



October 31, 2016

Re: Reimagine Peterborough's Comments on the Proposed Growth Plan for the Greater Golden Horseshoe, 2016 - EBR #012-7194

City-making today is about so much more than just sewers and roads: it is about creating thriving, diverse and sustainable places to live, work, move, play — and prosper. Reimagine Peterborough is a citizens' movement to invite the incredible potential within our city to create, share, and engage in city planning for a future that responds to the new challenges of our times. Our role is to inspire and contribute to a wider conversation on public engagement and community planning. Other Ontario cities such as London, Guelph, Kingston and Toronto are embracing this “smart growth” approach to urban planning.

As we seek to enhance our urban planning processes for addressing the complex challenges and amazing opportunities of the 21st century, we are grateful for the opportunity to comment on the proposed Growth Plan for the Greater Golden Horseshoe, 2016, during this period of provincial review. The Growth Plan is the only one of the four Plans under review that currently applies to the City of Peterborough. We take a particular interest in the Growth Plan as it will provide important context for the City's ongoing comprehensive review of its Official Plan, for the first time since 1981, and initiated back in 2011.

As part of this process, Reimagine Peterborough seeks to cultivate a city-wide dialogue about how Peterborough should plan for growth over the next 20 years, including with regard to some of the comments and concerns highlighted by the City of Peterborough in their report PLPD16-060 on the proposed Growth Plan. We will address these through our own experience and expectations for the future of Peterborough.

Background on Reimagine Peterborough

Reimagine Peterborough is a growing circle of citizens from across the city. We are both long-time and newer residents, and include professionals with careers in urban planning, environmental law, communications and facilitation, consulting, architecture, municipal and provincial policy development, education, health care, and more. Some work full-time, some are retired, while others are navigating our precarious employment market. Many have children and loved ones whose daily lives and futures are integrated into the fabric of our city. All are volunteers, who devote hours each week towards making our city the best it can be.

We have formed at this time to assist in gathering public input, to foster informed and highly participatory cross-sectoral dialogue and debate on the key challenges and opportunities facing our city in the future.. A robust, ongoing conversation between City Hall and the city's citizens is essential to the success of this enormous task of shaping the city's guiding document and the provincial context in which it operates.

We would like to support the City in embracing an integrated, holistic approach to urban planning that includes consideration of economic, environmental and social aspects of community life in addition to traditional land use aspects. We seek to provide constructive and collaborative input into the comprehensive review of the City of Peterborough's guiding document - the Official Plan. Through our efforts, we invite the City in a spirit of collaboration to join in exploring the exciting possibilities that could emerge as we harness the creative thinking, expertise and enthusiasm of our community.

Reimagine Peterborough Comments on “Proposed Growth Plan for the Greater Golden Horseshoe, 2016”

Reimagine Peterborough is grateful for the opportunity to provide our comments on the proposed Growth Plan and will actively seek opportunities to collaborate with local citizens, organizations, and city staff to promote progressive urban planning in Peterborough.

1. Support Increased Density Targets and Related Measures

Reimagine Peterborough is thoroughly supportive of the Growth Plan's targets for increased density within built areas. This includes the proposed 60% annual development within the Built Area and the higher density of 80 dwellings or jobs per hectare for the Designated Greenfield Areas (DGA) found in the proposed Growth Plan's sections 2.2.2 and 2.2.7. As the City's submission notes, this will require planners and developers to make the shift towards designing and marketing more sustainable, compact/intensification-friendly development projects.

In our view, this can be a positive shift and would enable Peterborough to catch up with other communities in southern Ontario, and across North America, which are being challenged by the budgetary implications of conventional, low-density development patterns. Importantly, Peterborough is currently (but likely only momentarily) in the enviable position of being able to be proactive in planning for this shift since the rapid pressures of growth faced by other cities in the Greater Golden Horseshoe have not yet fully presented themselves in Peterborough.

The City's report suggests that the Built Area boundary be expanded to encompass those areas that to date have been built, or currently have draft approvals. In discussions with staff, there is not yet a map of these areas nor an analysis of what effects this might have on the goals and calculations of intensification.

Shifting the built boundary outwards will likely make it easier to meet the proposed new 60/40 percentage split across this boundary, by diluting the intended effects of the policy: to intensify further within the Built Area.

There is presently approximately four to five years of housing land supply in the city. And there remains considerable unrealized potential for further units within the built area over the planning horizon of the new Plan. Since 2009, we are not aware of any new secondary planning for the intensification corridors and other sites identified in the City's 2009 City Structure (OP Schedule A-1), adopted as part of its conformity exercise with the current Growth Plan. For example, increased discussion and a completed Environmental Assessment for the refurbishment of Chemong Road is a perfect opportunity for such secondary planning to increase densities and foster enhanced multi-modal transportation along this designated Intensification Corridor. Along with other projects, current planning and design work for Bethune Street in the transition area of the Urban Growth Centre provides promising directions for downtown intensification. Our initial perspective, then, is that **the built boundary should remain where it is** to foster further intensification within the city's Built Area, and certainly until maps and analyses are presented and discussed with the wider community and province through the Official Plan Review process..

Currently, the continued development of ground-based single family housing in car-centric suburbs (which are not complete communities, in themselves) will have significant impacts on the prosperity and health of our city. As documented in the *Transportation and Health Indicators Report* of 2014 developed by the City, Health Unit and GreenUP, rates of active transportation are extremely low in low-density neighbourhoods, largely annexed to the City in the 1960s. Specifically, rates of less than 5 percent are seen in the low-density suburbs compared to 20-30 percent closer to downtown areas that have higher densities. This affects health, and limits transportation options as the population ages. Low densities also reduce neighbourhood cohesion and exacerbate air pollution resulting from increased commuter traffic.

According to the City's Census 2011 population density maps, the province's proposed Designated Greenfield Area target of 80 residents or jobs per hectare would correspond with the current densities found in much of Peterborough's downtown. This existing pattern of several storey main street buildings, some higher density sites, and a mix of surrounding ground-based housing forms seems to largely work now in the central city and is increasingly recognized as desirable in the urban planning literature.

Moreover, without higher densities, new suburbs will need to be subsidized by the City in the future as the increased municipal servicing costs (sewer, water, road maintenance, garbage collection, policing, ambulance and fire services, etc.) will have to be carried by the City and all its taxpayers. As documented in more and more studies (and indeed a central driver for the proposed Growth Plan's DGA targets), low density suburbs built only for single-family houses are unaffordable to service and to maintain^{1,2}. (In Peterborough, this difference is partly

¹ <http://blogs.lse.ac.uk/usappblog/2015/06/01/urban-sprawl-costs-the-american-economy-more-than-1-trillion-annually-smart-growth-policies-may-be-the-answer/>

recognized in the development charges for DGAs, where each lot is charged an average of \$5,387 or 21% more to service than sites within the existing Built Boundary.)

Ground-based suburban housing has been successful in the past, in part because the full costs associated with its initial and long-term servicing are not entirely passed on to developers or home buyers. This under-pricing creates hidden subsidies that promote inefficient development and in the long-term may deflect investment from other worthwhile projects. Low density development, such as these suburbs, is unsustainable for small urban centres such as Peterborough; currently, the long-term servicing costs are being off-loaded to future generations. Putative “market demand” must not be used as an apology for short-sighted planning.

Intensification must also come with a number of related elements that make a community liveable and sustainable at higher densities. These include:

- First identifying and protecting natural areas and functions within a natural heritage system;
- Setting parkland, open space and recreational targets to ensure the health and social benefits in an urban environment (as Peterborough currently does);
- Setting targets for low impact development (water infiltration) and green infrastructure measures;
- Ensuring effective transportation demand management, active transportation and transit;
- Fostering community hubs where diverse public facilities and services can be clustered;
- Increasingly emphasizing human- and environmentally-oriented design and the scenic and aesthetic nature of placemaking; and
- Committing to complete communities and streets (as discussed further in the following section).

Most of these directions are supported in the draft Growth Plan, and we encourage further emphases on these aspects.

Reimagine Peterborough feels that there is a pressing need and desire for the city to engage in a conversation about planning and community design, including identifying strategies and incentives to promote intensification within the existing built area — and that this is essential in signalling to the development community that the city is committed to achieving intensification targets.

We also acknowledge that the Province has an active role to play in updating policies and establishing incentives to make compliance with (for example) environmental and fire regulations in existing downtown buildings more affordable for developers and residents. See point #3 below for elaboration of the Province’s role in these development incentives.

² See: Blais, P. (2011). *Perverse cities: hidden subsidies, wonky policy and urban sprawl*. Vancouver: UBC Press.

With leadership from the city on a “smart growth” approach to planning in Peterborough, the development industry will respond with a business model that supports jobs and profitable projects through non-traditional means — such as intensification, renovation and core area redevelopment. There are numerous examples of such business trends across Ontario, such as in Kitchener and Waterloo. Our municipal government cannot extol green virtues and sustainability while at the same time allowing subsidized suburban sprawl because of perceived market dynamics. The increased density targets in the proposed Growth Plan present the opportunity -- indeed, the responsibility -- to take a leadership role in planning for a more fiscally and environmentally sustainable future.

2. Support Provincial Directions on Complete Communities and Complete Streets

Reimagine Peterborough is strongly supportive of the province’s proposed revised definition for the term “complete communities” — as ones which support quality of life and human health by encouraging the use of active transportation and providing high quality public open space, adequate parkland, opportunities for recreation, and access to local and healthy food, as well as supporting climate change mitigation by providing public transportation and options for safe, non-motorized travel, and by minimizing land consumption through compact built form.

Our view is that sustainable urban planning requires neighbourhoods that are walkable for basic needs and have access to other forms of active transportation including public transit. A complete community is a neighbourhood-level concept, and flexibility in the term’s application to specific contexts is already contemplated in the proposed Growth Plan’s definition. Along with others, we thus strongly oppose, as wrong by definition, the City’s perspective as proposed in their report that a complete community is the entire City of Peterborough.

Peterborough is relatively smaller and geographically separate from much of the Greater Golden Horseshoe but, as the city grows, Reimagine Peterborough believes it will be essential for new subdivisions and secondary plan areas to be developed as complete communities. Indeed, last week’s City Council approval of the first subdivision in the Lily Lake Planning Area in the northwest part of the city indicates wide Council support for complete community elements within this new development: active transportation, transit, trails, parkland, higher densities, commercial and mixed-use sites along a central street corridor, water- and energy-efficient features, and urban design guidelines.

Reimagine Peterborough is especially concerned about the financial implications and impacts to quality of life for our city’s full demographic profile if the city continues in its view that it can plan a “complete community” on a city-wide rather than a neighbourhoods scale.

Peterborough is in transition from a city largely built for 20th century daily life dominated by 9 to 5 employment, commuting by car, and single-family homes. As outlined in section 2.1 of the updated Growth Plan, this model is now outdated, inefficient, and wholly unsustainable. It simply can no longer be the basis upon which planning decisions are made -- regardless of a city’s

size, rate of growth, or geographic relationship to larger population centres. Importantly, the City of Peterborough has not conducted a comparative cost analysis of alternative growth patterns, as recently undertaken by other Canadian cities like London³ and Halifax⁴, to inform its review of the proposed Growth Plan or its Official Plan.

Peterborough's thriving cultural, academic, entrepreneurial and innovation sectors are bringing great changes to Peterborough, such as the Research and Innovation Park, green technology, vibrant public and commercial spaces, festivals, and downtown developments. It is widely acknowledged that Peterborough is at a tipping point of growth and changing demographics. This will significantly impact market forces and, as witnessed in every other urban core in North America, the past "struggles" experienced by the development community in achieving the Growth Plan's density target will no doubt be overcome in the near future.

Reimagine Peterborough also endorses the concept of complete streets and support for multi-modal transportation as outlined in the proposed Growth Plan's sections 3.2.2.3 and 3.2.2.4. We understand that this concept means that our streets must be seen as community spaces for all forms of travel, including public transit, pedestrians, and cyclists. The safety of all users is also an important concept in the Peterborough context, given the deaths of three pedestrians within a two-week period in September 2016 on our wide Lansdowne Street.

City Council is supportive of complete streets, and approved a complete streets direction across the city and a draft complete streets policy in its 2012 Comprehensive Transportation Plan. While City staff express concern about how a mandated Complete Streets policy would impact the City, we understand that Complete Streets policies are implemented within a context-sensitive framework. For vibrant, healthy and sustainable cities, communities need the infrastructure to support all forms of active transportation. Some of the changes which would support the concept of safe and complete streets could be implemented at relatively low cost, such as the lowering of speed limits in the built-up core to 30 kph.

3. Implement Complementary Measures to Achieve Growth Plan Objectives through addressing Site Remediation, Fire Escapes, and Natural Land Acquisition

Both the province's consultation document and the province's Advisory Panel, chaired by the Hon. David Crombie, identified the need to develop complementary implementation measures to help achieve the objectives of the land use plans under review. We completely concur and provide a number of specific suggestions below.

First, in order for the City of Peterborough to conform to the requirements of the new Growth Plan, the Province needs to re-evaluate current regulations that may be barriers to urban intensification. For example, there are current regulations around environmental remediation

³ <https://www.london.ca/business/Planning-Development/Official-Plan/Documents/RethinkLondon/4%20Building%20a%20MixedUse%20Compact%20City.pdf>

⁴ <https://www.halifax.ca/boardscom/documents/HRMGrowthScenariosFinalReportApril292013.pdf>

that discourage developers from considering former industrial sites or “brownfields” for redevelopment. The removal of contaminated soil, to take a specific case, may be prohibitive for a developer. Could the Province initiate new measures and incentives that maintain environmental safety while making this regulation less of a barrier for potential developers? Other examples exist in areas such as fire prevention and providing fire escapes for upper floors. The answer is not to dilute these necessary regulations, but to review them for sensible accommodations, and incentivize the completion of lawful building restorations so that fire regulations do not become disincentives for development. Peterborough currently has a large stock of century-old buildings in the downtown core which languish unused -- and limit the achievement of Growth Plan density targets for the Urban Growth Centre -- largely because of these challenging environmental and fire prevention costs.

Second, as the City’s submission identifies, there is the growing need in urban as well as rural settings to achieve a fully functioning and connected natural heritage system. Reimagine Peterborough fully supports the proposed Growth Plan’s sections 4.2.1 and 4.2.2 that call for identification, planning and protection of water resource and natural heritage systems.

However, this cannot be achieved simply by a establishing a provincial map, a provincial Plan policy, and adoption in the City’s Official Plan. Much of the land that is needed to make the connections, round out the integrity of areas, and protect critical ecological functions and economic values is held in private hands. There may be no Planning Act “triggers” that are able to influence the timely protection of natural features, or there may well be grandparenting, exceptions, timing or other limitations on their use and implementation. These limitations will then short-change not only the ecological but also the economic, scenic, health and green infrastructure functions and benefits widely documented for natural heritage systems.

Accordingly, we urge the province to adopt a suite of measures that will foster land acquisition and stewardship of natural lands, thereby implementing the “long-term approach” identified in the proposed Growth Plan’s section 4.2.2.1.

As identified more thoroughly by Kawarthas Naturally Connected, the Ontario Land Trust Alliance and others, these measures should include:

- Enabling severances for conservation purposes without creating a new building lot;
- Creative and long-term funding to support both capital purchase and transaction costs for acquiring strategic parcels of lands as part of a natural heritage system (such as allocating 1% of provincial Land Transfer Tax revenues, or applying carbon credits under the province’s new cap-and-trade system to address climate change);
- Improving incentives and financial leverage for land conservation and stewardship;
- Clarifying and streamlining the registration of conservation easement agreements;
- Increasing the rate of parkland dedication, particularly for areas of higher densities; and,
- Requiring a review of all potentially surplus government and agency lands in relation to a natural heritage system before disposition of the land.

Such measures would enable the City and its partners to further achieve important Official Plan goals: to acquire lands along its waterfronts, achieve parkland and recreation objectives, and round out its natural heritage system. These tools, and a stronger direction for implementing natural heritage systems and open space, would also assist in achieving the protection of several significant natural areas that are part of the city's natural heritage system but are now under serious threats from development pressures, such as Harper Park and Loggerhead Marsh. Provincial mapping will also need to coordinate with natural heritage system mapping already undertaken at the regional and local scales.

Third, Reimagine Peterborough has identified as an important theme for planning in our city — including for the new Official Plan — the need to further enhance citizen engagement in the planning process. We cannot rely solely on the good graces of provincial policy and municipal planners to implement the vision and objectives of the Growth Plan. New directions in Bill 73 that foster public engagement are helpful, yet need to be further echoed in the Growth Plan, perhaps by adding a new section to the Culture of Conservation in section 4.2.9.

Such a section would set out objectives for public engagement, identify public multi-media communication strategies for Official Plans, and require environmental advisory committees (as is successful in many municipalities and is proposed in Peterborough Council's approved Urban Forest Strategy). This would be supplemented by provincial guidance documents, consultation and training services for municipal staff and citizens, reporting, and oversight functions.

Conclusions

Reimagine Peterborough appreciates the large responsibility faced by the City's planning staff to track, coordinate, synergize, and implement increasingly complex urban planning and growth policies. The proposed Growth Plan is inspiring, and inviting of a more progressive future — one that Reimagine Peterborough believes our city can embrace.

As we advance through the Official Plan Review process, Reimagine Peterborough believes that it is premature at this time to identify exceptions from the proposed Growth Plan policies. Rather, public engagement, cross-sectoral dialogue, better information and informed decision-making (including on the Official Plan Review) are necessary first steps to mapping Peterborough's response to the Growth Plan and its role in accommodating continued growth in the Greater Golden Horseshoe.

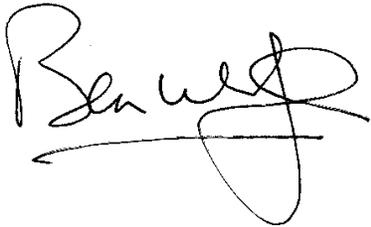
In summary, Reimagine Peterborough makes the following recommendations on the proposed Growth Plan for the Greater Golden Horseshoe, 2016:

- 1. We support the increased density targets.**
- 2. We support measures in the Plan that make intensification work for communities, such as natural heritage systems, parkland, green infrastructure, multi-modal transportation, sustainable design, community hubs, and full-cost accounting for growth planning.**

3. **We support the province’s directions on complete communities and complete streets.**
4. **We strongly encourage the province to implement diverse complementary measures that:**
 - a. **foster brownfields site remediation,**
 - b. **provide remedies for fire escapes in older buildings, and**
 - c. **enhance land acquisition and management for natural heritage systems.**
5. **We propose that measures to structure and foster public engagement be incorporated explicitly into the Growth Plan and be further supported by provincial guidance materials, training, reporting, oversight and associated measures.**

The future planning of our city and region are at a critical tipping point. Innovative planning is more important than ever to addresses the lessons of past development forms, the limitations in current processes, and new challenges and possibilities. We look forward to ongoing discussions with the province, the City and other participants in the updating of the Growth Plan, the City’s new Official Plan, and the implementation measures that will support both.

Sincerely,



Ben Wolfe



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On behalf of Reimagine Peterborough
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