



City of
Peterborough

To: Members of the Planning Committee

From: Ken Hetherington, Manager, Planning Division

Meeting Date: May 25, 2015

Subject: Report PLPD15-029
Coordinated Review of Provincial Plans, 2015

Purpose

A report to inform Council of the Ministry of Municipal Affairs and Housing's coordinated review of Provincial Plans and Planning Staff's response.

Recommendations

That Council approve the recommendations outlined in Report PLPD15-029 dated May 25, 2015, of the Manager, Planning Division, as follows:

- a) That Report PLPD15-029 be received for information.
- b) That Planning & Development Services staff be authorized to forward a letter summarizing the City of Peterborough's comments on the Growth Plan for the Greater Golden Horseshoe, as described in Report PLPD15-029, to the Ministry of Municipal Affairs and Housing for consideration as part of Phase 1 of the Coordinated Provincial Plans Review.

Budget and Financial Implications

There are currently no financial implications associated with the Province's Coordinated Review of Provincial Plans.

Background

On February 27, 2015, the Ministry of Municipal Affairs and Housing launched a coordinated review of the Growth Plan for the Greater Golden Horseshoe, the Niagara Escarpment Plan, the Oak Ridges Moraine Conservation Plan, and the Greenbelt Plan, as required under their respective legislation. Together, these four plans are intended to manage growth, protect agricultural lands and natural environment, reduce greenhouse gas emissions, and support economic development in the Greater Golden Horseshoe (GGH) area.

To facilitate this review, the Ministry released a discussion document titled *Our Region, Our Community, Our Home* which outlines the review's goals, process, and focus. A copy of this document is available on the Ministry's website (www.mah.gov.on.ca). According to the document, the review is intended to assess how the plans can better achieve the following six goals:

- Protecting agricultural land, water and natural areas;
- Keeping people and goods moving, and building cost effective infrastructure;
- Fostering healthy, livable and inclusive communities;
- Building communities that attract workers and create jobs;
- Addressing climate change and building resilient communities; and,
- Improving implementation and better alignment between the plans.

Consultation for the Coordinated Review is planned to occur in two stages. The first stage, which focuses on collecting feedback from municipalities, landowners, stakeholders, Aboriginal communities and the general public regarding fulfillment of the aforementioned goals, began in March 2015 and is anticipated to continue to mid-2015. Following completion of the first stage, the Ministry is planning to conduct a second stage of consultation that will focus on obtaining feedback on potential amendments to the plans.

As part of Phase 1, the Ministry is currently hosting town hall meetings across the region and has posted the review to the Environmental Bill of Rights Registry (No. 012-3256). Comments may be submitted to the Registry until May 28, 2015. On April 7, 2015, the Ministry hosted a Town Hall meeting in Peterborough where several City staff attended.

Growth Plan for the Greater Golden Horseshoe

Of the four plans under review, only the Growth Plan for the Greater Golden Horseshoe (GGH) applies within the City of Peterborough. The Growth Plan came into effect in 2006

and Council adopted Official Plan Amendment No. 142 in 2009 to bring the City's land use planning policies into conformity with the Growth Plan.

According to the Ministry, the Growth Plan sets the direction for accommodating growth and development in the region by requiring municipalities to use land and resources more efficiently, reduce outward growth, use existing infrastructure to fullest potential, and create complete communities. Specifically, the Ministry states that the goals of the Growth Plan are to:

- accommodate growth through intensification and build at sustainable, livable densities to curb sprawl and avoid the unnecessary loss of farmland and natural areas;
- optimize new and existing infrastructure;
- focus new development to create complete communities and revitalize downtowns;
- plan public transit, reinforced by transit supportive densities, as the first priority for moving people;
- plan highways and highway corridors to promote efficient goods movement and to support compact built form;
- ensure appropriate land is available to accommodate future employment growth and that it is planned to facilitate economic development; and
- promote a culture of conservation which includes, but is not limited to, conservation policies within municipal official plans.

To achieve these goals, the Growth Plan includes policies that require the City to conduct its planning in a way that:

- is in accordance with population and employment forecasts established in the Growth Plan;
- plans to achieve a minimum of 40% of annual residential development occurring within the built-up portion of the city;
- achieves a minimum population and employment density of 150 persons and jobs per hectare in the City's Urban Growth Centre (i.e. downtown commercial core) as defined in the Growth Plan and illustrated on Schedule A1 – City Structure of the Official Plan by 2031;
- achieves a minimum average population and employment density of 50 persons and jobs per hectare across the City's Designated Greenfield Area;
- directs major office and institutional employment to urban centres and near transit;

- plans for industrial and commercial uses close to transportation facilities such as highways, rail and airports; and,
- coordinates growth with infrastructure investment.

To date, the City has had some success with implementation of the Growth Plan including achieving higher densities and a greater diversity of housing mix in newly developing Greenfield Areas and achieving an average annual intensification rate of 45% between 2007 and 2013. However, progress toward achieving other goals, such as the planned density target for the Urban Growth Centre, has been slower.

Due to the highly structured nature of the Ministry's consultation program, comments regarding the City's overall experience with the Growth Plan are not being sought at this time. Accordingly, the remainder of this report will focus on the six goals of the Coordinated Review as they relate to the City's experience with the Growth Plan.

Protecting Agricultural Land, Water and Natural Areas

Currently, the Growth Plan contributes to the protection of agricultural land, water and natural areas by limiting settlement boundary expansions, establishing population and employment forecasts that direct growth primarily to urban centres with municipal services, and by setting density targets within urban communities. Additionally, the Growth Plan contains policies requiring the identification and protection of natural systems and prime agricultural areas through a province-led sub-area assessment process and policy requiring municipalities to develop policies in support of water conservation.

To better address the overall goal of protecting agricultural land and natural areas, staff recommend that the province move forward with the sub-area assessment process as described in Sections 4.2.1.1 and 4.2.2.1 of the Growth Plan. Moving forward with such an initiative to identify prime agricultural areas and natural systems would be of significant help to municipalities that may not have the staff or financial resources to conduct such an assessment in a timely manner. Furthermore, to facilitate the protection and conservation of water, staff recommend that the province consider establishing guidelines for water demand management and water recycling as well as amendments to the Growth Plan to provide direction on stormwater management best practices.

Keeping People and Goods Moving, and Building Cost-Effective Infrastructure

Section 3.2.2 of the Growth Plan states that the transportation system in the GGH will be planned and managed to:

- a) provide connectivity among transportation modes for moving people and goods;
- b) offer a balance of transportation choices that reduces reliance on any single mode and promotes transit, cycling and walking;

- c) be sustainable, by encouraging the most financially and environmentally appropriate mode for trip-making;
- d) offer multi-modal access to jobs, housing, schools, cultural and recreational opportunities, and goods and services; and
- e) provide for the safety of users.

Furthermore, when considering the movement of people, the Plan states that public transit will be the first priority for transportation planning and major transportation investments while goods movement will focus on highway investments that link inter-modal facilities, international gateways, and communities within the GGH.

From staff's perspective, the transportation component of the Growth Plan appears to focus more on how transportation within the GGH functions as an overall system rather than on its function within any one community. This focus becomes evident when reviewing the coordinated review discussion document which refers to the impact that congestion has on the economy, the need for strong transportation connections to domestic and international markets, and the province's plans for investing in transit, highways, and infrastructure over the next 10 years. With respect to these macro-scale issues, staff feel it is imperative that the City continue to work with the province as the opportunity arises to advocate for provincial infrastructure investment that strengthens the City's links to the GGH including highway, rail and air investments.

In 2013, the Growth Plan was amended to incorporate more aggressive population and employment forecasts for the City of Peterborough. In light of these forecasts, provincial infrastructure planning should assess the need for enhanced transportation services between Peterborough and the GGH and reflect those needs (if any) as amendments to Schedules 5 (Moving People – Transit) and 6 (Moving Goods) of the Growth Plan.

When considering planning and infrastructure investment at a local scale, the Growth Plan establishes a number of principles that municipalities are required to follow, however, the plan provides little direction on how to implement those principles. For example, if public transit is to be the first priority for transportation infrastructure planning and investment, then guidance should be provided on how to prioritize public transit needs with the needs of other travel modes. With respect to transportation planning and investment at a local scale, staff do not feel that amendments are necessary to the Growth Plan to improve the movement of people and goods, however, provincial support in the form of guidance and a reliable source of funding for infrastructure investment is key.

In 2014 the Province issued a new Provincial Policy Statement (PPS) which, among other things, requires municipalities to coordinate and integrate infrastructure and land use planning in a way that ensures financial viability for infrastructure over its life cycle. Additionally, the City has also adopted a Capital Asset Management Plan (December 2014) which recommends the creation of an overall growth plan for the coordination of

servicing and urban growth. To provide further direction on these goals, the Growth Plan could incorporate policy to require the coordination of land use and infrastructure planning with consideration given to the fiscal impact of new development.

Fostering Healthy, Livable and Inclusive Communities

The Growth Plan requires the City to accommodate growth in a way that supports Peterborough as a complete community by meeting people's daily needs throughout their lifetime with convenient access to jobs, services, community infrastructure, transportation options, a range of housing, and vibrant public spaces and streets. According to the Ministry, key elements of a complete community include active modes of transportation such as walking and cycling, connected transit systems, parks, natural areas, public spaces and people-focused streets.

While this goal is applicable across the GGH, interpretation of how to implement this goal is left to each municipality. While it is important for municipalities to be able to establish plans and make investments that consider the unique qualities of their community, provincial guidance on what constitutes a complete community could also be beneficial. Presently, municipalities must determine what levels of service are appropriate for building complete communities. For example, how much parkland is required in a municipality? How many bike lanes and trails should be provided? Is there a minimum standard that municipalities should follow when planning for the number and location of community infrastructure facilities such as schools, churches, libraries, community centres, etc.? To address the Growth Plan's goal of building healthy, livable and inclusive communities, staff would appreciate continued support from the province in the form of guidance and the identification of best practices and recommended service level expectations.

One issue that affects communities' ability to remain inclusive is housing affordability. In Peterborough, over half of renter households cannot afford the median rental shelter cost in the community (Affordable Housing Advisory Committee, 2014). As of 2013, almost 1,500 people were on the wait list for social housing in Peterborough and area.

Generally, the Growth Plan seeks to address housing affordability by requiring municipalities to plan for an appropriate range and mix of housing types. Changes to the Planning Act in 2011 to support the provision of Secondary Suites or Accessory Apartments will help to create affordable housing in Peterborough however staff feel that more could be done to maintain housing affordability. In staff's opinion, planning for a range and mix of housing types only addresses a limited portion of the community's need for affordable housing and does not truly address that segment of the population in greatest need. The Province can support municipalities in their effort to plan for affordable housing by continuing to provide funding for affordable housing programs and by monitoring the economic status of communities across the GGH and providing periodic advice on housing mix. Additionally, consideration should be given to enabling communities to zone for affordable housing and to require development proponents to

make lots and/or units available to affordable housing providers through the plan of subdivision and condominium approval process.

Building Communities that attract Workers and Create Jobs

One of the goals of the Growth Plan is to ensure appropriate land is available to accommodate future employment growth and that communities are planned to facilitate economic development. To do this, the Plan directs major office and major institutional development to Urban Growth Centres (such as Downtown Peterborough) and industrial and commercial uses close to transportation facilities such as highways, rail lines and airports. Furthermore, the Plan seeks to protect lands designated for employment uses by establishing rigorous review procedures that discourage the conversion of employment land to other uses.

Generally, staff is satisfied with the current Growth Plan's approach to identifying and protecting employment lands. However, additional provincial support for municipal economic development would be welcome in the form of infrastructure investment and research that identifies and promotes economic strengths and opportunities for the Peterborough area.

Addressing Climate Change and Building Resilient Communities

The Province of Ontario has committed to mitigating climate change through reduced greenhouse gas emissions and increased resiliency of infrastructure. According to the Ministry, land use planning can significantly reduce the production of greenhouse gases by influencing where people live, work and shop and how they move between them and by protecting natural areas that can capture and store greenhouse gases. Furthermore, in the interest of building community resiliency, land use planning can lead to the establishment of infrastructure that acts both as a carbon sink and as a protective measure against extreme weather events.

Presently, the Growth Plan does not explicitly address climate change, however, such language has been incorporated into the PPS. To maintain consistency with the PPS, the Growth Plan should be amended to reflect the climate change direction of the PPS and guidance should be provided to municipalities in the form of identifying best practices for supporting energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and climate change adaptation techniques.

Staff notes that the Ministry of the Environment and Climate Change is currently developing one such guideline for low impact development stormwater management techniques which is anticipated to be complete in 2016. Implementation of low impact development measures is one means of building resiliency into the City's stormwater management system and protecting against extreme weather events by increasing water infiltration, reducing runoff, and delaying the peak runoff of water.

Improving Implementation and Better Alignment Between the Plans

As part of the coordinated review, the Ministry is seeking advice on how implementation of the four plans can be improved. Because the City is directly affected by only one of the four plans under review, staff does not have any comment with respect to alignment between the plans. However, looking at the Growth Plan specifically, staff see a few areas where implementation can be improved.

Presently, the Growth Plan requires performance monitoring of its implementation both by the Province and by municipalities. To this end, the Ministry recently released a monitoring document titled *Performance Indicators for the Growth Plan for the Greater Golden Horseshoe, 2006* which describes the progress being made across the GGH for a number of indicators. For municipalities, Section 5.4.3.3 of the Growth Plan requires municipalities to monitor and report on implementation of the Plan in accordance with guidelines developed by the province. To date, no guidelines have been developed. To facilitate municipal monitoring of Growth Plan implementation, staff would encourage the Ministry to issue guidelines for municipal use.

Additionally, to facilitate implementation, the Growth Plan envisioned the Province undertaking sub-area assessments in conjunction with municipalities and stakeholders. A sub-area assessment is intended to investigate, at a regional scale within the GGH:

- regional economic analysis and provincially significant employment areas;
- the proposed transportation network;
- implications of projected growth for water and wastewater servicing;
- identification of natural systems;
- identification of prime agricultural areas, including specialty crop areas; and
- identification of significant mineral aggregate resources.

Staff see these assessments as being an important tool for ensuring proper implementation of the Growth Plan on a macro-scale and would encourage the province to conduct these assessments as soon as possible.

Generally, the Growth Plan establishes expectations for how municipalities should conduct land use planning. However, many of the Growth Plan's directions are expressed in general terms and therefore municipalities must determine the appropriate means for implementing the Plan at a local level. While staff feel this approach is appropriate, staff would welcome continued support from the province through the periodic release of guidance documents that identify best practices and minimum expectations for specific areas of the Plan.

Other Comments

As noted previously, the highly structured nature of the Ministry's consultation program does not leave room for comments regarding the City's overall experience with the Growth Plan. Staff question this consultation approach and feel that opportunity should be provided for additional comments beyond the Ministry's established scope.

Furthermore, staff note that the structured nature of the consultation program appears to be tailored to planning and development practitioners that have a working knowledge of the plans under review. To foster a more open and inclusive consultation, consideration should be given to conducting a less-structured, public-oriented consultation program in parallel to the current program.

Since 2004, Council and staff has maintained a keen interest in the Places to Grow legislation and the Growth Plan for the Greater Golden Horseshoe. At the April 7, 2015 Town Hall meeting hosted in Peterborough, it was evident that this interest transcends municipal boundaries given the presence of staff and elected officials from municipalities throughout the broader Peterborough area. Unfortunately for the City of Peterborough, this meeting coincided with a regular meeting of Council which thereby prevented any elected officials or senior administrative staff from attending. To maximize the potential for elected municipal officials and senior municipal administrative staff to attend such meetings in the future, staff would appreciate if area-municipal Council meeting schedules could be reviewed prior to establishing meeting dates.

In 2009, through the adoption of Official Plan Amendment No. 142, staff noted that the City, like many other municipalities in the Greater Golden Horseshoe, had struggled with planning to meet the established density targets for greenfield development. Multiple unit residential development is key to achieving the density targets published in the Growth Plan; however, staff questioned whether the drastic change necessary in housing form to meet the density targets would be realistic. Staff noted that because students are not considered "permanent" residents and because of the way that some seniors' residences are defined for Census purposes, many of the new multi-unit residential developments that the City had seen in recent years would not count toward the density targets.

Furthermore, staff expressed concern at the time regarding the use of residential and employment population as the unit of measure for the density targets established in the Growth Plan. In staff's experience both before the Growth Plan and since, it is difficult to track population, particularly the geographic location of jobs, using standard data available through the Census. Because employment and residential density varies on a per-unit basis across the GGH (i.e. persons per household and employees per square metre of employment space), some municipalities may have to plan for more development in the same geographic space than others in order to meet the targets that have been applied uniformly across the GGH. In Peterborough, the average number of people living in a household is significantly smaller than many other GGH communities. As a consequence, Peterborough needs to plan for more households per hectare than other municipalities.

In light of Peterborough's lower than average household size, older population age profile, traditionally slower growth rate, and topographical limitations compared to other GGH communities, Official Plan Amendment No. 142 included a policy to signal the City's intent to review the appropriateness of the overall minimum Greenfield target with the Province. Presently, staff feel that the concerns expressed in 2009 remain valid and therefore staff recommend that the City advocate for an opportunity to review the Greenfield density target as part of the current coordinated plans review. Furthermore, to facilitate implementation and monitoring of density targets, staff recommend that the Growth Plan be revised to establish new density measures based on the number of dwelling units per hectare and the amount of employment floor space per hectare.

Starting in 2015 and for each year thereafter, Section 2.2.3.1 of the Growth Plan requires the City to ensure that "a minimum of 40 per cent of all residential development occurring annually...will be within the built-up area." As noted previously, the City has had some success in this regard achieving an average annual intensification rate of 45% between 2007 and 2013. However, as noted to Council in 2009, staff anticipate this target will become increasingly difficult to achieve over time as existing vacant sites in the built-up area are developed and the focus of intensification switches to the redevelopment of under-utilized properties and buildings. Staff feel that the imposition of an annual intensification target over an indefinite period of time is difficult to administer because it assumes an unlimited supply of intensification opportunities moving forward. Accordingly, staff would recommend that the Growth Plan establish a horizon for the annual residential intensification target.

Furthermore, with respect to intensification, Section 2.2.3 of the Growth Plan requires municipalities to implement a strategy and policies for achieving intensification and intensification targets, however, it does not explicitly speak to the need for adequate municipal infrastructure when planning for intensification. Instead, the Growth Plan requires municipalities to use infrastructure investment as a means of facilitating intensification. In staff's opinion, to ensure the financial viability of intensification, the Growth Plan should identify the municipal need to consider infrastructure availability when planning for intensification. Additionally, where an intensification target is identified in the Growth Plan for a specific area, such as the downtown Urban Growth Centre, the Plan should include a Provincial commitment to financially assist municipalities in their efforts to assess infrastructure needs and make intensification-related infrastructure improvements and/or provide flexibility to adjust the intensification area boundary or target. Making such changes to the Plan will help ensure that intensification is planned in a practical and financially viable way.

Finally, staff note that Section 2.2.7.6 of the Growth Plan requires municipalities to "develop and implement phasing policies, and other strategies, for designated greenfield areas to achieve the intensification target and density targets" of the Plan. When this section is read in conjunction with the intensification requirement of Section 2.2.3.1 described previously, one could conclude that the Growth Plan requires municipalities to assume an authoritarian approach to planning for intensification and greenfield

development. Staff question whether it is the Growth Plan's intent to prohibit or restrict greenfield development from time to time based on a municipality's annual intensification performance. If it is, staff feel that such an approach to development phasing could have broad adverse consequences on both the City's housing market and its economy. In staff's opinion, a more objective and contextually-sensitive means of establishing a broad community phasing plan would be to assess the economic feasibility of new development. To provide clearer direction for municipalities, staff would recommend that the Growth Plan include greater detail regarding the expectation for municipal development phasing.

Summary

The Ministry of Municipal Affairs and Housing's coordinated review of the Growth Plan for the Greater Golden Horseshoe, the Niagara Escarpment Plan, the Oak Ridges Moraine Conservation Plan, and the Greenbelt Plan is currently seeking comments from municipalities, stakeholders and the public to address six specific themes. Of these plans, only the Growth Plan for the Greater Golden Horseshoe directly affects land use planning decisions in the City. Based on the themes identified in the consultation process, staff recommend the following actions with respect to the Growth Plan for the Greater Golden Horseshoe:

- To better protect agricultural land, water and natural areas, the Province should:
 - Move forward with the sub-area assessment process as described in Sections 4.2.1.1 and 4.2.2.1 of the Growth Plan;
 - Establish guidelines for water demand management and water recycling; and
 - Amend the Growth Plan to provide direction on stormwater management best practices.
- To keep people and goods moving, and build cost-effective infrastructure:
 - The City should continue to work with the province as the opportunity arises to advocate for provincial infrastructure investment that strengthens the City's links to the GGH;
 - The Province should assess the need for enhanced transportation services between Peterborough and the GGH in light of aggressive growth forecasts;
 - The Province should provide support in the form of guidance and a reliable source of funding for infrastructure investment for local transportation infrastructure development; and

- The Growth Plan should be amended to require the coordination of land use and infrastructure planning based with consideration given to the anticipated fiscal impact of new development.
- To foster healthy, livable and inclusive communities, the Province should:
 - Provide guidance and identify best practices and recommended service levels for the provision of community infrastructure;
 - Continue to provide funding for affordable housing programs;
 - Monitor the economic status and housing affordability across the GGH and provide periodic advice on housing mix; and
 - Enabling communities to zone for affordable housing and to require affordable housing through the plan of subdivision and condominium approval process.
- To build communities that attract workers and create jobs, the Province should:
 - Provide strategic infrastructure investment and research that identifies and promotes economic strengths and opportunities for the Peterborough area.
- To address climate change and build resilient communities, the Province should:
 - Amend the Growth Plan to reflect the climate change direction of the Provincial Policy Statement, 2014; and
 - Provide guidance by identifying best practices for supporting energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions and climate change adaptation techniques.
- To improve implementation of the Growth Plan, the Province should:
 - Issue performance monitoring guidelines for municipal use;
 - Conduct sub-area assessments as described in the Growth Plan; and
 - Provide guidance documents that identify best practices and minimum expectations for specific areas of the Plan.

Furthermore, although the coordinated review is not seeking comments on the City's overall experience with the Growth Plan or the coordinated review process, staff recommend that:

- consideration be given to conducting a less-structured, public-oriented consultation program as part of the coordinated review;

- the City advocate for an opportunity to review the Greenfield density target as part of the current coordinated plans review in accordance with Official Plan Policy 2.4.7.3;
- the Growth Plan be revised to measure density on a dwelling units per hectare and employment floorspace per hectare basis;
- a horizon for the annual residential intensification target be established;
- infrastructure availability be identified as a consideration for municipal intensification strategies and policies;
- financial assistance be provided by the Province for assessing and addressing infrastructure needs in Growth Plan-mandated intensification areas such as Urban Growth Centres; and
- greater detail be provided in the Plan regarding the expectation for municipal development phasing and the need to achieve the established intensification target.

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