



## What We Heard: Written Submissions

City of Peterborough Official Plan Update

November 2021

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## Introduction

This is a summary of questions and comments received by City staff after the release of the draft Official Plan in July 2021 and the City's respective responses. Please note that some comments have been listed verbatim and others are summarized and this comment matrix captures those comments received between October 7, 2021 and November 29, 2021.



## Bousfields Inc. (On behalf of Brookfield/BPH)

#	Comment/Question	City's Response
1	A down-designation will prevent Brookfield from developing their lands. As such, Brookfield/BPH requests that Council direct staff to revise the draft Official Plan to continue to permit the existing land use permissions on Brookfield/BPH lands and to remove the rural transitional area from these lands that Brookfield/BPH has clearly indicated an intent to develop.	Comment is noted.
2	Brookfield/BPH requests that Council direct staff to revise the intensification target and to share the details of their analysis with the public	The intensification target of 50% is consistent with the direction provided by Council in March 2018.

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#	Comment/Question	City's Response
3	<p>Brookfield/BPH requests to revise the population and employment forecast as well as the intensification and density targets and to remove the rural transitional area designation .</p>	<p>The City's land needs assessment was completed in accordance with the methodology established by the Province and in consultation with the Province/Ontario Growth Secretariat. The Province is satisfied with the assumptions and that the land needs assessment fulfills the requirements of the Provincial methodology. The provincial methodology does not require the exploration of alternative growth scenarios. The intensification and designated greenfield area density target are consistent with Council direction from March 2018.</p>

## County of Peterborough

#	Comment/Question	City's Response
1	Concerns around absence of Parkway mapping on Schedule D (Transportation).	The need for a new roads will be assessed through the Transportation Master Plan and changes will be made accordingly to the Official Plan. It is not the intent of the Official Plan policies to preconceive the outcomes of the Transportation Master Plan and/or Environmental Assessment process. Section 6.2.2 acknowledges that Schedule D: Road Network Plan and Schedule E: Bikeways and Trails Network Plan does not attempt to comprehensively delineate all future roadways, bikeways and trails. Future roadways, bikeways and trails may be delineated through the completion of a transportation master plan, detailed Secondary Plans, plans of subdivision and Environmental Assessments, and incorporated into Schedules D and/or E as part of an Official Plan Amendment.
2	We believe that the Future Municipal Roadway Corridor delineation should be deleted from Schedule D together with the associated policy section.	The Future Municipal Roadway Corridors were removed from Schedule D and respective policy in Section 6.2.6(j) was revised to state: "Where the City's Transportation Master Plan indicates the need to protect long-term future municipal roadway corridors in proximity to the City's boundaries to meet future needs for transportation and coordinated regional connectivity associated with growth

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#	Comment/Question	City's Response
		<p>beyond the population horizon of this Plan, the general location of Long Term Corridor Protection Areas may be identified on Schedule D: Road Network Plan by amendment to this plan, in consultation with the County of Peterborough and affected adjacent municipalities. Final alignments for any identified corridors will be determined on the basis of corridor protection studies and Class Environmental Assessments in partnership with the County and affected adjacent municipalities.</p> <p>Where Long Term Corridor Protection Areas have been identified with concurrence from the County and affected adjacent municipalities, the City will cooperate with the County and affected adjacent municipalities to protect these corridors through negotiation in the review of area plans, plans of subdivision and Official Plan and/or Zoning By-Law Amendments. Where the ultimate alignment and right-of-way of a long-term corridor has been determined, the City will seek to ensure the required road allowance is reserved either as part of, or independent from such planning approvals. Where such allowances have not been determined, the City will request a corridor study in conjunction with proposals to develop land where an allowance may be required to determine which portion of the subject land should be reserved for the future road allowance.</p>

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#	Comment/Question	City's Response
		<p>In addition to all applicable municipal requirements, all development proposals adjacent to and in the vicinity of Provincial Highways will be subject to Provincial review and approval. Early consultation with the Province is encouraged to ensure the integration of municipal planning initiatives with Provincial transportation planning. Areas identified for future development that are located adjacent to or in the vicinity of a Provincial Highway or an interchange/intersection will be subject to the Province's policies and standards."</p>
3	<p>Has any type of transportation impact analysis been undertaken with respect to the Prestige Employment Area identified between Chemong Rd and Fairbairn in the north end.</p>	<p>The population and employment associated with the Chemong West area and rest of the city was considered in the analysis for the Transportation Master Plan. As part of approving the zoning for any industrial land uses, traffic impact studies will be done to determine any required improvements to infrastructure.</p>

## Curve Lake First Nation

#	Comment/Question	City's Response
1	<p>It was very nice to see the Land Acknowledgement up front. It was very nice to see Michi Saagiig Peoples and Treaty 20 acknowledged. It was also very refreshing to see inclusions throughout the Draft OP regarding Michi Saagiig cultural history and the importance of Anishinaabemowin and of inclusion in place-naming etc</p>	<p>Comment is noted.</p>
2	<p>1.2 Purpose and Effect</p> <p>Please add:                      iv. Will be implemented in a manner that is consistent with the recognition and affirmation of existing Aboriginal and treaty rights in section 35 of the Constitution Act, 1982.</p> <p>This statement should come before the statement below – as this is how it is laid out in Section 4 of the PPS 2020.</p>	<p>Added suggested language to Section 1.2.</p>

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#	Comment/Question	City's Response
3	<p>4.3.8 Jackson Creek Special Policy Area Is there a Harper Creek Special Policy Area? There is cold water brook trout present in Harper Creek that requires special protection. This is an area of Aboriginal rights.</p>	<p>There is no Harper Creek Special Policy Area. As a note of clarification, Special Policy Areas are approved by the Minister of Natural Resources and Forestry and the Minister of Municipal Affairs and Housing and are used to enable communities that had historically settled in the floodplain to continue to use these areas subject to specific conditions. Harper Creek and fish habitat are protected under the Natural Areas policies.</p> <p>The City is also undertaking an update of the 1997 Harper Creek Subwatershed Study to create a detailed inventory of the water resource system, including the natural heritage features, functions, and cultural values of the Harper Creek subwatershed and to recommend a land use plan, detailed management strategy, and stormwater management strategy for the subwatershed.</p>
4	<p>4.6.2 Natural Areas Designation This section makes the following statement: d. Level B is comprised of the following natural heritage features and areas: i. Non-Provincially Significant Wetlands or Unevaluated Wetlands greater than 0.5 hectares or 0.2 hectares to 0.5 hectares that meet one or more of the following:</p> <p>Then in the following graphic: Table A: Natural Heritage Feature Minimum Vegetation Protection Zones:</p>	<p>The natural heritage system levels and minimum vegetation protection zones serve different purposes and are not necessarily intended to be consistent with each other. The width of the vegetation protection zone is to be determined by a site-specific Environmental Impact Study when development or site alteration occurs within 120 metres of a Level A, B or C natural heritage feature and will be of sufficient width to protect the feature and its functions from the negative impacts associated with the proposed development or site alteration. Where a site-specific Environmental Impact Study establishes the need for a</p>

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#	Comment/Question	City's Response
	<p>Provincially Significant Wetlands or Unevaluated Wetlands is listed as: 30 metres.            Non-Provincially Significant Wetlands or Unevaluated Wetlands that have been excluded from a wetland evaluation as per the Ontario Wetland Evaluation System for Southern Ontario are listed as: 15 metres.</p> <p>The above listed protective zones should be in-line with statements made in Sections c. and d.</p>	<p>vegetation protection zone that exceeds the minimum width specified in Table A, the larger recommended protection zone will be established.</p> <p>The treatment of unevaluated wetlands as provincially significant wetlands has been considered by the City and the City has made revisions in response to the comments received to apply the minimum 30 metre buffer to unevaluated wetlands, consistent with the minimum buffer for PSWs. The City has chosen not to extend full protection until such time that they are properly evaluated under OWES and found to meet the tests of a PSW. However, there is a policy commitment to work to get all wetlands in the City considered for evaluation under OWES.</p> <p>This goes to the evaluation of wetlands (which is something that the City supports), and the recognition that wetlands should not, and arguably can not, be evaluated on a site specific level such as when a single property is being developed – it would not be reasonable to force a single landowner to evaluate wetlands as part of one wetland evaluation across many landowners lands. With this suggested change, the removal of a wetland, no matter how small, would require its full OWES evaluation. As wetlands are defined by wetland plants, this could even include ditches and temporary or constructed ponds.</p>

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#	Comment/Question	City's Response
5	<p>Sections c. and d. should be revised to be consistent with defining criteria for the graduated approach of Levels A, B, C.</p> <p>We approach unevaluated wetlands as if they were provincially significant unless a wetland study demonstrates otherwise.</p>	<p>See response to comment #4.</p>
6	<p>In the same Table A, reference is made to being “in conjunction with Conservation Authority requirements.” There should be mention of “in conjunction with Treaty 20 obligations to First Nations,” or something similar. It should be noted that treaty and Aboriginal rights are much more pronounced regarding environmental protection and stewardship activities concerning natural features within the City of PTBO. The Official Plan should reflect a heightened awareness of Indigenous rights in sections that cover policy regarding natural areas and specific creeks and wetlands within the City.</p>	<p>The policies within Section 7.1 of the Plan are intended to address Treaty 20 obligations, notably those policies addressing respect, collaboration and consultation on rights and concerns.</p>

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#	Comment/Question	City's Response
7	<p>5.1 Cultural Heritage                      5.1.1 Introduction                      a. Peterborough's cultural heritage resources make a vital contribution to its unique sense of place, economic vitality and high quality of life for its residents. It is the objective of this Plan that the City's cultural heritage resources be identified, conserved, promoted and enhanced and that development should occur in a manner which protects and complements the City's heritage.</p> <p>"City's cultural heritage resources" indicates a possessive form. Not all cultural heritage resources can be said to belong to the City's history itself. As the history of the area spans thousands of years prior to the City's birth, this distinction should be made. Recommendation would be to remove the possessive form.</p>	<p>Revised this policy to state "It is the objective of this Plan that the cultural heritage resources within the city be identified, conserved...."</p>

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#	Comment/Question	City's Response
8	<p>The following section requires more respectful and robust wording:</p> <p>g. It is recognized that the geographic area of the City of Peterborough is located on Treaty 20 Michi Saagiig territory and in the traditional territory of the Michi Saagiig Nation. As such, the City will make every effort to ensure the notification and involvement of Indigenous Communities having interest in cultural heritage matters, as appropriate.</p> <p>The above statement does not conform to the PPS 2020 Section 2.6.5. The above statement should read: It is recognized that the geographic area of the City of Peterborough is located on Treaty 20 Michi Saagiig territory and in the traditional territory of the Michi Saagiig Nation. As such, the City [shall engage with these Michi Saagiig communities and consider their interests when identifying, protecting and managing cultural heritage and archaeological resources.]</p>	<p>The Growth Plan for the Greater Golden Horseshoe references both First Nations and Metis communities with respect to the management of cultural heritage resources. The second sentence of this policy has been revised to be consistent with the wording from PPS Section 2.6.5: “As such, the City shall engage with Indigenous Communities and consider their interests when identifying, protecting and managing cultural heritage and archaeological resources .”</p>

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#	Comment/Question	City's Response
9	<p>5.1.6 Archaeological Resources</p> <p>c. Where burial sites are encountered during any excavation or other action, the provisions of the Funeral, Burial and Cremation Services Act and its regulations will apply. The appropriate Indigenous Communities will be notified in regard to the encounter of burial sites and archaeological resources related to their ancestry.</p> <p>If any burial sites of an Indigenous context are encountered during any excavation or other activity within the City of PTBO, the appropriate Indigenous communities to contact are Curve Lake First Nation and Hiawatha First Nation. This should be stated in the above paragraph.</p>	<p>The reference to “appropriate Indigenous Communities” has been removed and the policy has been revised as follows:</p> <p>“c. Where burial sites are encountered during any excavation or other action, the provisions of the Funeral, Burial and Cremation Services Act and its regulations will apply. [Curve Lake First Nation and Hiawatha First Nation] will be notified in regard to the encounter of burial sites and archaeological resources <del>related to their ancestry</del> [of an Indigenous context].”</p>

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#	Comment/Question	City's Response
10	<p>g. Where the preservation of the archaeological resources in situ is not possible, the proponent must engage with appropriate Treaty 20 First Nations to address their interest in the resource and define interpretive and commemorative opportunities related to the resource. These measures will apply to any development projects, including infrastructure development, conducted by private property owners or the City of Peterborough.</p> <p>Please remove the word “appropriate” – it is redundant, as the 3, Treaty 20 First Nations are the appropriate First Nations to engage with. The First Nations could be named too: Curve Lake First Nation, Hiawatha First Nation, Scugog Island First Nation.</p>	<p>Removed “appropriate” from this policy.</p>

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#	Comment/Question	City's Response
11	<p>j. The City may, in partnership Indigenous Communities and relevant stakeholders, prepare an Archaeological Management Plan, to be reviewed on the same schedule as this Plan. A Contingency Plan will also be prepared, with the advice of a licensed archaeologist and the Province and adopted by By-Law, for emergency situations to protect archaeological resources that are accidentally discovered or are under imminent threat(s).</p> <p>“Indigenous Communities” should be replaced with “local First Nations.”</p>	<p>As mentioned above, the Growth Plan for the Greater Golden Horseshoe directs municipalities to work with First Nations and Métis communities in developing and implementing official plan policies and strategies for the identification, wise use and management of cultural heritage resources. Revised this policy to state j. The City may, in partnership [local First Nations, Métis] and relevant stakeholders, prepare an Archaeological Management Plan, to be reviewed on the same schedule as this Plan. A Contingency Plan will also be prepared, with the advice of a licensed archaeologist and the Province and adopted by By-Law, for emergency situations to protect archaeological resources that are accidentally discovered or are under imminent threat(s).</p>
12	<p>6.1.4 Water Resources As the OP refers to the Ojibwa Language and working to include Anishinaabemowin within City initiatives and projects, in a previous section, perhaps a comment on the word “Otonabee” would also be appropriate in this part of the OP on water resources. The Otonabee River is a significant feature in the City of PTBO, and the name itself is an Anishinaabe word. This should be included – similar to how Nogojiwanong is defined at the beginning of the OP. It is an opportunity for inclusivity and education.</p>	<p>Added language to Section 6.1.4(a) to acknowledge the meaning of Odenibi as follows:</p> <p>a. The City occupies nine primary watersheds that all drain into the Otonabee River[, which is named after an Anishnaabe word, meaning the river that beats like a heart.] Healthy watersheds and water resources are vital to the quality of life and health of residents of the City and downstream communities. The benefits of healthy watersheds include: safe drinking water, greater adaptive capacity in the face of climate change, erosion control, flood mitigation, fish and wildlife habitat and nature-based recreation opportunities.</p>

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#	Comment/Question	City's Response
13	<p>d. The City will promote and play a leadership role in the efficient and sustainable use of water resources, including practices for water conservation and sustaining water quality. Such practices may include encouraging educational initiatives, supporting other agencies with programs related to water conservation, sustaining water quality, incorporating stormwater management best practices, including green infrastructure and/or low impact development and considering technological and other system improvements to address such issues as inflow and infiltration of sanitary sewers.</p> <p>If the City of PTBO is to play a leadership role in the efficient and sustainable use of water resources, including Indigenous Knowledges is essential to that process. The practices as listed above should be inclusive of Indigenous Knowledge systems to determine appropriate and sustainable uses of water resources.</p>	<p>Added reference to "respecting Indigenous Knowledge systems" to list of practices in this policy, noting this is also the intent of the City's Watershed Plan and Implementation Plan.</p> <p>d. The City will promote and play a leadership role in the efficient and sustainable use of water resources, including practices for water conservation and sustaining water quality. Such practices may include encouraging educational initiatives, supporting other agencies with programs related to water conservation, sustaining water quality, [respecting Indigenous Knowledge systems], incorporating stormwater management best practices, including green infrastructure and/or low impact development and considering technological and other system improvements to address such issues as inflow and infiltration of sanitary sewers.</p>

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#	Comment/Question	City's Response
14	<p>A question that we have: Are there any limits or thresholds on the amount of waterfront development that can occur, while keeping the integrity of shoreline ecologies in-tact? How many septic systems, how much near shoreline and shoreline development is sustainable? How much is too much? The cumulative impact of waterfront development should be considered here. Thresholds should be implemented. Most waterbodies in and around the City of PTBO are suffering in some way or another. The massive soap-suds-like formations that cover the top of the Otonabee and float throughout the City is a visible symptom.</p>	<p>A point of clarification is that the establishment of new septic systems is not permitted within the city. Further, all waterfront is designated in the draft Official Plan as Major Open Space and Natural Areas.</p> <p>Consideration of cumulative impacts are in the policies related to the Stormwater Plan and Watershed Plan/planning. Section 6.1.4:</p> <p>c. The City will lead the implementation of watershed planning initiatives, in partnership with the Conservation Authority, neighbouring municipalities, Indigenous Communities and other agencies, that:</p> <p>iii. Address the long-term cumulative impact of development on the watershed as necessary;</p> <p>h. The City will develop a stormwater plan, or equivalent for its serviced settlement area that:</p> <p>iv. Examines the cumulative environmental impacts of stormwater from existing and planned development, including an assessment of how extreme weather events will exacerbate these impacts and the identification of appropriate strategies for building adaptive capacity;</p> <p>Watershed planning is defined in the draft Plan as: "Planning that provides a framework for establishing goals, objectives, and direction for the protection of water resources, the management of human activities, land, water, aquatic life, and resources within a watershed and for the assessment of cumulative, cross-jurisdictional, and cross-watershed impacts."</p>

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#	Comment/Question	City's Response
15	<p><b>7.0 IMPLEMENTATION</b>  <b>7.1 Indigenous Peoples of Canada and the Duty to Consult</b>            This section should be placed near the front of the document in terms of "how to read the document." There are several sections in the OP that refer to First Nations and treaty and traditional territories, as well as to Indigenous culture, history, and language. These references would have more context to the reader if the section on Indigenous Peoples of Canada was at the front of the document. This would add clarity to the inclusion of First Nations throughout the document. As it reads right now, there is no background as to how the Draft OP and its land-use planning policies relate to the First Nations. This section should be included up-front in the OP to add context and understanding to the greater document itself. Constitutionally protected rights.</p>	<p>The addition to the recommended language to Section 1.2 Purpose and Effect "iv. Will be implemented in a manner that is consistent with the recognition and affirmation of existing Aboriginal and treaty rights in section 35 of the Constitution Act, 1982" will provide additional context and understanding at the beginning of the document. It is noted in Section 1.4 that the Plan is not intended to be read as individual, stand-alone Sections addressing specific topics, but rather the Plan needs to be read as a whole to support successful city-building.</p>

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#	Comment/Question	City's Response
16	<p>The Heading should read: 7.1 Indigenous Peoples of Canada and the Duty to Consult [and Accommodate]</p>	<p>The suggested revision requires additional direction from City Council and larger discussion separate from the Official Plan. In 2017, Peterborough City Council had considered the adoption of the Consultation and Accommodation Standards and Archaeological Protocol (Report CSD17-017, dated June 19, 2017 and Report CSD17-027, dated November 6, 2017); however these items were deferred to staff to be considered as part of a future report on the City's role in implementing action items relating to municipal mandate in response to the Truth and Reconciliation Commission of Canada: Cover Letter, Reconciliation Principles, and Calls to Action.</p>
17	<p>a. Peterborough is located on land which is in the traditional territory of the Michi Saagiig Nation and covered by Treaty 20 (Rice Lake Treaty, 1818). The modern First Nations signatories to Treaty 20 are Curve Lake, Hiawatha and Mississaugas of Scugog Island.</p> <p>The highlighted section should be corrected to: The signatories to Treaty 20 are Curve Lake First Nation, Hiawatha First Nation, and Scugog Island First Nation.</p>	<p>The correction has been made to this policy as suggested.</p>

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#	Comment/Question	City's Response
18	<p>b. In the spirit of reconciliation, in acknowledging the “free, prior and informed consent” as set out in the United Nations Declaration on the Rights of Indigenous Peoples as applied and interpreted by Courts of competent jurisdiction, and the right to carry out traditional pursuits in a respectful and unrestricted manner, Peterborough will continue its work on building a new relationship with the diverse Indigenous peoples who call Peterborough home. “Free, prior and informed consent” involves consulting with Indigenous Communities prior to development and gaining consent before moving forward, where appropriate.</p> <p>Free prior and informed consent is applied to First Nations communities with Aboriginal and treaty rights to the land – those that have the right to make decisions on land-use planning – as it pertains to harvesting rights. These discussions would only take place with Treaty 20 First Nations. This distinction must be made in the above paragraph.</p>	<p>Revised references to “the diverse Indigenous peoples who call Peterborough home” and “Indigenous Communities” in this policy and replaced with “Treaty 20 First Nations ”.</p> <p>“In the spirit of reconciliation, in acknowledging the “free, prior and informed consent” as set out in the United Nations Declaration on the Rights of Indigenous Peoples as applied and interpreted by Courts of competent jurisdiction, and the right to carry out traditional pursuits in a respectful and unrestricted manner, Peterborough will continue its work on building a new relationship with Treaty 20 First Nations. “Free, prior and informed consent” involves consulting with Treaty 20 First Nations prior to development and gaining consent before moving forward, where appropriate.”</p>

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#	Comment/Question	City's Response
19	<p>c. The City recognizes the urban Indigenous population in Peterborough and the broader interest of the Treaty 20 First Nations from a local and regional planning perspective. The City will engage and partner as appropriate with Indigenous Communities when considering planning matters that may affect their rights. Collaboration with the First Nations of Curve Lake, Hiawatha, Scugog Island, and other local First Nations will be the priority, with continued cooperation and communication with the Nogojiwanong Friendship Centre</p> <p>Please identify these "other local First Nations" whose rights may be affected by land-use planning in the City of PTBO?</p>	<p>This reference to "other local First Nations" was made in light of the comments/recommendations made at the meeting with Treaty 20 First Nations on September 24, 2019 to remove and replace the previous reference to Alderville First Nation with "other local First Nations". The reference to "other local First Nations" has been deleted.</p>

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#	Comment/Question	City's Response
20	<p>7.2 Public Consultation and Community Engagement 7.2.1 Introduction</p> <p>There is no introduction in the Indigenous Peoples duty to consult section. There should at least be equity in relation to these sections on Indigenous and public consultation processes.</p> <p>There are Sections and Subsections with the following headings: Objectives and General Policies. However, there are no such objectives or general policies regarding consultation processes with Indigenous Peoples. Again, there should be equity demonstrated here, and we are hopefully optimistic that objectives and general policies can be developed to include in the Indigenous Peoples of Canada section.</p>	<p>The objectives and general policies for public consultation and community engagement are intended to apply to everyone, including local First Nations. The intent of Section 7.1 is to provide additional policy direction, including the objectives and general policies regarding consultation processes with Indigenous Peoples.</p>

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#	Comment/Question	City's Response
21	<p>7.2.2 Public Meetings and Notification            There is no similar section in the Indigenous Peoples of Canada section 7.1. This section should be developed – Curve Lake First Nation and Hiawatha First Nation have Consultation and Accommodation Standards that serve to guide this process. They should be mentioned here.</p>	<p>As mentioned above, the proposed changes and adoption of the Consultation and Accommodation Standards require further direction from Council and will be contemplated as part of a future report on the City's role in implementing action items relating to municipal mandate in response to the Truth and Reconciliation Commission of Canada. It is important to note that the Official Plan is a living document and will be amended accordingly based on the direction of Council.</p>

## Downtown Business Improvement Area Association

#	Comment/Question	City's Response
1	Letter of support for proposed policies, as well as execution and consultation conducted in preparation of this Draft Official Plan.	Comments are noted.

## Ecovue Consulting

#	Comment/Question	City's Response
1	<p>eHeight limits within the Central Area – and in particular, eight storeys within the Downtown Core Area sub-designation – is inappropriate to achieve the Growth Plan density target of 150 jobs/units per hectare. Therefore, it is not necessary to limit heights in order to protect an established built form.</p>	<p>The proposed building heights and policy framework are consistent with the recommendations of the community urban design charrette completed by the Planning Partnership and Lett Architects in 2018. Through the community design charrette and other community consultation, there were concerns regarding additional height in the downtown. Higher building heights may be considered through an Official Plan Amendment where the proposed development is considered compatible development.</p>
2	<p>The highest level of intensification must occur within the Urban Growth Centre. A stricter height limitation within the Urban Growth Centre runs counter to the goals and objectives of the Growth Plan and the proposed OP.</p>	<p>The designation of the Urban Growth Centre in the Growth Plan does not mean its necessarily the primary area for intensification area; it does however come with specific policies and a density target. The draft Plan intends to promote intensification of different types throughout the city and balance the density target with other factors such as, compatibility with adjacent development, cultural heritage resources, urban design.</p>

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#	Comment/Question	City's Response
3	<p>The current OP encourages High Rise development within the Urban Growth Centre without any height limitations or restrictions. High Rise development is commonly understood to be over 10 storeys.</p> <p>Existing policies adequately provide the flexibility needed to encourage additional density within the core, without compromising the character of the downtown built form.</p>	<p>The current Official Plan has limitations with respect to density (units per hectare), which in addition to the zoning regulations limits the building height/built form. Please also refer to response #2.</p>

## Embee Properties

#	Comment/Question	City's Response
1	<p>Embee wishes to ensure its existing property rights, site-specific policies and approvals in principle, are properly embedded in the Draft Official Plan policies. Site specific exemption policies are offered in the Draft Official Plan; however, we would like to suggest that the City tighten up the language - The site specific exemption policies leaves a lot of interpretation in terms of the property boundary development limits and recognizing the previous approvals. As a suggestion, perhaps a map should be shown clearly delineating the subject property and its associated development limits.</p>	<p>The current Official Plan designates the subject property as Service Industrial and Service Commercial. The proposed permitted uses for the General Employment designation and site-specific policy are consistent with the current Official Plan, noting also that public parks, playfields, schools, public and private utility installations, transportation infrastructure/commuter facilities, institutional and quasi-institutional uses and other public service facilities are permitted in all designations, excluding the Natural Areas designation subject to the criteria of the draft Plan. Notwithstanding approvals with respect to the pre-grading of the site, the interpretation of boundary development limits is subject to a site-specific Environmental Impact Study to determine the applicable vegetation protection zone(s) for any natural heritage features.</p>

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2	<p><b>Flood plain mapping and development constraints</b>            The subject site has been pregraded and the floodplain designation seems irrelevant. We also have concerns with the proposed mapping as depicted in the City of Peterborough Draft New Official Plan Schedule 'F' Natural Heritage System and Environmental Constraints (i.e., flood plain area).</p>	<p>Regulatory floodplain limits are established by the Otonabee Region Conservation Authority. This is acknowledged in Section 4.1.3 which states that the delineation and regulation of hazardous lands and hazardous sites are generally shown on Schedule F: Natural Heritage System and Environmental Constraints and that changes to the boundary of hazardous lands and hazardous sites may be facilitated through a study approved by the Conservation Authority without the need to amend the Plan. With respect to the concerns regarding the floodplain mapping, this is a regulatory matter dealt with outside of the Official Plan and a permit will be required from the Otonabee Region Conservation Authority for development and site alteration within the regulated area.</p>
3	<p>We are also concerned with the policy language regarding Table A: Natural Heritage Feature Minimum Vegetation Protection Zones (i.e., wetlands). How would the City now evaluate these setbacks?</p> <p>We also have concerns with the proposed mapping as depicted in the City of Peterborough Draft New Official Plan Schedule 'F' Natural Heritage System and Environmental Constraints (i.e., Natural Areas mapping). Again, we would suggest that the City ensure that the existing development rights are protected and that the subject property is exempt from such policy provisions.</p>	<p>The subject lands have been identified as part of the Natural Heritage System in the draft Official Plan due to the presence of an unevaluated wetland and woodland. A preliminary natural heritage feature screening would be required to be undertaken and prepared by a qualified professional for any development, redevelopment or site alteration. If a natural heritage feature is identified within 120 metres of the subject property, an environmental impact study is required to identify and map all natural heritage features on site, including Natural Heritage System Level A, B or C features and demonstrate conformity with the requirements of the Natural Heritage System Level that may be affected.</p>

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#	Comment/Question	City's Response
	<p>Subject lands have been redesignated from Industrial to Natural Areas. Can the City please provide us with the rationale as to how the subject property has been redesignated leaving no room for any future development opportunities?</p>	<p>Level A features are afforded the highest level of protection and are intended to be protected in situ. Level B features are provided some flexibility in how they are protected where it can be demonstrated that a net gain in function will be achieved through mitigation or a compensation strategy. Level C features are given the most flexibility for considering development and site alteration where there is opportunity to replicate the function on site or elsewhere in the city. This level approach ensures that an appropriate balance is struck between protecting the key elements of the natural environment and the need to accommodate and manage future growth in a sustainable and healthy environment.</p> <p>With regards to Table A: Minimum Vegetation Protection Zones, a site-specific Environmental Impact Study would need to determine the appropriate vegetation protection zone. Section 4.6.2 requires an Environmental Impact Study to determine the extent of the vegetation protection zones based on the function of the feature. The intent is that vegetation protection zones are not predetermined; however, a minimum is identified in Table A.</p> <p>The draft Official Plan includes transition policies with respect to existing planning approvals as of the effective date of the Plan that were supported by an Environmental Impact Study (Section 4.6.2). Once the new Plan is in effect, any by-law passed by the 3</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
		<p>City, such as a Zoning By-law, must conform with the Plan. Should an application that has been deemed complete under the current Official Plan not receive a decision until after the new Official Plan is in effect, any decision on that application will need to conform with the new Plan unless Council deems it appropriate to consider an amendment to the new Plan within two years of it coming into effect.</p>
4	<p>Insofar as the site-specific permitted uses that are currently allowed on the subject property (i.e., service commercial, restaurants, and limited retail commercial), we are requesting that the City expand the permitted uses on these lands in order to create a more viable, cohesive, and complementary ancillary uses to the adjacent Casino and Hotel. Embee feels it could develop a neighbourhood/convenience retail plaza at this location, but is currently stymied by the limited use permissions. Retail commercial uses such as food/ grocery stores, pharmacy, liquor store/beer store, financial institution, and other typical convenience retail uses would be far more suitable for this property.</p>	<p>The proposed expansion of site-specific uses (i.e., food stores, pharmacy, retail commercial, and other convenience retail uses) are not consistent with the current, in-force Official Plan nor the draft Official Plan. In the draft Official Plan, such uses are directed to Neighbourhoods and Strategic Growth Areas to support the creation of complete communities. Retail uses are also limited within Employment Districts to the sale of products manufactured, processed or assembled on the premises. A change to this direction would need to be considered through an Official Plan Amendment. Regarding financial institutions, the proposed site-specific provision in the draft Official Plan permits service commercial uses. Service commercial uses are defined in the Plan as “a building or structure or part thereof where clerical, business, professional and administrative services such as banking, accounting, insurance, investment and financial planning, land use planning, engineering or</p>

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#	Comment/Question	City's Response
		<p>architectural services or the services of other consultants are provided and may include personal service uses such as florists, dry cleaning, tailors, travel agents, hair salons, day spas, and shoe repair, but shall not include any Adult Entertainment Use”.</p>

## General Public

This table summarizes written submissions received between October 7<sup>th</sup> and November 29<sup>th</sup> as well as feedback from the Public Open House held on October 21, 2021.

#	Comment/Question	City's Response
1.	Recommendation that the Maria Street extension be eliminated.	The Maria Street extension to Television Road requires an Environmental Assessment and the Official Plan would be amended accordingly to reflect the recommendations of the Environmental Assessment.
2	Recommendation that Ashburnham Drive be extended as an arterial road as shown generally on the enclosed Plan. This means that the collector street shown for the Ashburnham subdivision be altered and upgraded to an arterial road.	Section 6.2.2 acknowledges that Schedule D: Road Network Plan and Schedule E: Bikeways and Trails Network Plan does not attempt to comprehensively delineate all future roadways, bikeways and trails. Future roadways, bikeways and trails may be delineated through the completion of a transportation master plan, detailed Secondary Plans, plans of subdivision and Environmental Assessments, and incorporated into Schedules D and/or E as part of an Official Plan Amendment.
3	What is the proposed location for the collector road that would proceed north/south, generally parallel with Television Road, which would connect the west side of the Liftlock study area to Parkhill Road?	Future streets and transit systems shown on the Schedules to this Plan are shown in approximate locations only.

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
4	<p>I am aware that the current direction from Council remains that the Parkway with a bridge over Jackson Park is approved. There has been no vote/direction from the 2018-2022 Council that reverses or amends the standing approval for the Parkway that was voted by the previous 2014-2018 council. What is the status of the Parkway Project?</p>	<p>The Parkway project received a Ministerial Order in 2016 informing the city that it must complete an individual environmental assessment study to proceed with The Parkway.</p> <p>The need for a new roads will be assessed through the Transportation Master Plan and changes will be made accordingly to the Official Plan. It is not the intent of the Official Plan policies to preconceive the outcomes of the Transportation Master Plan and/or Environmental Assessment process.</p>
5	<p>How do you expand the "Schedule J" to include East City and Auburn on the OP And, create a heritage district for the Burnham Point on the OP?</p>	<p>The Official Plan does not designate heritage conservation districts – the Ontario Heritage Act requires that the Official Plan have provisions related to the establishment of a heritage conservation district. The creation of a heritage conservation district requires a study. The City is looking at undertaking a series of neighbourhood character studies to understand more fully the areas of heritage value in the city and how best to provide protection for the heritage resources therein.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
6	<p>The draft policies as highlighted are laudable. However it is my view consideration of these Official Plan policies should be paused and that study applicable urban design guidelines, development standards and new zoning regulations should be established before moving to approve them.</p>	<p>The draft Official Plan is required to contain policies allowing up to 2 secondary suites on a property per the Planning Act. Within three years of the new Official Plan coming into effect, the zoning bylaw will need to be updated to be consistent with the Official Plan and permit up to 2 secondary suites on a property. It is not appropriate to delay the policies with respect to secondary suites in order to establish zoning and design guidelines for secondary suites as these policies are needed for the Official Plan to achieve conformity with the Province's policies.</p>
7	<p>Council should take a short time to action the review and development of appropriate urban design guidelines, development standards: and zoning provisions so as to provide clear direction as to the City's expectations for such conversions so as to accommodate second units.</p>	<p>Please refer to response #6 of this section. The consideration and timeline of urban design guidelines will be considered as part of an implementation strategy for the Official Plan.</p>
8	<p>Provide stronger language in Section 2.2.1 to include carbon neutral footprint.</p>	<p>No further changes recommended – additional language has been added to the Vision, Guiding Principles and Context of the Plan with respect to climate change adaptation and mitigation.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
9	The visibility of indigenous people, their culture and their languages needs to be promoted in the city under section 2.2.3.	<p>Section 2.2.3 (Vibrant and Unique) acknowledges the importance of the local Indigenous language, known as Anishinaabemowin in Ojibwa, and including Indigenous place names on the landscape of the City and providing opportunities for Indigenous placemaking and working with Indigenous communities to celebrate and commemorate Indigenous history and/or culture in public spaces.</p> <p>Additional language was added to Section 6.1.4 Water Resources to acknowledge "Odenibi" and its meaning.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
10	Section 3 should promote 15 minute communities that include services such as doctors, dentists, convenience stores, children's play facilities, parks and active travel corridors	<p>Section 3 states that Peterborough will continue to develop as a complete community by managing growth in a logical and well-defined urban structure. The draft Plan identifies Strategic Growth Areas as the focus of intensification, which support the achievement of the prescribed Urban Growth Centre (UGC) density target and annual residential intensification target. Strategic Growth Areas include the Central Area and Mixed-Use Corridors. These areas are identified on Schedule A: Urban Structure and Schedule B: Land Use Plan.</p> <p>There is a focus on alternative modes of transportation and getting people out of cars (e.g., transit, walking and cycling). The Plan also focuses on establishing an urban structure that will support an enhanced transit system over time (e.g., though the identification of strategic growth areas – corridors and centres that form the basis of an enhanced transit system). In addition, there are policies promoting active transportation supportive facilities and transit supportive development.</p>
11	Section 4.2 should require expansion of joint use community open spaces within the city.	Section 4.2 (Neighbourhoods) encourages the joint use of community open spaces and institutional uses. The specific language used throughout the policies of this Plan is intentional and indicates the level of flexibility, or lack thereof, that exists in implementing this Plan.

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
12	Section 4.3.2 should talk about pedestrianization of Hunter Street Café district and other minor streets in that area.	The objectives of the Central Area state that all development within the Central Area are required be transit-supportive and pedestrian-oriented, incorporating high-quality design to support active transportation, and creating a strong public realm, which includes built form, architectural details, landscaping and signage to create a sense of place.

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
13	<p>The uncovering of Jackson Creek during period of redevelopment, should be a requirement instead of a consideration.</p>	<p>Section 5.4.1 states that “The City recognizes that there are many components that contribute to the City’s unique and vibrant sense of place for both residents and visitors to the community. These include Peterborough’s riverfront location on the Otonabee River and the Trent-Severn Waterway; its heritage resources, cultural amenities, rolling topography, scenic natural areas and waterfront trails; and the City’s distinctive public areas such as Little Lake, the Central Area, the Lift Lock and Jackson Park. In its approval of new development or redevelopment, the City will build on and enhance the amenity of these valued places, wherever possible.</p> <p>The draft Plan indicates that the City will investigate the feasibility of rediscovering/daylighting Jackson Creek in the Downtown. Further, Section 4.3.2 (Downtown Core Area Designation) states that “the design of sites which abut Jackson Creek should recognize and enhance the relationship of the site to the creek” and 4.3.5 (Downtown Neighbourhood Designation) states that “Development applications should demonstrate how they meet the following criteria: (iii) Recognize the natural amenities of the site, particularly sites which abut Jackson Creek and respect the Creek as a public amenity and pedestrian corridor.”</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
14	I like the designation of areas for strategic growth/mixed use that I would hope could be used for increasing density of residences & supporting small businesses.	Comment is noted.
15	I support the development of more off road trails, especially along Water Street between Hilliard & Carnegie. Bike lanes should be prioritized off the major streets.	Comment is noted. Improvements to the cycling network to be reviewed in the Transportation Master Plan and Cycling Master Plan. Both the Transportation Master Plan and The Cycling Master Plan are still underway and subsequent amendments may be required to the Official Plan to reflect the recommendations. Section 6.2.3 (Active Transportation) states that the City shall continue to provide for the development of bikeways by implementing the bikeway network as per the recommendations of the Transportation Plan and ensuring that all new development proposals and infrastructure works provide bikeways and support facilities
16	Opposed to removing the "parkway" road off Schedule D. We need a solution to the traffic in the city.	Please refer to response #4 of this section.
17	Building bypasses around the city outside the current city limits would not improve traffic flow within the city.	Those "Future Municipal Roadway Corridors" previously shown on Schedule D has been removed.

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
18	Draft roadway plan leaves all sorts of gaps and stubs and is incomplete.	Section 6.2.2 acknowledges that Schedule D: Road Network Plan and Schedule E: Bikeways and Trails Network Plan does not attempt to comprehensively delineate all future roadways, bikeways and trails. Future roadways, bikeways and trails may be delineated through the completion of a transportation master plan, detailed Secondary Plans, plans of subdivision and Environmental Assessments, and incorporated into Schedules D and/or E as part of an Official Plan Amendment.
19	The City needs to continue to recognize and enhance the following corridors: Jackson Creek Valley, the Harper Creek watershed area and the Parkway Corridor along the river.	It is the intent of the Natural Areas Designation to protect the health and water quality of the Otonabee River Watershed and all of the subwatersheds within the City and protect natural heritage features and their associated ecological functions. Section 7.13 states that the City will undertake a Restoration and Enhancement Strategy to guide acquisition, compensation, restoration and stewardship activities within the City. The Restoration and Enhancement Strategy will provide recommendations regarding the identification of priority areas for restoration, enhancement and securement using principles of conservation biology and landscape ecology, including special consideration of Regional Connections and Proximity Linkages, and will allow for compensation measures to be directed in a manner that will provide a benefit for the overall Natural Heritage System.

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
20	Planning procedures which apply to other lands in the City have to apply to the Trent Land and this should be clearly stated in the Official Plan because they constitute approximately 17% of City's natural areas.	The City's Official Plan is applicable to all lands within the City's boundary.
21	We need strong Official Plan policies to protect our green spaces and especially Natural Areas.	This is consistent with the intent of the Open Space and Natural Areas designations of the Plan.
22	There is no direction to have the EIAs reviewed by qualified individuals. The City needs to have EIAs reviewed to ensure the procedures follow confirm with good science and accepted protocols.	Section 7.21.2 states all required reports and/or studies shall be prepared in accordance with any applicable standards or specifications, and be completed by qualified professional consultants retained by and at the expense of the applicant.
23	The City needs to create Stewardship Plan for each natural area to provide guidance to City staff.	Section 7.13 states that the City will undertake a Restoration and Enhancement Strategy to guide acquisition, compensation, restoration and stewardship activities within the City. The City's Restoration and Enhancement Strategy will guide stewardship activities and priority areas for enhancement.
24	Implement signage for natural areas similar to City of London.	Please see response #23 of this section.

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#	Comment/Question	City's Response
25	4.6.1.a refers to the Natural Heritage System (NHS) approach as being preferable to protection of natural heritage features, as if such protection is not afforded by NHS, but it could be. Alter the wording slightly as follows: "Developing a Natural Heritage System approach is the preferred method to only protecting natural heritage features and their associated ecological functions". Note that the NHS approach needs a clearer explanation in order to justify that statement, as illustrated by the example in the next paragraph.	Comment is noted.
26	Provide stronger language in 4.6.2. For example: 'Conserve and restore biodiversity" or "Protect and rehabilitate natural heritage features and their associated ecological functions".	This intent is captured in the policy commitment for the City to undertake a Restoration and Enhancement Strategy.
27	Add to Policy 4.6.2 (i) "and their Adjacent Lands" (as defined in the Planning Act)	A point of clarification is the adjacent lands is the distance from the natural heritage feature for considering potential negative impacts.

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
28	4.6.2 d Seems to be inconsistent with Table A. Make all wetlands Level A until evaluated.	<p>The treatment of unevaluated wetlands as provincially significant wetlands has been considered by the City and the City has made revisions in response to the comments received to apply the minimum 30 metre buffer to unevaluated wetlands, consistent with the minimum buffer for PSWs. The City has chosen not to extend full protection until such time that they are properly evaluated under OWES and found to meet the tests of a PSW. However, there is a policy commitment to work to get all wetlands in the City considered for evaluation under OWES.</p> <p>This goes to the evaluation of wetlands (which is something that the City supports), and the recognition that wetlands should not, and arguably can not, be evaluated on a site specific level such as when a single property is being developed – it would not be reasonable to force a single landowner to evaluate wetlands as part of one wetland evaluation across many landowners lands. With this suggested change, the removal of a wetland, no matter how small, would require its full OWES evaluation. As wetlands are defined by wetland plants, this could even include ditches and temporary or constructed ponds.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
29	Development Policies k. n. (p. 120) the wording is confusing. It says that a vegetation protection zone shall be established when development is proposed within 120m of a Level A, B, or C natural heritage feature, but then immediately contradicts the 120m width by referring to Table A which has different guidelines on the width of the zone for particular types of natural heritage feature.	The recommendations of an approved site-specific Environmental Impact Study will determine appropriate buffer widths that is no less than those specified in Table A. The 120m is not a buffer width, this refers the trigger area for study to determine the ecological function and demonstrate that there will be no negative impacts on the natural features or their ecological function.
30	The 30m minimum for Provincially Significant Wetlands is very troubling. The Planning Act and general practice across Ontario sets 120m as the minimum.	Per the Provincial Policy Statement, the 120 m adjacent lands is a “trigger” area for study to determine the ecological function and demonstrate that there will be no negative impacts on the natural features or their ecological function. Policy 4.6.2 requires an EIS to determine the extent of the vegetation protection zones based on the function of the feature. The intent is that vegetation protection zones are not predetermined however a minimum is identified in Table A.
31	4.6.2 x The reference to compensating or offsetting unavoidable negative impacts to Level B NHS features provides insufficient information on how this would be done. Language in the Draft OP about the NHS approach is appropriate, but the approach is vague.	The draft Plan requires that the City prepare an Enhancement and Restoration Strategy to guide acquisition, compensation, restoration and stewardship activities and consider a mitigation hierarchy approach.

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#	Comment/Question	City's Response
32	<p>Preliminary Natural Heritage Feature Screening. The title "preliminary" here is more accurate than "complete" in the title of 7.21.2. The Draft OP does not provide its screening criteria.</p>	<p>"Complete" in the title of 7.21.2 refers to the development application requirements that must be provided in order to deem an application submission 'complete' under the Planning Act for review of the proposal. Preliminary Natural Heritage Feature Screening is one component of a broader list of items/requirements.</p>

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#	Comment/Question	City's Response
33	<p>Draft OP Natural Heritage components frequent reference is made to the Conservation Authority as an approving or requirement-setting body. However, the Planning Act defers to the Ministry of Natural Resources (now Northern Development, Mines, Natural Resources and Forestry) as the authority on Natural Heritage.</p> <p>MNDMNRF has the legislated authority on natural heritage components that is the basis for the Planning Act deference.</p> <p>The Conservation Authority's legislated responsibilities certainly cover some of the natural heritage concerns, such as hazard lands and water regulation. The Draft OP could helpfully indicate the role of the MNDMNRF along with that of the Conservation Authority in the application of the OP. For example, it might refer to that Ministry as having the responsibility for wetlands evaluation and offsetting as described in the <i>Wetlands Conservation Strategy for Ontario, 2017-2030</i></p>	<p>It is not within the purview/authority of the Official Plan to define/limit the role of Ministry of Northern Development, Mines, Natural Resources and Forestry nor the Conservation Authority – this is governed by other legislation.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
34	Schedule B or Schedule F should delineate different types of natural areas.	<p>The Natural Areas shown on Schedule E (now Schedule F) are not intended to represent an exhaustive inventory of all natural heritage features and their associated ecological functions. Certain components lend themselves to being expressed in a mapping better than others. Some features (Level A and B woodlands, wetland and watercourses) can be identified through aerial photo interpretation, background resources, and roadside surveys. Whereas other components (significant wildlife habitat, threatened or endangered species habitat, ephemeral drainage features) require site specific investigations and/or studies to identify and are therefore difficult to delineate within the context of the Official Plan Update. More importantly, they change over time, even over short time frames. These items do not lend themselves for mapping as part of the Natural Areas as shown on Schedule F. Some can not be shared in a public form due to feature sensitivity (e.g., the location of a sensitive endangered species). It is important to note that the mapping is meant to be a tool for the expression of the NHS and that the ultimate identification, implementation and protection of the NHS will be determined through the OP policies.</p>
35	Level B and C Features should be mapped.	Please refer to response # 34 of this section.

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
36	<p>The area of Trent University's Symons Campus is labelled as "Major Institutional Designation". However Trent University has repeatedly said in public that it will follow the policies and designations of the OP. So who is guiding whom? There does not seem to be a good reason why Trent's lands should not be divided into the 12 types of land use that are indicated for the rest of the city.</p>	<p>Major Institutional Designation does not solely refer to Trent Lands, but includes other Institutions such as Sir Sanford Fleming College and Peterborough Regional Health Centre. The Major Institutional designation provides flexibility to consider uses functionally associated with the university/major institution.</p>
37	<p>In public meetings about its ongoing improvements to the canal, the Trent-Severn Waterway/Parks Canada has stated that it plans two bike/pedestrian trails between Parkhill Rd. and Nassau Mills Rd., one on each side of the canal. Schedule E shows only the west bank trail.</p>	<p>Section 6.2.2 acknowledges that Schedule D: Road Network Plan and Schedule E: Bikeways and Trails Network Plan does not attempt to comprehensively delineate all future roadways, bikeways and trails. Future roadways, bikeways and trails may be delineated through the completion of a transportation master plan, detailed Secondary Plans, plans of subdivision and Environmental Assessments, and incorporated into Schedules D and/or E as part of an Official Plan Amendment.</p>
38	<p>The minimum vegetative buffer of 30 meters can be problematic especially for unevaluated wetlands. In the report "wetland and Stream Buffer size requirements - a review" Castelle, Johnson and Conolly( 1994) said " wetland buffer policies have often been established with significant regard for political acceptability but with little consideration of scientific data"</p>	<p>The recommendations of an approved site-specific Environmental Impact Study (EIS) will prescribe appropriate buffer widths, which may be no less than the minimum prescribed in Table A. An EIS will be required for any development application located within 120 metres of a natural heritage feature, which may be subject to peer review.</p>

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#	Comment/Question	City's Response
39	All bogs and fens regardless of size should receive level A protection because they cannot be compensated due to their formation.	Comment is noted.
40	It is good to see that under section 4.6.2 W that there is a commitment to evaluate all wetlands however, this may be unattainable due to a 260 year back log as reported in the report Back to Basics by Dianne Saxe.	A point of clarification is that this policy commitment pertains to the City. The city-wide wetland evaluation is being considered as part of the 2022 Capital Budget.
41	I recognize that under section 4.6.2 (n) there is a requirement to conduct individual environmental Impact studies however I am concerned that this might not take into account city wide wetland loss and the city has not recorded historic wetland loss	For clarification, Policy 4.6.2(n) relates to the minimum vegetation protection zone, which is a vegetated buffer area surrounding a natural heritage feature that is intended to protect the feature and their ecological and hydrological functions from the negative impacts of adjacent land uses. The purpose of the natural areas designation is to protect natural heritage features and their associated ecological functions. The Watershed Plan and Implementation Plan also seeks to support wetland ecosystem function.
42	<p>Over the last 2 years the traffic flow has increased to the point it's getting difficult to turn onto Fairbairn safely.</p> <p>How is the traffic going to be minimized on Fairbairn with new subdivision going in?</p>	Road improvements will be assessed through the Transportation Master Plan. Changes will be made accordingly to the Draft Official Plan - it is not the intent of the Official Plan policies to preconceive the outcomes of the Transportation Master Plan and/or Environmental Assessment process.

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#	Comment/Question	City's Response
43	<p>Is the draft official plan aligned with the United Nations 17 Sustainable Development Goals? (<a href="https://sdgs.un.org/goals">https://sdgs.un.org/goals</a>)</p>	<p>It is important to note that the Planning Act provides the rules on how land use planning is done in Ontario. It is a requirement that the Official Plan for the city be consistent with the Provincial Policy Statement and conform to A Place to Grow: Growth Plan for the Greater Golden Horseshoe. However, there are some overlapping goals with respect to the Official Plan and UN Sustainable Development Goals, such as making cities inclusive, safe, resilient and sustainable.</p>
44	<p>Clarification regarding the various timelines and planning horizon?</p>	<p>A point of clarification is that the planning horizon of the draft Official Plan is to the year 2051. The Planning Act requires that the official plan be reviewed, at a minimum, within 10 years of the Plan coming into effect and every 5 years thereafter.</p>
45	<p>Do not support the comment heard from the public that was mentioned in "What We Heard" section of the presentation regarding the establishment of a public or advisory committee to provide input on environmental impact studies. Will staff resources be increased?</p>	<p>Comment is noted. Report IPSPL21-042 dated November 8, 2021 will provide recommendations to support the development review process,</p>

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#	Comment/Question	City's Response
46	Concerns raised around the risk surrounding changes to Provincial policies and their implications to the Official Plan.	This is difficult to anticipate; however, changes in provincial government have a significant impact on planning processes and policies. Changes in provincial policy tend to be relatively subtle. Bill 108 and 197 has had a focus on speeding up the delivery of housing. The Official Plan is a living document that needs to be updated to respond to the local context, community priorities and provincial policies.
47	Clarifications around monitoring and evolutions to measure success and failure of the Draft Official Plan.	The Official Plan establishes a framework and includes policies that enable on-going monitoring of the effectiveness of this Plan as well its commitments (Section 7.3.3 a). The Plan will need to be reviewed, at a minimum, within 10 years of coming into effect and at least every 5 years thereafter until it is replaced with another new official plan. It is envisioned that an implementation strategy will be established to guide priorities, work schedule, and initiatives, including monitoring.
48	Questions with respect to Transportation Master Plan scope and the outcome on the Parkway Environmental Assessment requirements	Ultimately the environmental assessment

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#	Comment/Question	City's Response
49	Concerns with limiting heights (i.e., three storeys) in Neighbourhoods and desire to see more density.	It is the intent of this Plan to direct growth to appropriate locations, while minimizing undue, adverse development-related impacts on existing built-up areas. There is policy flexibility to consider development that is higher than 3-storeys considering the location and site conditions without the need to go through an official plan amendment.
50	What are the differences between regional connections and proximity linkages identified on Schedule F – Natural Heritage System?	Regional Connections are areas that provide a general pathway of connectivity between the City's Natural Heritage System and the County's Natural Heritage System. Proximity Linkages occur where Natural Heritage System Level A and Natural Heritage System Level B features occur within 60 metres of each other and a functional linkage is present.
51	The minimum buffer for wetlands is 30m in the Plan and the Provincial guidelines indicate 120 m.	A point of clarification is that the 120m refers to the trigger area for study to determine the ecological function and demonstrate that there will be no negative impacts on the natural features or their ecological function.
52	Concerns regarding housing affordability and the reduction of proposed development densities and housing units as a result of NIMBY and opposition from the neighbourhood (e.g., Armour/Cunningham)	The draft Official Plan provides enhanced language regarding compatible development.

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#	Comment/Question	City's Response
53	Has the City historically achieved the intensification target?	Since 2007, the city has achieved an average intensification rate of 49%.

## Kawartha Land Trust

#	Comment/Question	City's Response
1	<p>Wonderful to see such a focus on the natural environment in the new OP and the recognition that our natural heritage system needs to be protected both through strong public policy.</p>	<p>Comment is noted.</p>
2	<p>Through our work identifying and protecting a Natural Heritage System in the Kawarthas we have learned, time and again, that the key features of a natural heritage system rarely obey pre-existing lot lines on the map.</p> <p>KLT recommends that the City of Peterborough follow the example set by these provincial plans and municipalities and add a conservation severance amendment to the OP, either as part of s 7.13 Securement of Lands or s 7.11 Land Acquisition.</p> <p>“Despite other provisions of this Plan, the City may grant a consent and waive associated requirements where a recognized charitable organization will retain or otherwise protect a lot for natural or cultural heritage conservation purposes. This exception recognizes the intent to protect the</p>	<p>Section 7.13 of the draft Plan outlines mechanisms to secure lands within the Natural Areas Designation. This section also states that in instances where the City may not be able to acquire or secure in public ownership all of the lands that are within the that are within the Natural Areas Designation of the Natural Heritage System or within 120 metres of a natural heritage feature, the City shall consider the following stewardship techniques to ensure the appropriate level of protection for the natural heritage features and their associated functions: i. Municipal land use controls including zoning; ii. Information and education programs; iii. Stewardship agreements; iv. Charitable tax receipts; v. Conservation easements; and/or, vi. Any other appropriate agreements with the landowners.</p>

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#	Comment/Question	City's Response
	<p>feature and its functions for the long term. For clarity, the zoning may permit passive recreational uses, as well as buildings and structures outside of key features and vegetation protection zones, provided they are sensitively designed and used for conservation or education purposes.”</p>	

## MHBC (On Behalf of Activa Holdings)

#	Comment/Question	City's Response
1	Concerns regarding the extent of the Natural Areas designation mapping with respect to site specific property and corresponding wooded area located on lands.	The Natural Areas shown on Schedule F are not intended to represent an exhaustive inventory of all natural heritage features and their associated ecological functions. A site-specific environmental impact study will need to clearly identify and map all natural heritage features on site, including Natural Heritage System Level A, B or C features and other features.
2	NHS Area is larger than current Official Plan has identified.	Please refer to response #1 of this section.
3	We note that the Natural Areas Development policies draft Official Plan policies permit: "minor adjustments to the boundary of the Natural Areas Designation", without an amendment to the Official Plan, (Section 4.6.2.u). However, the Draft Official Plan does not contain direction regarding the meaning of the term "minor adjustment".	Section 8.1 states that provided that the intent of this Plan is maintained, minor adjustments to the location of boundaries shown on the Schedules to this Plan shall not require an Amendment to this Plan.

## Peterborough Public Health

#	Comment/Question	City's Response
1	<p>Support and acknowledgement for incorporation of the suggested elements into the Plan. Further commitment to provide support in selection of assessment tools for ongoing evaluation of this Plan as it relates to health assessment. Recommendation for creation of a Municipal Active Transportation Plan.</p>	<p>Comment is noted.</p>
2	<p>However, the implementation policies to ensure these stores are easily accessible by all residents (including those who do not have access to transportation) was not clearly outlined. For example, distributing large-scale food stores on a per capita system could result in low density development not meeting the threshold for a store, which means those residents may need to travel a far distance to access food. For circumstances like this, the City of Peterborough could use small-scale food stores to fill the gap, however the implementation criteria of small-scale food stores were also limited in the Final Draft OP. Furthermore, the small-scale food store definition did not include a minimum requirement for “healthy food”, which means these stores may not achieve any greater access to nutritious food across our City.</p>	<p>The intent is that small-scale food stores are permitted in Neighbourhoods and Strategic Growth Areas, where appropriate. It is not within the purview of the Official Plan to set minimum requirements (nor define) healthy food.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
3	<p>Recommendation to Add a Monitoring and Evaluation strategy to the “10-year strategic plan for Recreation, Parks, Arenas and Culture” to ensure a sufficient variety of open spaces types outlined in the draft Official Plan.</p>	<p>This is outside the scope of the Official Plan and would be reviewed as part of the 10-year strategic plan for Recreation, Parks, Arenas and Culture update.</p>

## Peterborough Bicycle Advisory Committee

#	Comment/Question	City's Response
1	<p>Recommendation 1: that Council strengthen the Official Plan's discussion of factors that will shape the City's Future and update the City Vision. The Vision needs to describe what they are, specifically, so that what Peterborough citizens value is both recognized in the Official Plan through the Vision and is protected and conserved through policy.</p>	<p>No change recommended - The vision was developed based on the input received through the public consultation activities, particularly the online surveys. Other sections of the Plan provide the intent to the policies of the Plan in further detail.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
2	<p>Recommendation 2: that Council reword the climate change policies to bind the City to implement them. The conditional nature of three of the four climate change policies remains, suggesting a lack of implementation will have no bearing on how the City (as opposed to its citizens) considers the successful implementation of the Official Plan.</p>	<p>Every sentence in the draft Official Plan has been reviewed in terms of the strength of the language. Municipalities are given authority in provincial legislation to compel on certain policy statements, but not all statements. It has been the approach of this draft Plan to use the strongest language where it has the authority to do so, and to soften the language (e.g., consider/encourage/may) where no full authority is provided.</p>
3	<p>Recommendation 3: that Council strengthen Official Plan provisions for “end-of-journey” active transportation parking, storage, and user needs.</p> <ol style="list-style-type: none"> <li>1. Include bicycle parking requirements in all policies where that identify automotive parking requirements. Currently, whereas the official plan comprehensively addresses the former, it does so only sporadically for active transportation users.</li> <li>2. Wherever the term "parking facilities at-grade and/or in structure." appears, "including bicycle parking" should be added to the policy.</li> </ol>	<p>Section 6.2.7 states that adequate and accessible off-street parking and loading areas shall be provided for all permitted uses. Specific requirements for vehicular and bicycle parking shall be articulated in the Zoning By-Law.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
4	<p>Recommendation 4: that Council strengthen Official Plan wording to clarify and commit the City to undertaking and implementing the Municipal Active Transportation Plan.</p>	<p>No change recommended - The specific language used throughout the policies of this Plan is intentional and indicates the level of flexibility, or lack thereof, that exists in implementing this Plan. The City's Cycling Master Plan is also underway</p>
5	<p>Recommendation 5: that Council include measures to strengthen intermodal connections by including policy direction to include secure bicycle storage at the central bus station, park-and-ride lots on the city periphery at bus route and cycling network termini.</p>	<p>Sub-section for Parking under Section 6: Transportation addresses the provision of adequate and accessible off-street parking and loading areas for all permitted uses. The Zoning By-law will include context appropriate on-site vehicular and bicycle parking as well as specific requirements.</p>

## Peterborough Field Naturalists

#	Comment/Question	City's Response
1	<ul style="list-style-type: none"> <li>4.6.2 k. i. Express an expectation to protect the habitat of Endangered and Threatened Species, subject to legislation, rather than to present development as the likely scenario; wording such as “The City recognizes the value of Threatened and Endangered Species habitat and, as a minimum, will seek to protect this habitat and meet provincial and federal legislation”.</li> </ul>	<p>This intent to protect natural heritage features and their associated ecological functions is expressed in Section 4.6.2.</p>
2	<ul style="list-style-type: none"> <li>4.6.2 k. ii and iii and 4.6.2 y.: For Level C areas, ensure application of a mitigation hierarchy (avoid, mitigate, replace), seek Conservation Authority advice, and a net gain for replacement habitat.</li> </ul>	<p>A mitigation hierarchy approach will be explored in the development of the Restoration and Enhancement Strategy (indicated in Section 7.13).</p>

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#	Comment/Question	City's Response
3	<p>end of Section 4.6.2 w, page 123] ... Further, wherever possible and in cooperation with others, the City will inventory, evaluate and appropriately designate those natural heritage features and ecological functions within its responsibilities, including Significant Woodlands, Valleylands, and Wildlife Habitat.</p>	<p>The Natural Areas shown on Schedule E (now Schedule F) are not intended to represent an exhaustive inventory of all natural heritage features and their associated ecological functions. Certain components lend themselves to being expressed in a mapping better than others. Some features (Level A and B woodlands, wetland and watercourses) can be identified through aerial photo interpretation, background resources, and roadside surveys. Whereas other components (significant wildlife habitat, threatened or endangered species habitat, ephemeral drainage features) require site specific investigations and/or studies to identify and are therefore difficult to delineate within the context of the Official Plan Update. More importantly, they change over time, even over short time frames. These items do not lend themselves for mapping as part of the Natural Areas as shown on Schedule F. Some can not be shared in a public form due to feature sensitivity (e.g., the location of a sensitive endangered species). It is important to note that the mapping is meant to be a tool for the expression of the NHS and that the ultimate identification, implementation and protection of the NHS will be determined through the OP policies.</p>
4	<p>[end of Section 5.3.1 b, page 149] ... Management plans will be developed as a priority for major natural and regional parks and areas, in conjunction with the Restoration and Enhancement Strategy.</p>	<p>Note: the draft current policy states "This may include the preparation of management plans."</p>

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#	Comment/Question	City's Response
		The specific language used throughout the policies of this Plan is intentional and indicates the level of flexibility, or lack thereof, that exists in implementing this Plan.
5	5.3.2 c. or d.: Where there is a proposal to eliminate open space parkland, then need consultation and a net gain in the City.	No change recommended - Section 4.2.4 states that the adequacy of public open space in the vicinity and City wide as a consideration, further noting that if a proposed amendment would result in development that would have a significant negative impact on the Natural Heritage System or disrupt the continuity of the linked open space system, the amendment will not be supported.
6	5.5 d.: All trees to be planted should be native species. We disagree with the recent change to "preferably native species". This leaves open the possibility of continuing to plant the introduced Norway Maple; a tree that produces a dark shade underneath, is invasive and is not wildlife-friendly	No change recommended – this policy was modified to prefer native species and acknowledge there are non-native species that are more climate adaptable.

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#	Comment/Question	City's Response
7	<p>[end of Section 7.21.2 j, page 278] ... and will require peer and possibly advisory committee review where development, site preparation or infrastructure is proposed within or in proximity to natural heritage features or functions, the Natural Area designation, the Natural Heritage System, or a primarily natural park.</p>	<p>The scope and mandate of the Peterborough Environmental Advisory Committee was determined through Council and is further defined in the terms of reference established in By-Law Number 19-052. Changes to the terms of reference for that advisory committee or establishment of a sub-committee would need to be discussed and determined through Council.</p> <p>Requirements for peer review may be considered as part of the Environmental Impact Study guidelines - noting that the draft Plan states that the City, in consultation with the Conservation Authority, Indigenous Communities, appropriate stakeholders and any other agency having jurisdiction, will establish Environmental Impact Study Guidelines or a Terms of Reference, to fulfill the policy requirements of this Plan and assist owners/applicants in identifying the scope of any required Environmental Impact Study.</p>
8	<p><b>Key Recommendations for Schedules B and F:</b> Planning staff should revisit the mapping from the Peterborough Natural Areas Strategy (1995) and ensure that all the areas in that study that have not since been developed, should be included in the natural area designations in the Official Plan.</p>	<p>Please refer to response #3 of this section.</p>

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#	Comment/Question	City's Response
9	Planning staff should examine mapping for provincially significant wetlands in the city to ensure that they are all reflected in the Official Plan natural areas mapping	Provincially significant wetlands are included in the Natural Areas mapping.
10	Schedule F (Natural Heritage System) should show, in addition to the designated natural areas, potential connecting links between natural areas as well as riparian buffers around all permanent watercourses in the city.	Please refer to response #3 of this section.
11	Designate the road verge along the Harper Creek trout stream as a thin park.	No changes recommended – the Major Open Space designation is not intended to capture every park – the Major Open Space Designation includes Community Parks and Regional Parks in excess of 3 hectares in size. Harper Creek, fish habitat and the associated vegetation protection zones are part of the Natural Areas designation.

## ReImagine Peterborough

#	Comment/Question	City's Response
1	<p><b>Add/revise underlined text:</b></p> <p><b>Section 4.6.2 (k)</b></p> <p>i. For Level A features, notwithstanding the permitted uses identified above, an Environmental Impact Study shall consider the protection <u>and restoration</u> of features and functions associated with the Natural Heritage System as paramount. Development and site alteration will not be permitted in Level A Provincially Significant Wetlands, Significant Woodlands, Significant Life Science Areas of Natural or Scientific Interest or Significant Wildlife Habitat in natural features. <u>Development and site alteration shall not be permitted in Fish Habitat nor in Habitat of Endangered Species and Threatened Species, except in accordance with provincial and federal requirements.</u></p>	<p>Section 7.21.2 states that an environmental impact study will recommend means of preventing, minimizing or mitigating impacts as well as opportunities for enhancing or restoring the quality and connectivity of the elements comprising the Natural Heritage System. The draft Official Plan states that in accordance with Provincial and Federal requirements, development and site alteration may be permitted in Level A Fish Habitat or Level A Habitat of Endangered or Threatened Species.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
2	<p><b>4.6.2 (k) ii.</b> For Level B features, additional issues may be considered where it can be demonstrated to the satisfaction of the City, in consultation with the Conservation Authority and any other agency having jurisdiction:</p> <ul style="list-style-type: none"> <li>- That there is no negative impact to the function of the features within the overall Natural Heritage System;</li> <li>- That a net gain of Natural Heritage System function will be achieved through compensation;</li> <li>- That conformity with Provincial and Federal policies regulation is achieved; <u>and</u></li> <li>- <u>That a priority has been applied to avoid, minimize and mitigate impacts before considering any compensation or relocation and that any of the latter activities are the responsibility of the proponent and include performance monitoring and contingencies.</u></li> </ul>	<p>A mitigation hierarchy approach will be explored in the development of the Restoration and Enhancement Strategy (indicated in Section 7.13).</p>

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#	Comment/Question	City's Response
3	<p><b>4.6.2 (k) iii.</b> For Level C features, additional uses may be considered where there <u>can be demonstrated to the satisfaction of the City and Conservation Authority that a replication and net gain will be achieved in Natural Heritage System functions elsewhere on-site or within the City as well as conform with Provincial and Federal policies/regulation, priority has been applied to avoid, minimize and mitigate impacts before considering any compensation or relocation, and that any of the latter activities are the responsibility of the proponent and include performance monitoring and contingencies.</u></p>	<p>The intent of the natural areas designation is to apply a graduated protective approach that reflects the function and significance of the various system components.</p> <p>See response to comment #3 regarding a mitigation hierarchy approach.</p>

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#	Comment/Question	City's Response
4	<p><b>4.6.2 (w).</b> The City, in coordination with appropriate parties, will evaluate all of the wetlands within the City following the Ontario Wetland Evaluation System for Southern Ontario to determine significance. Prior to evaluation of a wetland by the City, a landowner may complete an evaluation following the Ontario Wetland Evaluation System for Southern Ontario to determine significance. <u>Further, wherever possible and in cooperation with others, the City will inventory, evaluate, and appropriately map and designate those natural heritage features and ecological functions within its responsibilities, including Significant Woodlands, Valleylands, and Wildlife Habitat.</u></p>	<p>The Natural Areas shown on Schedule E are not intended to represent an exhaustive inventory of all natural heritage features and their associated ecological functions with the City of Peterborough. More importantly, natural heritage features can change over time, even over short time frames. It is also important to note that the mapping is meant to be a tool for the expression of the NHS and that the ultimate identification, implementation and protection of the NHS will be determined through the OP policies.</p>
5	<p><b>5.3.1 (b).</b> The City will manage municipally-owned land in an environmentally conscious manner. This may include the preparation of management plans to address practices such as the reservation of natural buffer strips in relation to water courses and the limitation of pesticides, herbicides and road salt being applied to lands adjacent to natural heritage features. <u>Management plans will be developed as a priority for major natural and regional parks and areas, in conjunction with the Restoration and Enhancement Strategy.</u></p>	<p>The specific language used throughout the policies of this Plan is intentional and indicates the level of flexibility, or lack thereof, that exists in implementing this Plan.</p>

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#	Comment/Question	City's Response
6	<p><b>[p. 247, new] 7.5.3 d.</b> Despite other provisions of this Plan, the City may grant a consent and waive associated requirements where a recognized charitable organization will protect or retain the lot for natural or cultural heritage conservation purposes. This exception recognizes the intent to protect the feature and its functions for the long term. For clarity, the zoning may permit passive recreational uses, as well as structures outside of key features and vegetation protection zones, provided they are sensitively designed and used for conservation or education purposes.</p>	<p>Section 7.13 of the draft Plan outlines mechanisms to secure lands within the Natural Areas Designation. This section also states that in instances where the City may not be able to acquire or secure in public ownership all of the lands that are within the that are within the Natural Areas Designation of the Natural Heritage System or within 120 metres of a natural heritage feature, the City shall consider the following stewardship techniques to ensure the appropriate level of protection for the natural heritage features and their associated functions: i. Municipal land use controls including zoning; ii. Information and education programs; iii. Stewardship agreements; iv. Charitable tax receipts; v. Conservation easements; and/or, vi. Any other appropriate agreements with the landowners.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
7	<p><b>7.21.2 (j).</b> Environmental Impact Studies are to be undertaken by the proponent in accordance with City/Conservation Authority requirements and approved by the City in consultation with the Conservation Authority and any other agency having jurisdiction. As a condition of approval, the City may peer review all or part of an Environmental Impact Study by the proponent in support of a development application, at the sole expense of the proponent, <u>and the City will require peer and possibly advisory committee review where development, site preparation or infrastructure is proposed within or in proximity to natural heritage features or functions, the Natural Area designation, the Natural Heritage System, or a primarily natural park.</u></p>	<p>The establishment of an advisory committee is beyond the purview of the Official Plan, where changes to the terms of reference for any advisory committee or establishment of a sub-committee would need to be discussed and determined through Council. However, it is noted that peer review is a more advisable and effective tool. The draft Plan requires that the City prepare environmental impact study guidelines (in consultation with the Conservation Authority, Indigenous Communities, appropriate stakeholders and any other agency having jurisdiction), which can further explore triggers for peer review.</p>

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#	Comment/Question	City's Response
8	<p><b>5.7 (b).</b> The City will promote development and land use patterns that conserve biodiversity and consider the impacts of a changing climate. The City has adopted the Greater Community/Sustainability Peterborough Plan (2012) and Greater Peterborough Climate Change Action Plan (2016) <u>and Climate Change Declaration (2019)</u> to reduce local contribution to climate change and to better prepare for a changing climate. In addition the City <u>will make every effort possible to support and advance:</u></p> <ul style="list-style-type: none"> <li>i. The preparation of Sustainable Neighbourhood Action Plans for all existing communities identified as Neighborhoods on Schedule A: Urban Structure;</li> <li>ii. The establishment of climate change action policies which build adaptive capacity, and which would apply to all capital works projects, including those within existing neighborhoods;</li> <li>iii. Developing strategies to reduce greenhouse gas emissions and improve resiliency;</li> <li>iv. The development of greenhouse gas inventories and forecasts; and</li> <li>v. Monitoring and reviewing greenhouse gas emission targets.</li> </ul>	<p>The Climate Change Declaration is indicated in the Context section of the draft Plan. The specific language used throughout the policies of this Plan is intentional and indicates the level of flexibility, or lack thereof, that exists in implementing this Plan.</p>

#	Comment/Question	City's Response
9	<p><b>Arts, Culture and Heritage</b>  <b>[p. 141, new] 5.1.8 Arts and Culture</b>  <u>a. The City recognizes and supports:</u>            i. <u>a vibrant arts and culture sector;</u>            ii. <u>the preservation and enhancement of indoor and outdoor cultural production, exhibition and performance spaces;</u>            iii. <u>the unique housing needs of artists and cultural workers, such as live-work studios, home-based galleries, production spaces, and proximity to exhibition and performance spaces, particularly in the Central Area; and,</u>            iv. <u>the need for streamlined licensing and permitting for arts and culture events.</u>  <u>b. The City will investigate and, where feasible, advance the identification, designation and celebration of a “cultural district” in all or a portion of the Central Area.</u>  <u>c. The City will involve and integrate the arts and culture sector in any community improvement plan, community benefit by-law or Heritage Conservation District, particularly where they may affect the Central Area.</u></p>	<p>Recognition of the arts and culture sector is acknowledged in Section 2.2.5 Strong and Diverse Economy.</p> <p>Live-work units are permitted uses in the Central Area and Mixed-Use Corridors. The Central Area designations also permit home occupations, artisan studios, galleries and associated retail sales facilities.</p> <p>Consideration of these uses may be explored further in the Community Benefits study/by-law and a cultural district may be considered through update through Central Master Plan/Secondary plan.</p> <p>Community consultation is a requirement of any community improvement plan, community benefit by-law and heritage conservation district.</p>

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#	Comment/Question	City's Response
10	<p><b>[p. 145] 5.2.4 f iii.</b> Considering affordable or accessible housing as priority uses for surplus City-owned land and working with other <u>organizations, institutions and</u> levels of government to make surplus land available to providers of affordable or accessible housing development, <u>including non-profit and community land trust organizations</u>, at little or no cost;</p>	<p>The Official Plan does not preclude the consideration of this recommendation.</p>
11	<p><b>[p. 147] 5.2.5 a iv.</b> Satisfactory incentives <u>or space</u> being provided to established tenants to allow them to purchase or remain in the unit, <u>including a live-work unit, or otherwise in the building</u> after the conversion to condominium;</p>	<p>Under the Residential Tenancies Act, any tenant at the time that the property is converted to condominium, may have the right to continue to rent their units or to purchase the unit. Further, the results of a Rental Market Impact Study/Rental Housing Conversion Assessment would need to demonstrate that there are no adverse impacts on the supply or range of rental housing.</p>

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#	Comment/Question	City's Response
12	<p><b>4. Public Engagement</b>            [p. 234] 7.2.1 (f). Community engagement will take place early in the planning process and on a continual basis, as practical and appropriate.  <u>Effective and meaningful public engagement will be practiced at all reasonable opportunities and will apply at least the values and the “involve” level of participation as described by the International Association for Public Participation.</u></p>	<p>Section 7.2.1 states as one of the objectives to provide equitable opportunity for a wide demographic to be informed and involved on planning matters. Further, this section states that the City will provide opportunities for community engagement during: i. The Municipal Comprehensive Review, and amendments to this Plan; ii. The development and review of the Zoning By-Law and other applicable By-Laws; iii. The preparation and review of Secondary Plans, other Area-Specific Planning Studies, and Community Improvement Plans; iv. The development review process, where appropriate; and, v. Any other planning matter that the City considers appropriate for public engagement.</p>

## RNLANDPLAN Consultants Inc (On behalf of Aon Inc)

#	Comment/Question	City's Response
1	<p>Site specific concerns with the Woodlands designation based on the 0.2 ha requirement. Do not support the proposed Natural Areas designation. The Natural Areas designation could effectively prohibit an appropriate development of the entire site.</p> <p>There is no natural wetland, woodland or valley feature, no watercourse and no significant wildlife habitat and no area of natural and scientific interest.</p>	<p>The City of Peterborough is committed to increase woodland cover over time, and at a minimum the maintenance of woodland cover. Area thresholds based on patch size analysis were incorporated in the development of the significance criteria that reflect existing woodland cover within the City of Peterborough. The draft Official Plan requires a Preliminary Natural Heritage Screening to determine whether any natural heritage features exist on or adjacent to the subject site that meet the criteria for natural heritage system Level A, B, or C. If a natural heritage feature is identified within 120 metres of the subject property, an environmental impact study is required to identify and map all natural heritage features on site, including Natural Heritage System Level A, B or C features and demonstrate conformity with the requirements of the Natural Heritage System Level that may be affected. Level A features are afforded the highest level of protection and are intended to be protected in situ. Level B features are provided some flexibility in how they are protected where it can be demonstrated that a net gain in function will be achieved through mitigation or a compensation strategy. Level C features are given the most flexibility for considering development and site alteration where there is opportunity to replicate the function on site or elsewhere in the city. This level approach ensures that an appropriate balance is struck between protecting the key elements of the natural environment and the need to accommodate and manage future growth in a sustainable and healthy environment.</p>
2	<p>Concerns with the Land Needs Assessment outlined by the UrbanMetrics report (September 2021).</p>	<p>Please refer to UrbanMetrics table for comments and responses.</p>

## Richard Taylor Law (On Behalf of 2340981 Ontario Inc.)

#	Comment/Question	City's Response
1	<p>Was a Transportation Plan Analysis and Traffic Impact Study associated with the proposed Prestige Industrial Park in the north end/Chemong Road west completed as part of the decision-making process?</p>	<p>The population and employment associated with the Chemong West area and rest of the city was considered in the analysis for the Transportation Master Plan. As part of approving the zoning for any industrial land uses, traffic impact studies will be done to determine any required improvements to infrastructure. A secondary plan process would also be an appropriate approach to address transportation, municipal infrastructure, phasing of development, natural heritage system and other matters.</p>
2	<p>The cost associated with infrastructure improvements, and financial impact, represented by this proposed Industrial Park should also be available for full public viewing and disclosure.</p>	<p>Section 7.15 of the draft Plan states that the City will prepare a background study and enact a By-Law under the Development Charges Act, to ensure that the capital cost of growth related services does not place a financial burden upon the City's existing taxpayers and that new taxpayers bear no more than the growth-related net capital cost attributable to providing the current level of services. The development charges background study forecasts future residential and non-residential growth to determine infrastructure needs and costs. A background study must be completed at least every five years and at least one public meeting is held before passing a development charge by-law.</p>

## What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
3	The adverse impacts, whether it be environmental, or demonstrative upon neighbourhoods, should also be made available	Please refer to response #1 & #2 of this section.

## Risk Management Official (O.R.C.A.)

#	Comment/Question	City's Response
1	<p>The suggested revisions to achieve consistency are <b>shown in red font</b> below.</p> <p><b>Highly Vulnerable Aquifer</b> A type of Vulnerable Area defined under the Clean Water Act, 2006, that identifies <b>A</b>an aquifer on which external sources have or are likely to have a significant adverse effect, and includes the land above the aquifer.</p> <p><b>Intake Protection Zone</b> A type of Vulnerable Area defined under the Clean Water Act, 2006, <b>An area</b> that is related to a surface water intake and within which it is desirable to regulate or monitor drinking water threats.</p> <p><b>Significant Groundwater Recharge Area</b> A type of Vulnerable Area defined under the Clean Water Act, 2006, within which it is desirable to regulate or monitor drinking water threats that may affect the recharge of an aquifer.</p> <p><b>Vulnerable Area</b> An area defined under the Clean Water Act, 2006, for the purpose of protecting the quality and quantity of drinking water sources, now and in the future.</p> <p><b>Wellhead Protection Area</b> A type of Vulnerable Area defined under the Clean Water Act, 2006, that is related to a wellhead and within which it is desirable to regulate or monitor drinking water threats.</p>	<p>This suggested revision will be deferred to the approval authority for further consideration.</p>
2	<p>There's an "is" missing in the definition for Intake Protection Zone 1);</p>	<p>Correction made.</p>

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#	Comment/Question	City's Response
3	<p>Consider Policy G-3 of the Trent Source Protection Plan (<a href="http://trentsourceprotection.on.ca/images/SPPs/Trent_Approved_SPP_August2020.pdf">http://trentsourceprotection.on.ca/images/SPPs/Trent_Approved_SPP_August2020.pdf</a> (pg 29)) which addresses <b>Land Acquisition in Vulnerable Areas</b> (i.e. Intake Protection Zones 1 and 2 for the Peterborough Municipal Surface Water System). This policy has a Must Confirm Legal Effect and identifies the Municipality as the Implementer. The policy text reads as follows:</p> <p>G-3(1)            "To prevent the activity causing the threat, consider the purchase of properties located in the most vulnerable areas on an ongoing basis. Criteria for evaluating the feasibility of purchasing land can include, but are not limited to:</p> <p>a) The nature of any existing and potential future significant drinking water threats;            b) The availability of the lands for purchase; and            c) The availability of funds and financial feasibility."</p> <p>Given the above, should 7.11(b) be revised to include reference to the most vulnerable areas (which are the Intake Protection Zone 1 and 2)</p>	<p>Edit to add "lands within the Intake Protection Zones" to Section 7.11(b) is proposed and subject to Council approval.</p>
4	<p>Please note that <b>the IPZ-3 for Hastings is relevant to the City's draft OP</b>. Why? Because it extends upstream into the City ending only where the IPZ-1 for Peterborough begins. The IPZs are hydrologically connected - the Otonabee River flowing through Peterborough receives inputs from the municipal storm sewer system and flows down through Rice Lake and into the Trent River which is the source of municipal drinking water for Hastings. As a result, much of the City is within an IPZ (be it the IPZ-3 for Hastings or the IPZ-1 or 2 for Peterborough). The City's IPZ-1 and 2 are shown by dark and medium blue shading on the</p>	<p>This note will be deferred to the approval authority for further consideration.</p>

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#	Comment/Question	City's Response
	<p>map below; the IPZ-3s for Peterborough AND Hastings are shaded light blue (Map source: <a href="#">MECP Source Protection Information Atlas</a>)).</p> 	

## SGL Planning

#	Comment/Question	City's Response
1	<p>Concerns with respect to the intensification target of 50%. Concerns with Rural Transitional areas affecting lands currently designated for urban land uses. Concerned with higher density targets are not reflective of the current market demand.</p>	<p>The intensification target of 50% and density target of 60 residents and jobs per hectare for new greenfield subdivisions are consistent with the direction provided by Council in March 2018. The City has achieved, on average, an intensification rate of 49% since 2007.</p>
2	<p>Transportation concerns on limitations of access from arterial and collector roads for mid- and high-rise developments. Policies 4.2.2 i) i) and 4.2.2 k) i) of the draft Official Plan state that mid-rise and high-rise developments shall have direct access to a Collector or Arterial road. The policies should be revised to recognize that in some cases, it may be appropriate for mid-rise and high-rise development to have direct access to a Local Roads.</p>	<p>Flexibility is already provided with respect to mid-rise development. Secondary access may still be considered to and from Local Roads.</p>

What We Heard: Written Submissions Post Draft OP Release

#	Comment/Question	City's Response
3	Concerns regarding minimum height density of 2 storeys as it relates to expansions for existing 1 storey developments. In our opinion, this policy is not appropriate for primarily commercial uses on sites along the corridors (which are permitted as stand-alone commercial uses), and the minimum building height policy should be removed.	It is the intent of the Major Mixed-Use Corridor designation to intensify over time with higher density development. It is also a requirement of the draft Plan that development in Strategic Growth Areas minimize land uses and built form that would adversely affect the achievement of transit-supportive densities. For those reasons, no changes have been proposed to remove the minimum building heights.
4	Concerns with the Natural Heritage Mapping accuracy. Further we request that policy 4.6.2 t) be deleted, as any changes to the Natural Areas designation that are warranted through the submission of an Environmental Impact Study should be permitted within an amendment to the Plan	Comment is noted. The Natural Areas shown on Schedule E are not intended to represent an exhaustive inventory of all natural heritage features and their associated ecological functions with the City of Peterborough. The policies of the Plan require site-specific studies/EIS to identify and delineate the boundaries of natural heritage features and areas.
5	Seeking clarification on how the increased affordable housing target of 20% will be achieved.	The intensification and density targets support higher density housing forms where housing generally is more affordable due to reduced per unit land costs. In addition, the Plan identifies additional considerations to support affordable and accessible housing objectives as well as enabling policies for additional residential dwelling units, mix of housing types, and the opportunity to provide financial incentives where appropriate.

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#	Comment/Question	City's Response
6	Concerns regarding vistas and view sheds surrounding complete streets policies. We request that the sentence that states "The road network shall be designed to provide vistas and view sheds to public parks and open spaces and to the Natural Heritage System to assist in the creation of a sense of place" be removed or reworded to recognize that it is not always possible or feasible to achieve vistas and view sheds	The guiding framework in the Official Plan Charrette: Nodes, Corridors and Downtown Urban Design Guidelines prepared in August 2018 states that "Streets have 'windows' to large open spaces including environmental areas, community parks, and schools, providing views, and pedestrian/cycling access to those features.". Council had received and approved in principle the Urban Design Guidelines for consideration in drafting the Official Plan.
7	Concerns with application of urban design policies, which enable street edges and active frontages to residential uses. In our opinion, policy 5.4.3 a) should be revised to focus on commercial uses	This design guideline was taken from the Official Plan Charrette: Nodes, Corridors and Downtown Urban Design Guidelines prepared in August 2018. Council had received and approved in principle the Urban Design Guidelines for consideration in drafting the Official Plan.
8	Seeking clarification on the provision for and support of pedestrian, cycling and public transportation within 500m of new development being applied to all public right of ways.	The intent of this policy is that development will support active transportation and use of public transit

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#	Comment/Question	City's Response
9	We do not support the down-designation of any lands that are currently designated for urban land uses. We request that the City revise the draft Official Plan to carry over the existing urban land use permissions for all these lands.	Comment is noted. The Growth Plan requires a that a land needs assessment be completed in accordance with the Provincial Methodology and delineate excess lands based on the land needs assessment.
10	We request that City Council refer the draft Official Plan back to staff to identify a more appropriate DGA density target that is reflective of market demand in the City of Peterborough, and that City Council then request an alternative DGA density target accordingly.	On March 18, 2018, Council endorsed the achievement of a minimum of 55 to 65 residents and jobs per hectare in new subdivisions. The City's lands needs to 2051 have been determined based on the achievement of an overall minimum density of 50 residents and jobs per hectare in the designated greenfield area And 60 residents and jobs per hectare for new subdivisions. These targets are consistent with the Council direction from March 2018.

## Spears + Associates (On behalf of BentalGreenOak)

#	Comment/Question	City's Response
1	<p>Site specific concerns with respect to existing food store permissions and how the new official Plan designates food stores.</p>	<p>The intention is that a large format food store is considered a "Retail use" and identified as a permitted use in the Major Mixed Use Corridor which is where this property would fall. Section 4.1.4 indicates that large format food stores are directed to 'Strategic Growth Areas' (Schedule A – Urban Structure) which includes the Major Mixed Use Corridors (Schedule B Land Use Plan).</p> <p>Additional clarification has been added to the list of permitted uses within Major Mixed Use Corridors to state: Retail and service commercial uses, [including large-scale food stores subject to the policies of this Plan].</p>
2	<p>General concerns whether medical office and clinics fit into the 'Office' use which is not defined in Draft Official Plan.</p>	<p>Healthcare offices and clinics are permitted in the Major Mixed Use Corridor designation of the draft Official Plan. The term office use within the Major Mixed-Use Corridor in the Plan is intended to include office uses of all types (e.g., commercial, medical, social service, administrative, government and institutional), with the exception of major office. The zoning by-law will establish the appropriate range of permitted uses on a site-specific or area-wide basis.</p>

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#	Comment/Question	City's Response
3	<p>Concerns around height limits of minimums and maximums in Major Mixed Use Corridor Designation. Properties with one story building height would not comply with this Draft Official Plan. BGO would suggest there be no minimum height regulation.</p>	<p>It is the intent of the Major Mixed-Use Corridor designation to intensify over time with higher density development. It is also a requirement of the draft Plan that development in Strategic Growth Areas minimize land uses and built form that would adversely affect the achievement of transit-supportive densities. For those reasons, no changes have been proposed to remove the minimum building heights.</p>
4	<p>Seeking site specific clarification on interim built form policies for properties not in conformity with new Draft Official Plan. BGO would suggest that there needs to be a clear understanding that in the short to mid-term the subject property will be permitted to continue as a one-storey shopping centre and will be allowed to expand (additions, renovations) with heights appropriate for retailers.</p>	<p>BGO suggested that there needs to be a clear understanding that in the short to mid-term the subject property will be permitted to continue as a one-storey shopping centre and will be allowed to expand with heights appropriate for retailers. The Planning Act requires that the zoning by-law be updated to ensure conformity with the official plan within three years of the official plan taking effect. The rights to continue as legal non-conforming uses are entrenched in the Planning Act (as well as Section 7.6 of the draft Official Plan), where any use which legally existed on the date the zoning by-law was passed can continue and noting the zoning by-law is not retroactive. Upon the new zoning by-law and minimum building height taking effect, existing one-storey shopping centers may seek permission from the Committee of Adjustment to permit the enlargement or extension of a building or structure where the use of the building or structure is a legal non-conforming use.</p>

## Township of Cavan Monaghan

#	Comment/Question	City's Response
1	Requesting written confirmation that there is no need to continue boundary adjustment discussions with the Township of Cavan Monaghan at this time.	For this new Official Plan, Council directed staff to focus land uses within the municipal boundary.
2	Supporting the position that development of the Rural Transitional Area is not permitted until the lands are redesignated through a Municipal Comprehensive Review; and	Comment is noted.
3	Supporting the protection of Employment Districts for employment uses;	Comment is noted.
4	Supporting the preparation of an Employment Lands Strategy in collaboration with Peterborough County and the Township;	Comment is noted.
5	Requesting that the City, County and Township develop a more collaborative approach to planning for the Peterborough Airport and surrounding area;	This may be considered as part of an Employment Lands Strategy and/or Economic Development Strategy – both are policy commitments of the draft Official Plan.

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#	Comment/Question	City's Response
6	Requesting the policy framework be amended to permit the consideration of cross-border servicing for regionally significant employment related projects	It is a policy of the current official plan that municipal utility services, sanitary sewer and water supply are not extended beyond the City. However, it is a requirement of the draft Plan that the City develop an Economic Development Strategy in co-operation with the County of Peterborough, other levels of government and key agencies and stakeholders. It is also a policy of the Official Plan to liaise with the County of Peterborough and surrounding municipalities in managing its future growth and development.
7	Requesting the policy framework be amended to require an official plan amendment to permit the upgrade to or expansion of municipal utility services, sanitary sewer and water supply to the Peterborough Airport;	Comment is noted.
8	Requesting that the portion of the "Future Municipal Roadway Corridor" in the North Monaghan Ward of the Township be removed from the Plan;	The Future Municipal Roadway Corridors were removed from Schedule D and respective policy in Section 6.2.6(j) was revised to state: "Where the City's Transportation Master Plan indicates the need to protect long-term future municipal roadway corridors in proximity to the City's boundaries to meet future needs for transportation and coordinated regional connectivity associated with growth beyond the population horizon of this Plan, the general location of Long Term Corridor Protection Areas may be identified on Schedule D: Road Network Plan by

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#	Comment/Question	City's Response
		<p>amendment to this plan, in consultation with the County of Peterborough and affected adjacent municipalities. Final alignments for any identified corridors will be determined on the basis of corridor protection studies and Class Environmental Assessments in partnership with the County and affected adjacent municipalities.</p>
9	<p>Requesting that the Township receive a written commitment from the City that Township representatives will be included on any future Master Transportation Planning processes affecting lands in the Township.</p>	<p>Comment is noted.</p>

## Township of Otonabee-South Monaghan

#	Comment/Question	City's Response
1	<p>Concerns regarding Employment Lands within the Coldsprings Special Study Area on adjacent lands and uses located within the Township.</p>	<p>The Growth Plan states that municipalities should designate and preserve lands within settlement areas located adjacent to or near major goods movement facilities and corridors, including major highway interchanges, as areas for manufacturing, warehousing and logistics, and appropriate associated uses and ancillary facilities. The intent of the Special Study Area is to do additional studies to determine the appropriate urban structure and land uses. Through the secondary plan process, there will be additional studies (e.g., soil and water studies, land use compatibility studies, environmental studies) and the buffers between residential and employment uses will be determined. The integration of industrial uses with the surrounding area must be done in accordance with the Province's land use compatibility and noise guidelines. The adoption of secondary plan will require additional public consultation.</p> <p>Section 3.3.6 states that the lands identified as Coldsprings Special Study Area are approximate and does not constitute as a land use designation.</p>

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#	Comment/Question	City's Response
2	<p>Concerns with respect to the Road Network policies and preservation of corridors for future transportation growth outside of City's political boundaries on the east side of Television Road from Old Norwood Road to Parkhill Road East.</p>	<p>The Future Municipal Roadway Corridors were removed from Schedule D and respective policy in Section 6.2.6(j) was revised to state: "Where the City's Transportation Master Plan indicates the need to protect long-term future municipal roadway corridors in proximity to the City's boundaries to meet future needs for transportation and coordinated regional connectivity associated with growth beyond the population horizon of this Plan, the general location of Long Term Corridor Protection Areas may be identified on Schedule D: Road Network Plan by amendment to this plan, in consultation with the County of Peterborough and affected adjacent municipalities. Final alignments for any identified corridors will be determined on the basis of corridor protection studies and Class Environmental Assessments in partnership with the County and affected adjacent municipalities.</p>

## Township of Selwyn

#	Comment/Question	City's Response
1	<p>Township Council expressed concern with the implications related to the proposed changes to Schedule 'D' Road Network Plan. The removal of a future high-capacity arterial road (Parkway) will have long term implication on Township roads.</p>	<p>The need for a new roads will be assessed through the Transportation Master Plan and changes will be made accordingly to the Official Plan. It is not the intent of the Official Plan policies to preconceive the outcomes of the Transportation Master Plan and/or Environmental Assessment process.</p>

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#	Comment/Question	City's Response
2	<p>Schedule 'D' depicts future roadway corridors located outside of the City's political boundaries over which it has no jurisdiction. It would be appropriate for the depiction of these corridors within the Township of Selwyn to be deleted from 'Schedule 'D'.</p>	<p>The Future Municipal Roadway Corridors were removed from Schedule D and respective policy in Section 6.2.6(j) was revised to state: "Where the City's Transportation Master Plan indicates the need to protect long-term future municipal roadway corridors in proximity to the City's boundaries to meet future needs for transportation and coordinated regional connectivity associated with growth beyond the population horizon of this Plan, the general location of Long Term Corridor Protection Areas may be identified on Schedule D: Road Network Plan by amendment to this plan, in consultation with the County of Peterborough and affected adjacent municipalities. Final alignments for any identified corridors will be determined on the basis of corridor protection studies and Class Environmental Assessments in partnership with the County and affected adjacent municipalities.</p>

## UrbanMetrics Inc. (on behalf of AON Inc.)

#	Comment/Question	City's Response
1	<p>We have reviewed the Land Needs Assessment prepared by the City. While it does generally conform with the Land Needs Assessment Methodology required by the Province as per the 2020 Growth Plan with regards to Community Lands, it lacks conformity with respect to the Employment Land needs assessment, particularly with regards to accounting for the available supply of employment lands.</p>	<p>Overall, the City's land needs assessment was completed in consultation with the Province/Ontario Growth Secretariat. The Province has reviewed the City's land needs assessment and is satisfied with the assumptions and confirmed that the requirements of the Provincial methodology has been fulfilled.</p>

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#	Comment/Question	City's Response
2	<p><b>The City Failed to Account for Vacant Employment Lands:</b> The Land Needs Assessment Methodology requires that the City undertake an inventory of its employment lands. While the Methodology does not specifically indicate that vacant lands should be separated out from the inventory, this is implied as the Methodology requires a separate type of analysis for built lands. The City only considers the entire employment land inventory (after appropriately excluding environmental lands) and modifies densities to determine the overall capacity of the lands to accommodate future employment need. By not considering vacant lands separately, the City underestimated both current employment densities and the capacity of vacant employment lands to accommodate future growth. Our review of the City's employment land supply using GIS spatial analysis revealed some 84 net hectares of vacant lands within the City's employment areas (after accounting for environmental lands).</p>	<p>The supply of vacant employment land was included in the assumptions as described in Component E3, where the intensification and build-out of existing and vacant/underutilized parcels were considered. While it is agreed that 2016 density figures would be influenced/reduced by the supply of vacant lands, this figure was not applied to estimate the capacity of vacant lands. Rather, the job potential of these lands was estimated from proposed floor areas (where available) or average floor area ratios and floor area per employee. The 2051 density figures are not impacted since full build-out is assumed in the land needs assessment.</p>

#	Comment/Question	City's Response
3	<p><b>The City Has Discounted the Capacity of the General Electric Site to Accommodate Employment Growth:</b>            The General Electric property is 30 hectares and is near to the Urban Growth Centre. The City indicated that the future use of the General Electric property is uncertain due to potential environmental contamination, cultural heritage value, and other complexities associated with the site. The City also acknowledged that some form of redevelopment over the next 25+ years is not unrealistic. Notwithstanding, they indicated that “only a small portion of the site could proceed with redevelopment within the (2051) planning horizon”. It is unclear how much employment was allocated to the site, although in total, the City only added a total of 1,120 jobs over the entire 420 hectares of employment lands identified in its report.</p> <p>Given the strategic location of the site, the fact that it is fully serviced, and Growth Plan policies which emphasise the efficient use of existing lands, the City should incorporate the redevelopment of the site into their projections. At a density of 30 jobs per gross hectare, which the City has suggested would be appropriate for a newly developing area, this site could accommodate some 900 jobs. This would represent over a quarter of the additional employment land jobs that would need to be accommodated on employment lands by 2051 as identified by the City. The General Electric site would be in addition to the vacant lands noted above.</p>	<p>The assertion that the General Electric site could accommodate more than one-fourth of jobs that need to be accommodated on new employment areas assumes there were no jobs at the site as of 2016. However, there were approximately 720 jobs as of 2016 from BWXT and General Electric and 358 jobs were lost in 2017-18. At a density of 30 jobs per hectare, the job growth at the General Electric site would represent a net increase of 140 jobs from 2016 to 2051 (i.e., 860 jobs in total). Although this calculation is not distinguished in the report, the City's land needs assessment assigns 760 jobs at the General Electric site by 2051. Given the condition of this site, more conservative job figures were assigned to the site.</p>

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#	Comment/Question	City's Response
4	<p>The City included in its calculations of employment land need, employment with no fixed place of work (“NFPOW”). In our opinion, the work at home and the workers with no fixed place of work have no bearing on the need for employment land and should be removed from the forecasts to determine need. The Land Needs Assessment Methodology does indicate that municipalities should consider how work at home employment should be factored into the assumptions in order to estimate the need for employment lands, it is, however, silent on whether the municipality should explicitly remove NFPOW employment in the same way. In our opinion, if the no fixed place of work employment is not removed from the calculation of need, it would not be possible to tie the forecasts into meaningful employment densities or to actual business survey data as there is no way of knowing as to where this employment should be allocated either by a specific municipality or by geographic location within a municipality. For example, many financial, insurance, scientific, and technical services professionals may work on behalf of companies located all over North America either remotely or through travel and would not show up on any local company’s payroll or impact its space needs. This is also true for many contractors involved in the construction industry.</p>	<p>While it is agreed that the land needs methodology should provide additional direction on the treatment of NFPOW, the current land needs assessment methodology is silent in regard to the removal of NFPOW employment. For that reason, the inclusion of no fixed place of work jobs in the land needs assessment is not inconsistent with the land needs methodology.</p>

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#	Comment/Question	City's Response
5	<p>The City failed to account for employment lands developed between 2016 and 2021. The City utilises employment forecasts from 2016 to 2051. However, to determine the actual employment land need beyond 2021, they would need to deduct employment that has already been accommodated as per new construction. We are aware of at least two major projects on the City's employment lands that were constructed during this period and have already accommodated a part of the employment lands employment projected by the City. This includes the Kawartha Metals Distribution Centre on Fisher Drive and the new Casino and Hotel. There may be other openings that we are not aware of. By not deducting the over 400 employees at these two facilities, the City has over estimated the demand for future employment lands.</p>	<p>Job growth for employment areas between 2016 and 2021 are accounted for and reflected in the 2051 tables; however, the land needs assessment does not require that these interim calculations be distinguished in the tables. Some of these jobs were reflected by increasing the proportion of population-related employment in employment areas from 8% to 11% to 2051 to account for jobs associated with the casino and hotel. It is further noted that the draft Official Plan provides some opportunity for population-related jobs in employment areas, including business service establishments, automobile-focused uses and limited retail sales of products manufactured, processed or assembled on the premises.</p>

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#	Comment/Question	City's Response
6	<p>The City acknowledges that between 2,000 and 4,000 employment land jobs will be accommodated within the Trent University CleanTech Business Park, which is part of the Community Area. However, in their analysis they only allocate some 1,770 employment land jobs to the Community Area from the Employment Land Area. They suggest that growth in employment land employment in the community area is “offset however by some potential business relocations to employment areas or job loss/business closures”. However, there is no evidence of any employment land jobs currently existing in the community area or why the City did not also consider the relocation and closure of population serving jobs on employment lands or for that matter why these employment land jobs could not be replaced by other employment land jobs. The result of this assumption is to overestimate employment need on employment land by between 230 and 2,230 workers.</p>	<p>The City's land needs assessment applies a conservative job figure to CleanTech Commons and loss factor to employment land jobs in the community area to provide contingency and account for businesses in the Industrial Conversion Area designation that may be better served in the long-term at a more modern location. Other examples of employment land employment in the community area include PepsiCo Foods, GenPak and Dufferin Concrete.</p>

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#	Comment/Question	City's Response
7	Forecasted growth can be accommodated through existing 84 ha vacant supply	The City's land needs assessment assigns more conservative job growth to the identified vacant employment land supply. A significant portion of the identified vacant parcels are part of the proposed Natural Areas designation, flood plain or zoned as open space. The identified vacant supply does not provide a size and range of development opportunities to meet market choice and does not provide the municipality with a degree of contingency nor flexibility to deal with potential business leads. This sentiment has been echoed by Peterborough and the Kawartha Economic Development, who has indicated that the lack of suitable sites and inventory within the city has negatively impacted active recruitment efforts.

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#	Comment/Question	City's Response
8	<p><b>a) Work From Home</b>            The Land Needs Assessment assumes that the proportion of work from home (“WFH”) employment will increase from 5.1% of total employment in 2016 to 6.1% in 2051. If the proportion of already existing employment was to stay the same, this assumes that some 9% of new jobs would be WFH employment. Statistics Canada has estimated that between 14% and 19% of employment may be permanently work from home moving into the future, with this proportion varying significantly across industries. As such, the 6.1% assumption is speculative and conservative considering recent research. The impact of a conservative work from home population could be reflected in projected employment needs being accommodated by an increase in WFH employment, thereby decreasing the need for additional employment lands?</p>	<p>The assumptions regarding work from home, albeit conservative, are consistent with the proportions and assumptions of other municipalities that have completed a land needs assessment under the current methodology. The long-term impacts for work at home are still unknown post-pandemic and will continue to be monitored and adjusted through future municipal comprehensive reviews. Further, it was asserted that the designated greenfield area work at home jobs consisted of 65% of the total increase in work at home employment. It is noted that the 1,030 work at home figure for the designated greenfield area includes some work from home that is existing as of 2016 and therefore should not be calculated as part of the total projected increase in work from home.</p>

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#	Comment/Question	City's Response
9	<p>Peterborough Airport is owned and operated by the City even though it is within the municipal limits of Peterborough County. The City is responsible for undertaking all infrastructure projects related to the airport, and in fact, the City has invested over \$35 million on airport infrastructure over the past 10 years, including the expansion of the runway to accommodate large jets. There are approximately 61.8 hectares of available employment land surrounding the airport including an aerospace employment park with fully serviced lots that are being marketed by the City. Furthermore, it is almost certain that almost all persons employed at the airport will be Peterborough residents, given the close proximity of the airport to the City and the lack of urban area in the County near the airport. While the Land Needs Assessment Methodology is silent on cross jurisdictional situations, the Growth Plan and Provincial Policy Statement require that municipalities plan in a co-ordinated manner with regards to cross-jurisdictional issues, particularly with respect to managing infrastructure and economic development. Furthermore, the current Peterborough Official Plan provides for the City, in consultation with the County and Townships to plan for land uses near the airport. In our opinion, given the importance of the Airport to the Peterborough's economic development, the City's ownership and its significant investment in the Airport the City should have considered lands around the Airport to accommodate employment prior to the redesignation of residential lands.</p>	<p>Earlier this year, City Council directed Planning staff to focus land needs within the municipal boundary for the purpose of completing the Official Plan. For that reason, annexation and a settlement area boundary expansion were not considered for the purposes of fulfilling any land need to 2051.</p> <p>Further, through consultation with the Ministry of Municipal Affairs and Housing, it was confirmed that any jobs at the Peterborough Airport must be considered under the County's land needs and Growth Plan Schedule 3 employment forecasts. The inclusion of jobs located at the Peterborough Airport would be double-counting jobs that are in the County's forecasts and would not fulfil the minimums required under Schedule 3 of the Growth Plan.</p>

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#	Comment/Question	City's Response
10	<p>There is no background information provided by the City with regards to the inventory of residential lands that could be realized in the Designated Greenfield Area. There are two previously approved draft approved plans of subdivision on the Aon Lands which are also currently designated and zoned for residential uses. The draft plan approval lapsed in error and will be refiled for approval. However, the lack of background information provided in the report does not provide clarity as to whether the lands within these residentially designated and zoned lands are included in the committed DGA residential land supply.</p>	<p>The previously draft approved units in the Coldsprings subdivision are not included in the inventory for the designated greenfield area, as draft plan of subdivision approval has lapsed.</p>
11	<p>It is also important to note that the City's Land Need Assessment did not determine which lands should be considered surplus. This was undertaken as part of the Official Plan Review, which recommended that the subject Aon lands be redesignated to the Coldsprings Special Study Area with approximately 80 hectares of developable land area designated as Prestige Employment and approximately 60 hectares of developable land area designated for other community uses.</p>	<p>The criteria for identifying surplus/excess lands were discussed in Report IPSPL21-016 dated May 3, 2021.</p>