

Chapter 3: Sustainable Region

Below is a summary of written comments received on [PDS 17-2021](#) between May 2021 and July 15, 2021, related specifically to the Natural Environment System, Niagara Watershed Plan, and Climate Change.

Comments received verbally through municipal meetings and Public Information Centres (PIC) are not summarized below. Video recordings, presentations, as well as Regional responses to comments not addressed at the June PICs can be found at the Region's website: Niagara Official Plan (<https://www.niagararegion.ca/official-plan/public-information-centres.aspx>)

Detailed comments of the submissions below are available at the Region's website: Niagara Official Plan (<https://www.niagararegion.ca/official-plan/>)

Commenter	Participant Type	Municipality of Residence	Chapter Subsection	Summary of Comments	Regional Response
Marcie Jacklin	Public	Fort Erie	3	Question about where the presence of Indigenous communities are in the process	Staff have engaged with Indigenous communities throughout the NOP process, most recently in May 2021 on the topics of the Natural Environment System, Climate Change, and the Archaeological Management Plan (AMP).
Debra Kassay	Public	Fort Erie	3.1	3C please.	Thank you for your comment.
Susan Murphy	Public		3.1	Has the Region considered "hard" urban boundaries to incentivise intensification and protect agricultural areas and natural heritage?	Urban boundaries are based on community needs after a land needs assessment. In determining expansions, the impact on agricultural areas and the natural environment is considered. Municipalities with boundaries within the

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					specialty crop area designation of the Greenbelt Plan have fixed boundaries.
Kenneth Goddard	Public	NOTL	3.1	Stop urban sprawl in St. Davids, Virgil, and Niagara region. Stop habitat loss, developing farmland, and bulldozing natural habitat.	Thank you for your comments. The balanced policy approach considers these factors. Urban expansion is considered on a land needs basis.
Victoria Berk	Public	Fort Erie	3.1	Emphasis on natural spaces, trails and parks should be focused on so that people are not all crowding into one space.	Thank you for your comments. This is taken into account through secondary planning at the local level. This is being encouraged by the Region for growth management purposes.
Preservation of Agricultural Land Society (PALS)	Stakeholder		3.1	One significant change that should be made to environmental policies is that peer review of Environmental Impact Studies (EIS) should be required, not just imposed at the discretion of the Regional Planning Director as is now the situation. Peer Reviewers should have access to the site to study field conditions and draft reports for public comments. Complaint of EIS studies by consultants missing key features. Comment that municipalities are limited in their	There is the option for the Commissioner to request a peer review, however, staff also have the option. We frequently identify EIS's for peer review at a staff level.

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				planning to protect wildlife and suggestion for more naturalist groups to provide habitat information.	
Preservation of Agricultural Land Society (PALS)	Stakeholder		3.1	PALS supports the more restrictive Option 3C to move forward with but also believes phosphorous trading should be included. To achieve a net phosphorous reduction, efforts should be made to examine how some of the heavy sums spent on storm and sanitary disconnections could achieve a larger net reduction if used for such purposes as riparian tree buffer plantings, purchase of conservation easements and acquisition of natural habitats.	Thank you for your comments. Staff will consider further when developing climate change policies.
Lynda Goodridge	Public	Fort Erie	3.1	Planning process needs to be addressed with reliance on Environmental Impact Studies to show negative effects on properties for development. Comment on the accuracy of these assessments when	EIS's are prepared by qualified professionals and reviewed by staff.

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				consultants are hired by the developer.	
Maria Featherston	Public	Fort Erie	3.1	The general public clearly supported 3C and yet 3B, which is supported by developers, is still being considered. The amount of land involved is only 1.5%; is the physical and mental health of our residents not worth that? We need natural green spaces in which to walk and encounter all of nature's creatures. We need buffers and linkages to support the movement of wildlife, reduce roadkill and protect biodiversity.	Thank you for your comment. Regional Council has chosen to move forward with Option 3B and 3C.
Maria Featherston	Public	Fort Erie	3.1	Comment on conflict of interest with EIS' being paid for by developers ,the need to improve the process, and have endangered species reported by local residents included in the reports.	EIS's are prepared by qualified professionals and reviewed by staff. The MNRF has jurisdiction for endangered species in the province.
Town of Lincoln	PA Circulated Agency		3.1	Comments supporting Option 2 for additional local flexibility, however recognizes Option 3B does propose enhanced protection and that it may be possible through assessments to	Thank you for your comments. Regional Council has chosen to move forward with Option 3B and 3C.

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				conclude a feature or linkage is not necessary.	
Niagara Escarpment Commission	PA Circulated Agency		3.1	Support Option 3B, note that key natural heritage features (NEP policy Part 2.6.1 and 2.7.1) include all wetlands and not just provincially significant wetlands, and want to continue to be consulted.	Thank you for your comments. You are correct, within the NEP area all wetlands are considered key natural heritage features. Staff are aware of the NEP's definition of wetland through discussions with NEC staff. Outside of the NEP area, other provincial plans apply.
Town of Fort Erie	PA Circulated Agency		3.1	Staff previously reviewed the mapping options and provided information to Council. Feedback based on the draft mapping was provided to Regional Staff at that time. Staff have no further comments at this time and look forward to reviewing the mapping and policies when they are available.	Thank you for your comments.
Marcie Jacklin Dawn Pierrynowski	Public	Fort Erie Welland	3.1	Mapping should be done first and who is doing the mapping? Ground truthing needs to be done. Also statement that there should not be an appeal process for developers.	Thank you for your comment. The Planning Act allows for an appeal process by land owners and the public.

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Marcie Jacklin Dawn Pierrynowski	Public	Fort Erie Welland	3.1	Question that given climate change, why is the region even considering 3B? Comment recommending 3C+, sighting Niagara as being an area mentioned in study by Nature Conservancy Canada as being in an eco-crisis area. It is not good enough to exceed provincial standards. The residents of Niagara deserve more protection. It is after all only 1.5% of land. There should be no appeal process by developers, who will use natural events like Emerald Ash Borer to their advantage.	Thank you for your comment. The Planning Act allows for an appeal process by land owners and the public.
Marcie Jacklin Dawn Pierrynowski	Public	Fort Erie Welland	3.1	Shouldn't a cost-benefit analysis be done to find out how much money a Natural Heritage System actually save the community in Niagara? Requiring all the municipalities to have a Natural Assets Plan is a good solution. https://mnai.ca/	Thank you for your comment.
Marcie Jacklin Dawn Pierrynowski	Public	Fort Erie Welland	3.1	It should be obvious to everyone how much the natural areas in Niagara have been a source of therapy, wellness and enjoyment	Thank you for your comment.

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				during the stressful time of the pandemic. Shouldn't the region be looking to expand these areas rather than reduce them given the expected increase in population growth?	
Marcie Jacklin Dawn Pierrynowski	Public	Fort Erie Welland	3.1	<p>I was surprised that you did not respond to my question at the webinar on June 23/21 about what will be done to fix the EIS process. Here are some key points:</p> <ul style="list-style-type: none"> *the EIS is paid for by the developer. I can't imagine a developer paying for an EIS that won't allow them to build. *what does qualified biologist or environmental planner mean? What are appropriate qualifications? Why isn't this process regulated? This shows a real need for option 3C+ *there is a lack of qualified experts at the region, NPCA, and municipalities to properly assess EIS. MNRF staff are not allowed to do site visits. *what is the penalty for an incomplete or inaccurate EIS? 	Thank you for your comments. All questions not responded to verbally at the PICs have been replied to and can be found on the Niagara Official Plan website: https://niagararegion.ca/official-plan/public-information-centres.aspx

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				Essential the peer review process is not functional. In some cases, many of the proposed developments in Niagara that are opposed by the community are as a result of the numerous flaws in this process. This process needs to be fixed and many of us are waiting for a response about this issue.	
Preservation of Agricultural Land Society (PALS)	Stakeholder		3.2	The Niagara Watershed Plan policy has a clear position that watershed plans will be a pre-requisite to be considered before any urban boundary expansion. No watershed plans have been done to evaluate the urban boundary expansions being considered in Fort Erie, Welland and West Lincoln. Any more work on the urban area boundaries features of this plan, should wait until such watershed studies are completed. This should not	The Niagara Watershed Plan project is underway. It is being completed in conjunction with the NOP work program. Volume 3 of the plan will analyze potential growth scenario in the region.

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				prevent approval of other aspects of this plan.	
Town of Fort Erie	PA Circulated Agency		3.2	Staff will provide more specific comments when the NWP is made available but is generally supportive of the creation of an overarching watershed plan for the Region.	Thank you for your comments.
Marcie Jacklin Dawn Pierrynowski	Public	Fort Erie Welland	3.3	The basics of life include clean air and water. We can't survive without them. Relying on municipalities to have the expertise and the will to deal with higher level threats and actions is inadequate. We are at the tipping point and more importance needs to be given to this area immediately.	Thank you for your comment.
Town of Fort Erie	PA Circulated Agency		3.5	Staff will provide more specific comments, if applicable, when the Climate Change Policies are made available but are generally supportive of the identification and inclusion of policy that supports planning for climate change.	Thank you for your comments.

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Susan Murphy	Public		3.5	When you talk about creating "complete communities" in terms of mitigating and adapting to climate change, are you talking about developing new areas from the ground up or redeveloping underutilized, already serviced lands within existing urban boundaries?	Thank you for your question. Through Chapter 2: Growing Region, the majority of growth will be directed to urban areas with existing or planned municipal service in order to support complete communities.
Susan Murphy	Public		3.5	How is the loss of agricultural lands and natural areas and their associated ecosystem services (climate mitigation / adaptation) weighed when evaluating the benefits of greenfield development and growth management?	The purpose of the planning process is to evaluate a range of factors when making a decision. Community benefits, natural services, and agricultural potential are important considerations that go into making a decision under the Planning Act.
Ellen Qualls	Public	NOTL	3.5	I recently saw that Niagara-on-the-Lake only has 10% tree canopy and it needs 30% to support biodiversity. I would like to see funds allocated to planting a significant number of native trees and other plants on public lands and rights-of-way. And I would like to see some sort of program to reward landowners for planting native species.	Thank you for your comments and suggestions. The purpose of the Regional Greening Initiative is to increase vegetative cover across the region. Your feedback will be explored through that initiative.

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Maria Featherston	Public	Fort Erie	3.5	Comment that climate change should be on everyone's mind and the importance of trees and wetlands providing natural infrastructure. Comment on needing to prevent trees from being cut down and new trees do not provide the same benefits as mature trees.	Thank you for your comments. Staff will consider your feedback related to the planting of new trees and maintaining existing mature trees as part of the Regional Greening Initiative.
Grape Growers of Ontario	Stakeholder		3.5	Emphasizes the risk that climate change poses to the viability of agriculture in the Region. Due to increasing frequency of extreme weather events, water for irrigation is becoming more critically important and the need for access to irrigation water and infrastructure should be recognized as part of planning for climate change. We encourage the Region to add a policy section for agriculture infrastructure.	Section 4.1 Agricultural System contains policy 4.1.7.1 "The Region encourages the continued operation and expansion of agricultural infrastructure including irrigation systems". Staff will also consider this comment through the development of climate change policies.
Dawn Pierrynowski	Public	Welland	3.1 3.3 3.5	Comment on trying to contact regional representatives and only having one response. Expressed difficulty with reception during June PIC webinar and was unable to watch the entire webinar.	Official Plan Team confirms receipt of comments as well as comments received February 3, 2021. The June public information centre (PIC) videos, presentations, and outstanding questions not responded to verbally at

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Marcie Jacklin Dawn Pierrynowski	Public	Fort Erie Welland	3.1, 3.5	Comment that climate change has not been as prominent as it should be driving this plan and it should be the number 1 priority. Suggestion that there needs to be bigger emphasis on mitigation and adaptation strategies particularly for transit, watershed planning, natural heritage system, and agriculture. Planting trees isn't enough, need to save the mature trees. Concerns that buffers are inadequate and other regions have 120 m buffers, whereas in Niagara we only have 30m.	<p>Thank you for your comment. The climate change section will reference the topic areas of transportation, watershed planning, the natural environment system, and agriculture as part of climate change mitigation and adaptation.</p> <p>The Regional Greening Initiative will focus on increasing vegetative cover across the region. Your feedback with respect to planting and preserving mature trees will be considered through that initiative.</p> <p>We are not aware of other Regions that require 120m buffers. 120m is typically the radius used around certain features to trigger a study on a site-specific basis.</p>

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Lynda Goodridge	Public	Fort Erie	3.1, 3.5	Comment on the importance of climate change and questions why climate change is not the main issue for a sustainable region? Comment that it is to be integrated within the entire plan but seems to be lost in the text. Comment that best defence is enhancing our 'green infrastructure', maintaining and expanding woodlands, wetlands and other natural features but many are destroyed through planning policies. Importance of Option 3C for the Natural Environment System.	Climate change impacts many of the topic areas addressed through a Regional Official Plan. The Niagara Official Plan will have a climate change section, as well as policies throughout the plan. Planning for climate change from a land use planning perspective includes supporting the development of complete communities that are compact, walkable and transit-supportive; protecting agricultural lands for agricultural use; protecting the natural environment system; encouraging and supporting the use of sustainable construction materials; supporting existing and planned transit and active transportation; supporting energy conservation for existing and planned developments; assessing infrastructure risks and vulnerabilities, among others.