



June 9, 2022

By email to: clerk@niagararegion.ca

Ann-Marie Norio
Office of the Regional Clerk
Niagara Region
1815 Sir Isaac Brock Way, P.O. Box 1042
Thorold, Ontario L2V 4T7

Dear Ms. Norio:

**Re: PDS 17-2022 Niagara Official Plan: Recommendation Report for Adoption
Comments on Proposed Niagara Region Official Plan
Canadian Niagara Hotels Inc. and related companies and persons ("CNH")**

We write in regards to the draft Official Plan, on behalf of CNH (and related companies and persons).

We appreciate the opportunities to review drafts of the Official Plan and the time provided by Regional Staff to discuss same.

The Official Plan contains many improvements over the existing plan. However, in our view, certain areas remain of concern. For example:

- The Plan has very limited focus on the tourism industry as the Region's key economic and employment driver. The Plan should include specific policies directing hospitality-related growth to the core tourist areas of Niagara Falls and Niagara-on-the-Lake. These areas are of Regional importance.
- We are unsure the appropriateness of the minimum density target set out for Glendale Niagara District Plan area.

**CROWNE PLAZA NIAGARA FALLS - FALLSVIEW
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- The new Natural Environment policies in chapter 3 are unnecessarily restrictive, beyond the Provincial Plan requirements. In our view, these policies must be incorporated more comprehensively with other Provincial Plan requirements, including policies requiring a sufficient housing supply that reflects market demand and what is required in local communities. Proposed Plan policies unduly restrict development on existing lots.
- The new Official Plan identifies Region-wide Employment Areas for the first time. We have concerns that certain areas do not reflect Provincial Plan policies, including conversion requirements.
- The new Official Plan permits settlement area adjustments, subject to detailed policies. One of those policies limits adjustments to no net increase of “developable land”. The *Growth Plan* policy upon which this Official Plan policy is based uses the term “land” and not “developable land”. In all prior versions of the draft Official Plan, and all previous consultations held, there was no qualifier that this policy be based on “developable land”. The Official Plan policy should not restrict adjustments to “development land” and instead should reflect the *Growth Plan* language of “land”. The effect of this change is significant: it makes it very difficult to solve practical land supply problems through boundary adjustments.

We appreciate the opportunity to discuss the new Official Plan and to provide these comments.

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Please provide us with notice of Council's decision in this matter.

Kind regards,

A handwritten signature in black ink, appearing to read 'Chris Mason', is written over a horizontal line.

Chris Mason
Chief Operating Officer

Copy: Michelle Sergi, Commissioner, Planning and Development Services
David Heyworth, Manager of Long Range Planning
Diana Morreale, Director (Acting), Community and Long Range Planning