



CITY OF KAWARTHA LAKES
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DATE: Wednesday, August 22, 2018
TIME: 12:30 p.m. – 12:45 p.m.
LOCATION: Westin Hotel, Oak Room

SUBMISSION TO: Honourable Steve Clark, Minister of Municipal Affairs
and Housing

SUBJECT: Impact of 2017 Growth Plan Policies
City of Kawartha Lakes (CKL)
County of Peterborough
Northumberland County

Recommendations:

That for slow/low growth single/upper tier municipalities, it is recommended that the Minister:

1. Remove slow/low growth single/upper tier municipalities from the Growth Plan (2017); or
2. Consider scoped Growth Plan 2017 implementation requirements and/or lesser standards for slow/low growth single/upper tier municipalities; or
3. Consider establishing in the Growth Plan (2017) a threshold rate of growth to trigger a land need assessment requirement for municipalities.

Background:

- The City of Kawartha Lakes, County of Peterborough and County of Northumberland are located on the fringe of the Greater Toronto Area (GTA) and do not experience the same growth pressures as communities within the core of the GTA. The Growth Plan allocates annual growth of approximately 1,000 to 1,200 people per year but in reality we are issuing 300-500 building permits per year. Notwithstanding, we are being asked to accommodate

intensification and greenfield densities that are more common to the 905 and 416 areas.

- Through the coordinated land use planning review, the Province released the 2017 versions of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan, and Niagara Escarpment Plan on May 18, 2017.
- CKL's planning policies are governed by the Growth Plan for the Greater Golden Horseshoe and Oak Ridges Moraine Conservation Plan, which both became effective July 1, 2017.
- CKL has been working for the past 7 years on a series of Secondary Plans for Lindsay, Bobcaygeon, Fenelon Falls, Omemee, and Woodville to enable the City to accommodate development to 2031. The work is based, in part, on the City's Growth Management Strategy which implemented the City's residential and employment growth allocation under the 2006 Growth Plan for the Greater Golden Horseshoe. These documents have now been formally appealed to the Ontario Municipal Board for a consolidated hearing.

While the City of Kawartha Lakes has found the 2006 Growth Plan implementation process challenging, the new 2017 Growth Plan will have greater impacts on CKL's land use planning decisions:

- The 2006 Growth Plan was introduced 12 years ago and to a large extent, CKL didn't have sufficient time to implement this policy framework through the current Official Plan and Secondary Plan framework. Although the intention of the Growth Plan was to promote intensification while curbing greenfield development, loss of agricultural lands, and employment land conversions, these issues are far more germane in the 416 and 905 areas on the Greater Golden Horseshoe than in our community. Although we are a low growth community, we are tasked with implementing the same policy framework applicable to high growth communities.
- The City currently has to direct 30% of all new residential growth existing within the Built Boundary (by existing Ministerial Order; 40% is the general target). As of July 1, 2017, CKL can use the targets in the approved and in effect Official Plan, but when the City does its next Municipal Comprehensive Review (MCR) for 2017 Growth Plan compliance, we must use 60% unless we are granted an amended target through the MCR process. The target is phased in at 50% up to 2031 and reaches 60% between 2031 and 2041.
- The City currently has to achieve a target density of 40 persons and jobs per hectare for greenfield development (by existing Ministerial Order; 50 persons and jobs is the general target). As of July 1, 2017, CKL can use the targets in the approved and in effect Official Plan, but when the City

does its next Municipal Comprehensive Review (MCR) for 2017 Growth Plan compliance, we must use 80 persons and jobs unless granted an amended target through the MCR process. The target is phased in at 60 persons and jobs per hectare up to 2031 and reaches 80 between 2031 and 2041.

- The 2017 Growth Plan committed the Province to developing consistent land needs assessment methodologies for residential and employment land needs. To date, the Province has released the draft residential land needs assessment methodology but has not released employment land needs assessment methodology. From a preliminary review, the residential land needs assessment seems very complex and will be expensive to implement.
- The City's 2011 Growth Management Strategy (GMS) concluded that Lindsay had excess residential and employment lands to 2031. The 2017 Growth Plan has allocated population and employment growth targets of 7,000 and 3,000 respectively; however, our study requirements will be similar to those Regions (Durham or York Regions) in the Greater Golden Horseshoe who are planning for population and employment growth in the hundreds of thousands. Given the City's low growth scenario, the City would prefer to utilize the existing study methodology and recommendations for growth to 2041.
- The 2017 Growth Plan contains new "excess lands" policies, which require the City to use the residential and employment land needs assessment methodologies to determine our land needs to 2041. The City has spent millions of dollars on expanding infrastructure into greenfield areas and upgrading infrastructure to accommodate intensification in our urban core areas at 2006 Growth Plan rates. Implementation of this policy has important financial implications for the City.
 1. If excess lands are identified at our current intensification and greenfield development rates, we would then have to place serviced lands into a future development area until they are needed from a timing perspective. Given that we have used a Municipal Act Capital Charge mechanism to develop greenfield infrastructure in Lindsay, our cost recovery timeframes are expanded beyond our estimated timeframes for which higher interest charges are incurred.
 2. Should the City be required to adopt higher intensification and greenfield development rates, the amount of excess lands identified through an updated GMS would increase. Not only would the City have to freeze development rights on excess lands, the upgraded infrastructure may not be able to accommodate increased intensification rates within the Built Boundary.

- The 2017 Growth Plan contains a new provision that creates hierarchies both between settlement areas based on the level of municipal servicing. Growth will therefore be directed to areas where cost effective extension of services reduces sprawl. This policy does limit the City's options for growth in partially serviced areas.
- Overall, the 2017 Growth Plan does not provide sufficient policy flexibility in determining growth patterns that are suitable for the CKL context. Environmental, topographical and geological constraints aren't given sufficient allowance in developing urban boundaries and development policies that are suitable for our development context. Increased targets for intensification both within the Built Boundary and in Greenfield Areas enforce growth patterns that are present in a Regional context not ours. Urban sprawl is not a problem that we are facing in CKL.
- The Agricultural and Natural Heritage Systems mapping for the Greater Golden Horseshoe was released on February 9, 2018 and immediately came into force and effect on this date. Many municipalities would have preferred to have a phase in period to conduct the necessary public consultation to implement these mapping systems. Of concern was the manner in which these mapping tools were implemented: while some consultation took place, the Province didn't release any background details. The City, in conjunction with the County of Peterborough, Region of Durham, Conservation Authorities, Ministry of Natural Resources and Forestry, and relevant stakeholders, and the public, undertook a 5 year project to develop a Natural Heritage System (NHS), which was sent to MNRF for inclusion into the NHS mapping. Unfortunately, this collaborative mapping system was not accepted by the MNRF.
- The City remains supportive of planning principles such as intensification, agricultural land preservation, and environmental protection but feels that the Growth Plan's policy framework doesn't match the community goals and values and the financial capability to continually upgrade servicing to match the increased densities being proposed. The City believes that the PPS has sufficient guiding principles to allow the Province to achieve these goals in our communities, allowing sufficient flexibility to promote development that is in context with the community. The PPS could however be augmented with housing density targets at low (70%), medium (20%), and high density (10%) for development within the City.

Additional funding and investment commitments for supporting infrastructure is needed from the Province to realize desired growth and development. This would include, but is not limited to, investment in municipal servicing and regional public transit expansions.