

**Table 1: Niagara Region Staff Responses to ERO 019-8462 Questions**

<b>ERO Questions</b>	<b>Niagara Region Staff Response</b>
<p>1. What are your overall thoughts on the updated proposed Provincial Planning Statement?</p>	<p>Niagara Region staff note that there are many improvements and efficiencies in the proposed PPS (2024), however, staff are concerned with the loss of some Growth Plan policies (i.e. natural heritage, agriculture, growth management, etc.) which are not being replaced in the proposed PPS (2024). Further, staff are concerned about the impact of changes to employment area policies and the unintended consequences of the ‘ad-hoc’ nature of settlement area expansion and the responsible delivery of services and infrastructure.</p>
<p>2. What are your thoughts on the ability of updated proposed policies to generate appropriate housing supply, such as: intensification policies, including the redevelopment of underutilized, low density shopping malls and plazas; major transit station area policies; housing options, rural housing and</p>	<p>Although it is possible that some of the updated policies will have the intended effect of increasing housing supply it is difficult to project. Overall the last several years the rate of change in Provincial planning policy and legislation has been significant. This, along with the reversal of many changes has created an atmosphere of uncertainty, both with municipalities and the development community. It is recommended that the Province move towards an environment of stability to allow policies to be implemented, their effectiveness be determined and focus municipal efforts on approving housing developments.</p>

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<p>affordable housing policies; and student housing policies?</p>	
<p>3. What are your thoughts on the ability of the updated proposed policies to make land available for development, such as: forecasting, land supply, and planning horizon policies; settlement area boundary expansions policies; and employment area planning policies?</p>	<p>Niagara Region staff have concerns that requiring each individual local municipality to do their own forecasting of population and employment growth may result in inconsistent forecasts and/or methodologies which impact the Region’s ability to plan for investments in infrastructure and the coordination of regional public services between local municipalities. The ad-hoc nature of settlement area expansion coupled with proposed Planning Act changes via Bill 185 will lead to inefficient use of existing services area and expansion that may not be fiscally responsible.</p> <p>It is the recommendation of Niagara Region staff that the PPS include policies to required growth targets and coordination of development with the delivery of infrastructure across municipalities.</p>
<p>4. What are your thoughts on updated proposed policies to provide infrastructure to support development?</p>	<p>Niagara Region staff are supportive of the proposed policies which would allow the allocation and reallocation of unused capacity in the water and wastewater system and which would promote the development of phasing policies as appropriate. These policies will encourage the orderly development of urban areas and support the efficient use of existing and planning infrastructure and public services.</p>

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	PPS should also reference municipal infrastructure master plans and require that development aligned with the planned services.
<p>5. What are your thoughts on updated proposed policies regarding the conservation and management of resources, such as requirements to use an agricultural systems approach?</p>	<p>Niagara Region staff are generally not supportive of the proposed policies related to the conservation and management of resources. An agricultural system approach based on provincial-mapping has historically been in place in the Growth Plan GGH municipalities. Similarly with the elimination of the Growth Plan, the Growth Plan Natural Heritage System is being eliminated as provincial land use policy. Overall the proposed PPS (2024) represent a lesser protection of the natural environment and resources as compared to the existing policy framework of the PPS (2020) and Growth Plan (2019).</p>
<p>6. What are your thoughts on any implementation challenges with the updated proposed Provincial Planning Statement? What are your thoughts on the proposed revocations in O.Reg. 311/06 (Transitional Matters - Growth Plans) and O.Reg. 416/05 (Growth Plan Areas)?</p>	<p>It needs to be recognized that after the effective date, and until municipal official plans (and zoning by-laws) can be updated, there will be a range of inconsistent and conflicting policies for land-use planning in Ontario. This type of policy environment creates confusion and uncertainty for both land developers and municipal planning staff, it serves to delay development and construction rather than to expedite it. This is compounded by the removal of statutory planning authority from Regional municipalities, which further creates uncertainty in the Planning process at a time when stability and certainty is required.</p>