



BOUSFIELDS INC.

January 4, 2022

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Re: *City of Peterborough Official Plan – Trent University Comments*
Ministry Reference Number 15-OP-165376

We are the planning consultants for Trent University (“the University”) with respect to their lands located in the City of Peterborough. We are writing on their behalf with respect to the City of Peterborough Official Plan (Ministry Reference Number 15-OP-165376), dated November 2021 that is posted on the Environmental Registry of Ontario (“ERO”).

As an anchor institution, a major landowner and employer, a significant economic driver and a contributor to social and recreational vitality, the health and aspirations of the University should be of primary concern to the Province and the City. While we appreciate that the importance of the University to the City has been captured to some degree in the City’s Official Plan, there are a number of concerns with the proposed City of Peterborough Official Plan that could impact the continued success of the University, including its ability to provide innovative programming, enhance sustainability commitments and maximize community benefit. Additionally, several components of the proposed Official Plan do not align with the Trent Lands and Nature Areas Plan (TLNAP), a campus plan developed by the University in consultation with the community, stakeholders, First Nations and the City and adopted by the University’s Board of Governors in February 2021. The TLNAP was developed with input from the City and it is intended that it be reflected in the proposed Official Plan.

We have prepared this letter to outline a number of the University’s comments and concerns on the City’s Official Plan and note that the University participated fully in the City’s process leading up to their adoption of the Official Plan. These comments and requested changes were provided to the City at that time. The key concerns include:

- 1) The proposed Rural Transition Area designation and the corresponding down-designation from Designated Greenfield Area of some of the University’s lands;
- 2) The proposed Major Open Space designation that applies to some of the lands within the campus lands;
- 3) Restrictive policies for the Natural Heritage System and mapping that does not reflect known features;
- 4) That clarification be provided for the population and employment forecasts and that these are considered a minimum.

- 5) The need for a special policy area to be applied to Trent University lands to provide the appropriate flexibility for future development.

Our concerns for these matters are briefly discussed below:

Rural Transition Area – as shown on proposed Schedule ‘A’: Urban Structure and proposed Schedule ‘B’: Land Use Plan of the adopted Official Plan, together with the associated policies, would restrict the development of the University Districts outlined in the TLNAP, in particular the extent of the developable area, the permitted uses and the type of buildings allowed on the lands. As discussed, the TLNAP was developed in consultation with the City and other stakeholders and timed to ensure that the University’s intentions would be known to the City prior to the completion of the Official Plan. The Rural Transition Area designation freezes the lands and excludes them from redevelopment in the time horizon of the Official Plan. The University’s lands should not be down-designated in this way. Given that the University has already completed a detailed plan for their lands, in consultation with the community and the City, it has already planned its long-term needs and prepared a detailed natural heritage study that identified development limits. In this regard, none of the University’s lands should be designated Rural Transition Area.

Major Open Space Designation – Similar to the concerns about the Rural Transition Area designation, the use of the Major Open Space designation is not appropriate on lands owned by Trent University. The draft of the Official Plan identifies parts of what the University refers to as the Peninsula Lands as Major Open Space, however, this is inappropriate, given that this land has consistently been identified as a development opportunity as a northern gateway to the City and to provide much-needed housing for the region in accordance with regional and provincial planning policy direction.

Natural Heritage System - We have concerns about the inclusion of the minimum vegetation protection zone widths and the adjacent lands overlay in the mapping. GEI Savanta Inc. had previously written to the City on behalf of the University outlining concerns with respect to the NHS policies within the draft Official Plan and had recommended a systems-based approach to guide the final adjustment of buffer boundaries within vegetation protection zones. This approach would offer a higher degree of precision in the delineation of ecological buffers and a higher degree of confidence that biological diversity and ecological function will be preserved and enhanced. Additional information on this systems-based approach can be provided if requested. Further, it is our opinion that where applicable, appropriate setbacks and buffers should be determined through the development review process and through an Environmental Impact Study, rather than in the Official Plan. As discussed, much of this work has already been completed by the University on their lands and the limits of the Natural Heritage System should reflect this work. The Trent Board of Governors ²

have committed to maintain 60% of the Symons Campus lands as natural and green spaces, and has completed environmental studies in collaboration with First Nations to establish this system.

Population and Employment Forecasts – It is our opinion that the population and employment projections in the draft Official Plan anticipated for the City should be considered minimums and should not restrict the ability of Trent University to grow and develop at its own rate. While we recognize that the City worked with the Province’s methodology for the Land Needs Assessment, the growth targets have been established without the consideration of post-secondary population numbers. This is particularly important in a City like Peterborough where the impacts on the overall rental market of the housing needs for students outside of purpose-built student residences is substantial. In this regard, housing for students as well as other services and amenities for the student population are not adequately addressed in the Draft Official Plan. This is important because Trent University intends to continue to grow meaning that it will add continue to add to people and jobs from outside the City of Peterborough and broader Peterborough County that are not accounted for in the overall planning for growth and associated infrastructure for the City as a whole.

The University has grown by 35% over the past five years with more than 80% of the students coming from outside of the region. The Official Plan needs to support the continued growth of the University and the necessary services and amenities needed to achieve successful growth and student development. This includes concerns regarding the ability of the University to provide housing for students not just in student residences. Ensuring that there is permission to develop housing on the University lands will help to alleviate student-based demand for off-campus rental housing with on-campus student housing options. This will assist in providing additional rental housing stock to residents and non-student populations in the City of Peterborough. Further, as outlined in the TLNAP, the University intends to develop other housing to support the housing needs of the broader community, including senior’s housing and additional housing stock on their ‘Peninsula Lands’ as well as in the Cleantech Commons area. The introduction of housing in these areas will not only support the University’s objectives but will also contribute to the creation of a complete community and provide much-needed housing in Peterborough.

Special Policy Area for University – Trent is a key contributor to Peterborough’s economic, social, cultural and environmental success. It is one of the top three employers in the City and a major landowner with a unique role as an institution, innovator and contributor to social, economic, environmental and recreational aspects of the community. For these reasons, we are of the view that the University’s lands should be identified as a Special Policy Area in the City’s Official Plan. The Special Policy area could be created as a stand-alone section or as an exception to the Major

Institutional Use to provide specific policy direction for the University lands, including the flexibility to respond to Trent's changing needs and for Trent to respond to the City's changing needs. The Special Policy Area would address Trent's vision for its lands, including enhancing sustainability and maximizing community benefit. It should include exceptions for significant environmental features and/or hazardous lands while allowing the University to utilize lands for growth and development as outlined in the TLNAP. This special policy area applying to the University should include area-specific policies for Cleantech Commons which is a joint project with the City and is planned to provide a premier location for clean, green and low-carbon technology-based, innovation, entrepreneurship and commercialization. These policies for Cleantech Commons, as part of the Major Institutional exception, would permit the uses for Cleantech Commons that have been contemplated with the City. It would also provide greater certainty to potential tenants to fully facilitate the innovation that is the basis of the Commons and other Trent lands.

It is our opinion that a Special Policy Area designation should apply to all the University's lands and would be more appropriate than the proposed land use designations that have been applied in the draft Official Plan. Residential and/or research and development facilities that may be associated with institutional use should be permitted and would not be captured in the Major Institutional and Major Open Space designations. Further, the Special Policy Area designation would include exception areas to restrict the land uses for areas such as environmentally sensitive and/or hazardous lands. The Special Policy Area designation would also assist with the development of additional housing options on the University lands that would help to alleviate student-based demand for off-campus rental housing. This will assist in providing additional rental housing stock to residents in the City of Peterborough. In summary, the Special Policy Area should align with the University's objectives outlined in the TLNAP to create a complete community on the University lands to serve the campus and increase the University's contributions to the region.

We thank you for the opportunity to provide comments on the proposed Official Plan process. The University would be happy to meet to discuss their concerns and provide additional detail or recommendations for modifications to the Official Plan. If you have any questions regarding these comments, please do not hesitate to contact the undersigned.

Yours very truly,
Bousfields Inc.



Emma West, MCIP, RPP

cc: Dave Smith, MPP – Peterborough – Kawartha
Ontario Ministry of Colleges and Universities

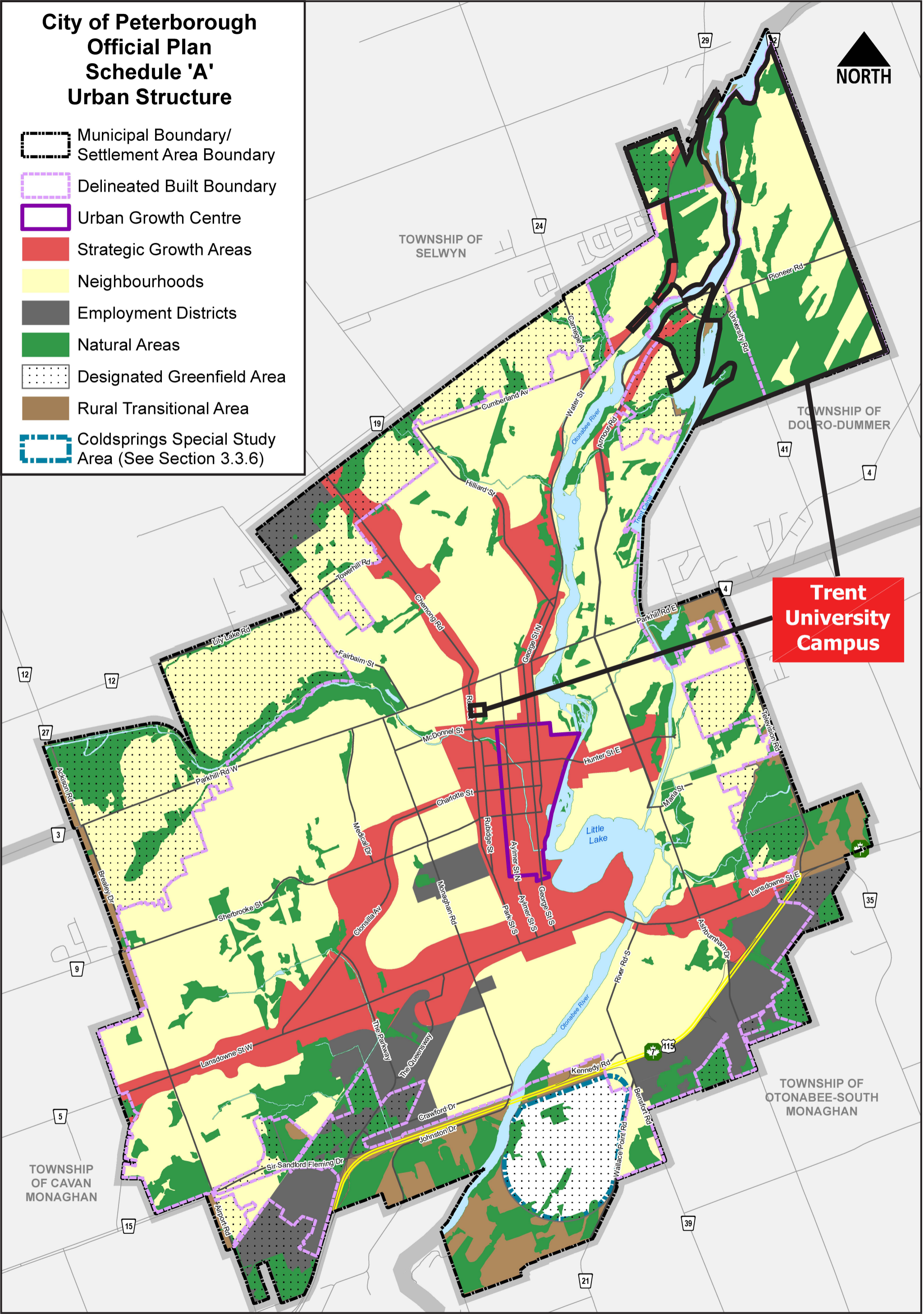
Attachment One

Schedule 'A' – Urban Structure

(Adopted City of Peterborough Official Plan – November 2021)

City of Peterborough Official Plan Schedule 'A' Urban Structure

-  Municipal Boundary/
Settlement Area Boundary
-  Delineated Built Boundary
-  Urban Growth Centre
-  Strategic Growth Areas
-  Neighbourhoods
-  Employment Districts
-  Natural Areas
-  Designated Greenfield Area
-  Rural Transitional Area
-  Coldsprings Special Study
Area (See Section 3.3.6)








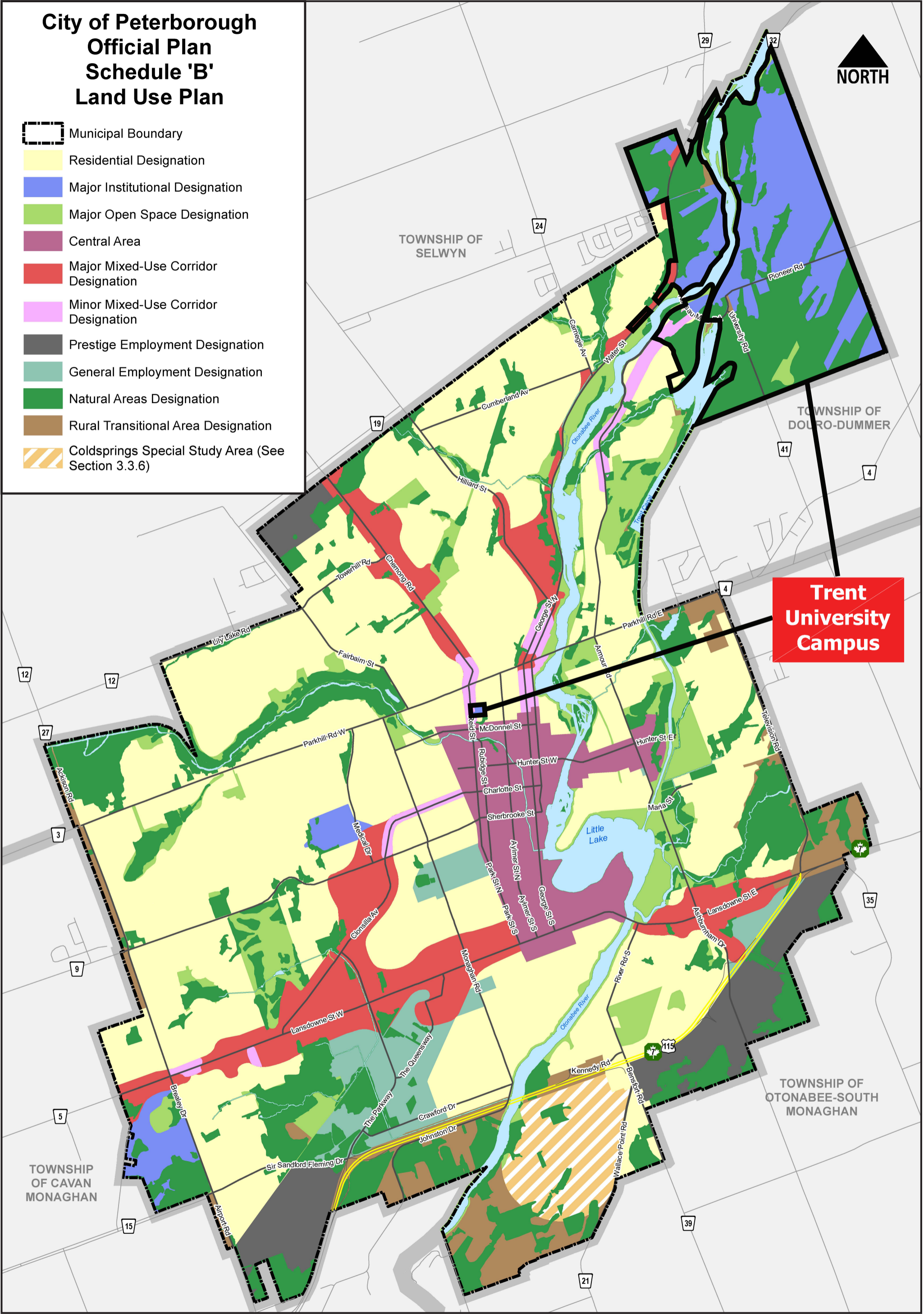
Attachment Two

Schedule 'B' – Land Use Plan

(Adopted City of Peterborough Official Plan – November 2021)

City of Peterborough Official Plan Schedule 'B' Land Use Plan

-  Municipal Boundary
-  Residential Designation
-  Major Institutional Designation
-  Major Open Space Designation
-  Central Area
-  Major Mixed-Use Corridor Designation
-  Minor Mixed-Use Corridor Designation
-  Prestige Employment Designation
-  General Employment Designation
-  Natural Areas Designation
-  Rural Transitional Area Designation
-  Coldsprings Special Study Area (See Section 3.3.6)



**Trent
University
Campus**

Attachment Three

**Letter on behalf of Trent University to the City of Peterborough regarding the
City's Draft Official Plan**

(November 19, 2019)



BOUSFIELDS INC.

November 19, 2019

Infrastructure & Planning Services
Planning Division
City of Peterborough
500 George Street North
Peterborough ON
K9H 3R9

Dear Cynthia Fletcher,

**Re: City of Peterborough Draft Official Plan Update
Response on Behalf of Trent University**

We are the planning consultants for Trent University (“the University”) with respect to their review of the City of Peterborough’s draft Official Plan update. University senior administration, board members and staff have participated actively throughout the process for developing this plan, including participation in the advisory committee, design charette and attendance at community meetings.

Trent University values the working relationship that has been established over a number of years with the City of Peterborough and they believe that it has been, and can continue to be, a key contributor to Peterborough’s economic, social, cultural and environmental success. Trent looks forward to continuing this relationship in a way that respects the interests of the University and the City as a whole. We welcome the discussion and consultation this requires and believe that it will be a positive catalyst for the continued growth and success of the University and the City.

Through our review of the draft Official Plan, dated June 19, 2019, we have identified a number of comments and concerns on the proposed changes to the City’s Official Plan. While the draft Official Plan preparation was underway, including during the charrette process, the University was working with the City to share its vision for the future use of its lands, to meet both community and campus needs.

As an anchor institution, a major employer, a significant economic driver and a contributor to social and recreational vitality, the health and aspirations of the University should be of primary concern to the City. While we recognize that the draft Official Plan does acknowledge the importance of the University in some of the proposed principles, including those related to complete communities, attracting and retaining the workforce, and the efficient use of land and infrastructure; the associated policies do not address the significant role that the University plays in the City and in

many cases create barriers to it fulfilling that role. In fact, there are a number of significant concerns about the proposed policies that would negatively affect the continued success of the university, including Trent's ability to enhance its sustainability and maximize community benefit.

The following is a summary of our comments and concerns with focus on the most significant matters. We are in the process of completing a detailed analysis of the proposed policies and their potential impacts on the University. As part of that analysis, we intend to provide you with recommended changes to the draft Official Plan which will address the concerns of the University while respecting the planning principles which the City wishes to advance in the new Official Plan. As such, this letter does not represent a comprehensive submission of all of the University's comments in respect of the draft Official Plan, but is a preliminary summary of its major concerns.

Of most concern are:

- 1) The proposed Rural Transition Area designation and the corresponding down-designation from *Designated Greenfield Area*;
- 2) Incomplete background information available on and new, more restrictive policies for the Natural Heritage System; and
- 3) The need for a special policy area to be applied to Trent University lands to provide the appropriate flexibility for future development.

Our concerns for each of these matters are discussed below.

1. Rural Transition Area and Designation Greenfield Areas

The draft Official Plan identifies three main components of the Urban Structure: the delineated built-up area; the *Designated Greenfield Area*; and the Rural Transition Area ("RTA"). Some of the University's lands are within the delineated built-up area, including the Traill campus and part of the Symons campus (refer to **Figure 1**) and the remaining portions of the Symons campus are located within *Designated Greenfield Areas* and identified as Rural Transition Area.

The Rural Transition Area is a new component of the Urban Structure that was not included in the in-force Official Plan. Section 3.4.4 states that these RTA lands are included in the Settlement Area but are not anticipated to accommodate urban land uses until after 2041. No rationale has been provided for this down-designation.

It is our understanding that a draft Land Needs Assessment (“LNA”) that was prepared by the City concluded that some of the *Designated Greenfield Area* lands in the in-force Official Plan were not required within the planning horizon of this plan and were therefore identified as excess lands.

It is difficult to fully comment on the proposed Official Plan without reviewing the results of the LNA, however, the decision to identify lands owned by the University as ‘excess lands’, which appears to have been an outcome from the LNA and to down-designate these lands to Rural Transition Area is of great concern. The land needs of the University are, for the most part, independent of the needs for the rest of the City. Enrolment at the University has grown over the last few years meaning that more space for academic programs and residences are now required. Further, the types of activities on a university campus will generally evolve and continuously change. As such, there should be no constraint on the University and their lands where it is required for their purposes, either for traditional academic and residence purposes, or in connection with new types of activities that are related to or complement the activities of the University. The redesignation would have a significant impact on the University’s plans for growth, including accommodating community housing needs and adding new places of employment, given that the majority of the lands that are part of the *Designated Greenfield Area* in the in-force Official Plan have been included as RTA in the draft Official Plan. No portion of the University’s lands should be included in the Rural Transition Area.

The Land Needs Assessment should be made available for review and comment before removing lands from the Designated Greenfield Area and designating them as RTA. In addition to the concerns raised above, it is also important to understand the assumptions used in the LNA: the number of jobs associated with the University including the assumed growth in university related jobs; assumptions regarding spin-off benefits of planned growth of the University; assumptions regarding existing and future student housing needs and how that relates to the housing capacity in the city; and finally, if the assumptions in the LNA has taken into account the City and University’s plans for Cleantech Commons as a mixed-use innovation hub. It is also important to understand the criteria that will be used to determine which lands will be developed, particularly with respect to the RTA designation.

Further, it is unclear how the University was considered in the *Designated Greenfield Area* policies. For example, the draft Official Plan states that significant growth will be accommodated in *Designated Greenfield Areas* over the time horizon of the plan, including new residential neighbourhoods and new business parks (3.4.3.b) however institutional uses are not mentioned. Similarly, in section 3.4.3.c, planned mixed use

communities in *Designated Greenfield Areas* are described to include only local services, social amenities and a range of housing are described as the uses.

2. Natural Heritage System Policies and Mapping

Trent's natural areas are an important part of the identity of the campus, support teaching and research and provide recreational opportunities on the campus and for the community at large. Further, these areas contribute to the City's overall forest canopy and natural heritage system.

The draft Official Plan introduces a new approach to the creation and protection of the Natural Heritage System. The boundaries of the Natural Areas have been expanded in the draft Official Plan and the policies have been updated. We have concerns with the proposed approach and with the lack of clarity with respect to the mapping, as well as some inconsistencies in the terminology used in connection with these policies.

The proposed Natural Heritage System policies provide three levels of natural features: Levels A, B and C. No development is permitted in Level A features, Level B features would allow some flexibility in the protection if a net gain can be demonstrated and Level C features would provide a supporting role to the Natural Heritage System and the preservation or replication of these features is 'paramount'. While we do acknowledge that a level-based approach is sometimes used because it allows for variable consideration of features and their functions, we have comments and questions regarding the specific components included in each level and the implementation of the policies.

The draft Official Plan appears to have an expanded natural heritage system, as identified on the proposed Schedules B and E. It is unclear if the natural features mapping includes all three levels in the Natural Areas designation and/or the setbacks. Further, the analysis and assumptions used to develop the mapping and categorize the features has not been made available. Further, we have concerns about the inclusion of the minimum vegetation protection zone widths and the adjacent lands overlay in the mapping as these are not appropriate for the Official Plan. In particular, in the Cleantech Commons area, the area of influence overlay exceeds the approved buffers. There is a similar issue for lands fronting onto the south side of Pioneer Road. Instead, where applicable, appropriate setbacks and buffers should be determined through the development review process and through an Environmental Impact Study, rather than in the Official Plan.

Of particular concern for the University is the Natural Areas mapping on the University lands at the intersection of Woodland Drive and Water Street/ Lakefield Road. The proposed NHS mapping in this area covers the entirety of land that Trent has contributed to the cost of servicing through a tripartite agreement with the City of Peterborough and the Township of Selwyn. Trent's environmental consultants have assessed this area and determined that it contains fair to poor quality cultural vegetation with invasive species which do not contribute to the NHS. They have concluded that it would not meet the criteria for a Level A feature; however, because the proposed policies provide that a woodlot of 2 ha or greater is automatically considered to be level A, irrespective of the quality of the woodlot or connectivity value, Trent would be unable to develop this area. Moreover, this area is along a major mixed use corridor and the University has intentions to develop the site for a long-term care home, to address the shortage of these beds in the region. Further, Trent's parcels at the northeastern end of their land holdings are now proposed as part of the NHS where they front onto the Trent-Severn Waterway System. These lands have great long term potential for development at the northern edge of the City

The City should provide an opportunity to review the criteria used to categorize the natural heritage features and identify what is proposed to be included in the system mapping. The draft policies reference an appendix which we understand is meant to include the background analysis used in support of the proposed approach. It is important to allow property owners affected by these policies to review this information and provide comments before the City proceeds with their implementation. While the policies provide that minor changes in the Natural Area mapping would be possible without amendment to the Official Plan, it is important that the mapping realistically reflect the part of the system to be protected. In our view it is inappropriate for landowners to have to proceed with an Official Plan Amendment to change designations that were made without completion of detailed groundwork. The policies should at the very least be amended to allow much more flexibility with respect to changes in Natural Area mapping that are justified by detailed studies.

3. Special Policy Area for Trent University

Trent University is a key contributor to Peterborough's economic, social, cultural and environmental success. It is one of the top three employers in the City and major landowner with a unique role as an institution, an innovator and a contributor to social, environmental and recreational aspects of the community. For these reasons we are of the view that the University's lands should be identified as a Special Policy Area in the Official Plan, including the Symons and Traill campuses. In the draft Official Plan, the Traill campus is not even identified.

In the draft Official Plan, the University's lands are designated as: Major Institutional; Major Mixed Use Corridor; Minor Mixed Use Corridor; Natural Areas; Major Open Space; Rural Transition Area; and Residential. In the in-force Official Plan the same lands are designated as Major Institution, Major Open Space, Residential and Commercial. We have concerns that the land use designations proposed in the draft Official Plan would not provide the University with the flexibility to plan for its growth, respond to the changing needs of the institution and address community housing, employment, social and recreational needs.

The Special Policy Area could provide the flexibility to respond to Trent's changing needs and for Trent to respond to the City's changing needs. The Special Policy Area would address Trent's vision for its lands, including enhancing sustainability and maximizing community benefit. For example the University has long contemplated development of a "sustainable village", on part of its lands. With Trent's focus on sustainability, this village could be a demonstration site to showcase how an integrated, sustainable, mixed use development could function. The vision for a development such as this would integrate residential uses that would not be limited to students and faculty.

In particular, the land use permissions for Cleantech Commons should permit a range of uses to support the provision of complete communities, including provision for commercial and residential development that would support the core business of the University. The model for research parks is evolving to integrate a broader range of uses, including housing such as apartment units in mixed use buildings, within the research park, moving away from stand-alone land uses areas to complete communities.

Further, the proposed redesignation to Rural Transition Area would limit the growth of the University. The redesignation to Rural Transition Area from Residential uses on the 'peninsula' lands is of particular concern (refer to **Figure 2**). This down-designation would be contrary to policies to provide complete, compact communities with jobs and residential areas located in proximity. As one of the City's top three employers and with a range of recreational and community infrastructure already on Trent lands, we suggest good planning policy would encourage development and intensification around these existing assets.

It is our opinion a Special Policy Area designation would be more appropriate than the Major Institutional and Major Open Space designations that apply to the some of the Trent lands. Residential and/or research and development facilities that may be associated with the institutional use should be permitted and would not be captured in the Major Institutional and Major Open Space designations. Further, the use of the

Major Open Space designation is not appropriate on Trent's lands, particularly along Pioneer Road. This designation would prevent utilization of the servicing infrastructure that was recently installed. Development in this area would allow for contiguous growth in an active area of the existing campus as well as areas already planned for expansion. While the University's lands contain a private open space system they should not be included as part of the public's open space system.

Further, Major Office should be permitted on Trent lands and not restricted to a research facility with supportive office.

The University's unique role needs to be addressed in the Official Plan in that it not only provides services to the City but is also a regional and province-wide service provider. In this regard, the Official Plan should include a commitment to growth within the Trent University Lands and to provide to the University and surrounding area's needs. The Special Policy should include a commitment to service this regional service provider, including water, wastewater, transit and road capacities. In particular, the policies should address improvements to the road network including upgrades to the Nassau Mills bridge, upgrading of University road, and addressing the significant traffic issues at key intersections along Nassau Mills road. Provincial policies and plans provide that land use planning and infrastructure should be planned together. In addition to the Special Policy, the noted concerns can be addressed in Section 3.3 of the Official Plan to include objectives for post-secondary institutions.

Additional Comments

Additional comments on the draft Official Plan that should be addressed include:

- The Vision Statement (Section 2.1) should be updated to clearly address the significant role of the University in the City, including how Trent's vision contributes to the City's vision for complete communities, environmental stewardship and sustainability, a vibrant and unique identity, and a strong and diverse economy.
- With respect to the Central Area component of the Urban Structure (Section 3.4.5), the draft OP directs that the Central Area is planned to accommodate a significant share of the City's projected population and employment growth to 2041 and beyond, however there is no analysis with respect to how this share of the growth could be accommodated in the Central Area, in particular with respect to employment and assumptions regarding Major Institutions. Without understanding the LNA and the assumptions regarding the capacity to accommodate new development in the Central Area, it is difficult to determine if the overall land supply is sufficient and therefore if the down-designation of *Designated Greenfield Area*

to *Rural Transition Area* is necessary. Further in Section 4.3 with respect to the Central Area designation, while opportunities for post-secondary institutions are encouraged in the objectives, the policies in this section are for residential uses and do not include policies for non-residential uses.

- Section 4.1.5 provides general policies for food stores however the final subsection (e) directs that the City will monitor population growth, off-campus student housing and food store floor space growth to implement the intent of this plan. The reference to off-campus student housing seems out of place in this section and if such a policy were to be included, it should also include on-campus student housing. Further it is unclear what the intent of monitoring student housing and food store floor space growth would be. One of the greatest challenges those living and working at Trent face is the lack of local commercial offerings. Providing the opportunity to walk to local food stores for the 10,000 people who work or study at Trent would reduce demands on an overburdened transit system and reduce emissions from car travel.

- Clarification should be provided to confirm that the Neighbourhoods designation and the housing policies address existing and future needs for student housing. As discussed, how housing for students has been accounted for in the LNA is an important consideration in the context of the overall land needs for the city and the redesignation of lands to RTA.

- The infrastructure section of the draft Official Plan addresses Source Water Protection. With respect to policy 6.1.4.h, it is unclear if the land use activities would continue to be permitted on sites where the activity existed prior to the approval of the new Official Plan.

- Some of the new definitions included in the draft Official Plan should be revised. In particular, the minimum gross floor area of 4,000 square metres in the Major Institutional definition should be deleted because it would not provide for the integration of smaller scaled institutional buildings into the fabric of the City, particularly on sites outside of the main campus. In addition, the public service facilities definition should be updated to confirm if it includes the University. We also note that the definition for Vegetation Protection Zone is based on the Growth Plan (2019) definition but that the Growth Plan definition indicates that it applies to the Greenbelt lands whereas the definition in the draft Official Plan is applied more broadly.

- Implementation policies requiring that development in Designated Greenfield Areas will only be considered following the approval of a Secondary Plan prepared

by the City. (7.3.5.c) with exceptions for a limited amount of development are too restrictive. This is of particular concern because the Master Plan for Cleantech Commons has been approved by the City however there is no Secondary Plan in place for this approved plan. As such, development would not be able to proceed.

We thank the City of Peterborough for the opportunity to provide comments on the Official Plan update process. As discussed, we plan to follow-up with a more detailed response to the draft Official Plan including proposed modifications to the policies. Further, we request that an updated draft of the Official Plan be circulated by the City prior to the draft going to Council. Finally, we request that we be kept apprised of this process as it progresses. We look forward to participating with Trent at the City meeting on November 25 to discuss these matters. If you have any questions regarding these comments, please do not hesitate to contact the undersigned.

Yours very truly,

BOUSFIELDS INC.








Emma West, MCIP, RPP

Schedule A: Urban Structure

Figure 1.

-  Municipal Boundary/Settlement Area Boundary
-  Delineated Built Boundary
-  Rural Transitional Area



Lands within the Delineated Built Boundary (Delineated Built-Up Area)

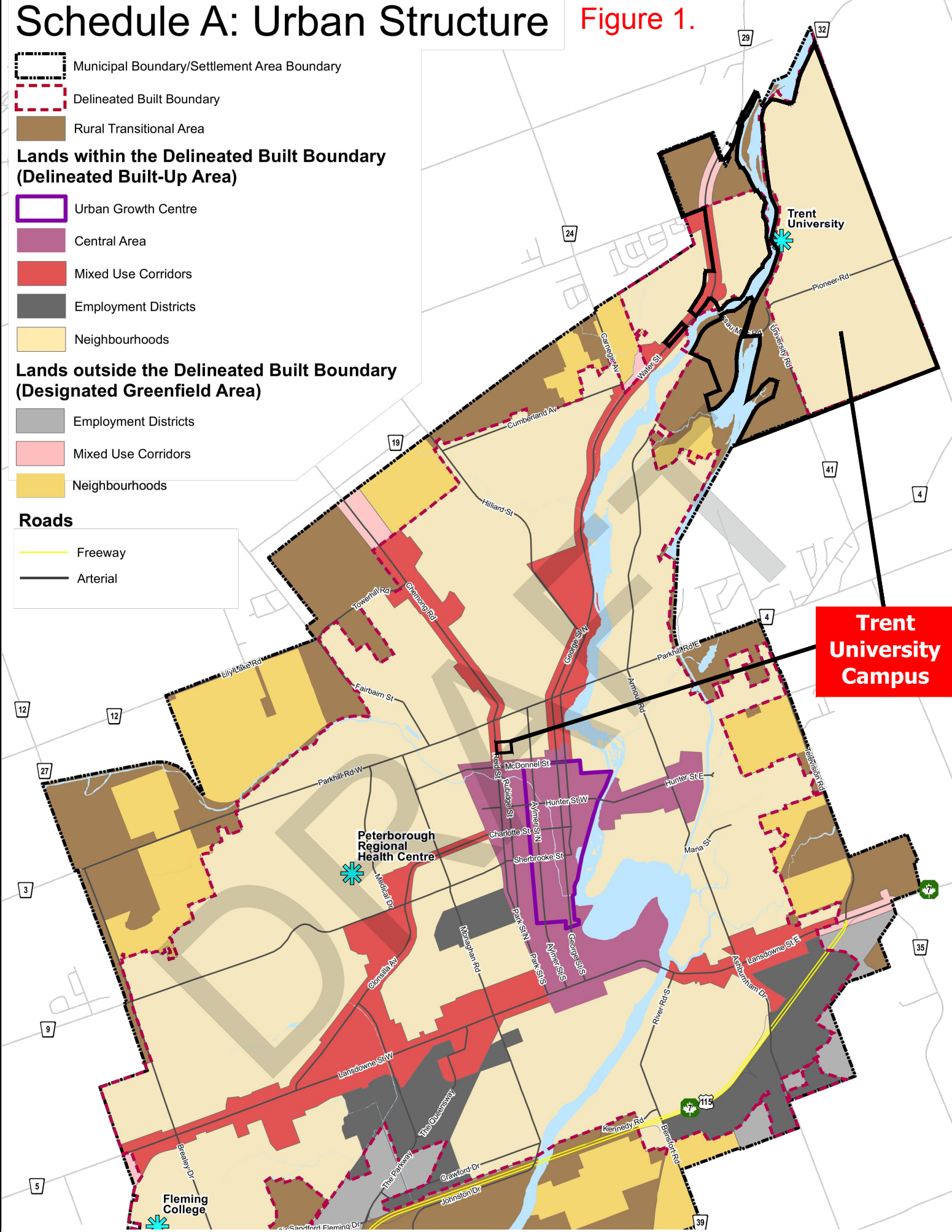
-  Urban Growth Centre
-  Central Area
-  Mixed Use Corridors
-  Employment Districts
-  Neighbourhoods

Lands outside the Delineated Built Boundary (Designated Greenfield Area)

-  Employment Districts
-  Mixed Use Corridors
-  Neighbourhoods

Roads












-  Freeway
-  Arterial

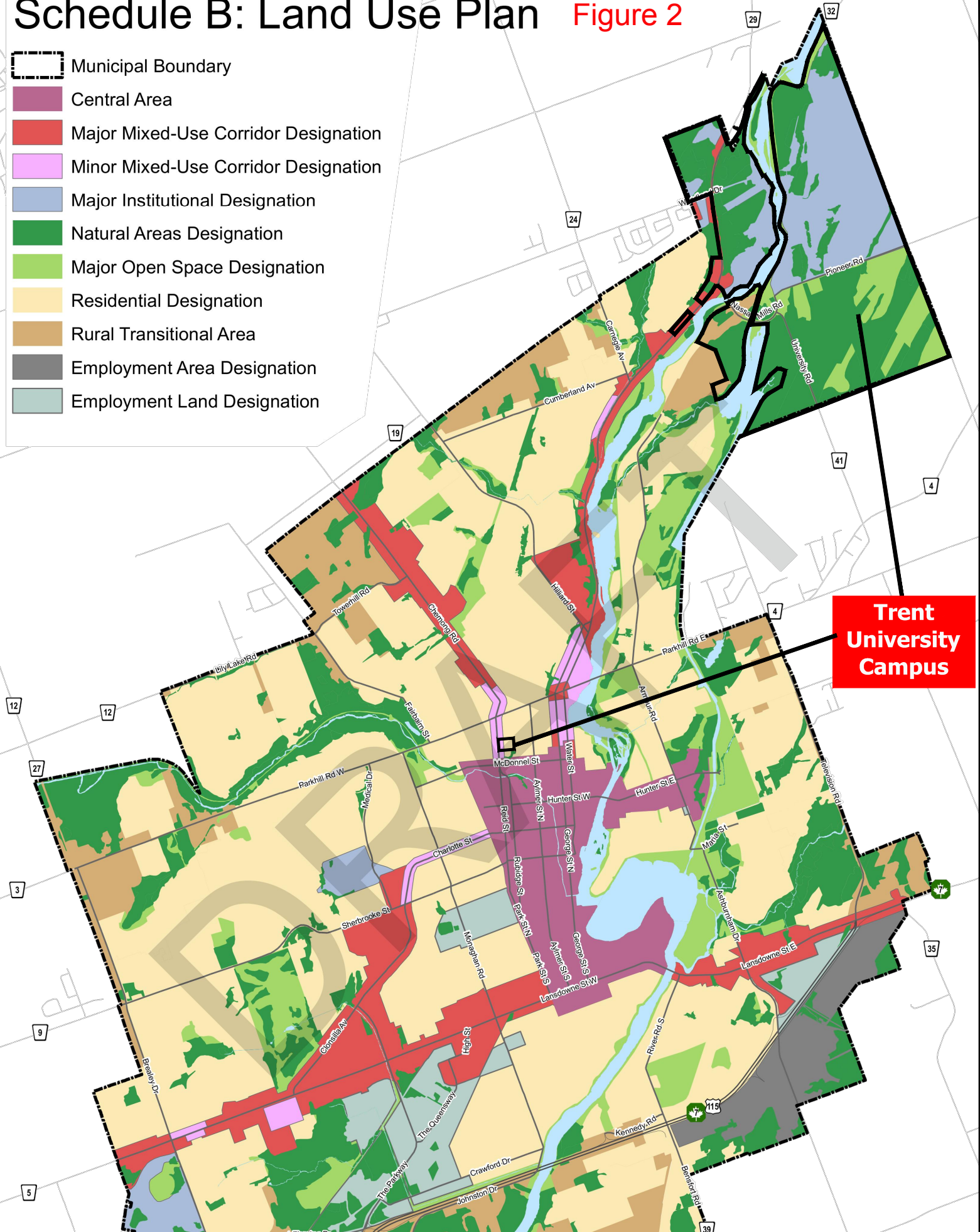


Trent University Campus

Schedule B: Land Use Plan

Figure 2

-  Municipal Boundary
-  Central Area
-  Major Mixed-Use Corridor Designation
-  Minor Mixed-Use Corridor Designation
-  Major Institutional Designation
-  Natural Areas Designation
-  Major Open Space Designation
-  Residential Designation
-  Rural Transitional Area
-  Employment Area Designation
-  Employment Land Designation



Trent University Campus

Attachment Four

**Letter on behalf of Trent University to the City of Peterborough regarding the
City's Draft Official Plan**

(April 23, 2020)



BOUSFIELDS INC.

April 23, 2020

Mr. K Hetherington,
Manager, Planning Division,
Infrastructure & Planning Services
City of Peterborough
500 George Street North
Peterborough, ON
K9H 3R9

Dear Ken Hetherington,

**Re: City of Peterborough Draft Official Plan Update
Response on Behalf of Trent University**

We write further to our letter dated November 19, 2019, in respect of the City of Peterborough Draft Official Plan. As the planning consultants for Trent University (“the University”), we wrote to outline a number of comments and concerns with respect to the proposed changes to the City’s Official Plan and subsequently attended a meeting in November last year to discuss the comments. To date, we have not received any further correspondence from the City of Peterborough responding to the comments and concerns raised.

Trent University values the working relationship that has been established over a number of years with the City of Peterborough. The institution and its trustees believe that it has been, and can continue to be, a key contributor to Peterborough’s economic, social, cultural and environmental success. As an anchor institution, a major employer, a significant economic driver and a contributor to social and recreational vitality, the health and aspirations of the University should be of primary concern to the City. The University’s unique role needs to be addressed in the Official Plan in that it not only provides services to the City but is also a regional and province-wide service provider. In this regard, the Official Plan should include a commitment to growth within the Trent University Lands and to provide for the University and surrounding area’s needs.

Within our original letter we set out that we would provide the City with recommended changes to the draft Official Plan which would help to address the concerns of the University while respecting the planning principles which the City wishes to advance. Accordingly, please find enclosed with this letter two documents which outline two proposed approaches for modifications to the policies; these are shown as track changes to relevant sections and paragraphs of the draft Official Plan:

- 1) The first version proposes changes to the general policies within the draft Official Plan but also includes a proposed Site and Area Specific Policy relating to Trent University Lands. As set out in our original letter, the University has significant and distinct landholdings within the City, and plays a unique and important role as an institution, innovator, employer and a contributor to social, environmental and recreational aspects of the community. For these reasons we are of the view that the University Lands should be identified within a Site and Area Specific Policy (SASP). The SASP would provide for greater flexibility of land uses, complementing and diversifying the University's important economic role within the city, providing flexibility to adjust to funding constraints, changing programmes and technologies to meet evolving campus and community needs and to ensure economic sustainability, while at the same time helping the City to achieve the Vision and Guiding Principles outlined within the draft Official Plan.
- 2) The second version also includes proposed changes to the general policies within the draft Official Plan with a particular focus on the Major Institutional Designation policies. This option proposes amendments to the Major Institutional Designation which again seek to allow sufficient flexibility for Trent University to carry out its role and to adjust to funding constraints, changing programmes and technologies; to meet evolving campus and community needs and to ensure economic sustainability, while at the same time helping the City to achieve the Vision and Guiding Principles sets out within the draft Official Plan.

You will note that there is an element of crossover between the two versions where the same text amendments are proposed. To assist in comparison, we have edited the text with the following colour codes:

- Red – text amendments proposed in both versions;
- Green – text amendments proposed unique to Version 1;
- Blue – text amendments proposed unique to Version 2.

We have added comments in to the margin to assist in identifying why changes are proposed or requesting points of clarification from the City. We request this letter and the enclosed documents, be read alongside our previous letter, dated November 19, 2019 which raised further points and made specific comments with respect to the content of the Draft Official Plan.

In particular, within our original letter, we requested that a copy of the draft Land Needs Assessment and a copy of the 'Appendix I: The Natural Heritage System Background Study' (prepared by Beacon Environmental) be shared for review. The request to

review these documents still stands. With respect to the draft Natural Heritage System (NHS) policies and mapping within the draft Official Plan, we raised concerns with respect to these aspects of the Plan within our original letter. We have suggested amendments to the policy wording in the enclosed documents which seek to address some of our concerns in this respect. However, the University has engaged Savanta to review the draft NHS policies and mapping to consider the implications upon the University's landholdings. Savanta has commenced with a review of the mapping and background data that is currently available. However, clearly, a thorough review depends upon access to the above referenced Background Study. We request a meeting between the City, the University and their respective environmental consultants to discuss the draft NHS policies and mapping in greater detail. We would also welcome the opportunity to meet and more broadly discuss the text amendments proposed within the enclosed documents. Given the current circumstances with respect to COVID-19, we are of course happy to have a remote meeting with you to discuss this further, and we can use the Bousfields remote meeting infrastructure if that is helpful.

We thank the City of Peterborough for the opportunity to provide comments on the Official Plan update process. We request that an updated draft of the Official Plan be circulated by the City prior to the draft going to Council. Finally, we request that we be kept apprised of this process as it progresses. If you have any questions regarding these comments, please do not hesitate to contact the undersigned.

Yours very truly,

BOUSFIELDS INC.



Emma West, MCIP, RPP

City of Peterborough – Draft Official Plan – Suggested Edits – 23 April 2020 – Site and Area Specific Policy

1.0 INTRODUCTION

1.1 a. (first para, page 4)

Situated on the Trent-Severn Waterway, the City of Peterborough is a **complete community** that provides a high quality of life for its residents within a highly valued natural environment. The City is the urban hub and focus of the northeast portion of the Greater Golden Horseshoe (GGH), and has an older average demographic and smaller average household size than many other GGH communities. Based on prevailing demographic trends, it is expected that the City's population growth will be driven by immigration and the migration of new citizens, including the migration of **students and** rural residents to urban centres.

1.1 b. (fourth para, page 4)

~~Peterborough is also home to a number of important post-secondary educational and healthcare institutions that serve a much broader area, including Fleming College, Trent University and the Peterborough Regional Health Centre and constitute key employers within the city. The Peterborough Airport, located outside of City boundaries, also supports business activities both within the City and in nearby municipalities.~~

Today, the City is known as “the Gateway to the Kawarthas” in recognition of its key location on the Trent-Severn waterway, which links Lake Ontario to Georgian Bay through the Kawartha Lakes system. Peterborough's historic downtown opens to Little Lake, providing a scenic waterfront and a marina that allows boaters easy access to the core. Tourists are attracted to the Peterborough Lift Lock, the Canadian Canoe Museum, and to numerous cultural venues, festivals and sporting events in the City. ~~Peterborough is also home to a number of large institutions that serve a much broader area, including Trent University, Fleming College and the Peterborough Regional Health Centre. The Peterborough Airport, located outside of City boundaries, supports business activities both within the City and in nearby municipalities.~~

2.1.1 b. (page 7)

The Vision for Peterborough's future is articulated in the following statement:

Peterborough is a prosperous community, distinctive in its natural beauty, cultural heritage and strong sense of community. As a leader in environmental sustainability, growth in Peterborough uses infrastructure and land efficiently, promotes healthy lifestyles and incorporates green initiatives. The City will continue to develop as a complete, resilient and connected community that provides a high quality of life, supports a strong and diverse economy, offers high quality healthcare facilities and education opportunities and promotes a unique, vibrant sense of place. Peterborough is equitable and accessible for all residents, students and visitors and celebrates its engaged, inclusive and diverse community.

2.2.1 a. (page 7)

A **complete community** is one that meets people's needs for daily living throughout their lifetime by providing convenient access to a mix of jobs, services, housing, food, **public service facilities including education opportunities**, open space, and transportation choices. Peterborough will continue to grow as a **complete community** by:...

2.2.5 Strong and Diverse Economy (page 11)

- a. A strong, diverse economy is integral to a successful community. Peterborough is fortunate to be home to an abundance of natural resources, world-class educational facilities, a modern regional health care centre, a strong government sector, a diverse industrial sector including food services, manufacturing and aerospace, and a highly skilled, creative workforce. ~~Additionally,~~ Peterborough is favourably positioned with strong regional agricultural and tourism sectors, a growing regional airport, and convenient transportation links to regional, national and international markets.
- b. With respect to post-secondary education, Peterborough is home to Fleming College and Trent University; both institutions are recognised globally for leadership in teaching, innovation and research. The importance of these post-secondary institutions to the city's economic prosperity and resilience is recognised within Peterborough Economic Development's 2020 – 2024 Strategic Economic Objectives; it is acknowledged that these post-secondary institutions, along with many other educational and skills training facilities in the area, favourably position the Peterborough region to take advantage of the new information, knowledge and creative economy. Acknowledging the important role Trent University has to play in the economic success of Peterborough in particular (as a significant landowner and key driver of population and economic growth), this plan seeks to provide the policy context to ensure the positive impacts of potential opportunities to intensify and diversify land uses within Trent University's land holdings (particularly the Symons campus) can be leveraged and maximised for the strategic economic benefit of the city and the region as a whole.
- c. Peterborough recognizes the economic benefits and importance of being accessible to all people. Diversity and inclusion are important drivers of economic growth and innovation. Strong and diverse economies capitalize on existing community assets and are sustained by: strategic infrastructure investment; maintaining and protecting a sufficient land base for employment; **attracting**, developing and retaining a talented, creative labour force; fostering partnerships and economic diversification; and by enhancing quality of life. Peterborough will support a strong, diverse and creative economy by:
 - i. Providing for a wide range of employment opportunities, including employment in major institutions and the tourism industry;
 - ~~ii. Fostering a high quality of life to attract and retain a younger workforce and new investment;~~
 - ii. Developing a Site and Area Specific Policy for Trent University's Symons Campus to enable mixed use development and greater flexibility of land uses, complementing and diversifying the university's important economic role within the city, adapting to changing programmes and technologies; meeting evolving campus and community needs; enabling opportunities to collaborate with the private sector, the municipality and other governmental entities; and ensuring economic sustainability by pursuing alternative revenue streams where core public funding is constrained;
 - iii. **Fostering a high quality of life and providing the housing and services to attract and retain a skilled workforce and new investment;**
 - iv. ~~iii.~~ Planning for, protecting and preserving **Employment Areas** for current and future employment uses and ensuring that the necessary infrastructure is provided to support current and future needs;
 - iv. Protecting **Employment Areas** for the long term by limiting the conversion of such areas to other uses or permitting the infiltration of uses which would undermine the function and viability of **Employment Areas**;
 - vi. Protecting **Employment Areas** near major transportation facilities and corridors associated with the inter- and intra-provincial movement of goods for uses which require such locations;
 - vii. Cooperating with existing and prospective businesses to facilitate economic growth and opportunity, with a particular focus on supporting and providing opportunities for small and medium-sized businesses, local business and local economies;
 - viii. Considering opportunities to offer incentives for business growth, particularly in the green and knowledge economies and food production; and,

~~ixviii.~~ Strategically planning the location, function and built form of Mixed-Use Corridors to support their vitality and the vitality of the Central Area.

3.2. Population and Employment Forecasts (page 13)

3.3 Objectives for Growth Management (page 14)

3.3 d. (page 14)

d. Peterborough needs to provide **access to** a mix of jobs, ~~and~~ housing **and educational opportunities** to create opportunities for people to work **and study** close to where they live. Peterborough also needs to grow at **transit supportive** densities, with **transit-oriented** street configurations. This Plan:...

3.3 e. (page 15)

e. The City will:

- i. Plan to achieve minimum average density targets for the **Designated Greenfield Area** and within the defined **Urban Growth Centre**;
- ii. Implement an annual minimum residential intensification target generally throughout the **Delineated Built-Up Area** and, in particular, encourage the intensification of people and jobs in the Central Area, and within Mixed Use Corridors as illustrated on **Schedule A: Urban Structure**;
- iii. Encourage new development within the **Delineated Built-Up Area** to have a compact form and an appropriate mix of uses and densities that allow for the efficient use of land, infrastructures and **public service facilities**;
- iv. **Plan for the intensification, expansion and diversification of land uses associated with post-secondary institutions (as significant landowners and key drivers of population and economic growth) to make efficient use of land, provide enhanced educational facilities and promote economic development;**
- v. Provide sufficient land to accommodate an appropriate range and mix of employment opportunities, housing and other land uses to meet projected needs for the Official Plan timeframe;
- vi. Encourage the remediation and redevelopment of **brownfield sites** to uses that revitalize neighbourhoods; and,
- vii. Encourage the reuse and/or conversion of **greyfields** and underutilized sites.

3.4 Planning for Growth in an Urban Structure (page 16)

b. i) first reference to Rural Transitional Area

3.4.1 c. (page 16)

The **Delineated Built-Up Area** and **Designated Greenfield Area**, as administrative elements which articulate how development will occur, are further subdivided into the functional components of the urban structure. Of these components, the Central Area, **the University Symons Campus** and the Mixed Use Corridors are identified as **“Strategic Growth Areas”** and are to be the focus for accommodating intensification and/or higher intensity mixed uses in a more compact built form. Major development/redevelopment opportunities may include infill, **brownfield sites**, the expansion or conversion of existing buildings, **greyfields**, or the development of new mixed use, higher density corridors and centres serving emerging greenfield communities. The City will encourage appropriate development applications within the **“Strategic Growth Areas”** by considering:...

3.4.2 The Delineated Built-Up Area (page 17)

a. Peterborough’s **Delineated Built Boundary** is identified on **Schedule A: Urban Structure**. It represents the City’s developed urban area as of June 16, 2006. The **Delineated Built Boundary** is an administrative boundary to

facilitate implementation and monitoring of the growth management policies of this Plan. The **Delineated Built Boundary** defines the **Delineated Built-Up Area** of the City, and includes the following components:

- i. Neighbourhoods;
- ii. Central Area, including the Urban Growth Centre;
- iii. Mixed Use Corridors; ~~and~~
- iv. Employment Districts; ~~and~~
- v. Trent University Site and Area Specific Policy Area.

c. Intensification will be achieved through conversions of non-residential uses to residential, infilling, **secondary suites**, and redevelopment to promote an increase in planned densities. Development of employment **and education** opportunities through intensification **and mixed use development** will also be encouraged, where appropriate. The City will undertake intensification studies to identify/delineate priority areas for intensification City-wide.

3.4.3 The Designated Greenfield Area (page 18-19)

a. The **Designated Greenfield Areas** represent those lands within the City that are outside the **Delineated Built Boundary**, but excluding those lands within the Rural Transitional Area. The **Designated Greenfield Area** lands are intended to accommodate a portion of the City's anticipated residential and employment growth in conjunction with intensification within the **Delineated Built-Up Area**, to the year 2041. The **Designated Greenfield Area** includes the following components:

- i. Neighbourhoods;
- ii. Mixed Use Corridors; ~~and~~
- iii. Employment Districts; ~~and~~
- iv. Trent University Site and Area Specific Policy Area.

b. The **Designated Greenfield Areas** are expected to accommodate significant growth over the time horizon of this Plan, and to develop with new residential neighbourhoods, ~~and~~ new business parks **and expanded education facilities**, contributing to a healthy and **complete community**. However, all lands within the **Designated Greenfield Areas** may not be needed to accommodate significant growth during the time horizon of this Plan.

Greenfield development initiatives will be subject to the following:

- i. New residential neighbourhoods within the **Designated Greenfield Area** shall be planned to achieve an overall minimum density of **55 residents and jobs combined per hectare of developable land area** and will include **population-related employment** opportunities (public service facilities, retail, institutional and smaller scale office uses).
- ii. New business parks within the **Designated Greenfield Areas** ~~shall~~ **should** be planned to achieve an overall minimum density of **20 jobs per hectare of developable land area** and will include primarily employment land employment opportunities (industrial/warehouse uses with associated office and accessory retail uses), along with limited **population-related employment** opportunities;
and,
- iii. New residential neighbourhoods, ~~and~~ business parks **and education facilities** within the **Designated Greenfield Areas** should be planned to include higher density, mixed use centres and corridors to achieve the required associated density **targets and the efficient use of land**.

c. Development of the **Designated Greenfield Areas** will be planned to be compact and **transit-supportive** through Secondary Plans that will provide:

- i. Mixed-use communities that include local services, social amenities (including schools, **post-secondary facilities**, parks and healthcare), a range of housing (including **affordable** and accessible housing) that will be

suitable for a broad range of age groups, and convenient and accessible transportation systems to the City's Central Area, Mixed-Use Corridors and designated **Employment Areas**;

INSERT THE FOLLOWING TEXT AFTER 'EMPLOYMENT DISTRICTS' PAGE 22

Trent University Site and Area Specific Policy

h. The Trent University Site and Area Specific Policy is illustrated on **Schedule A: Urban Structure** and detailed within **Section 7/8** of this plan. Development proposals within this identified area will seek to:

- i. Include a diverse mix of uses, including education facilities, commercial and residential uses, to support the growth of Trent University and facilitate the vision for development across the campus;
- ii. Foster collaboration between the university and private sectors, such as joint development projects;
- iii. create revenue to support the growth and fiscal sustainability of the university;
- iv. Provide necessary social and community infrastructure;
- v. Promote land use and built form transitions and urban design approaches that protect:
 - Areas of cultural heritage and areas of natural heritage sensitivity; and
 - The stability or amenity of adjacent Neighbourhoods.
- vi. Accommodate **transit-supportive** densities and promote **active transportation** and a range and mix of uses and activities, including providing alternative development standards, such as reduced parking standards.

i. The Site and Area Specific Policy applying to the Symons Campus area includes land both within the **Delineated Built-Up Area** and within the **Designated Greenfield Area**. The land within the Delineated Built-Up Area provides opportunities for intensification; the land within the **Designated Greenfield Area** provides opportunities for new development and will continue to evolve as an important element of the City's Urban Structure.

j. The Site and Area Specific Policy applying to the Traill Campus area is located within the **Delineated Built-Up Area**. Land within the Delineated Built-Up Area provides opportunities for appropriate intensification within the context of the surrounding area, including a scale and character compatible and sensitive to the surrounding neighbourhood.

4.1.5 General Policies for Foodstores (page 28)

e. The City will monitor **growth, off-campus** post-secondary student housing, and food store growth to implement the intent of this Plan.

4.2 Neighbourhoods (page 28)

4.2.1 Introduction

Intent

a. The Neighbourhoods, identified on **Schedule A: Urban Structure** include the areas of the City that are focused on residential land uses, including a variety of housing types, but also including **public service facilities**, parks, institutional uses and supportive local retail and **service commercial uses**. The Neighbourhoods comprise a diverse range of communities within the City, from historic districts to recently constructed subdivisions and planned neighbourhoods.

Objectives

b. The land use policy framework included in this Section of this Plan is intended to:

- i. Permit and facilitate a variety of appropriately located and scaled residential building types, as well as an array of supportive land uses; ~~and~~

- ii. Permit and facilitate the intensification, expansion and diversification of land uses associated with Major Institutional designated areas to make efficient use of land, provide enhanced facilities and promote economic development; and
- iii. Ensure that all new development is compatible with the existing community character.

c. The objectives of this Section of this Plan with respect to Neighbourhoods are:

- i. Encourage the provision of a broad range of housing types with respect to location, size, cost, tenure, design, and accessibility, including affordable housing and student housing, to meet the needs of all residents;...

4.2.3 Major Institutional Designation (page 39)

Intent

a. The Major Institutional Designation is intended for institutional uses that are of a community or regional scale. Major Institutional uses are intended to be integrated into the City fabric, and are a crucial part of a **complete community**. Our major health and educational institutions are important employers and service providers and will continue to grow to serve the needs of an increasing city and regional population.

b. The Major Institutional Designation primarily consists of Trent University, Sir Sandford Fleming College, and the Peterborough Regional Health Centre, recognizing the importance of these major institutions to the City and the wider region. This Designation does not preclude the establishment of new major institutions or separate colleges and facilities and may include the development of **innovation hubs**. Trent University, particularly the Symons Campus exhibits notable characteristics which distinguish it from the rest of the city: unique land division, ownership and building patterns set in a spacious and prominent open space network. Recognising the distinct and important economic, social and environmental role that Trent University can play in the City of Peterborough's future success, a separate Site and Area Specific Policy has been developed for the Symons and Traill Campuses, distinct from the Major Institution designation.

4.2.4 Major Open Space Designation (page 41)

Permitted Uses

4.4.2 Major Mixed-Use Corridor Designations (page 67)

Permitted Uses

b. Permitted uses on lands designated as Major Mixed-Use Corridor, as identified on Schedule B: Land Use Plan, may include:...

- University, school and college buildings including academic, office, research, laboratory, administrative and maintenance facilities;

4.6 Natural Heritage System (page 82)

4.6.2 Natural Areas Designation

The natural heritage system is illustrated on **Schedule E: Natural Heritage and Environmental Constraints**; this plan indicates the approximate location of the natural heritage system boundaries, following a desk-top review.

When development is proposed on or near lands shown as part of the natural heritage system, the proposed development's impact on the system is to be evaluated and an impact study may be required. As part of the evaluation, the natural heritage features on or near the land in question and their location will be more precisely

defined. Where development is proposed adjacent to natural features, buffer widths should be established through an impact study. Adjustments to the boundary of the Natural Areas Designation in accordance with the Level classification may be facilitated through an Environmental Impact Study without the need to amend this Plan. Where an adjustment to the boundary of the Natural Areas Designation is justified by an Environmental Impact Study and is approved by the City, in consultation with the Conservation Authority and any other agency having jurisdiction, the adjacent land use designation as identified on **Schedule B: Land Use Plan** shall apply, without the need to amend this Plan.

INSERT THE FOLLOWING TEXT INTO A NEW SECTION 7/8 (BEFORE/AFTER IMPLEMENTATION) WHICH COVERS SECONDARY PLANS AND SITE AND AREA SPECIFIC POLICIES

Trent University Site and Area Specific Policy; Interpretation

The following policies and principles apply to the Trent University Symons Campus Area, as outlined on Map XX.

Intent and Objectives

Trent University is important to the city as both a resource and a key player in a changing and increasingly information based economy. The Trent University Symons and Trill Campus Areas contains a concentration of educational, cultural and research institutions with associated support services and housing which is unique in the city and which accommodates a community of scholars and professionals. The vitality of this institutional community will be promoted.

Recognising the unique and diversified role Trent University can play in building a socially, economically and environmentally resilient city, the objectives for the Trent University Site and Area Specific Policy Area are as follows:

- Recognise the Symons and Trill Campus as primarily Institutional areas, while providing planning regulations that give the University flexibility to adjust to funding constraints, changing programmes and technologies; to meet evolving campus and community needs; to enable opportunities to collaborate with the private sector and the municipality; and to ensure economic sustainability by pursuing other funding opportunities available to public institutions;
- Preserve, protect and, where possible, enhance the unique built form, heritage and landscape character of the Symons and Trill Campus Areas,

Permitted Uses

Despite the permitted uses within Sections 4.2.2, 4.2.3, 4.2.4, 4.4.2 and 4.4.3, the following uses may be permitted in the *Site and Area Specific Policy Area*, as identified on **Schedule_ : Trent University Site and Area Specific Policy**, subject to the applicable provisions of this Plan:

- University and college buildings including academic, office, research, laboratory, administrative and maintenance facilities;
- Major office, office and business parks including offices, research and development, university premises and teaching laboratory space and associated light industry;
- Commercial, medical, social service, administrative, government and institutional uses of all types;
- Low-rise, mid-rise and high-rise residential uses, including student accommodation, live-work units, home occupations and communal or special needs housing;
- Long-term care facilities and seniors housing;

- Retail, service commercial uses, financial and personal service uses and restaurants of all types and scales;
- Social, cultural and recreational facilities, including private athletic clubs, parks, places of worship and daycare facilities;
- Agricultural, Natural areas and Conservation uses;
- Convention/conference facilities, including related temporary uses;
- Hotels and motels, including ancillary uses;
- Utilities and infrastructure;
- Parking facilities at-grade and/or in structure.

Development Policies

Despite the development policies within Sections 4.2.2, 4.2.3, 4.4.2 and 4.4.3, when considering an application for development within the Trent University Symons Campus and Trill Campus, the following shall be evaluated:

1. The landscape, built form and functional character of the surrounding community is enhanced;
2. Significant natural heritage features and their associated ecological functions are appropriately protected;
3. Identified on-site or adjacent cultural heritage resources are appropriately conserved;
4. No undue, adverse impacts are created on adjacent properties in the vicinity;
5. The height and massing of nearby buildings is appropriately considered and buffering and/or transitions in height and density to adjacent properties are implemented, where necessary;
6. Utility, infrastructure and transportation system capacity exists to serve the proposed development and there are no undue adverse impacts on the City's sewer, water, stormwater management and transportation systems.

Specific regulations for development shall be provided in the Zoning By-Law. Applications for development shall be subject to Site Plan Approval.

City of Peterborough – Draft Official Plan – Suggested Edits – 23 April 2020 – Major Institutional Amendment

1.0 INTRODUCTION

1.1 a. (first para, page 4)

Situated on the Trent-Severn Waterway, the City of Peterborough is a **complete community** that provides a high quality of life for its residents within a highly valued natural environment. The City is the urban hub and focus of the northeast portion of the Greater Golden Horseshoe (GGH), and has an older average demographic and smaller average household size than many other GGH communities. Based on prevailing demographic trends, it is expected that the City's population growth will be driven by immigration and the migration of new citizens, including the migration of **students and** rural residents to urban centres.

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A **complete community** is one that meets people's needs for daily living throughout their lifetime by providing convenient access to a mix of jobs, services, housing, **public service facilities including education opportunities**, open space, and transportation choices. Peterborough will continue to grow as a **complete community** by:....

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- a. A strong, diverse economy is integral to a successful community. Peterborough is fortunate to be home to an abundance of natural resources, world-class educational facilities, a modern regional health care centre, a strong government sector, a diverse industrial sector including food services, manufacturing and aerospace, and a highly skilled, creative workforce. **With respect to post-secondary education facilities, Peterborough is home to Fleming College and Trent University; both institutions are recognised globally for leadership in teaching, innovation and research. The importance of these post-secondary institutions to the city's economic prosperity and resilience is recognised within Peterborough Economic Development's 2020 – 2024 Strategic Economic Objectives; it is acknowledged that these post-secondary institutions, along with many other educational and skills training facilities in the area, favourably position the Peterborough region to take advantage of the new information, knowledge and creative economy.** Additionally, Peterborough is favourably positioned with strong regional agricultural and tourism sectors, a growing regional airport, and convenient transportation links to regional, national and international markets.
- b. Peterborough recognizes the economic benefits and importance of being accessible to all people. Diversity and inclusion are important drivers of economic growth and innovation. Strong and diverse economies capitalize on existing community assets and are sustained by: strategic infrastructure investment; maintaining and protecting a sufficient land base for employment; **attracting**, developing and retaining a talented, creative labour force; fostering partnerships and economic diversification; and by enhancing quality of life. Peterborough will support a strong, diverse and creative economy by:
 - i. Providing for a wide range of employment opportunities, including employment in major institutions and the tourism industry;
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 - ii. **Recognising and protecting the important economic role post-secondary education institutions play within the city by establishing planning policies and regulations that give institutions the flexibility to adjust to changing programmes and technologies; to meet evolving campus and community needs; to enable opportunities to collaborate with the private sector and the municipality; and to ensure economic sustainability by pursuing alternative revenue streams where core public funding is constrained;**
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 - viii. Considering opportunities to offer incentives for business growth, particularly in the green and knowledge economies and food production; and,
 - ~~ix~~viii. Strategically planning the location, function and built form of Mixed-Use Corridors to support their vitality and the vitality of the Central Area.

3.2. Population and Employment Forecasts (page 13)

3.3 Objectives for Growth Management (page 14)

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e. The City will:

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3.4 Planning for Growth in an Urban Structure (page 16)

b. i) first reference to Rural Transitional Area

3.4.2 The Delineated Built-Up Area (page 17)

c. Intensification will be achieved through conversions of non-residential uses to residential, infilling, **secondary suites**, and redevelopment to promote an increase in planned densities. Development of employment **and education** opportunities through intensification **and mixed use development** will also be encouraged, where appropriate. The City will undertake intensification studies to identify/delineate priority areas for intensification City-wide.

3.4.3 The Designated Greenfield Area (page 18-19)

b. The **Designated Greenfield Areas** are expected to accommodate significant growth over the time horizon of this Plan, and to develop with new residential neighbourhoods, ~~and~~ new business parks **and expanded education facilities**, contributing to a healthy and **complete community**. However, all lands within the **Designated Greenfield Areas** may not be needed to accommodate significant growth during the time horizon of this Plan.

Greenfield development initiatives will be subject to the following:

- i. New residential neighbourhoods within the **Designated Greenfield Area** shall be planned to achieve an overall minimum density of **55 residents and jobs combined per hectare** of **developable land area** and will include **population-related employment** opportunities (public service facilities, retail, institutional and smaller scale office uses).

ii. New business parks within the **Designated Greenfield Areas** ~~shall~~ **should** be planned to achieve an overall minimum density of **20 jobs per hectare of developable land area** and will include primarily employment land employment opportunities (industrial/warehouse uses with associated office and accessory retail uses), along with limited **population-related employment** opportunities;
and,

iii. New residential neighbourhoods, ~~and~~ business parks **and education facilities** within the **Designated Greenfield Areas** should be planned to include higher density, mixed use centres and corridors to achieve the required associated density targets **and the efficient use of land**.

c. Development of the **Designated Greenfield Areas** will be planned to be compact and **transit-supportive** through Secondary Plans that will provide:

i. Mixed-use communities that include local services, social amenities (including schools, **post-secondary facilities**, parks and healthcare), a range of housing (including **affordable** and accessible housing) that will be suitable for a broad range of age groups, and convenient and accessible transportation systems to the City's Central Area, Mixed-Use Corridors and designated **Employment Areas**;

4.1.5 General Policies for Foodstores (page 28)

e. The City will monitor **growth, off campus** post-secondary student housing, and food store growth to implement the intent of this Plan.

4.2 Neighbourhoods (page 28)

4.2.1 Introduction

Intent

a. The Neighbourhoods, identified on **Schedule A: Urban Structure** include the areas of the City that are focused on residential land uses, including a variety of housing types, but also including **public service facilities**, parks, institutional uses and supportive local retail and **service commercial uses**. The Neighbourhoods comprise a diverse range of communities within the City, from historic districts to recently constructed subdivisions and planned neighbourhoods.

Objectives

b. The land use policy framework included in this Section of this Plan is intended to:

i. Permit and facilitate a variety of appropriately located and scaled residential building types, as well as an array of supportive land uses; ~~and~~

ii. **Permit and facilitate the intensification, expansion and diversification of land uses associated with Major Institutional designated areas to make efficient use of land, provide enhanced facilities and promote economic development; and**

iii. Ensure that all new development is compatible with the existing community character.

c. The objectives of this Section of this Plan with respect to Neighbourhoods are:

i. Encourage the provision of a broad range of housing types with respect to location, size, cost, tenure, design, and accessibility, including affordable housing **and student housing**, to meet the needs of all residents;...

4.2.3 Major Institutional Designation (page 39)

Intent

a. The Major Institutional Designation is intended for institutional uses that are of a community or regional scale. Major Institutional uses are intended to be integrated into the City fabric, and are a crucial part of a **complete community**. *Our major health and educational institutions are important employers and service providers and will continue to grow to serve the needs of an increasing city and regional population.*

b. The Major Institutional Designation primarily consists of Trent University, Sir Sandford Fleming College, and the Peterborough Regional Health Centre, recognizing the importance of these major institutions to the City and the wider region. This Designation does not preclude the establishment of new major institutions or separate colleges and facilities and may include the development of **innovation hubs**.

c. *Strong linkages between major institutions and the private sector for joint research, innovation, the creation of new products and services, and meeting of community needs will be encouraged by permitting firms to collaborate with a major institutions, research and development facilities and professional offices affiliated with, or in combination with major institutions, to locate in Major Institutional areas.*

d. Major institutions, particularly post-secondary institutions, are important both as resources and key players in a changing and increasingly information based economy. The City will support this role and will adopt land use and development controls that permit sufficient flexibility for these institutions to carry out their roles and to adjust to funding constraints, changing programmes and technologies; to meet evolving campus and community needs; to enable opportunities to collaborate with the private sector, the municipality and other governmental entities; and to ensure the economic sustainability of such institutions by accommodating the pursuit of alternative revenue streams where core public funding is constrained.

Permitted Uses

dē. *Despite the policies within Section 4.1.4, Permitted uses on lands designated Major Institutional, as identified on **Schedule B: Land Use Plan**, may include the following:*

- ~~— Schools, including post-secondary institutions, or other uses pursuant to the Education Act;~~
- University, school and college buildings including academic, office, research, laboratory, administrative and maintenance facilities;
- Hospitals, health offices and health clinics, medical laboratories;
- Major office, office and business parks including offices, research and development, university premises and teaching laboratory space and associated light industry;
- ~~— Residential uses, where they are intended to provide accommodation for persons associated with academic and research uses;~~
- ~~— Cultural and recreational uses that support a major institution as well as the general public;~~
- ~~— Research and development facilities;~~
- Manufacturing and employment uses that are related to a research and development facility or are compatible with the intent of this Designation; ~~and,~~
- ~~— Complimentary uses, such as convenience retail, small scale office, service commercial, financial and personal services uses may also be permitted provided those uses primarily serve the needs of those persons associated with a major institution.~~
- Commercial, medical, social service, administrative, government and institutional uses of all types;
- Low-rise, mid-rise and high-rise residential uses, including student accommodation, live-work units, home occupations and communal or special needs housing;
- Long-term care facilities and seniors housing;

- Retail, service commercial uses, financial and personal service uses and restaurants of all types and scales;
- Social, cultural and recreational facilities, including private athletic clubs, parks, places of worship and daycare facilities;
- Agricultural, Natural areas and Conservation uses;
- Convention/conference facilities, including related temporary uses;
- Hotels and motels, including ancillary uses;
- Utilities and infrastructure; and
- Parking facilities at-grade and/or in structure.

4.2.4 Major Open Space Designation (page 41)

Permitted Uses

4.4.2 Major Mixed-Use Corridor Designations (page 67)

Permitted Uses

b. Permitted uses on lands designated as Major Mixed-Use Corridor, as identified on Schedule B: Land Use Plan, may include:...

- University, school and college buildings including academic, office, research, laboratory, administrative and maintenance facilities;

4.6 Natural Heritage System (page 82)

4.6.2 Natural Areas Designation

The natural heritage system is illustrated on **Schedule E: Natural Heritage and Environmental Constraints**; this plan indicates the approximate location of the natural heritage system boundaries, following a desk-top review.

When development is proposed on or near lands shown as part of the natural heritage system, the proposed development's impact on the system is to be evaluated and an impact study may be required. As part of the evaluation, the natural heritage features on or near the land in question and their location will be more precisely defined. Where development is proposed adjacent to natural features, buffer widths should be established through an impact study. Adjustments to the boundary of the Natural Areas Designation in accordance with the Level classification may be facilitated through an Environmental Impact Study without the need to amend this Plan. Where an adjustment to the boundary of the Natural Areas Designation is justified by an Environmental Impact Study and is approved by the City, in consultation with the Conservation Authority and any other agency having jurisdiction, the adjacent land use designation as identified on **Schedule B: Land Use Plan** shall apply, without the need to amend this Plan.

Attachment Five

**Letter from Trent University to the City of Peterborough regarding the City's Draft
Official Plan**

(September 10, 2021)

September 10, 2021

Ken Hetherington
Manager, Planning Division
City of Peterborough
500 George Street North
Peterborough, ON K9H 3R9

Dear Ken Hetherington -

Re: City of Peterborough Official Plan Update

We write further to our earlier correspondence with respect to the Official Plan Update (letters submitted in November 2019, April 2020 and February 2021 by Bousfields on behalf of Trent University). In those earlier letters we wrote to outline our concerns with the draft Official Plan with respect to Trent University's plans and their unique role in the City. We value the work that the City has been doing on the Official Plan but continue to have the concerns outlined below.

1. Major Institutional Designation

Trent University is of the opinion that the uses permitted in the Major Institutional designation are too restrictive given the evolving role of universities in the Canadian context. Over the last few years, the University has undertaken the development of the Trent Lands and Nature Areas Plan (TLNAP). The ambitious TLNAP articulates a clear vision and framework that upholds the University's mission as a learning institution, steward of the natural environment, and community anchor in a changing landscape. The TLNAP was built on a foundation of significant and transparent engagement, including representatives from the City.

While Trent recognizes that some of the policies for the Major Institutional designation have been revised, we continue to have concerns that the list of permitted uses does not clearly articulate and align with the TLNAP and vision for Cleantech Commons.

Cleantech Commons is a joint initiative between Trent University and the City of Peterborough. Its vision is "to be Canada's premier location for clean, green and low-carbon technology based, innovation, entrepreneurship and commercialization." The principle of development of the innovation park was supported and approved by the City through the Plan of Subdivision process and is supported by the "Cleantech Commons at Trent University Master Plan". In the Master Plan the following key design principles have been articulated:

1. Cleantech Commons will be integrated with the Campus physically, visually and socially.
2. Cleantech Commons will foster an innovation community culture encouraging social interaction and collaboration in all seasons.
3. Cleantech Commons will be a leader in sustainable design.
4. Cleantech Commons will be based on a design strategy that is landscape-led to maintain natural features and existing topography.
5. Cleantech Commons will be flexible to accommodate a range of enterprises and uses in a unique setting.
6. Cleantech Commons will be well-connected to the City and Region.

A critical feature of the Master Plan is collaborative uses through the creation of an “Integration Zone” (identified as Mixed Use – MU in the Master Plan) that “are intended for multi-tenant office/research buildings and uses that serve both University and Commons users (for example, restaurants, daycare, fitness centre, shops, etc.).” This collaboration is to be anchored by the T-Lab Commons “a community hub building that is envisioned to contain shared work and learning spaces (for example, a business incubator program, exhibit and event spaces, lecture theatres, shared lands and office space, etc.).” Quality of life gathering spaces that promote the “collision” of staff and ideas, support the successful growth of tenants and the attraction of employees is key.

The Tenant Criteria for the Commons, established by Trent University and the City of Peterborough allows for not just research- and technology-based enterprises but also associated professional service providers, investors, incubators and accelerators with the same focus.

Importantly, not all tenants will be directly affiliated with or managed by Trent.

While City of Peterborough staff have indicated that it is the intent of the policy language for the Major Institutional designation to recognize and permit the uses of the Cleantech Commons that have been contemplated to date, Trent would like to see clearer language in this regard that will provide greater certainty to potential tenants and fully facilitate the innovation that is the basis of the Commons and other Trent lands.

As such, Trent University requests the following modifications to 4.2.3.d:

*d. Permitted uses on lands within the Major Institutional Designation, as identified on **Schedule B: Land Use Plan**, may include the following:*

- i. Research and development facilities;*
- ii. Manufacturing and employment uses that are related to a research and development facility or are compatible with the intent of this Designation;*
- iii. Places of worship; and,*
- iv. Complementary uses, such as residential, convenience retail, ~~restaurants~~ **small scale** office, day care facilities, service commercial, financial and personal service, **hotel, motel and other hospitality services, and recreational and cultural facilities***

uses may also be permitted provided those uses primarily serve the needs of those persons associated with a major institution and its associated facilities.

2. Major Open Space Designation

While Trent acknowledges that several parcels of land associated with the Symons Campus are designated as Major Open Space in the current Official Plan, with the growth and diversification in University function and programming in the last 20 years, these lands are now better suited to be included in the Major Institutional designation.

Several parcels of particular concern include:

- i. Playing fields (Parcel 4B) – these lands, located east of University and Nassau Mills Road and south of Pioneer Road, where there are current playing fields, are identified as Campus Core in the TLNAP. In particular, the lands are identified for Indigenous Spaces and Placemaking including a potential traditional lodge. It is the opinion of the University that the language of the Open Space designation is not sufficiently permissive as it relates to structures to facilitate this vision.
- ii. Experimental Farm (Parcel 4B) – Located on the south side of Pioneer Road and west of Douro Ninth Line, these lands have been identified in the TLNAP as the new location of the Trent Experimental Farm which is currently located north of Pioneer Road within the MTO Provincial Highway Reserve. Due to the increased interest in the Sustainable Agriculture program at Trent and the proximity to the newly installed servicing along Pioneer Road, the lands directly south are particularly well suited for not just accessory buildings but also classroom and laboratory space. The permitted uses of the Major Open Space designation would hinder the growth and evolution of this educational direction.
- iii. East Bank Peninsula Lands (Parcel 1B) – these lands, located on the east bank of the Otonabee River and north of Nassau Mills Road are identified as Future University Lands in the TLNAP, indicating the University’s desire to direct future growth to this location given its walkability to existing university facilities and proximity to servicing. Detailed environmental studies on the parcel indicate that the Natural Heritage System (NHS) on the property are smaller than portrayed on Schedules “B” and “F” of the Draft Official Plan.

Notwithstanding the 30-metre open space ribbon along the Otonabee River shoreline, Trent University requests that all lands on the Trent Symons Campus that are currently shown as Major Open Space be redesignated Major Institutional instead.

3. Minor Mixed-Used Corridor Designation

While the schedules that were released in July 2021 updated draft of the Official Plan show the northern stretch of Armour Road as Major Mixed-Use Corridor, the most current schedule “B” on the City website now shows this stretch as Minor Mixed-Use Corridor. While Trent University acknowledges the flexibility indicated in the intent language of the Official Plan for the Mixed-Use Corridors, we have concerns regarding the limited uses permitted within the designation. The Minor Mixed-Use Corridor designation does not allow the retail and commercial uses, restaurants, hotels, motels and tourism facilities, and recreational and cultural facilities that are

permitted in the Major Mixed-Use Corridors. Given the current absence of these uses in the North End of the City of Peterborough and the areas proximity to Cleantech Commons, **Trent University requests that these uses either a) be added to the Minor Mixed-Use Corridor or b) the City restore the Major Mixed-Use Corridor designation to Armour Road. Trent University further requests that this designation be extended over the east bank peninsula lands and terminate at University Road.**

4. Rural Transitional Area Designation

While reduced in extent from the original Draft Schedule “B” of the Plan, Trent notes that small portions of the University campus still appear to be designated Rural Transition Area. Given that the purpose of the Rural Transitional Area is for very limited development, this is an inappropriate designation on the lands. Of particular note are two locations:

- i. The intersection of Nassau Mills Road/University Road/Pioneer Road. The Rural Transitional Area shown in this location contains the existing operations yard and workshop for the University and may be relocated in the future. These lands are identified as Campus Core in the TLNAP and can be expected to in some fashion to continue Major Institutional uses in the future.
- ii. The block of land northeast of Water Street, north of Woodland Street and West of the Otonabee River. The Official Plan identifies an existing open area and stormwater management facility as Rural Transitional Area.

In both locations, the Rural Transitional Area appears to be the underlying designation to the Natural Heritage System (NHS), which means that should the NHS delineation be shown to be inaccurate, the lands would revert to the Rural Transitional Area designation. **Trent University requests that no lands on the University’s Symons Campus be designated Rural Transitional Area and instead be designated Major Institutional.**

5. Natural Heritage System Policies

Trent appreciates the opportunity to review the “Natural Heritage System Background Report” released in July. We will be providing additional comments in response to this document and NHS policies at a later date.

6. Miscellaneous

- a. Conceptual Road Network. The eastern end of Trent’s Symons Campus is impacted by a Provincial Highway Reserve. The Protected Provincial Highway Corridor shown on Schedule “D” is similar to the known Reserve, but is not exactly the same. While many of the policies contained within Section 6.2.2 speak to the conceptual nature of the road network, they do not apply that generality to the Protected Provincial Highway Corridor on Schedule “D”. **Trent requests confirmation from City staff that the Protected Provincial Highway Corridor shown on Schedule “D” is conceptual in nature.**
- b. Seniors Village Property. Based on Schedule “A” and “B” the lands fronting on 3819 Water Street have an underlying Major Mixed-Use Corridor designation. **Trent requests confirmation from City staff that this is correct.**

7. Transition Policies

The new Draft Official Plan does not appear to contain any transition policies for in-progress applications. While it is acknowledged that provincial policy is clear that the policies that are in place at the time of planning decision apply, provincial lockdowns and other service disruptions due to COVID-19 have created significant congestion and backlog in the planning approval process in the past year.

Trent University currently has an application that has been deemed complete that underwent significant pre-consultation and study scoping based on the policies of the existing Official Plan. Trent is concerned about the impact that a complete approval of the new Official Plan could have on the application.

Trent University requests that transitional policies be put in place to acknowledge current applications that have been deemed complete and could have reasonably expected to received approval in normal circumstances.

As always, we thank the City of Peterborough for the opportunity to participate in the development process of the Official Plan and the opportunity to work with City staff to review the Plan and make comments. We look forward to discussing our comments further and make delegations to City Council as is necessary.

Sincerely,



Jennifer Clinesmith, MCIP, RPP
Director, Campus Planning & Development
Trent University



Emma West, MCIP, RPP
Partner
Bousfields Inc.