



City of Peterborough  
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May 10, 2024

Ontario Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
777 Bay Street, 13th floor  
Toronto, ON M7A 2J3  
[growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)

To Whom It May Concern:

**Re: ERO019-8462: Updated Proposed Provincial Planning Statement**

Thank you for the opportunity to provide feedback on the updated proposed Provincial Planning Statement. Comments on the earlier version of the Proposed Provincial Planning Statement (ERO 019-6813) were made on August 3, 2023 that we trust you have reviewed and will continue to consider.

### **Planning for People and Homes/Growth Management**

The City is very concerned with the proposal to remove targets for intensification, urban growth centres and designated greenfield areas, as this represents a significant shift in growth management strategy and will undermine the strength of the City's recently approved Official Plan (April 2023). In the absence of explicit Provincial policy, the City fears that its growth management strategy and Official Plan, which were prepared in conformity with the current Growth Plan and its terminology, will now be open to challenges to the Ontario Land Tribunal. Through implementation of the Growth Plan, the City has made significant progress in directing residential growth to the delineated built boundary, increasing the density of greenfield development, and directing growth to our Urban Growth Centre to the betterment of both complete community building and the City. This strategic growth management is critical for the City to support increasing the housing supply while mitigating the burden to current and future taxpayers of the long-term infrastructure costs of maintaining the additional Core Assets required. The City requests that the PPS retain policies that support municipal targets established through growth management strategies that have been prepared using a consistent approach across the province and consider the impacts on overall growth.



## Strategic Growth Areas

Identifying downtowns as strategic growth areas is consistent with the policy framework of the City's new Official Plan, however, by eliminating defined targets for significant population and employment growth, the City feels that the proposed PPS will de-emphasize downtowns as focal areas for investment. The City advocates for policy frameworks that emphasize long-term investment in, and prosperity of, downtowns as complete, walkable and transit friendly communities, including the use of growth targets.

## Housing

The City is pleased to see the reinstatement of the definition for affordable housing. However, the City is concerned about the delivery of all housing types and levels of affordability. The City encourages the PPS to provide direction and support for large-scale public-private partnerships involving all levels of government to support new housing affordability types. Policy direction to support a minimum 25-year term of affordable rental housing and up to perpetuity for affordable ownership units is also encouraged to foster long-term, sustainable affordable housing options with support from all levels of government. The proposed PPS refers to "equitable housing". To aid interpretation, the City suggests that this term be defined.

## Settlement Areas and Settlement Area Boundary Expansions

Orderly development is promoted in the City's Official Plan based on availability of servicing, achievement of growth targets, and sequential expansion of urban development. The City is concerned that the proposed removal of minimum greenfield density targets and the elimination of Municipal Comprehensive Review requirements for settlement boundary expansions and employment area conversions will negatively affect the City's ability to optimize resources including servicing and social infrastructure upgrades to the detriment of Strategic Growth Areas and overall complete community building.

The City is concerned with the lack of strong policy requirements for settlement area boundary expansions, particularly as it relates to privately initiated requests. The City requests that allowances for settlement area boundary expansions be limited to municipally-initiated expansions through a municipal comprehensive review to address specific land needs. In any respect, there should be a policy requirement to demonstrate the long-term financial viability of any settlement area boundary expansions to ensure that such expansions will not create a long-term financial burden subsidy on the existing tax base.

## Infrastructure and Facilities

The City supports the policy direction encouraging schools in mixed-use developments within Strategic Growth Areas. Noting that the City's Strategic Growth Areas include our Central Area/downtown and designated Urban Growth Centre, the City urges the



Province to revisit school funding formulas, which are punitive on smaller/older schools and has historically led to the closure of several Central Area/downtown schools in Peterborough. Furthermore, given the increasing disparities in parkland due to Bill 23, any Provincial actions to facilitate joint use agreements for parkland associated with schools are encouraged.

### **Employment Areas and Land Use Compatibility**

The City continues to have concerns regarding the lack of a consistent and Provincially-issued land needs methodology. Coupled with the proposed changes in the land use compatibility policies and the City's current shortage in employment areas, the City is concerned with erosion of employment areas due to the ability for private-initiated requests for conversion outside the Municipal Comprehensive Review process.

The City recommends that the Province restore the Provincially-issued land needs methodology as well as the criteria for land use compatibility described in 2020 PPS policy 1.2.6.2, consistent with the direction in the recent Bill 150 and proposed Bill 162 retaining Modification #10 (i.e., Policy 1.2.6.2 of the PPS) in the City's new Official Plan.

### **Natural Heritage**

The City supports the retention of the existing Natural Heritage policies, as proposed.

### **Cultural Heritage and Archaeology**

The City acknowledges that this section remains largely unchanged from the previous draft PPS. Noting the 2017 draft Ministry of Tourism, Culture and Sport Guide to Cultural Heritage Resources in the Land Use Planning Process (ERO 013-0914) was not released, the City would appreciate the Province revisiting the establishment of guidelines to provide insights on engagement with Indigenous communities and proactive strategies for identifying properties for heritage evaluation.

### **Natural and Human-made Hazards**

The proposed definition of Special Policy Area remains largely unchanged from the current definition. The City requests changes to the definition of Special Policy Area to restore flexibility similar to the definition in the 1997 amended Provincial Policy Statement:

“means an area within a community that has historically existed in the flood plain and where site specific policies, approved by the Ministers of Natural Resources and Municipal Affairs and Housing, are intended to address the significant social and economic hardships to the community that would result from strict adherence to provincial policies concerning development.”



As upstream developments cause adjustments to regulatory flood limits in historical areas, Special Policy Areas need to have flexibility to permit safe development. In the City's case, any increase in the mapped flood extents beyond the City's existing Jackson Creek Special Policy Area will have a detrimental impact on the City's ability to achieve transit-supportive densities, address the Provincial housing crisis, promote the economic and social sustainability of the Central Area/downtown, and grow the Central Area's function as a regional business hub.

### **Implementation and Interpretation**

The City requests that the Province support meaningful consultation by working with First Nations communities to build capacity and prepare clear guidelines/procedures for municipalities to consult with First Nations communities. In addition to the need for municipalities to have the authority to require pre-consultation and facilitate early and meaningful consultation, these actions are needed from the Provincial government to foster more predictability and reliability in the development approvals process.

The City understands that Province intends official plans to be updated as necessary to implement the new PPS at the time of their ordinary review cycle (i.e., every ten years after a new official plan) and that the Minister may make regulations setting transition provisions. Any required conformity exercise before the regular legislative timeframe will have serious implications to the City's resources and ability to focus on other important initiatives (i.e., the implementation of a Community Planning Permit System and comprehensive review of the zoning by-law). Of particular significance is the Provincial approval of the City's new Official Plan from the time of Council adoption took over 16 months and still remains in state of flux due to Bills 150 and 162. Accordingly, the City appreciates having the ability to follow the ordinary review cycle for updating its official plan in response to a new PPS.


### **Conclusion**

The City supports the Province in its efforts to increase housing supply and address the affordability challenges that we are all experiencing. As we work to address these challenges, the City requests that any measures to expedite housing supply be appropriately balanced with other planning priorities including the natural environment, infrastructure and transit delivery, agricultural systems, economic prosperity and complete and healthy communities.



If any additional information or clarification is required, please do not hesitate to contact me.

Sincerely,



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