

July 31, 2020

Ms. Sandra Bickford
Ontario Growth Secretariat
777 Bay St, Suite 2304
Toronto, ON M7A 2J8

**Re: Proposed Land Needs Assessment and Amendment 1 to A Place to Grow:
Growth Plan for the Greater Golden Horseshoe
Region of Niagara, Commission of Planning and Development Services
ERO numbers 019-1679 and 019-1680**

Dear Ms. Bickford,

Please accept the following comments on behalf of the Planning & Development Commission for the Niagara Region, relative to the proposed Amendment 1 to *A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan)* and the associated *Land Needs Methodology*.

Technical Report Correction

The *Technical Report for Greater Golden Horseshoe: Growth Forecasts To 2051, June 16, 2020*, contained an error for Niagara Region: the employment forecasts by type was incorrect.

After alerting Hemson Consulting and the Ministry of Municipal Affairs and Housing, the error was acknowledged and a revised memo, dated June 30, 2020, was issued by Hemson Consulting. That memo provides the correct forecasts by type and is attached as Appendix 1.

The memo notes that the corrected forecasts will be included in a final consolidated version of the Technical Report, to be released after the Environmental Registry Office consultation period ends on July 31, 2020.

Recommendation: The final version of the Technical Report should reflect the employment forecast by employment type as set out in the Hemson Consulting June 30, 2020 Memo.

Growth Forecasts

Proposed Amendment 1 provides three growth forecast scenarios for each Upper- and Single-tier municipality within the GGH, including a Low Scenario, High Scenario and Reference Scenario.

Comparing the three growth scenarios against recent population growth rates suggests the High Scenario is the appropriate population and employment forecast for Niagara Region.

The Region's population has increased an average of 6,640 people per year¹ (1.45% annual growth rate) since 2016, which is a growth rate we support for forecasting purposes. The High Scenario estimates a similar 6,880 people per year to 2051 (1.50% annual growth rate).

We also support the High Scenario employment forecasts. Niagara is the only GGH region with direct access to the International Boarder with United States. The Growth Plan recognizes this with specific policies for the *Niagara Economic Gateway Zone and Centre* in recognition of the economic importance of cross-border trade. Given the importance of economic recovery from the COVID-19 pandemic, the *Niagara Economic Gateway Zone and Centre* should be a priority area for Provincial investment and employment growth.

Recommendation: Amendment 1 should assign Niagara Region the High Scenario population and employment forecasts.

Land Needs Assessment

In addition to Amendment 1, the Ontario Growth Secretariat released an accompanying Land Needs Assessment (ERO 019-1679).

Niagara Region staff generally support the simplified approach to land needs assessment, allowing for greater flexibility and consideration of local conditions.

However, there is concern with the elimination of a standardized approach to land needs assessments across the GGH. The benefit of the standardized methodology is consistency for municipalities, developers and Province when assessing land needs. The revised methodology, as presented, could lead to varying approaches across the GGH, impacting understanding and confidence for developers and consultants who have initiatives in multiple jurisdictions.

Recommendation: The land needs methodology should continue to provide a standardized framework as established in the 2018 methodology. The methodology should be accompanied with guidelines for modifying inputs and process for local conditions, including where simplified calculations may be appropriate.

Once an Upper- or Single-tier has approved its land needs methodology through a Regional Official Plan (and had that approved by the Province) that methodology should not be appealable. In its current draft form, the proposed LNA does not prevent other

¹ Statistics Canada. Table 17-10-0139-01 Population estimates, July 1, by census division, 2016 boundaries

parties from using alternative methodologies. This prolongs the development approval process and ties up resources in LPAT Hearings.

The Provincially-approved Regional methodology should be identified as the authoritative source for assessing land needs. This methodology should be regularly updated to ensure it remains current and adaptive to changing market and employment conditions.

Recommendation: The Growth Plan should recognize Upper- and Single-tier land needs assessments as the authoritative source of quantifying land needs beyond Growth Plan conformity. Municipalities should be directed to update land needs assessment, at a minimum, every 5 years based on updated Census data and changing market and employment conditions.

The *Community Area Land Needs Assessment* requires population and employment forecasts contained in Schedule 3 be used for planning and managing growth, as a minimum.

Amendment 1, however, proposes municipalities may plan for forecasts greater than Schedule 3 if determined through a municipal comprehensive review. It is unclear if the land needs assessment is referring to the forthcoming Schedule 3 forecasts as a minimum or if an alternative forecast identified in a municipal comprehensive review would still represent a minimum target.

Recommendation: Clarify how population and employment forecasts act as minimums in the final Amendment and under what circumstances land need assessments may consider higher targets.

The methodology suggests housing needs to 2051 use a Housing Needs Analysis based on age-specific household formation rates. However, age-specific household formation rates do not take housing affordability, intraprovincial migration or non-permanent populations into consideration. Niagara's population growth is driven entirely by intraprovincial migration and non-permanent residents who are either working or studying in Niagara.

Alternative data sources must be considered for the identification of housing needs in Niagara.

Recommendation: Allow for alternative housing forecasts based on local context, drivers of growth and housing affordability objectives to be utilized.

Alignment with Provincial Policy Statement, 2020

Regional staff support the inclusion of the new definition "*impacts of a changing climate*" to the Growth Plan to be consistent with the Provincial Policy Statement (2020).

Recommendation: Staff recommend the following sections be changed to use the phrase "*impacts of a changing climate*" rather than similar language such as "*climate change*", "*climate change impacts*" and "*changing climate*". The use of different terms may imply a different meaning that is not intended.

Specifically, we have the following recommendations:

Section	Recommendation
Vision for the GGH - paragraph 5	Change 'our ability to adapt to a changing climate' to 'our ability to adapt to the <i>impacts of a changing climate</i> '
1.2.1 bullet point 10	Italicize <i>impacts of a changing climate</i>
2.1 Context- paragraph 5	Change 'impacts of climate change' to the ' <i>impacts of a changing climate</i> '
3.1 Context- paragraph 11	Change 'climate change' to ' <i>impacts of a changing climate</i> '
3.2.1.2.d)	Italicize <i>impacts of a changing climate</i>
3.2.1.2.4	Italicize <i>impacts of a changing climate</i>
4.1 Context – paragraph 1, 4 and 10	Change 'climate change' to ' <i>impacts of a changing climate</i> '
Watershed Planning definition	Change 'climate change' to ' <i>impacts of a changing climate</i> '

Additional nuances in terminology exist between the Growth Plan and PPS related to "*market demand*", "*market-based*" and "*market-ready*".

Given the emphasis on "*market demand*" within the proposed Land Needs Assessment, the Province should provide better clarity and consistency of these terms in the Growth Plan and PPS to help inform the Land Needs Assessment process.

Recommendation: Establish a definition for "*market demand*" and revise references to similar terminology to create clarity and consistency across policy documents.

Implementation and Interpretation

Regional staff welcome the strengthened language around coordination of Plan implementation; however, clarification should be provided for specific terminology in Section 5.2.3 relating to what is meant by "*engage*" and "*informed involvement*".

Recommendation: Use standard definitions for interpretative terms to offer opportunity to build constructive and cooperative relationships with all interested stakeholders and

Indigenous communities. Planning staff look forward to the Province's qualification and/or standardization of these terms so that the Provincial land use vision may be successfully coordinated and implemented by planning authorities.

Transition

Amendment 1 does not propose an extension to the Growth Plan conformity date of July 1, 2022. Given the impact of extended planning horizons and increased growth forecasts, the Province should revise and approve Amendment 1 as soon as possible.

Recommendation: Finalize Amendment 1 by September 2020.

Schedule Options

Multiple versions of Schedule 3 are presented in Amendment 1 for consultation.

Since the Growth Plan and PPS are focused on the end planning horizon year (2051), there is no need to include additional horizon years within Schedule 3. The Province does so in its "Mock B" versions of the draft forecasts.

Recommendation: That only the Mock B Schedule 3 layout and including forecasts (households, population and employment) within the final version of the Technical Report, Greater Golden Horseshoe: Growth Forecasts to 2051 be implemented.

Technical Report, Greater Golden Horseshoe: Growth Forecasts to 2051

The Technical Report produced by Hemson Consulting provides relevant information for establishing the land needs assessment and monitoring progress of growth and policy objectives.

However, the commentary within the Technical Report and ERO postings are contradictory. Specifically, the Technical Report provides a consistent footnote for each municipal summary page:

The housing forecast does not replicate/predict the housing mix that would be determined through each municipality's APTG conformity work. Planning housing mixes will continue to be decided by municipalities through their local planning processes.

The proposed land needs assessment refers to housing forecasts by type as a *baseline*. Housing forecasts, however, are not included within Schedule 3 and only found within the Technical Report – contradicting the stated purpose of the forecasts in the Technical Report and implementation of the land needs.

Recommendation: Provide clarity on how and where the Technical Report may be used for land needs purposes and when municipalities should rely on their own forecast work.

Local Municipal Comments

Niagara Region includes 12 local municipalities. In preparing these comments, we invited local municipalities' planning departments to provide Regional staff with comments for inclusion with this submission.

We received comments from the Town of Lincoln and the Town of Pelham, each of which are included as Appendix 2 for your consideration. We are not aware of comments from any other local municipality.

Conclusion

We appreciate the opportunity to provide comment on Amendment 1. We view the changes as a positive step in implementing longer term growth management principles and forecasts while providing greater flexibility.

Feel free to contact me should you have any questions about our submission or wish to discuss further.

Respectfully,

A handwritten signature in black ink, appearing to read "R Mostacci".

Rino Mostacci, MCIP, RPP
Commissioner of Planning and Development Services
Niagara Region

Attachments

Appendix 1	Region of Niagara Schedule 3 Forecasts of Employment by Type, Hemson Consulting Update for the Growth Plan Technical Report
Appendix 2	Town of Lincoln and Town of Pelham comments on ERO 019-1679 and 019-1680

MEMORANDUM

To: Stewart Chisholm and Jeff Thompson
Ontario Ministry of Municipal Affairs and Housing

From: Russell Mathew, Stefan Krzeczunowicz

Date: June 30, 2020

Re: Region of Niagara Schedule 3 Forecasts of Employment by Type

The technical report *Greater Golden Horseshoe: Growth Forecasts to 2051* was released on June 16, 2020 as part of the Ministry of Infrastructure's release of a proposed amendment to *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (Amendment 1). Amendment 1 proposes to update and extend the time horizon of the growth forecasts for municipalities in the Greater Golden Horseshoe shown in Schedule 3 of the Growth Plan.

The purpose of this memorandum is to advise Ministry of Municipal Affairs and Housing staff of a correction to the forecasts of employment by type that is warranted for the Region of Niagara. Please note that any adjustment arising from the correction will have no effect on the total employment forecast for the Region. As such, it will not affect any of the forecasts set out in the proposed Amendment 1.

This memorandum is also being provided to Region of Niagara staff to assist them in responding to questions about the technical report and in preparing the Region's response to the proposed Amendment 1.

A. CORRECTED REGION OF NIAGARA FORECASTS

The Schedule 3 employment forecasts are structured around four land use based categories of employment: population-related; major office; employment land; and rural. Employment land employment refers to employment accommodated primarily in low-rise industrial-type buildings, the vast majority of which are located within business parks and industrial areas. In older urban centres such as St. Catharines, some share of this type of employment also occurs in more scattered locations.

The employment by type forecasts for the Region of Niagara on p.81 of the technical report inadvertently show a large decline in employment land employment between 2016 and

2021. In fact, the short-term decline anticipated in the forecasts, mostly arising from the impacts of the COVID-19 pandemic, is being felt in the population-related employment, mainly the tourism sector.

The table below sets out the corrected employment by type forecasts for the Region. The corrected forecasts will be included in a final consolidated version of the technical report, to be released after the Environmental Registry Office consultation period ends on July 31, 2020.

Year	Region of Niagara Employment By Type				
	Major Office	Pop-Related	Emp. Land	Rural	Total
2011	16,000	106,000	40,000	23,000	185,000
2016	16,000	111,000	41,000	23,000	191,000
2021	17,000	108,000	40,000	23,000	187,000
2031	19,000	128,000	46,000	25,000	219,000
2041	22,000	143,000	50,000	28,000	243,000
2051	25,000	158,000	57,000	32,000	272,000
2016-51 Growth	9,000	48,000	17,000	8,000	81,000

Cc: Isiah Banach, Regional Municipality of Niagara



Subject:	Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe
To:	Committee of the Whole Planning and Economic Development
From:	Planning and Development Department

Report Number:	PD-13-20
Wards Affected:	All
Date to Committee:	Monday, July 13, 2020
Date to Council:	Monday, July 20, 2020

Recommendation:

Receive Report PD-13-20 on the proposed Amendment 1 to the Provincial A Place to Grow: Growth Plan for the Greater Golden Horseshoe.

Direct Staff to forward comment and advice, to the Region for submission to the Province; and

Direct Staff to forward a copy of this report to the Niagara Region.

Purpose:

The purpose of this report is to provide to Committee and Council an update on the Province's recently proposed changes to the 2019 Growth Plan that can generally be categorized as growth forecasts, key policy changes and housekeeping items. These changes as outlined later in this report are being brought forward to the consultation stage by the Ministry of Municipal Affairs and Housing. The consultation period will close on July 31, 2020.

Background:

In 2019, the Province introduced A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the Plan, A Place to Grow) as part of the More Homes, More Choice: Ontario's Housing Supply Action Plan. The objective of this plan was primarily to improve provincial housing stock and thus providing more options and better opportunities for

individuals and families in the housing market. On June 16, 2020, the Ministry of Municipal Affairs and Housing provided notification of proposed changes to this plan including updates and policy changes to the population and employment forecasts, a change to the Plan horizon year, a new Land Needs Assessment methodology, adjustments to the aggregates policy framework and new policies to address Major Transit Station Areas within Provincially Significant Employment Zones (PSEZs). There are also policy revisions that support our government's objectives to increasing housing supply, create more jobs, attract business investments and better align infrastructure.

These changes come with the recognition that the Greater Golden Horseshow (GGH) will be critical to economic recovery from the impacts of the COVID-19 outbreak. With more than 85% of the province's population growth expected in this region by 2051, the GGH is a key economic driver. In preparation of this growth, the ministry is proposing targeted revisions to A Place to Grow to make it faster and easier for municipalities in the region to plan for growth. This will have impacts to Niagara Region's municipal comprehensive review and official plan revisions currently being undertaken.

The consultation period in which upper and lower tier municipalities can provide input is now open and will close on July 31, 2020.

Report:

This report summarizes the changes proposed to A Place to Grow and categorizes these changes into growth forecasts, key policy changes and housekeeping items. The full proposed amendment is attached in Appendix A. There is also the proposed land needs assessment methodology which provides potential for settlement boundary expansions in anticipation of significant growth in the GGH. This methodology is proposed in Appendix B.

Growth Forecasts

The most substantive changes proposed introduced through Proposed Amendment 1 relate to the population and employment projections that inform official plan reviews. The existing planning horizon projections, which date to the previous 2017 Growth Plan, are being proposed to be updated and extended from the 2041, to the 2051 planning horizon and will be updated every 5 years.

The existing 2031 and 2041 projections remain unchanged to ensure continuity of ongoing forecasting work; however, the forecast horizon is extended to 2051, when the Greater Golden Horseshoe Area is forecasted to grow to 15 million people and over 7 million jobs.

The 2051 population and employment forecasts are determined for each upper-and single-tier municipality by the Province and are subsequently allocated to lower-tier municipalities by an upper-tier planning authority, where applicable.

Changes to the policies in the 2019 Growth Plan require that municipalities use the proposed forecasts as minimum targets. However, municipalities may also use higher forecasts, as determined through their respective Municipal Comprehensive Review processes.

The rate of forecasted population change between the current 2041 horizon (population estimate of 611,000) and proposed 2051 horizon for Niagara Region (population estimate of 674,000) is approximately 10%. Furthermore, the forecasted employment change between the current 2041 horizon (243,000 jobs) and the proposed 2051 horizon (272,000 jobs) is approximately 12%. The slightly higher increase in percentage of jobs is a promising outlook.

Key Policy Changes

Mineral Aggregate Operations

Proposed changes to the existing mineral aggregate resources policies would remove barriers to the establishment of new mineral aggregate operations, wayside pits and quarries within the 2019 Growth Plan's identified Natural Heritage System, but not within the Greenbelt.

This is accomplished by removing the prohibition on new aggregate operations where there are endangered and threatened species. The goal of this change is to ensure there is an adequate supply of aggregate within proximity to end users and the market area, recognizing the continued population growth within the Greater Golden Horseshoe Area. Since the primary location of the Town of Lincoln's aggregate operations is above the escarpment and out of the Greenbelt area, this provide potential for increased opportunity for these operations.

Provincially Significant Employment Zones and Major Transit Station Areas

The Province has been undertaking a process to identify 29 Provincially Significant Employment Zones (PSEZs). These are employment lands that may not be converted to other uses outside of a Municipal Comprehensive Review without permission from the Province. There are no PSEZs identified within the Town of Lincoln, nor Niagara Region as a whole as the closest PSEZ is located along the QEW in Stoney Creek.

The 2019 Growth Plan also requires municipalities to identify Major Transit Station Areas (MTSAs), where higher densities are directed. One of the policy amendments proposes

to allow a conversion within a PSEZ outside of a Municipal Comprehensive Review, provided it is located within an MTSA. This is not a situation that currently has the potential to occur in the Town of Lincoln since there are no PSEZs present and the potential GO Transit Station in Beamsville is not identified as a MTSA.

It should be noted that both the MTSA delineation and PSEZ boundary identification processes are ongoing, and the Province expects to conclude the next phase of its PSEZ work, related to post-COVID-19 recovery and investment attraction, in early fall 2020.

Housekeeping Items

There are multiple minor changes introduced by Proposed Amendment 1, as well as proposed changes to O. Reg. 311/06 (which governs transitional matters in Growth Plans), generally with the goal of bringing the 2019 Growth Plan into line with the horizon and language of the Provincial Policy Statement 2020.

- All references to the PPS 2014 to the PPS 2020 will be changed
- Terms that were updated in the PPS 2020, such as changing “second units” to “additional residential units” and “climate change impacts” to “impacts of changing climate” will be replaced
- Language related to the requirement for planning authorities to engage with Indigenous communities, including replacing previous language related to Métis and First Nations communities is strengthened
- A provision is added requiring that where the Local Planning Appeal Tribunal has already conducted a hearing, but not yet issued a decision, the decision must conform with the 2019 Growth Plan
- There is no change proposed to the July 1, 2022 deadline for Official Plans to conform to the 2019 Growth Plan.
- New/updated definitions are provided, in order to reflect the definitions in the Provincial Policy Statement 2020, for the following terms: Cultural Heritage Landscape, Ecological Function, Habitat of Endangered Species and Threatened Species, Impacts of a Changing Climate, Municipal Water and Wastewater Systems, On-farm Diversified Uses and Public Service Facilities.

Lands Needs Assessment Methodology

Municipalities are required to ensure an appropriate range and mix of housing types are provided to meeting the projected growth targets, consistent with the timeframes established in the Provincial Policy Statement 2020. In working towards this, they are required to:

- Maintain a sufficient supply of land with servicing capacity to provide a three-year supply of residential development through lands zoned by a lower-tier municipality.
- Maintain the ability to accommodate residential growth for a minimum of 15 years.

In accordance with Policy 5.2.2.1c) of the 2019 Growth Plan, the Province has issued a proposed Lands Needs Assessment (LNA) methodology, which will be used to guide the preparation of land needs analyses for development across the 2019 Growth Plan planning horizon to 2051.

This LNA methodology was initially proposed as part of the 2017 Growth Plan but was not finalized prior to the release of the 2019 Growth Plan. It is proposed to be used by upper and single-tier municipalities to inform decisions around urban area boundary expansions or whether sufficient land has been identified to accommodate future growth, in accordance with the 2019 Growth Plan.

There are two principal components of the land needs assessment: the Community Area Land Needs Assessment and the Employment Area Land Needs Assessment.

The Community Area Land Needs Assessment is rooted in the proposed population forecasts from the 2019 Growth Plan for upper-and single-tier municipalities. The anticipated growth then must be associated with consideration of the historical and future trends for household growth by unit type. By doing so, housing need can be broken down by type of dwelling to include an age-specific household rate to forecast growth in the number of households across the planning horizon of the 2019 Growth Plan. Household demand can be adjusted for factors such as changes in vacancy rates, market contingencies, additional housing needs for post-secondary students, temporary workers, or units lost over time. The forecasted housing need (from the Housing Needs Analysis) can then be allocated based on local factors, including market conditions, urban planning structure, affordability and mix of housing forms and intensification. This allocation will be informed by an inventory of housing in the delineated built-up area, designated greenfield area, and other areas including rural settlements and rural area outside of settlement areas.

In addition to the accommodation of housing units, municipalities are required to assess the community area jobs to be allocated to the designated greenfield area to determine density targets. The community area jobs analysis are informed by estimations of persons per unit for the different housing types. Together with the projected housing units needed to accommodate growth, this will determine the land needed in this area across the 2019 Growth Plan horizon. The allocation of growth (to lower-tier municipalities, where applicable) is then translated into appropriate density targets for both the delineated built-up area and designated greenfield area. The community area lands are planned to accommodate the forecasted population, and the assessment may result in the identification of additional land required to accommodate the population forecast in

Proposed Amendment 1. When planning for community areas, municipalities will address the policy requirements of the 2019 Growth Plan.

The Employment Area Land Needs Assessment is intended to determine where and how much land is needed to accommodate the forecasted growth in jobs, in both the employment areas and the community areas. Based on the employment forecasts to the 2051 proposed planning horizon and informed by other data sources (e.g., Statistics Canada labour force surveys, local employment surveys, provincial fiscal updates), municipalities are permitted to calculate the employment growth rate. There are three steps which must be followed, at a minimum, when undertaking the Employment Area Land Needs Assessment through a land budgeting exercise process as part of a Municipal Comprehensive Review (MCR) including employment forecasts, categorization and needs analysis and allocation and reconciliation. Based on the employment forecasts, the total forecasted jobs should be grouped into four categories, while considering both historical and future trends in employment growth: Employment lands (traditional manufacturing and industrial types); Population related; Major office; and Agricultural/rural. The employment categorization can be adjusted for factors such as changes in economic activity, market disruptors, infrastructure and investment strategies, and other business environment impacts. The forecasted jobs determined can be allocated based on the understanding that community area jobs are to be located within settlement areas and outside employment areas, while employment area jobs are directed in the employment areas. The methodology permits community area jobs in the designated greenfield area to be counted towards the minimum density target. This allocation will ultimately determine whether there are sufficient area lands in a municipality to accommodate the determined employment growth.

Staff Comments and Next Steps

The proposed extension of the planning horizon and the corresponding population and enforcement forecasts are significant thresholds to achieve. Staff are satisfied that they provide an appropriate benchmark to which long term strategic planning need to accommodate through consideration of provisions to provide adequate housing stock and sufficient corresponding lands for a range of employment opportunities at both the Regional and Town levels.

With respect to the policy revisions proposed, those pertaining to PSEZs and MTSAs are not anticipated to result in any changes or implications to the Town's employment areas nor the proposed GO Transit Station site. That said, the Town has planned for appropriate intensification and employment opportunities in the vicinity of the site through the GO Transit Secondary Plan which was approved last year.

The proposed changes to policies pertaining to mineral aggregate operations could potentially result in opportunities for both existing and new operators to establish within the Town, outside of the Greenbelt. This could have implications resulting from increased truck traffic attempting to access the QEW.

The Region is preparing a submission to the Province. Some of the early comments identified pertain to some errors in the Provincial employment data as it relates to the breakdown of the types of employment and not the overall employment numbers which is to be corrected by the Province. The Region is setting up individual meetings with each municipality re growth allocations at the end of July into August.

Niagara Region is currently undertaking a municipal comprehensive review and official plan amendments and this methodology, should it be implemented, would inform the Region's population allocations to lower tier municipalities, such as the Town of Lincoln. As such, land requirements to accommodate growth and employment will need to be strategically planned for. Their employment strategy will be incorporated into their new Official Plan which is anticipated to be completed in 2021.

Financial, Legal, Staff Considerations:

Financial: N/A

Staffing: N/A

Legal: N/A

Public Engagement Matters:

The consultation period for municipalities to provide input to the Ministry of Municipal Affairs and Housing is open and closes July 31st.

The Ministry is also seeking feedback on a number of proposed actions to be taken to implement the Amendment, including:

- Possible approach to transition, to clarify how planning matters that are currently in process will be affected by the Amendment, if approved.
- A possible timeframe, to be set by the Minister, for municipalities to bring official plans into conformity with the Growth Plan as revised by the Amendment, if approved.

Conclusion:

This report provides a summary of the proposed amendments to the Growth Plan for the Greater Golden Horseshoe. Detailed conclusions on implications to the Town from a long-term strategic planning perspective cannot be made until further details

and implementation regulation is provided and the outcome of the Niagara Region's Municipal Comprehensive Review and Official Plan Amendments are finalized.

Respectfully submitted,

Matt Bruder, MCIP, RPP
Associate Director of Planning and Development

Appendices:

Appendix A – Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe.

Appendix B – Proposed Land Needs Assessment Methodology.

Appendix C - Watson and Associates June 2020 White Paper

Report Approval:

The report has been approved by the Director of Planning & Development Department and the Chief Administrative Officer.

From: [Shannon Larocque](#)
To: [Bowie, Greg](#)
Cc: [Barbara Wiens](#)
Subject: Comments on Proposed Changes to GPGGH
Date: Thursday, July 16, 2020 4:23:12 PM

CAUTION: This email originated from outside of the Niagara Region email system. Use caution when clicking links or opening attachments unless you recognize the sender and know the content is safe.

Hi Greg,

Town staff's comments are as follows:

By extending the planning horizon to 2051, our population forecasts become less accurate which may result in premature expansions to settlement areas for additional greenfield developments and the resulting loss of farmland and natural heritage features and further, the likelihood that less intensification, redevelopment of brownfield sites, etc. will occur because there isn't pressure to do so. In addition, we may see development plans approved that are not built out for a long time and that when they do build out are not reflective of the day's planning context or needs.

We are also concerned that the prohibition for new aggregate operations within the habitat of endangered species is being removed.

Best Regards,
Shannon



Shannon Larocque, MCIP. RPP.
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