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January 4, 2023

Mr. Damien Schaefer
Planner
Municipal Services Office – Eastern Region
8 Estate Lane
Rockwood House
Kingston, ON K7M 9A8

RE: ERO Posting #019-4969, City of Peterborough, Approval of a Municipality's Official Plan

Dear Mr. Schaefer:

Thank you for the opportunity to provide further comment on the City of Peterborough's proposed Official Plan. This submission builds on the comments and recommendations AON Inc. (AON) has made in the prior consultation through the Environmental Registry of Ontario and the October 2022 request AON made to Minister Clark to appoint the Provincial Land and Development Facilitator to resolve employment lands and natural heritage systems issues with respect to this proposed Official Plan.

As background, AON is a Peterborough-based full-service development and construction company, with innovative retirement, long-term care, residential rental, retail and office space, as well as the Port Hope Golf & Country Club in its portfolio. AON is among the largest landowners and employers in the Peterborough area and remains family-owned and run. We are committed to building sustainable, sensible communities in Ontario and elsewhere. Of note, AON owns land in the Coldsprings Planning Area (CPA), which were designated and zoned for residential uses (and had two municipally supported and approved draft plans of subdivision that had lapsed in error), but in the proposed Official Plan is to be designated as employment lands or as a rural transition area, precluding development until post-2051.

It has been more than 12 months since the City of Peterborough adopted this proposed Official Plan. In the intervening months, there has been, among other things, a growing appreciation of the housing crisis facing Ontario with the release of the Housing Affordability Task Force's final report, a provincial and a municipal election has seen many new officials come into place and the passage of several pieces of legislation to address this housing crisis. The political, economic and planning & development environment today is dramatically changed from the one in which the City of Peterborough adopted this proposed Official Plan. In this dramatically different environment, AON believes further consideration of the proposed Official Plan is warranted and that further requested modifications are needed.

Specifically, with respect to the City of Peterborough's proposed Official Plan, AON requests that the Minister modify this proposed Official Plan by:

- Restoring the residential land zoning and designations in the CPA; and
- Including as approved the secondary plan for the CPA, including the proposed road network within this area.

In the alternative, we renew our request for the appointment of the Provincial Land and Development Facilitator to work with the City, relevant municipalities and landowners to resolve the Employment lands issue and address associated municipal boundary changes to establish a realistic and likely more successful employment land response for the City and the County.

CPA Lands Should Be Designated for Residential Uses, Not Employment Uses

As noted in previous submissions, it is not appropriate nor is there demand for the CPA lands to be designated as employment lands. A City-commissioned report in 2010 recommended that appropriate land uses in the CPA are to be primarily residential (and associated services). The current Chief Planner, in evidence before the then-Ontario Municipal Board, acknowledged the CPA as not suitable for employment uses. Similarly, a January 2022 report from City Council flagged that the CPA is not suited to employment use.

Further, the business community has been clear the CPA lands are not where they would like to see an expansion of land for employment purposes. Rather, they would like to see employment lands expanded near the airport and Major Bennett Industrial Park, where there is already a critical mass of infrastructure to support employment uses (including investments from the Province) and associated market demand.

The market, and AON, would like the CPA to be designated for residential uses. Residential development in the CPA has been held up only due to a lack of municipal servicing. The City of Peterborough has been clear they do not have the budget to undertake this infrastructure work to extend municipal services. AON has offered to front-end the needed infrastructure work, but only for a residential development. If the CPA lands are designated as employment lands, effectively any development of these lands for any purpose is being held up until the next Official Plan review.

As in other parts of the province, there is an acute need to increase the supply of housing in the City of Peterborough. The City-commissioned 2010 report believed the CPA could accommodate approximately 5,200 units and 14,000 people. The City of Peterborough was not one of the selected lower- and single-tier municipalities to be given a 2031 housing target in the recent Housing Supply Action Plan. Yet, based on targets given to comparable-sized municipalities, one can calculate the City of Peterborough should aim to build an additional 8,000 – 10,000 units by 2031.¹ As a result, progress on residential development in the CPA will satisfy much of the City's medium-term housing needs.

Restoring the residential designations in the CPA and designating the area near the airport and Major Bennett Industrial Park would help to satisfy the Province's Housing Supply Action Plan, meet the City's need for an expansion of employment lands and sensibly accommodate the economic, employment and population growth that is forecast over the coming years.

¹ This calculation is based on the City of Peterborough's population and its growth rate and the population and growth rates in comparable municipalities that were given 2031 housing targets by the Province. According to the 2021 Census, the population of the City of Peterborough was 83,651, which is comparable to the Town of Caledon (76,581) and the City of Niagara Falls (88,071). The 2031 housing target for Niagara Falls is an additional 8,000 units and for Caledon it is an additional 13,000 (based, in part, on the faster growth rate in Caledon, which is also growing faster than the City of Peterborough).

Finally, restoring the CPA lands for residential development will resolve a municipal finance and budgeting issue. The CPA lands were originally part of Otonabee Township and the CPA became a part of the City of Peterborough as part of an annexation agreement. At the time of this annexation agreement, these lands were identified to be planned and used for residential purposes, with Otonabee Township being compensated for the annexation by receiving funds for each residential unit developed. With the re-designation, Otonabee Township will receive less compensation and revenue than expected when they entered into the annexation agreement, with a negative impact on the Township's budget. Otonabee Township is against the redesignation of these lands and made a submission to this effect when the proposed Official Plan was originally posted for comment.

Summary

AON requests that the Minister modify this proposed Official Plan by:

- Restoring the residential land designations in the CPA; and
- Including as approved the secondary plan for the CPA, including the proposed road network within this area.

In the alternative, we renew our request for the appointment of the Provincial Land and Development Facilitator to work with the City, relevant municipalities and landowners to resolve the Employment lands issue and address associated municipal boundary changes to establish a realistic and likely more successful employment land response for the City and the County.

Thank you for considering this submission and this request. I would be pleased to further discuss this situation and possible solutions with you and/or your staff at any time.

Regards,



Brad Smith
President
AON Inc.

Encl.

CC: Kate Manson-Smith, Deputy Minister, Ministry of Municipal Affairs and Housing
Hon. Steve Clark, Minister of Municipal Affairs and Housing
Ryan Amato, Chief of Staff, Office of the Minister of Municipal Affairs and Housing
Kirstin Jensen, Deputy Chief of Staff, Office of the Minister of Municipal Affairs and Housing
Jae Truesdell, Director of Policy, Office of the Premier.