assist municipalities in implementing the agricultural policies of the Provincial Policy Statement: the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas and the Minimum Distance Separation Formulae Document. These documents are not regulations or policies of themselves but provide additional information and tools to clarify the policies of the PPS. In Stratford, areas in the west and northeast of the City are designated "Agricultural Area" on Schedule "A" and Section 4.12 sets out policies for Agricultural Areas.

The Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas provide guidance on agricultural, agriculture-related and on-farm diversified uses described in Policy 2.3.3 of the PPS. The Guidelines also clarify the allowance for limited non-agricultural uses in prime agricultural areas, as well as the mitigation of impacts from new or expanding non-agricultural uses.

The Minimum Distance Separation Document outlines in more detail the Minimum Distance Separation (MDS) Formulae defined in the PPS, and provides technical guidance for implementing the MDS formula, which mitigates or prevents land-compatibility issues surrounding high-odour uses like livestock facilities or anaerobic digesters. Official plans are required to have up-to-date policies around MDS requirements.

### 2.2.4 Land Use Compatibility

The PPS 2020 provides direction to municipalities on land use compatibility. It requires major facilities and sensitive land uses to be planned in a way that avoids, minimizes, or mitigates adverse effects from odour, noise and other contaminants. New policies were added in 2020 to provide criteria for how to plan developments where avoidance is not possible.

Where the PPS 2020 provides general direction regarding land use compatibility, it is implemented through the Province's D-Series guidelines that provide specific direction for municipalities to follow when deciding whether a new development or land use is appropriate in any given location.

### 2.2.5 Conservation Authorities

Conservation Authorities (CAs) are public sector organizations that provide programs and services that further the conservation, restoration, development and management of natural

resources in watersheds in Ontario. Conservation Authorities are governed under the *Conservation Authorities Act*, which is administered by the Ontario Ministry of the Environment, Conservation, and Parks (MECP).

Conservation Authorities review and provide advice to municipalities in accordance with the *Act* and its regulations, including commenting on applications with respect to natural hazard risk policies, wetlands and source protection related matters. The City of Stratford is located in the jurisdiction of the Upper Thames River Conservation Authority (UTRCA). Under the *Act*, UTRCA regulates development and interference to wetlands and alteration to shorelines and watercourses through the issuance of permits within its jurisdiction. The UTRCA regulated area screening maps was last updated in December 2021.

### 2.2.6 Source Water Protection

The Provincial government passed the *Clean Water Act*, 2006 to protect existing and future sources of municipal drinking water throughout Ontario. A key deliverable required under the *Act* is a source water protection plan, which is undertaken to:

- Protect existing and future drinking water sources in the source protection area; and
- Ensure that activities never become a threat in every area where an activity is or would be a threat to drinking water.

The City of Stratford is located in the Thames – Sydenham Source Protection Region and the City's Official Plan is required to conform with the policies of the Source Protection Plan (SPP) for this Region. The Thames – Sydenham SPP was approved in September 2015 and has not been modified since that date. The City's previous comprehensive review (OPA 21) worked to ensure that the policies of the Official Plan conformed with the SPP. It is not anticipated that there will be significant modifications needed to maintain conformity with the SPP.

Examples of policies from Thames and Sydenham Region Source Protection Plan include:

- **Restricting Land Use:** Under Section 59 of the *Clean Water Act*, Development applications or activities which may be considered a clean water threat may be subject to restricted land use and other conditions. Official restrictions can be implemented through policies and/or regulations in the *Planning Act*, Official Plans, Zoning By-laws, and Site Plan Control.
- **Requiring Risk Management Plans:** Under Section 58 of the *Clean Water Act*, activities may be regulated, and a Risk Management Plan will be required before proceeding.
- **Supporting Education and Outreach Programs:** Engage the public and key stakeholders to raise awareness and understanding of drinking water threats as well as the Source Protection Plan and why it is significant for residents.

## 2.3 Local Context

While provincial legislation and policy can provide a high-level framework to guide development in Stratford, more specific local direction is provided by the Official Plan and various local studies, strategies and Master Plans.

### 2.3.1 City of Stratford Strategic Plan

In 2019, Stratford City Council adopted a statement of the City's mission, vision, and values, along with a document outlining the Council's Strategic Priorities for the 2018-2022 term. City Council has recently commenced the process for establishing Strategic Priorities for the 2022-2026 term, which will be reviewed and incorporated if they are finalized during the course of the Official Plan Review.

The City's **Mission Statement** is:

"To provide services to support a sustainable, caring community with exceptional quality of life."

The City's **Vision Statement** is to become:

"A vibrant city, leading the way in community-driven excellence."

In addition, the results from the 2018-2022 strategic priorities could be referenced to inform the Official Plan Review. These include:

- 1) More sufficient year-round parking
- 2) A safe, connected active transportation network
- 3) Further activating Market Square
- 4) Increasing affordable housing
- 5) Bringing new industrial land to market
- 6) Increasing residential development at all levels of affordability

### 2.3.2 Stratford Official Plan

Stratford's Official Plan is a powerful tool that the City can leverage to express its vision for the future, and to implement the necessary land use controls that will help to achieve that vision. Stratford's 2015 Official Plan will be the baseline document that will inform the new Official Plan. It will be necessary to critically analyze and evaluate the performance of the existing Official Plan policies and structure.

The existing vision statement in the Stratford Official Plan is "to be the best place to live, work, and play". This general statement is common across many planning policies throughout Ontario. A new vision that reflects the uniqueness of Stratford and espouses a specific vision for the City may be developed through the Official Plan Review. The guiding principles that follow the vision

statement are high level and may be updated to provide a unique sense of direction for the future of the City.

Through the OPR, the City will be able to identify issues that are going to affect the future of Stratford such as population growth, housing supply and climate change adaptation. A future-focused vision statement and Official Plan policies will speak directly to these issues and offer sufficient direction to manage challenges while contributing to long term growth objectives.

In addition to updating the vision and corresponding policies of the OP, this review creates an opportunity to re-visit the structure of the and consider changes to streamline and improve the readability of the document. The City of Stratford's existing Official Plan has a traditional structure and layout that includes text-heavy chapters and minimal use of visual elements such as diagrams and photographs. A more "user-friendly" Official Plan can help users (e.g., residents, developers and elected officials) to better understand the City's goals and contribute to the City's vision.

### **2.3.3 Official Plan Amendments**

The City's Official Plan has been amended ten times since the last comprehensive review and the adoption of OPA 21 in order to address site-specific matters.

Many of the amendments since 2016 have sought to increase the allowable density on specific parcels within the city (e.g., OPA 32 redesignated lands on the corner of Queensland Road and Lorne Avenue West from 'Residential Area' to 'High Density Residential Area', allowing a maximum height of six storeys and 100 units per net hectare). Recent amendments represent a trend towards greater density within the urban boundary. This trend will be considered as part of the OPR.

If the decision is made to prepare an entirely new Official Plan that would repeal and replace the in-effect OP, the content of all previous OPAs will be reviewed and integrated into the new document, as appropriate.

### **2.3.4 Secondary Plans**

Secondary Plans are area-specific amendments to the Official Plan which provide more detailed direction and a focused vision for a particular neighbourhood or district within the City. There are two in-effect Secondary Plans in the City of Stratford, contained in Sections 11.1 and 11.2:

- 1) North East Community Secondary Plan
- 2) Stratford West Secondary Plan

The approach to reviewing existing Secondary Plans is detailed in Section 4.3 of this Report.

### **2.3.5 Transportation Master Plan**

The City of Stratford is currently updating its Transportation Master Plan (TMP) that is intended to guide the management of driving, walking, cycling and transit in the city. The draft TMP

Report was presented to City Council on August 14, 2023 and a Notice of Completion was published on August 15, 2023.

The TMP is a long-term strategy that “identifies transportation infrastructure investment needed to help meet the City’s community-building objectives and support growth through 2041.” The goals of the Transportation Master Plan are closely related to the vision of the Official Plan and the documents work closely together.

The values that guide the TMP include:

- 1) Enable safe movement for residents, visitors, and goods.
- 2) Contribute to building healthy and complete communities.
- 3) Plan for an efficient, reliable, and inter-connected multi-modal transportation network.
- 4) Plan for accessibility and equity and ensure that the transportation system meets the mobility needs of all residents and their travel modes.
- 5) Assess recommendations through a climate change lens, with an eye towards reducing greenhouse gas emissions.

The City’s TMP identifies effective land use planning as a key support that will be needed to achieve its goals. The TMP provides the following directions for the new Official Plan:

- **Mixed uses:** Building complete communities with a mix of uses and amenities means a higher proportion of trips can be made within shorter distances with a higher probability of walking trips.
- **Site planning:** Narrow frontages encourage more variety and increase the attractiveness of walking. Smaller lots also help to locate more people and services close to one another.
- **Parking requirements:** A reduction or elimination of minimum parking requirements for new developments will allow for market-driven decisions on the supply of off-street parking.
- **Provision of active transportation facilities:** Sidewalks, trails and cycling facilities should be provided as per the typical characteristics outlined in the functional street classification framework. New neighbourhoods should seamlessly integrate cycling facilities into the existing and recommended networks.
- **Pedestrian walksheds:** Street networks should be designed to maximize pedestrian convenience. Traditionally, a fixed grid provides the most efficient layout for pedestrians.
- **Preventative traffic calming:** Streets should be designed originally to encourage slower traffic speeds, eliminating the need for retrofit traffic calming applications.

The OPR will align with the direction and recommendations set out in the TMP and support implementation of its vision for the future of transportation in Stratford.



### 2.3.6 Urban Design and Landscape Guidelines

The City's most recent Urban Design and Landscape Guidelines are from 2014 and conform to the Official Plan that was in-effect at that time. They contain direction for both the public realm and private realm. The guiding principles include a focus on sustainable development, protecting and enhancing the city's natural environment, and encouraging appropriate intensification and mixed-use development. The entirety of the guidelines can be considered when trying to understand the broader vision for the city.

### 2.3.7 Growth Management

As part of the City's comprehensive review in 2015, growth forecasts were prepared to 2033. These forecasts will need to be updated to 2048 and reflect new assumptions about growth trends in the city and broader region. The updated forecasts will be used to inform a Land Needs Assessment to determine how much additional land (if any) will be needed to accommodate growth for the next 25 years. Watson & Associates will be preparing the updated city-wide population, housing and employment forecasts in Phase 2 of the OPR.

### 2.3.8 Development Charges Background Study

The City of Stratford updated its Development Charges By-law in 2022 and prepared a corresponding Background Study. The Background Study was prepared by Watson & Associates and contained forecasts for population, households and non-residential gross floor area.

The City is required to Plan for the development that is anticipated by these growth forecasts, and to confirm that services are available for the forecast growth. The Official Plan review will undertake an assessment of the City's land needs based on population and employment growth forecasts. If there is an identified need for additional land to the horizon of the Official Plan, the review exercise will identify the most appropriate locations for expansion.

### 2.3.9 10-Year Housing and Homelessness Plan for Stratford, Perth County, and St. Marys

The 10-Year Housing and Homelessness Plan for Stratford, Perth County, and St. Marys was released in 2014 and most recently updated in 2020. An analysis of demographic and socio-economic data undertaken as part of the update showed that there was an increase in the proportion of households on low-income (from 10.1% in 2011 to 11.1% in 2016), and that overall income levels in the area were below provincial medians. Conversely, housing costs for both rental and ownership have increased in that period, and the availability of rental units has decreased. These combined factors highlight the urgent need for strong policies related to housing, that is shared across many municipalities in Ontario.

The updated plan lists four strategic objectives for 2020-2024:

- 1) **Ending Homelessness:** The plan focuses on chronic homelessness and commits to shifting resources away from managing to ending homelessness in line with the provincial goal of ending chronic homelessness by 2025.

- 2) **Creating Attainable Housing Options:** The plan recommends leveraging municipal, provincial, and federal funding sources to create more attainable housing options. It also recommends collaborating with municipal and economic development partners to develop incentives for building attainable housing.
- 3) **Sustaining Community Housing:** The plan seeks to build capacity in the community housing sector, which could involve enhancing providers' capacity for purchasing, capital planning and regeneration of housing stock.
- 4) **Addressing a Diversity of Needs:** The plan highlights the fact that certain population groups are more vulnerable to instability and are at greater risk of losing their housing. It commits to building partnerships with organizations that work directly with vulnerable population groups and improving the understanding of the needs of different users who are navigating the housing and homelessness system.

The development of housing and the creation of attainable housing options are inextricably linked to land use planning. The existing Official Plan broadly speaks about the need to encourage the integration of affordable housing with the wide housing market. The Official Plan review presents an opportunity to introduce definitive targets and strategies related to development proposals and the provision of affordable housing.

### 2.3.10 Heritage Conservation District

The City's downtown area is designated as a Heritage Conservation District (HCD) under Part V of the *Ontario Heritage Act*. The City of Stratford derives a great deal of its character and tourist potential from the uniqueness and historical significance of its downtown. The HCD allows the City to control and protect the heritage attributes of the area.

The existence of the HCD should not be interpreted to mean that no intensification can occur in the area. It is important to consider the need for growth and development in this district in order to support the continued vitality of the city's downtown, while respecting the heritage conservation district standards that have been developed.

This OPR will consider how gentle density can be accommodate in the HCD in order to meet the updated requirements of the *Planning Act* that allow a minimum of three residential units per lot.

### 2.3.11 Perth County Natural Heritage System Study

The Perth County Natural Heritage System Study (PNHSS) evaluates the existing natural heritage resources within the County, including within the City of Stratford. It provides guidance to local municipalities when determining the significance of features. The study is focused on using a science-based approach to identify natural heritage features and areas in order to support the implementation of other policies.

The Natural Heritage System shown in the Stratford Official Plan will be informed by the updated PNHSS and the most recent mapping. Following a municipal boundary adjustment in 2020, approximately 130 ha of new lands in the south-west corner of the city near Highway 7 and Line

29 now fall within the municipal boundary of the City of Stratford. These lands contain patches of vegetation that meet the PNHSS criteria to be considered ecologically important and will need to be documented accordingly in the new Official Plan.

The PNHSS report and mapping were most recently updated in 2019 using newer aerial photography from 2015. Any changes to the mapping as a result of the updated data source will need to be considered during the Official Plan Review.

## **2.4 Summary of Inputs, Documents, and Other Drivers**

Since the Stratford Official Plan was last updated in 2015, significant Provincial policy and legislative changes have occurred. The City has also advanced its own planning and updated various strategies and initiatives. This Official Plan Review must give consideration to the updated provincial and local direction as it develops a vision for future land use in the city.

The most notable provincial changes are the various amendments to the *Planning Act*, the 2020 update of Provincial Policy Statement and draft 2023 Provincial Planning Statement, which could replace the PPS 2020 during this review.

On a local level, the recently adopted Transportation Master Plan provides significant direction for the Official Plan Review. The Transportation Master Plan depends on land use planning policy to help develop complete communities where a multi-modal transportation network can provide citizens with a range of options for both local and regional movement. This vision aligns with general provincial direction to promote intensification, integrate land use and infrastructure planning, and leverage investments in public transit. Together, the various Provincial and local documents provide a strong basis from which to update the Official Plan.

## 3 Policy Gaps, Conflicts, and Opportunities

The purpose of Section 3 is to identify the major policy gaps, opportunities for new policies, and potential conflicts between the City's current Official Plan and emerging or recent Provincial and broader regional policy or initiatives (e.g., Perth County and adjacent municipalities), as well as other City-led master plans and studies. This section builds on the background review completed in Section 2.

### 3.1 Policy Review

Table 1 characterizes the existing policy of the Stratford Official Plan, identifies the key issue, conflict or gap, and summarizes the key policy and legislative drivers and resources to address this issue, conflict, or gap. Through this process, the project team will develop a list of priority policy changes and issues to be discussed further with the Province and agencies.

The table is organized by chapter of the City's Official Plan. Further gaps and opportunities may be identified and added through the final iteration of this Report, and through future Discussion Papers. This second report will build upon this table to propose policy directions for each of the issues, conflicts, and gaps identified in **Table 1**.

For convenience purposes, the following is a list of acronyms used in the analysis:

- PPS 2020 means the Provincial Policy Statement, 2020
- PPS 2023 means the proposed draft Provincial Planning Statement, 2023
- SOP means the Stratford Official Plan, 2010

The issues, conflicts, or gaps identified fall into one of three categories:

- Issues, conflicts or gaps that **must** be addressed to conform to or implement Provincial policies;
- Issues, conflicts or gaps that **should** be addressed to implement best and emerging practices; and
- Issues, conflicts or gaps that **could** be addressed to be innovative or respond to the local context in Stratford.

Table 1 - Policy Issues, Conflicts, and Opportunities Assessment

| Topic                          | Existing Policy Characterization   | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources   |
|--------------------------------|--|--|--|
| <b>Chapter 1: Introduction</b> |  |  |  |
| <b>Land Acknowledgement</b>    | New  | The Official Plan should include an acknowledgement of the traditional rights and territories of Indigenous peoples in the area.   | PPS 2020<br>Current Official Plan best practices |
| <b>Purpose</b>                 | This Chapter generally explains that the Official Plan is designed to establish a vision for the city regarding the type of community desired.<br><br>This over-arching vision is then used to inform the desired form, pattern and intensity of land use. | This purpose of this Chapter is to broadly explain the role of the SOP in guiding land use and achieving the objectives of the City. There is an opportunity to refresh the objectives set out in Section 1.1.<br><br>Section 16 of the <i>Planning Act</i> defines the contents required to be contained in an official plan. | <i>Planning Act</i>                              |
| <b>Growth Management</b>       | Section 1.3 notes that the planning period extends to 2033.<br><br>Section 1.4 notes that the Stratford Official Plan is “consistent with the Provincial Policy Statement which came into effect on March 1, 2005”.  | The PPS, 2005 has been superseded by the PPS, 2020 which is currently in effect.<br><br>The PPS, 2020 is proposed to be replaced with a “Provincial Planning Statement” (PPS 2023) that is currently in draft form.<br><br>Policies in the revised Official Plan will need to be consistent with the PPS 2020, as well as the  | PPS 2020<br><i>Planning Act</i>                  |

| Topic   | Existing Policy Characterization   | Issue, Conflict, or Gap   | Key Policy & Legislative Drivers and Resources   |
|---|--|---|--|
|   |  | <p>PPS 2023 when it comes into effect.</p> <p>The planning period will need to be extended to 2048.</p> <p>Section 2 of the <i>Planning Act</i> defines matters of provincial interest related to land-use planning.</p> <p>The PPS 2020 provides policy direction on the matters of provincial interest.</p> <p>Section 3(5) of the <i>Planning Act</i> directs planning authorities to make decisions related to planning matters that are consistent with the PPS.</p> |  |
| <b>Chapter 2: Vision and Guiding Principles</b> |  |   |  |
| <b>Guiding Principles</b>                       | It is noted that the vision and guiding principles in Chapter 2 “are not to be interpreted as direct statements of planning policy”. | Despite the disclaimer, the content of Chapter 2 can be used to provide additional context or assist with the interpretation of specific policies within the Official Plan.   | The Stratford Official Plan is to be read in its entirety, according as confirmed by Section 1.7 of the existing OP. The Ontario Land Tribunal has referred to preambles in its decisions. |
| <b>Vision</b>                                   | The broad vision of the existing Stratford Official Plan is to develop a complete community  | The guiding principles reflect the matters of provincial interest and   | One of the matters of provincial interested listed in Section 2 of the <i>Planning Act</i> is “the adequate provision  |





| Topic                     | Existing Policy Characterization   | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources   |
|---------------------------|--|--|--|
|                           | <p>that meets all the residents' needs for daily living.</p> <p>This entails maintaining a diverse economy, ensuring that transportation, infrastructure, and community services meet the needs of users of all ages and abilities, and protecting natural heritage and agriculture.</p> | <p>broadly match the direction of the PPS 2020.</p> <p>It is recommended to also include guiding principles related to the thematic areas of the OPR, including housing, climate action, and sustainability. Overall, the vision and guiding principles will be reviewed and confirmed with the community.</p> | <p>of a full range of housing, including affordable housing".</p> <p>Recent provincial planning direction has focused heavily on the provision of housing – this should be more directly addressed in the guiding principles of the Official Plan.</p> |
| <b>Guiding Principles</b> | <p>Many of the guiding principles are written using language that is not sufficiently directive or definitive.</p> <p>For example, 2.3 (xii) seeks to "encourage the continuation of agriculture and associated uses and discourage these areas from premature redevelopment."</p>       | <p>Open-ended language does not provide clear policy direction and leaves room for policies to be challenged and interpreted.</p> <p>PPS 2023 directs that "prime agricultural areas shall be designated and protected for long-term use for agriculture."</p>   | <p>PPS 2020</p> <p>Proposed PPS 2023</p>   |
| <b>Guiding Principles</b> | <p>Section 2.3 (vi) seeks to "encourage appropriate intensification and infill, including mixed use development, which reflects the existing context of the city with respect to factors such as height and design."</p>   | <p>Current and proposed provincial direction on intensification focuses on the need to efficiently use land and resources, as well as optimize investments in infrastructure (e.g., by promoting opportunities for transit-supportive development).</p>  | <p>PPS 2020</p> <p>Proposed PPS 2023</p>   |

| Topic                                       | Existing Policy Characterization  | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources  |
|---|---|--|---|
|   |   | Including factors such as 'existing context', 'height and design' in the guiding principle related to intensification potentially weakens the overall policy direction and does not match the direction of the PPS.  |   |
| <b>Chapter 3: General Policy Directions</b> |   |  |   |
| <b>Growth Management</b>                    | Section 3.2.1 provides population and employment forecasts to 2033.<br><br>It includes a target for the city's housing mix to 2033. | Updated population and employment forecasts, as well as a corresponding land needs assessment are being prepared as part of this Official Plan Review.<br><br>These documents will be required to consider the land needs of the City of Stratford to 2048 (25-year planning horizon).<br><br>The in-effect PPS 2020 and proposed PPS 2023 both require municipalities to make sufficient land available to accommodate projected land needs for a time horizon of 25 years. | PPS 2020<br><br>Proposed PPS 2023   |
| <b>Intensification</b>                      | Section 3.2.2 establishes an intensification target of 25% and  | The existing intensification target is low compared to similar sized cities in Ontario.  | PPS 2020 notes that "planning authorities shall ... accommodate a significant supply and range of housing |



| Topic                         | Existing Policy Characterization  | Issue, Conflict, or Gap   | Key Policy & Legislative Drivers and Resources   |
|-------------------------------|---|---|--|
|                               | <p>proposes strategies to achieve the target.</p> <p>The existing intensification strategies are focused on encouraging intensification in commercial areas on arterial roads, including the use of Community Improvement Plans to promote intensification in these areas.</p> <p>Policies such as 3.5.8 related to Heritage Areas and Heritage Corridors as shown on Schedule “E” can create extra barriers to housing and limit the amount intensification that occurs in existing Residential Areas. These policies should be reviewed in light of recent provincial direction on intensification and the need to achieve the City’s intensification target.</p> | <p>Information on the city’s annual intensification rate from 2016 will be reviewed to determine if the current rate is being achieved or if the strategies need to be modified.</p> <p>Policies that speak to permitting only “limited intensification of Residential Areas of a scale and built form which reflects the surrounding area” can create obstacles to intensification. Such policies do not align with provincial direction that has promoted intensification and removing barriers to adding density in existing neighbourhoods.</p> | <p>options through intensification and redevelopment...”</p> <p>Proposed PPS 2023 directs planning authorities to permit and facilitate “all types of residential intensification, including the conversion of existing commercial and institutional buildings for residential use, development and introduction of new housing options within previously developed areas”</p> |
| <b>Employment Conversions</b> | <p>Section 3.2.4 specifies that the City may permit the conversion of lands in the “Industrial Area” only at the time of comprehensive review”</p>  | <p>The existing SOP policy is consistent with PPS 2020 but does not align with proposed direction in PPS 2023.</p> <p>The proposed PPS 2023 aims to make more land available for development and provide</p>  | <p>PPS 2020</p> <p>Proposed PPS 2023</p> <p>It should be noted that a municipality can still refuse to approve privately initiated OPAs dealing with the removal of land from employment areas, and such a</p>   |



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| Topic                 | Existing Policy Characterization  | Issue, Conflict, or Gap   | Key Policy & Legislative Drivers and Resources  |
|-----------------------|---|---|---|
|                       |   | <p>greater flexibility for municipalities by removing the concept of the <i>comprehensive review</i>.</p> <p>If the proposed PPS 2023 goes into effect as written, municipalities will have the option to consider the conversion of lands in employment areas any time.</p>  | <p>refusal cannot be appealed at the Ontario Land Tribunal if the municipality has official plan policies dealing with the removal of land from employment areas [<i>Planning Act</i> s.22(7.3)].</p> |
| <b>Urban Boundary</b> | <p>Section 3.2.5 notes that future expansions of the City Boundary may only occur as part of a comprehensive review and when specific criteria have been met to demonstrate the need for additional lands in the settlement area.</p> | <p>The existing policies are generally consistent with PPS 2020. However, PPS 2020 allows a municipality to also consider the market demand for different types of housing when evaluating their projected land needs to the planning horizon.</p> <p>The proposed PPS 2023 would remove the comprehensive review process and allow municipalities to consider adding lands to their settlement area at any time.</p> <p>Further, there is a need to consider any policy changes that may be required for newly annexed lands in Stratford.</p> | <p>PPS 2020</p> <p>Proposed PPS 2023</p>  |



| Topic                    | Existing Policy Characterization   | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources   |
|--------------------------|--|--|--|
| <b>Housing</b>           | <p>The housing policies in Chapter 3 of the SOP aim to provide “a full range of housing choices ... in terms of tenure, form and affordability for current and future residents” (3.4.1).</p> <p>The SOP sets at target of having 25% of new units “constructed within the affordability limits applicable to [the] regional market area” [3.4.1 (vi)]</p> | <p>The existing policies are consistent with PPS 2020 which directs planning authorities to establish and implement minimum targets for the provision of affordable housing.</p> <p>The proposed PPS 2023 removes the direction to establish minimum targets for affordable housing as well as the definition of “affordable”. Instead, it directs planning authorities to coordinate with service managers under the <i>Housing Services Act</i> to address housing affordability needs.</p> <p>The streamlined direction in the proposed PPS 2023 would not prevent the City of Stratford from maintaining and updating its target for the provision of affordable housing in the Official Plan.</p> | <p>PPS 2020</p> <p>Proposed PPS 2023</p> <p>Housing and Homelessness Plan for Stratford, Perth County, and St. Marys</p> |
| <b>Growth Management</b> | <p>The SOP commits that the City will maintain the ability to accommodate residential growth for a minimum of 10 years through opportunities for intensification and lands</p>   | <p>The PPS 2020 and the proposed PPS 2023 both require municipalities to plan for a 15-year residential land supply.</p>   | <p>PPS 2020</p> <p>Proposed PPS 2023</p>   |



| Topic                               | Existing Policy Characterization   | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources |
|-------------------------------------|--|--|--|
|                                     | designated and available for residential development.  |  |  |
| <b>Chapter 4: Land Use Strategy</b> |  |  |  |
| <b>Downtown</b>                     | <p>The SOP defines a community structure with a traditional ‘Downtown Core’ at the centre, surrounded by older residential neighbourhoods with newer residential areas located on the periphery of the City.</p> <p>It is noted that newer large-scale retail development has been concentrated along the arterial roads outside the Downtown Core, and this has contributed to the prominence of the Downtown “being eroded over recent years”.</p> <p>The SOP notes that “the supply, cost and convenience of parking in the ‘Downtown Core’, both on-street and off-street, is considered a vital element to its continued economic health.</p> | <p>The PPS 2020 does not provide specific direction on community structure or a hierarchy of land uses, but there is an emphasis on promoting intensification in order to efficiently use land and resources as well as sufficient densities to support transit service (1.1.3.2).</p> <p>The existing goals and objectives the downtown core focus on encouraging compact development as well as a diversity of uses. These are consistent with the PPS.</p> <p>The emphasis on maintaining and increasing (where feasible) the supply of parking in the Downtown Core is potentially inconsistent with PPS policies that direct municipalities to plan for an efficient use of land and resources.</p> | <p>PPS 2020</p> <p>Proposed PPS 2023</p>       |





| Topic              | Existing Policy Characterization  | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources |
|--------------------|---|--|--|
| <b>Commercial</b>  | <p>Section 4.7 establishes policies for Commercial Areas, including permitted uses and the form of development.</p> <p>Section 4.13 sets out policies for the Gateway Mixed Use Areas, which were brought about by the annexation of these lands from the Township of Perth East.</p> | <p>There is an opportunity to confirm the applicability of the Commercial designation and whether a new “Mixed Use designation” should be introduced, which contemplates at-grade commercial uses with residential uses permitted on the upper storeys.</p> <p>The Gateway Mixed Use Area designation could then be consolidated with the rest of the City and serve as the basis for the new general designation.</p>                     | <p>PPS 2020</p> <p>Land Needs Assessment</p>   |
| <b>Residential</b> | <p>Policies around stable residential areas set specific criteria for new development in order to match the scale and design of the existing neighbourhoods. It is recognized that any intensification in these areas will be modest and incremental.</p>                             | <p>Section 4.5.3.1 – ‘Stable Residential Areas’ creates barriers to intensification in these areas and makes it more challenging to meet the City’s intensification target of 25%.</p> <p>Moreover, considering that Stable Residential Areas are adjacent to the Downtown Core, these policies potentially impede the ability of the City to attract more residents to the Core and support the vibrancy and diversity of businesses.</p> | <p>PPS 2020</p> <p>Proposed PPS 2023</p>       |

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| Topic                               | Existing Policy Characterization   | Issue, Conflict, or Gap   | Key Policy & Legislative Drivers and Resources  |
|-------------------------------------|--|---|---|
| <b>Additional Residential Units</b> | <p>Table 1 in Section 4.3 describes land uses that are permitted in all designations.</p> <p>It notes that second suites may be permitted in residential units if there is no garden suite on the same lot.</p> <p>Similarly, it notes that a garden suite may be permitted on the same lot as a residential dwelling, but this would preclude a second suite from being permitted in the principal dwelling.</p> <p>These existing policies allow a maximum of two residential units per lot.</p> | <p>Changes introduced to the <i>Planning Act</i> by Bill 23 – “More Homes Built Faster Act” require that all Official Plans permit a minimum of three residential units per lot (e.g., two suites in the main dwelling &amp; garden suite, or three suites in the main dwelling).</p> <p>The SOP policies do not meet the new requirements of the <i>Planning Act</i> that were introduced by Bill 23 and came into force on November 28, 2022.</p> <p>Considering these changes to Provincial legislation which allow up to three units on a residential lot, there is an opportunity to re-classify triplexes as a low-density residential use.</p> | <p>Bill 23 – More Homes Built Faster <i>Planning Act</i></p>  |
| <b>Employment</b>                   | <p>SOP policies around Industrial Areas seek to encourage the continued development of Stratford as a manufacturing and regional industrial service centre.</p> <p>The City protects employment areas in proximity to major</p>  | <p>The secondary uses permitted in the City’s ‘Industrial Areas’ include institutional uses, office uses not considered by the City to be appropriate for location in the Downtown Core, and</p>  | <p>Bill 97 changes the definition of “Area of Employment” in the <i>Planning Act</i>, and specifically notes that “institutional uses, retail uses, and office uses are not considered part of an Area of Employment. It should be noted that this definition change will take effect upon proclamation. This will likely be timed to</p> |



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|--------------------|--|---|---|
|                    | <p>goods movement facilities and corridors, in line with provincial direction.</p> <p>Existing policies also permit institutional, office, research and some educational uses in Industrial areas.</p> | <p>education and training uses other than elementary schools.</p> <p>Bill 97 changed the definition of “Employment Areas”, which has been mirrored in the proposed PPS 2023. These two documents signal the provincial government’s direction to incorporate office, retail and institutional uses into mixed-use areas in order to preserve industrial areas for specific industries and land uses that cannot locate elsewhere.</p> <p>As part of this Official Plan Review, the City will be required to review land uses permitted in the “Industrial Area” designation to ensure that it matched provincial direction.</p> | <p>coincide with the release of the final PPS 2023.</p> |
| <b>Agriculture</b> | <p>Agricultural Area policies in the SOP are directed at recent annexations that have brought agricultural land into the City limits.</p> <p>Non-intensive agricultural uses are encouraged.</p>       | <p>New lot creation is discouraged on designated agricultural areas. This is consistent with PPS 2020.</p> <p>It will be necessary to review any final policies released in the PPS 2023 and consider how they can affect development on lands</p>  | <p>PPS 2020</p> <p>Proposed PPS 2023</p>                |



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|----------------------------|---|--|--|
|                            | The SOP aims to prevent the premature redevelopment of the annexed agricultural lands.  | currently designated for agriculture.<br><br>The Official Plan Review can consider phasing requirements or “future-area” overlays on these areas in order to ensure the orderly development of these lands.  |  |
| <b>Factory District</b>    | Section 4.9 – Factory District Area notes that proposals to covert former industrial buildings will be encouraged. These conversions will not require a comprehensive review. | While conversions to non-industrial uses appear to be encouraged, there is a lack of vision for the future of the area or the desired built form.<br><br>Moreover, there is a reference to encouraging stability and avoiding “piecemeal conversion to industrial uses”. This section needs to be clear if there is an expectation for industrial uses to return to this area or if the type of land available in the factory district is no longer appropriate for industrial uses and should be re-designated accordingly. | General need to provide more detail and vision in order to guide potential development applications. |
| <b>Development Density</b> | Section 4.5 establishes density ranges for low and medium density residential development.  | There is a need to review and update density targets set out in the SOP. The City has historically seen significant  | PPS 2020   |

| Topic   | Existing Policy Characterization   | Issue, Conflict, or Gap   | Key Policy & Legislative Drivers and Resources |
|---|--|---|--|
|   |  | greenfield development; however, as the City shifts to more intensification these densities should reflect more contemporary development forms and facilitate infill.   |  |
| <b>Chapter 5: Environment and Sustainability Strategy</b> |  |   |  |
| <b>Natural Heritage System</b>                            | This chapter generally describes the framework for protecting natural heritage features as well as the role of the UTRCA in regulating lands that pose a flooding or erosion hazard. | <p>The general approach of the existing SOP is built around protecting natural heritage features (a feature-based approach).</p> <p>In addition to protecting features, the PPS directs municipalities to identify natural heritage systems and protect connectivity between features (a systems-based approach).</p> <p>While the City might not have identified many features, there is an opportunity to recognize the significance to the Avon River as a connection between key areas.</p> | PPS 2020                                       |
| <b>Natural System</b>                                     | Section 5.3 Natural Hazards generally defers to the UTRCA to determine the regulation limit of where natural hazards exist and   | While Bill 23 significantly reduced the role and scope of Conservation Authorities in reviewing and approving   | Bill 23 – <i>More Homes Built Faster Act</i>   |



| Topic                                       | Existing Policy Characterization  | Issue, Conflict, or Gap   | Key Policy & Legislative Drivers and Resources                               |
|---|---|---|--|
|   | where corresponding policies apply.   | development proposals, the regulation of development in the floodplain remains within their jurisdiction.<br><br>It will be important to follow any new developments in this area to ensure consistency with the most recent provincial direction regarding the role of Conservation Authorities. |  |
| <b>Water Resources</b>                      | Section 5.4 – Water Resources is succinct and defers to the Thames – Sydenham Source Protection Plan. It notes that all planning decisions shall be in conformity with the SPP.<br><br>Vulnerable areas are shown on the SOP Schedules. | There is an opportunity to identify key policies of the Source Protection Plan direction in the SOP. This allows readers to understand the broad requirements of the SPP before having to review the SPP.   | <i>Clean Water Act, 2001</i><br><br>Thames – Sydenham Source Protection Plan |
| <b>Chapter 6: Community Design Strategy</b> |   |   |  |
| <b>Urban Design</b>                         | The Section on Community Design highlights the goal for new and existing neighbourhoods to become “sustainable and resilient”.  | The goals for sustainable and resilient community design could be tied to general goals related to climate change adaptation and mitigation, as well as the directions of the City’s new TMP.   | PPS 2020<br><br>Transportation Master Plan                                   |





| Topic                                      | Existing Policy Characterization  | Issue, Conflict, or Gap   | Key Policy & Legislative Drivers and Resources       |
|--|---|---|--|
| <b>Stormwater Management</b>               | The Section makes general reference to Low Impact Development techniques. It could be strengthened by referring directly to guidelines and manuals prepared by the Province and Conservation Authorities.   | In 2022, the Province consulted on a draft guidance manual for Low Impact Development (LID). While this manual has not been finalized to date, it indicated the Province's interest in promoting greater adoption of LID techniques.<br><br>The current best practice guide in Ontario is the "Low Impact Development Stormwater Management Planning and Design Guide" prepared by the Sustainable Technologies Evaluation Program (STEP). The UTRCA references the STEP guide. | PPS 2020 1.6.2 and 1.8.1(f)<br>MECP Draft LID Manual |
| <b>Chapter 7: Community Infrastructure</b> |   |   |  |
| <b>Transportation</b>                      | This chapter provides guidance for the planning and development of infrastructure. It notes that streets will be planned and developed in accordance with the City's Transportation Master Plan (TMP) as well as the Bike and Pedestrian Master Plan. | Recent provincial direction emphasizes the need to optimize the use of existing infrastructure and ensure financial viability. This should be reflected in the SOP text.  | PPS 2020   |



| Topic   | Existing Policy Characterization  | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources             |
|---|---|--|--|
| <b>Infrastructure</b>   | The existing policies define approaches for various types of infrastructure, including transit, pedestrian facilities and water/wastewater.                         | The PPS 2020 and proposed PPS 2023 highlight the need for infrastructure planning to be integrated with land use planning. There should be a direct policy that recognizes and ensures the integration of land-use planning with infrastructure planning.  | PPS 2020   |
| <b>Climate Change</b>   | The chapter does not reference the link between planning for infrastructure and climate change adaptation.  | There should be a direct reference to the need to plan infrastructure that can withstand the impacts of climate change.  | PPS 2020<br>Proposed PPS 2023                              |
| <b>Chapter 8: Development Application Review Requirements</b> |   |  |  |
| <b>Pre-Consultation</b>                                       | Section 8.2.1 describes the pre-consultation process for development applications but does not provide a high level of detail regarding this aspect of the process. | <p>More detail on pre-application process could improve review timelines.</p> <p>Bill 109 has shortened the timelines available for municipalities to review development applications before they are required to begin refunding applications fees.</p> <p>As a strategy to manage the short timelines, many Ontario municipalities have developed enhanced pre-application</p> | Bill 109 – <i>More Homes for Everyone Act Planning Act</i> |

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|----------------------------------|--|---|---|
|                                  |  | procedures. This ensures that complete applications already have a thorough understanding of the City's intentions for any given development site.  |   |
| <b>Planning Applications</b>     | Chapter 8.3 lists the required information and materials that need to be submitted for different types of development applications. It notes that the City will advise the applicant in writing of the required submission requirements. | Bill 23 has reduced the scope of matters that can be considered by site plan control. For example, developments that contain no more than 10 residential units on a parcel of land are no longer subject to site plan control.<br><br>These changes should be reflected in the SOP to guide potential applicants early in the development approval process. | Bill 23 – <i>More Homes Built Faster Act</i>              |
| <b>Comprehensive Review</b>      | Section 8.3.1 (xviii) notes that a comprehensive review may be required for certain applications and will be carried out according to the Terms of Reference prepared by the City.   | The draft PPS 2023 has proposed to remove the concept of the comprehensive review. If PPS 2023 is implemented as currently proposed, this policy will need to be revisited.   | Proposed PPS 2023   |
| <b>Chapter 9: Implementation</b> |  |   |   |
| <b>Community Benefits</b>        | The chapter explains the legislative framework for implementing the SOP policies. Many of the implementation tools   | In 2019, the Province amended Section 37 of the <i>Planning Act</i> to remove height/density bonusing   | Bill 108 – <i>More Homes More Choice Act Planning Act</i> |



| Topic                                   | Existing Policy Characterization  | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources                             |
|---|---|--|--|
|   | such as the zoning by-law and subdivision control arise from the <i>Planning Act</i> which has been extensively amended since the previous OPR. (e.g., section 9.2.6 – ‘Height and Density Bonus Provisions’ describes a process that has been altered by Bill 108 – <i>More Homes More Choice Act</i> .)   | and replace it with the Community Benefits Charge.<br><br>The SOP should be updated to include policies enabling the use of Community Benefits Charges and directing for the preparation of a Community Benefits Charge strategy and by-law. |  |
| <b>Community Planning Permit System</b> | Section 9.2.7 describes the development permit system. This system is now referred to as community planning permits.  | Updates should be made to refer to “community planning permits” which have replaced the development permit system.   | Bill 108 – <i>More Homes More Choice Act Planning Act</i>                  |
| <b>Parkland</b>                         | SOP policies regarding Parkland Dedication (section 9.9) note that the City shall consider a wide range of mechanisms in order to achieve the objective of acquiring lands for the Parks and Open Space System. The mechanisms available to the City are defined by the <i>Planning Act</i> , <i>Municipal Act</i> , and <i>Development Charges Act</i> . | Since the last update of the SOP, significant changes have been made to the parkland conveyance tools under Section 42 and 51.1 of the <i>Planning Act</i> , including to dedication rates and cash-in-lieu rules.                           | Bill 108 – <i>More Homes More Choice Act Planning Act</i><br>O. Reg 509/20 |
| <b>Consultation and Engagement</b>      | New – No existing framework for consultation with Indigenous  | The PPS requires that municipalities engage with Indigenous communities on land  | PPS 2020   |



| Topic   | Existing Policy Characterization  | Issue, Conflict, or Gap  | Key Policy & Legislative Drivers and Resources |
|---|---|--|--|
|   | communities on land use planning matters.   | use planning matters. There is also an opportunity to address matters related to heritage, public art, community spaces, and parks specific to Indigenous communities.   |  |
| <b>Chapter 10: Interpretation</b>   |   |  |  |
| <b>Interpretation</b>   | <p>This chapter provides guidance for interpreting the policies and schedules of the Plan. It notes that the SOP represents a statement of policy and must be interpreted in general terms.</p> <p>The chapter contains definitions for any defined terms that are used throughout the SOP.</p> | <p>The list of definitions will need to be amended and updated throughout the OPR as new policies are developed that might require the use of defined terms.</p> <p>For example, the definition of ‘comprehensive review’ will need to be revised if the proposed PPS 2023 goes into effect as currently written.</p> <p>The definition of the built boundary will need to be updated if the City chooses to revise the location of the existing built boundary for the purpose of measuring future intensification.</p> | General Housekeeping                           |
| <b>Chapter 11: Secondary Plans</b>  |   |  |  |
| See Section 4.3 of this Report for more information about the City’s Secondary Plans. |   |  |  |

## 3.2 Key Questions

Key questions help inform where changes may be required to the Official Plan and will form the basis of community engagement in Phase 1 of the OPR. These key questions have been identified for each of the thematic areas introduced in Section 1.2 and building on the review of Provincial and Local documents in Section 2. The key questions can be addressed in a wide range of ways through Official Plan and other municipal tools, such as master plans and zoning.

### Thematic Area

### Key Questions

#### A Growing City

- Along existing commercial corridors, should the City encourage more placemaking and mixed-use development?
- With changes to the *Planning Act* allowing three units as of right on any lot, should the Official Plan allow up to triplexes as of right on any lot?
- Should the City consider identifying a new strategic growth area or node near Stratford Train Station?
- How can the Official Plan enable a wider choice of housing types, tenures, and affordability to meet diverse housing needs?

#### A Cultural City

- How can the Official Plan elevate the City's Heritage Conservation District and improve policies, while distinguishing it from the remainder of the core area?
- How can the Official Plan create a cohesive and distinctive built environment and strong sense of place?

#### A Sustainable City

- How can the Official Plan promote climate change mitigation and adaptation in Stratford?
- How can we be more resilient to future environmental hazards and health risks?

#### A Green City

- How can the Official Plan protect and enhance important natural heritage and water resources as the City continues to grow?

#### A Connected and Mobile City

- How can the City implement the goals and objectives of its new Transportation Master Plan?
- How can Stratford's transportation network account for expected growth? How can the City manage mobility and provide more complete streets as it grows?

## 4 Methodology

### 4.1 Approach to Updating the Official Plan

As outlined in the City's Terms of Reference, this Official Plan Review is intended to result in an updated Official Plan that satisfies the requirements for a Comprehensive Review set out in the Provincial Policy Statement. Building on the statutory requirements to update the Official Plan, this project provides the opportunity to reimagine a modern and forward-thinking Official Plan for the City of Stratford.

There are two options for a municipality to consider when implementing the proposed policy changes through an Official Plan Review. The first option involves preparing one or more Official Plan Amendment(s) which update, remove, and add policies throughout the Official Plan to implement the outcomes of the OPR. This was the approach taken by the City through its most recent Official Plan conformity exercise in 2015. The second approach involves crafting entirely new Official Plan for the City which, once adopted by Council, would repeal and replace the current Official Plan with a new planning document. In addition to the required conformity changes required to the Official Plan, this approach also provides the opportunity to re-write, re-format, and update many of the other policies and non-operative sections throughout the Official Plan and streamline redundant policies.

Based on the anticipated extent of required changes to the City's Official Plan, and the desire to craft a more contemporary and user-friendly document which also reflects an updated vision for Stratford, it is desirable to follow the second approach and prepare a new Official Plan which repeals and replaces the existing Official Plan. However, there may be sections and policies which are simply carried forward into the new Official Plan, whereas other aspects of the Plan will be reorganized, newly developed or otherwise modified.

### 4.2 Policy Development Principles

The overall approach to preparing Official Plan policies is to find the right balance between prescriptive policies and offering a degree of flexibility. The writing process for the Official Plan will be iterative in nature and input from the community, agencies, staff and Council will continue to inform policies. The following principles should guide the writing and approach to preparing and reviewing policies for the City's Official Plan.

#### Future-Thinking

The City's Official Plan should be written and structured to be a forward-thinking strategy which reflects the vision and goals of the community and City administration. The Official Plan will be instrumental to guide and navigate future growth, investments, and decision-making in Stratford.



## Flexibility and Criteria-Based

Policies should be written in a manner that is not overly prescriptive so they can remain appropriately flexible unless there is a need for specific, enforceable, and defensible policies and details. Policies should be criteria-based, which enables strategic decision making and flexibility allowing for detailed performance standards to be further explored and defined in the City's Zoning By-law, or through Secondary Plan areas. This is contrasted with prescriptive policies which reference specific minimum and maximum numbers. As a general guideline, an Official Plan should not need to be amended, but should contemplate criteria to allow staff to evaluate a range of different scenarios.

## Consistency

Throughout the document, repetition and cross references to other sections should be minimized where possible to improve readability and to ensure users do not miss important, relevant policies. A consistent writing style should be followed throughout the document. This style should yield policies that use plain language wherever possible and avoid the use of passive language, ensuring the intent of policy is clearly articulated and be easily interpreted.

### 4.3 Approach to Existing Secondary Plans

Over the years, the City has completed two Secondary Plans which establish more detailed policy direction for defined areas in Stratford. Secondary Plans are used to define land use policies, general development policies or area-specific policies which are specific to a defined area of the City. A Secondary Plan has the same "status" as an Official Plan under the *Planning Act*, meaning that any decisions by the City must conform to the policies of the Secondary Plan. Additionally, the broader overarching policies of the Official Plan may be applicable, and the Secondary Plans frequently work to complement these broader policies.

In addition to the Stratford West and Northeast Stratford Secondary Plans, Section 11.3 of the Official Plan contains policies for the Stratford East Planning Area (**Figure 2**). These policies relate to Special Policy Area #19 shown on Schedule A and are not associated with a specific Secondary Plan. It is anticipated that the policies of Section 11.3 will be retained in the new Official Plan; however, consideration should be given to where these policies are located in the document.

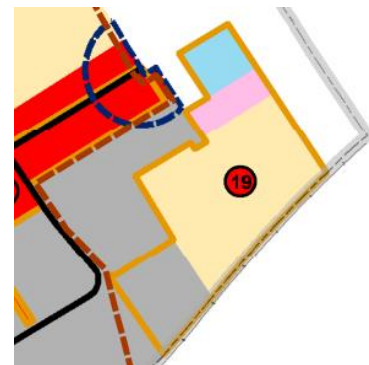


Figure 2 - Stratford East Planning Area (SPA 19)

The new Official Plan must be written and developed in a way that is considerate of the content and structure of the Secondary Plans. Fundamentally, Stratford's Secondary Plans will continue to be required. The notion of repealing or eliminating them in totality would not be desirable and would be very impactful. These Secondary Plan Areas are guiding on-going development and any repeal or significant modifications would be disruptive to on-going development processes.

Schedule A of the current Official Plan reflects the recommended land use plans for the Stratford West (**Figure 2**) and Northeast Secondary Plans (**Figure 3**). For example, blocks designated as medium density residential in the Secondary Plan are also designated medium density residential on Schedule A of the Official Plan.

The scope of the Official Plan Review does not include a comprehensive review or re-write of the City's Secondary Plans. As part of preparing the new Official Plan, it is anticipated that the following steps will be taken with respect to Secondary Plans:

- Secondary Plan policies (Chapter 11) will be carried forward in the new Official Plan.
  - Minor modifications to terminology used in the Secondary Plans may be made to align them with new terminology in the parent Official Plan. For example, if the name of a land use designation is changed or modified.
  - Major revisions or wholesale changes are not recommended to be made.
- Existing land use designations (Schedule A) and other features (e.g., road alignments) will be carried forward in the new Official Plan. It is not anticipated that changes to the delineation of land use areas (e.g., the Natural Heritage System or Medium Density Residential blocks) will be made to Schedule A of the Official Plan.

A subsequent review of the Secondary Plans following completion of the new Official Plan may be required to identify and remove conflicts with the new Official Plan. Reviewing the Secondary Plans can also ensure that they are working towards the new vision for the City, as well as to ensure conformity with Provincial policies.

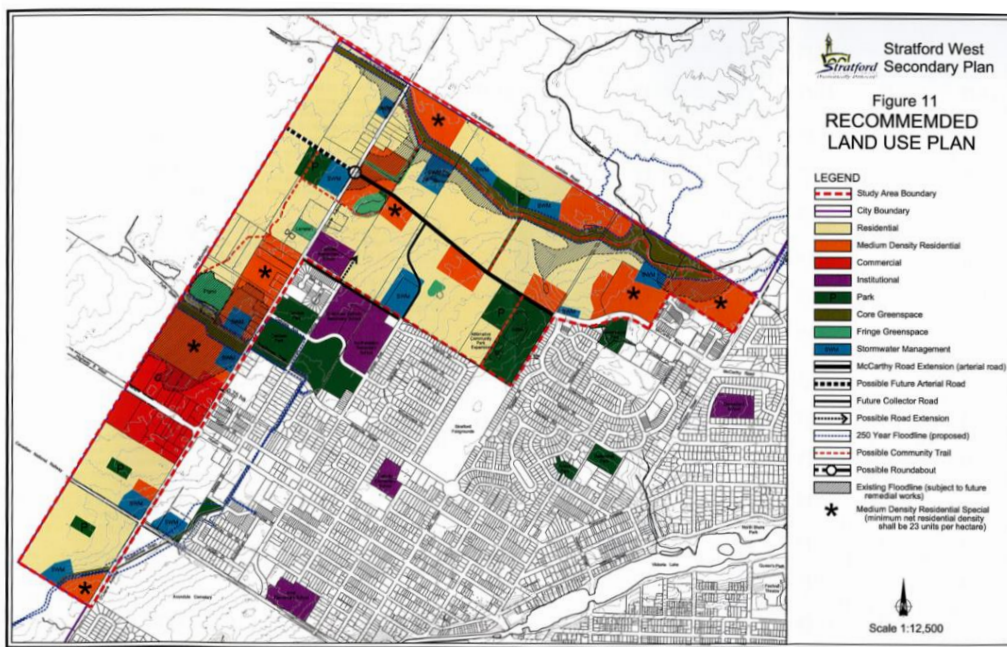


Figure 3 - Stratford West Secondary Plan - Recommended Land Use Plan

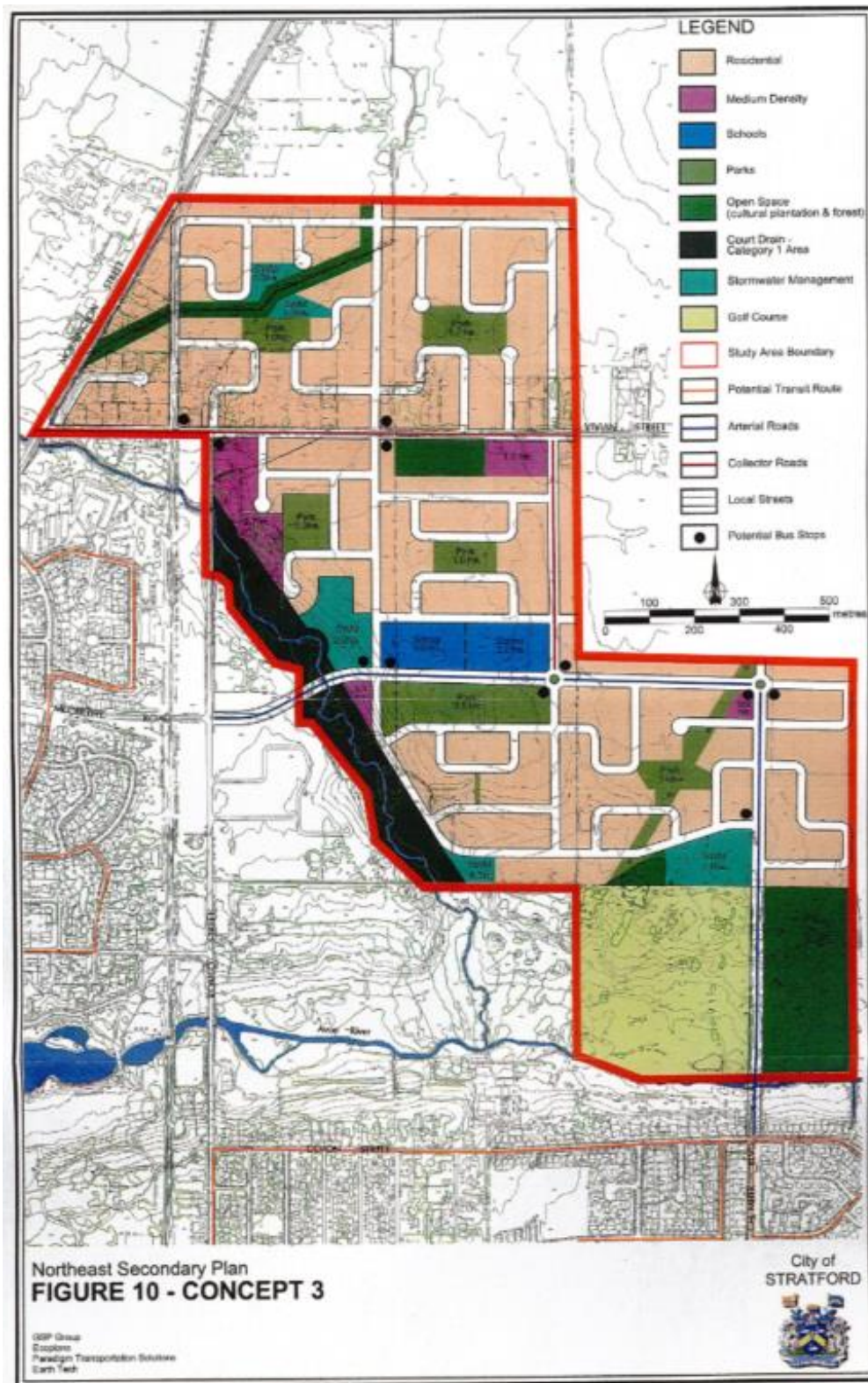


Figure 4 - Northeast Secondary Plan (Land Use Concept)



## 5 Official Plan Review Next Steps

This Background Review Report is the first deliverable of the Official Plan Review and identifies and reviews key policy drivers and inputs that need to be considered in the new Official Plan. Alongside this Report, Watson & Associates have prepared a Growth Management Background Report that documents trends and existing conditions regarding growth and development in Stratford which will feed into Phase 2. These two Reports will be presented to City Council for endorsement to conclude Phase 1.

### Phase 2: How will we grow?

Building on the findings of the Growth Management Background Report, Phase 2 will focus on providing the key technical analysis required to satisfy the Provincial requirements for a Comprehensive Review. City-wide population, housing, and employment forecasts will be prepared for the 2023 to 2048 period. Stemming from these growth forecasts, an updated land needs analysis over a 25-year period will be developed. The Phase 2 Report will include a:

- Residential Land Supply Analysis
- Non-Residential Land Supply Analysis
- Residential Intensification Analysis
- Residential Land Needs Assessment
- Employment Land Needs Assessment
- Review of Employment Conversions to a Non-Employment Use
- Commercial Land Needs Assessment

### Phase 3: How will the Official Plan Guide future growth?

Informed by the findings and recommendations set out in Phases 1 and 2 of the Official Plan Review, the third phase of the project will identify specific actions and recommendations about how to update the Official Plan. The work will result in a series of six Policy Directions Discussion Papers, informed by research and community input. Together, these Discussion Papers will serve as a roadmap for preparing the new Official Plan. Each Discussion Paper will be grouped into one of the five project thematic areas and address the key questions introduced in this Report, amongst other topics.

## Thematic Area

**A Growing City**

**A Cultural City**

**A Sustainable City**

**A Green City**

**A Connected and Mobile City**

## Policy Direction Discussion Paper Topics

Growth Management, Housing, and Land Use

Heritage, Tourism, and Design

Climate and Sustainability

Natural Heritage and Water Resource Systems

Transportation and Infrastructure