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**VIA E-MAIL: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)**

Municipal Affairs and Housing  
College Park 17th Flr,  
777 Bay St, Toronto, ON M7A 2J3

Attention: Hon. Steve Clark, Minister

Dear Sir:

**Re: *Recently Approved Official Plan of the Corporation of the City of Peterborough  
Employment Lands – Designations and Policies Associated with Employment  
Land Development  
Development of a Viable Industrial Land Needs Strategy for both the City of  
Peterborough and County of Peterborough***

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The following submission is made to you and members of your Ministry in relation to the review and potential approval of the recently adopted City of Peterborough Official Plan.

The City has undertaken a lengthy review of its Official Plan. In fact, that Official Plan Review commenced in April, 2011. The City has not been compliant with *The Planning Act (Ontario)*, nor the provisions of its own existing Official Plan associated with the timelines imposed in reference to such Official Plan reviews. The process has been long, tortuous, and deficient in many aspects.

This letter constitutes a submission particularly in reference to the Employment Lands Designations, and Employment Land Strategy & Policies, as reflected in the City's Official Plan recently adopted on November 29, 2021.

Incidental to the Employment Lands Designations and Employment Land Strategies, it is submitted that:

1. The designations for Employment Lands and Employment Lands Strategy & Policies do not represent good Planning.

2. The Employment Lands Designations and Employment Lands Strategies are not viable, nor do they reflect the need for appropriate and realistic market factors incidental to the development of appropriate Employment Lands for the City of Peterborough. It was my understanding that Amendment #1 to the Growth Plan, as introduced and made effective August 28, 2020, was to include language that would have the market criteria, market demand, and market opportunities viewed as a relevant factor in the development of Employment Land Policies. Neither the City itself, nor the Consultant, had any background as it would relate to Land Use Economics. A viable and justifiable approach to Industrial Lands within the City of Peterborough did not form any part of its analysis. In fact, the ultimate consequence and result of the Employment Lands Designations and Policies as reflected in the City's Official Plan are devoid of any sensitivity to market demand, market opportunities, and inquiries that are typically made to develop industrial lands within the City and County, together with the adjoining Region. The City's approach to Employment Lands is not realistic, and will delay the availability of such land "to market".
3. The designation of lands in the Coldsprings area, together with an associated Employment Land Strategies, is not feasible, justifiable, and has several constraints that would preclude and prohibit its feasible development for employment uses. Members of Council quite clearly did not receive appropriate information from its staff or Consultants as it would relate to the constraints associated with any Employment Lands for the Coldsprings Secondary Plan Area within the City of Peterborough. Those constraints are well known, and have been identified in terms of past reviews, including the development of the Secondary Plan for Coldsprings, a 2006 OMB Decision whereby the Manager of the City of Peterborough actually testified that Employment Lands should not be located within the Coldsprings area, and important and significant servicing constraints. Other site features in the area, and the close proximity of the Otonabee River would represent impediments to the appropriate designation and development of an Industrial Park within the Coldsprings area.
4. In addition, the City has allocated approximately 30 hectares of employment use to an area that constitutes land on its northern border. This has been referenced and described as Chemong North or Chemong West. Once again, the topography of that specific site, together with the significant constraints associated with appropriate transportation are major factors as to why that specific proposed area is not suitable for Employment Lands Designation.

There is little evidence, if any, as to what qualitative and quantitative information was relied upon by the City of Peterborough incidental to its Employment Lands Designations. Certainly, no appropriate evaluative framework was ever outlined in terms of the staff reports, or information made available to the public dealing with Employment Lands selection. Industrial site selection, by all measures, has to be undertaken in accordance with appropriate evaluation and criteria. From a market perspective, the subject lands must be identified as a feasible site. There is no demonstrative evidence, incidental to the City's Official Plan Review, that would suggest that both of these potential Employment Lands Designations have any viability incidental to appropriate industrial site selection.

The development of an appropriate viable Industrial Needs Strategy needs to be undertaken by both the City and the County. A quality Plan must have:

1. Reasonable and feasible goals associated with Employment Lands and industrial use;
2. Provide a directional framework to achieve the goals, including an analysis of appropriate land use compatibility, site constraints, servicing issues, and a complimentary transportation network that can properly service and provide avenues for traffic to and from such centers.
3. Any site selection process must be synchronized and be in balance with other components of the City's Official Plan, including an appropriate Transportation and Infrastructure Planning Review. This was not undertaken in this case. I am providing herein correspondence sent to the City addressing the need for an appropriate Transportation Planning Review, especially in reference to the Chemong Road North proposed Employment Land area.

The consequence has been that the City of Peterborough has approved of an Employment Lands Strategy that is inappropriate, constitutes bad Planning, and does not have appropriate regard for Transportation and Infrastructure Planning.

The long-term consequences of the City's approval, of its existing Official Plan, is a period of economic paralysis for any industrial growth within the City of Peterborough.

The Ministry will likely receive a petition from AON Inc. AON Inc. is the owner of the 80 hectares of proposed Employment Lands in the Coldsprings area. This is demonstrative that the property owner is not ready, willing, nor able to facilitate the development of those lands for Employment Area/Industrial Development. That specific property owner has a total land area, pursuant to the City's studies, of approximately 157+ hectares. Fundamental issues need to be addressed in reference to the land use compatibility between what the City has identified and approved, and the remnant lands for residential use within the Coldsprings area. Major transportation network problems are clearly evident by way of any analysis of Bensfort Road, Guthrie Drive, Wallace Point Road, and the MTO intersection involving Highway 115.

**Request:** We herein request that the Minister and the Ministry not approve of the City of Peterborough Official Plan, as presently constituted. We submit that the Plan should be resubmitted back to the Municipality for further consideration, in light of the criteria associated with industrial site selection and industrial site location. The City's present Official Plan, as approved, is not viable, justifiable, nor appropriate in terms of long-term Planning for employment growth within the City. The consequences arising from the errors of the City are dramatic and significant. It is highly probable that no feasible industrial site development will occur within the next 5-10 years. This arises from significant constraints in terms of the viability of these parcels to the marketplace, and also servicing and infrastructure issues.

**Development of a Viable Industrial Land Needs Strategy:** Enclosed as part of this submission is correspondence addressed to the Mayor and Members of Council of the City of

Peterborough, the Warden and Members of Council of the County of Peterborough, and the Mayor and Members of Council of the Township of Cavan Monaghan. This enclosed submission was made to the Members of all three Municipalities in relation to the development of potential viable Industrial Land Needs Strategy. This particular petition, at least in part, led to the County of Peterborough passing a Resolution, dated November 19, 2021, which encouraged a potential boundary adjustment to develop viable industrial lands.

My client, 2340981 Ontario Inc., is one of the land owners identified in the County Resolution for potential Settlement Boundary adjustment, and the designation of viable industrial lands. My clients' property is approximately 300 meters from existing conventional services, both sanitary and water, within the City's existing Major Bennett Industrial Park. Furthermore, my clients' property is located approximately 300 meters from the interchange with Highway 115. As a consequence, the transportation network presently exists to facilitate the appropriate movement of goods, services, and people to the proposed Employment Lands area which would be situate within the City's boundaries, if a boundary adjustment was implemented.

We believe that it is in the long-term objectives of both the City, County, and Township of Cavan Monaghan, together with all of the other Townships within the County, to have such an Industrial Land Needs Strategy implemented, with the appropriate designation of Employment Lands in close proximity to the Highway 115 corridor. As noted, the lands identified in the County of Peterborough Resolution constitute a logical, orderly, and sequential development which would constitute an expansion of the existing Major Bennett Industrial Park.

The environmental benefits, by way of the close proximity to Highway 115, are self-evident. A short travel from Highway 115 to the potential sites to be designated for Employment Lands is environmentally responsible, sustainable, and the best alternative within the context of the analysis of potential Employment Lands within the Region.

We urge and petition the Minister to consider this request to have the City's Official Plan not approved, and sent back to the City for continuing negotiations. The City appears to be operating upon an assumption that it must have all matters in place by July 1, 2022. As you are well aware, pursuant to your powers available by way of various legislation, it is quite possible for your Ministry to precipitate the appropriate objectives to have discussions ensue, and proper designations put in place for Regional industrial development.

Incidental to this submission, I am providing herein the following:

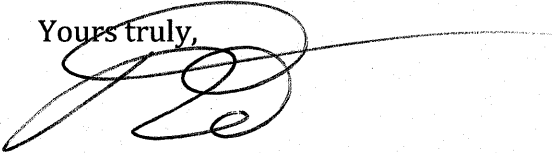
1. A copy of the November 1, 2021 petition to all three Municipalities dealing with a viable Industrial Land Needs Strategy;
2. A copy of the Resolution of County Council on November 18, 2021;
3. Correspondence addressed to the City of October 29, 2021 urging and petitioning them not to designate the Chemong Road north/west Industrial Park in its Official Plan without an appropriate Transportation Plan Analysis and Traffic Impact Study;

4. My correspondence to Bryan Weir, Director of Planning for the County of Peterborough, under date of October 29, 2021 encouraging the County to proceed with submissions dealing with the City's Official Plan/Transportation Network. As you may be aware, the County of Peterborough is undertaking its own Official Plan Review, Transportation Plan Review, and Land Needs Assessment pursuant to applicable policy, including the Growth Plan.

There is a definitive need for industrial development now. For example, within the last two weeks, my clients' Real Estate Agent has been approached by a national company who is seeking between 11-13 acres for industrial development. It has been noted that such a use would likely have up to 250 employees. Such industrial development, and job creation, is vitally needed for both the City, County, and Region. However, such opportunities are being lost due to Land Use Planning that has not recognized the need for an immediate viable Industrial Land Needs Strategy.

As a consequence, I hope that you will give careful consideration to this correspondence and submission. Obviously, it can be submitted to your Ministry staff.

Yours truly,



Richard J. Taylor  
RJT/tg

Encls.

1. *November 1, 2021 petition to all three Municipalities;*
2. *A copy of the Resolution of County Council on November 18, 2021;*
3. *Correspondence to the City of October 29, 2021;*
4. *Correspondence to Bryan Weir, Director of Planning for the County of Peterborough, under date of October 29, 2021*