



Office of the CAO

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August 4, 2021

Regional Chair Jim Bradley
Region of Niagara,
1815 Sir Isaac Brock Way, Campbell West,
P.O. Box 1042, Thorold, Ontario.
L2V 4T7.

Dear Chair Bradley

RE: City of Welland Comments Regarding PDS 31-2021 – Niagara Region Incentives Policy

The City of Welland would like to thank Niagara Region for the opportunity to participate in the Incentive Review. Our various policies, financial incentives and programs in partnership with the Region have created a positive impact on the City and the Region as a whole. This includes brownfield redevelopment, affordable housing, downtown redevelopment, and employment growth.

We request that Niagara Region Council maintain the existing Grants and Incentives Programs as detailed in this letter. The City has no objection to the Region adding additional financial incentives to create more affordable housing. We have and continue to work with public and private

City Staff have reviewed the Niagara Region's presentation on June 24, 2021 to Municipal Staff and Information Session for Regional Council on July 22, 2021 and Report PDS 31-2021. The City's comments are as follows regarding what Regional Staff are proposing:

1. Affordable Housing

City Staff agree that there is a need for more affordable housing units. The root cause of this situation is complex and multi-faceted. The need for this has been an ongoing issue for at least 20 years. There has been limited investment both by Federal and Provincial Governments and the private sector in rental housing or affordable housing for a range of reasons including, zoning and planning rules which prohibit investment. The City's current CIP areas and programs have, and will continue to offer incentives for housing, including affordable housing. For example, the City provides funding for the creation of additional apartment units, but without the affordable requirement, recognizing that the current vacancy rate is very low in the City and this will encourage the creation of additional rental units. Additionally, the City approved a New Zoning By-law in October, 2017 which creates a more favourable regulatory environment for small scale to large scale rental housing.

City Staff fully support the creation of more affordable housing units through more incentive programs, but at this point it is unclear as to how the Region will implement some of the requirements, such as

ensuring that the units are affordable and maintained. The implementation piece of these programs has not been identified.

2. Employment

The current alignment of Employment Attraction Policies between the City and Region has attracted over \$361 million in private sector investment on employment lands, over 1.4 million square feet of industrial buildings, and over 400 jobs retained/created. Current approved applications will generate over \$4 million in new taxes for the City and over \$4.6 million for the Region when factoring in the Tax Increment Grants (TIG grants). The net taxes for the City and Region will significantly increase as individual TIGs are completed.

Regional Staff indicate the goals of the Employment focus area are as follows:

- Incentivize an average of 100 full time jobs per year in the next five years;
- Attract five new businesses in the next five years;
- Expand the range of employment TIGs while maintaining unique status of Gateway CIP

Regional Staff are planning to attain the above goals by proposing to create, retain and modify the following programs under this focus area. The major highlights are as follows:

Program	Status
Gateway CIP Tax Increment Grant	Remains the same
Gateway CIP Regional DC Grant	Remains the same
Niagara Business Attraction Tax Increment Grant	New
Regional Employment Grant	Reduced from a 100% reduction to sliding scale based on number of employees
50% Industrial Expansion Grant	Proposed. However, is an existing requirement under the Development Charges Act.

City Staff have reviewed the proposed additions and changes. Staff have no objection to the additional of the Niagara Business Attraction TIG, however, it is unclear if this program would be available in Welland. The reduction in the grant for the Regional Employment DC-Base Grant from a 100% to a sliding scale based on the amount of employees is not supported by Staff and will impact economic development goals of the City. Small Businesses are the future of the City and the Region and these businesses will now be required to pay regional development charges.

City Staff also note that the goals of this focus area are concerning as they are very limited. For example, attracting 5 new businesses across the Region over five-years seems very low for a growing Region. However, when factoring in the reduction in certain programs this may be a plausible outcome. It should also be noted that affordable housing and jobs are invariably linked. If we cannot attract a growing job base it will continue to create affordable housing problems.

3. Brownfield

Under the current City and Regional policies for Brownfield redevelopment, the City will have produced over \$59 million in private sector investment, over \$2.6 million in City taxes, over \$2.8 million in Regional taxes. The additional benefits of Brownfield Redevelopment include improvements to the natural environment and human health by facilitating the remediation of contaminated sites.

The goals of the Brownfield focus area identified by the Region are as follows:

- Generate an average increase of 10 times the original assessment value on brownfield properties
- Approve two Tier 1 BTIGs in the next five years
- Provide funding for remediation of at least 200 acres in the next five years

The Region indicates they are focusing on Brownfield Remediation, however it is City Staff's opinion that this is not the case as they are proposing to further reduce the incentives available for brownfield remediation. Major changes proposed include:

- A reduction of the 50% rebate of the applicable Development Charge to a 100% Regional Development Charge (DC) deferral until occupancy permit is issue or five years.
- Elimination of the Brownfield Study Grant which provides funding for the Phase 2 Environmental Site Assessment allowing applicants to identify areas of contamination and determine clean-up costs; helping to reduce the risk of investing in Brownfields.
- Elimination of the Brownfield Tax Assistance Program which provides a freeze of the property taxes on a property that is undergoing or has undergone remediation and redevelopment to assist with payment of the cost of environmental remediation.
- Modifying the TIG programs to be tied to a minimum clean up amount and a reduction of the incentive currently offered.
- Modifying the TIG programs to be tied in with the creation of Affordable Housing.

City Staff question how the Region is focusing on Brownfields when in actual fact they are defocusing. The Brownfield remediation programs all now seem to be tied in some way to the number of affordable housing units created. Although incentivizing affordable housing is supported by the City, it's not the objective of the Brownfield Incentives Programs, in Staff's opinion. The goal of these programs is to have brownfield sites within the urban area remediated and redeveloped. It seems that tying it to the creation of affordable housing units creates another layer of red tape that is unnecessary, and may not be achievable. Furthermore, tying the TIG to a minimum clean up amount may leave some smaller sites to languish because they're not eligible for the TIG program with the Region.

As mentioned, the DC Exemption program has been proposed to change to a DC Deferral program. Brownfield lands are typically within areas that are developed with existing services and will not require the extension or expansion of services. The DCs may also be another barrier to realizing the clean-up of these sites, depending on the scale and costs of clean-up required. It's unclear as to why this program change is being proposed, and the City is not in support. Brownfield redevelopment is costly and has significant risks for investors. This will only make these site less desirable and less likely to be developed for affordable housing.

4. Public Realm

Regional Staff indicate their goals on programs for the Public Realm is as follows:

- Improve public realm including road, bike paths, sidewalk, trails and accessibility amenities in an average of six projects annually;
- Plant approximately 500 trees through Public Realm Investment Program (PRIP) in the next five years; and,
- Achieve at least 10 of the following in the next five years: public plaza enhancements, place making and public art installations, gateway features.

Regional Staff are proposing to continue the Public Realm Investment Program. City Staff have no objection to continuing this program, however, the funding allocations proposed are very low compared to actual cost of public realm improvements.

Programs Proposed to be Eliminated

Smarter Niagara Incentive Program (SNIP)

The Region is proposing to eliminate the Smarter Niagara Incentive Program (SNIP): façade and building improvement, heritage restoration, planning grant. These programs in partnership with Region form the City's Downtown CIP and have and continued to help enhance the City's Downtown and Health and Wellness Areas. Promoting investment in downtowns and intensification areas is critical for sustainable development and smart growth. The City's Downtown CIP will have generated over \$34 million in private sector investment, and over \$600,000 in taxes over a 10 year period for the City and over \$500,000 for the Region. This is in addition to the other numerous benefits that result from these investments. The net taxes for the City and Region will significantly increase as individual TIG's are completed.

As mentioned, the City supports the concept of trying to promote more affordable/rental housing but this should not occur at the cost of promoting Smart Growth and sustainable development in our communities. This is not to say that the current Programs are not achieving this, but there may be an opportunity to do more here. The SNIP program is one of the most popular incentive programs that the City provides as it allows small businesses to make improvements to their buildings that would otherwise have been outside of their financial abilities. Small businesses have had an incredibly difficult time these past 18 months, and it does not seem like now is the time to be taking away any financial incentives that would help them improve their buildings or facades. Further to this, the Region's new draft Official Plan policies are encouraging regrowth and development of downtowns, it is incongruous to remove the SNIP funding while encouraging a high level of urban design and upgrades in downtown areas. There needs to be incentive for the Region's policy initiatives to be realized.

Other Programs

The below table lists other programs that the Region is proposing to discontinue as a result of their incentives review.

Program	City Staff Comments
Brownfield Tax Assistant Program	As mentioned above, the program provided a tax freeze during the remediation period. Elimination of this program increases the financial risk associated with Brownfield redevelopment. This will make it more

	costly to redevelop brownfields, whether it be for affordable housing or not.
Niagara Investment in Culture Program	As the population of the City and Regions grows and diversifies the need for cultural investment will increase.
Waterfront Investment Program	As the Region and the City grows there is an increasing need for investment in waterfront access and enhancement. For example, there are ongoing issues in Waterfront Municipalities regarding waterfront access.
Heritage Tax Rebate Program	Heritage preservation is a component of good planning. Private landowners should be supported by municipalities to effectively maintain heritage properties.
Smart Growth Regional DC program	This program has helped the City to achieve and exceed Regional and Provincial intensification requirements and promote sustainable growth within the City. Elimination of this program will lead to increased urban sprawl in the Region and a reduction in intensification.

SUMMARY AND CONCLUSION:

Staff have reviewed the Region's presentations and Staff Report regarding their review of its various Incentives and Grants and proposed recommendations to create, retain, modify and remove them. Staff support the direction to develop incentives programs under the categories:

- Affordable Housing;
- Brownfield Remediation;
- Employment; and
- Public realm.

However, we are of the opinion that the current incentives and grants are working very well. The City has experienced significant redevelopment and investment as a result of the implementation of the various Community Improvement Plans (CIP) and Development Charge Incentives in place. They are helping the City transition to a more socially, environmentally and economic sustainable community in line with the Principles of Smart Growth. Staff note that these Incentives and Grants offered by both the City and Region are part of the toolbox of planning tools we have available to create sustainable planning outcomes. We do not want to see an abandonment of these tools as we need to retain a multi-pronged approach to planning our communities.

Staff support the concept of trying to promote more affordable/rental housing but the Region's approach seems to be doing this at the expense of the Brownfield, SNIP incentives, and various other programs. Rather than eliminate programs, this may be an opportunity to do more. In addition to the benefits associated with affordable/rental housing, the SNIP is one of the most popular incentive programs that the City provides as it allows small businesses to make improvements to their buildings that would otherwise have been outside of their financial abilities. Given the extreme adversities small businesses have faced due to the pandemic, it does not seem like now is the time to be taking away any financial incentives that would help them improve their buildings or facades. Lastly, City Staff question how the Region is focusing on Brownfields and Employment when in actual fact they are defocusing by reducing support and veering away from program objectives for these two priority areas.

Yours truly

Steve Zorbas
CAO