

Ministry of Municipal Affairs and Housing (MMAH)  
Provincial Land Use Plans Branch  
13th Floor, 777 Bay Street  
Toronto, ON  
M7A 2J3

**Subject: Niagara Region Comments – ERO 019-6813**  
**Review of Proposed Policies adapted from A Place to Grow and**  
**Provincial Policy Statement to form a new provincial planning policy**  
**instrument.**

Niagara Region staff appreciates the Province’s commitment to providing more housing across Ontario and the opportunity to provide comments on the proposed Provincial Planning Statement (PPS, 2023). Niagara Region supports the Province’s commitment on improving the efficiency of the land use planning system. Regional staff will be taking a report to Planning and Economic Committee on June 7, 2023 and Regional Council on June 15, 2023 outlining our submission. Please see attached three (3) tables that provide Niagara Region staff’s comments on ERO posting 019-6813:

- Table 1 – Comments on the ERO questions
- Table 2 – Comments and Recommendations on the proposed PPS, 2023
- Table 3 – Comments on the ‘Proposed Approach to Implementation of the proposed Provincial Policy Statement’ document

Although there are several beneficial changes aimed at improving the efficiency of the land use planning system in the proposed PPS 2023, there are several key areas where Niagara Region staff have concerns:

- Permitting lot creation in prime agricultural areas;
- Changes to the definition of “employment areas” and other changes impacting employment lands;
- Policies that specifically restrict municipalities from going beyond the minimum standards of the proposed PPS, 2023;
- Ad hoc nature of settlement area expansion and a lack of minimum intensification targets;
- Elimination of the definition of “affordable” housing; and
- Deferral of natural heritage polices.

---

## Permitting Lot Creation in Prime Agricultural Areas

Niagara Region staff do not support the proposed policies which would allow for new lot creation in prime agricultural areas. Permitting lot creation of this scale will undoubtedly lead to fragmentation of the agricultural land-base, and based on staff's initial analysis could result in **an estimated loss of approximately 4,500 to 5,000 hectares of Niagara's prime agricultural area to residential lot creation** which could have an annual economic impact (loss) of \$20-\$23 million in farm revenue per year. This estimated loss of farmland and economic cost is for lot creation in the prime agricultural area only and does not consider losses associated with less restricted settlement boundary expansions, or the potential impact on revenues related to land use conflicts.

The introduction of this level of non-agricultural uses to the agricultural areas will also create limitations on the expansion and introduction of new agricultural uses, for example livestock facilities that require minimum separation from residential uses. Detailed analysis and comments are included in Table 2.

Niagara Region staff strongly recommend that current provincial policy, which limits the creation of lots to surplus dwellings related to lot consolidation in prime agricultural areas be maintained. It is the recommendation of Niagara Region staff that provincial changes to increase housing supply be focused on settlement areas, which have the servicing capacity to support growth, and will better achieve the goal of creating complete and liveable communities.

## Changes to the Definition of "Employment Areas" and Other Changes Impacting Employment Lands

Niagara Region staff do not support the range of policy changes through Bill 97 and the proposed PPS that serve to limit the protection for employment areas and lands, and allow for residential development on lands that municipalities may have previously restricted to employment uses only. Staff have significant concern that the proposed changes will hinder the Region's ability to meet employment forecasts to 2051. For example, the revised definition of "employment areas" has the potential to **remove approximately 2,175 hectares of employment area lands** (approximately 46% of total employment area lands in Niagara) based on preliminary analysis. Detailed analysis and comments are included in Table 2.

Although the desire to create complete communities and increase housing is understood, once residential and other sensitive land uses are introduced into an area that was previously restricted to employment uses, significant land use compatibility issues can arise. These compatibility issues can make it difficult for existing industry to expand, and less attractive for new employment uses to establish.

---

## **Policies that Specifically Restrict Municipalities from Going Beyond the Minimum Standards of the Proposed PPS, 2023**

In conjunction with the policies for lot creation in prime agricultural areas and the proposed policy that would permit residential development in employment lands outside of the redefined employment areas, the proposed PPS includes policies that would prohibit municipalities from being more restrictive than the PPS.

Niagara Region staff do not support the inclusion of this type of policy in the proposed PPS. This type of policy is contrary to the introduction of the proposed PPS (and previous versions of the PPS), which states that “policies represent minimum standards” and “planning authorities and decision-makers may go beyond these minimum standards to address matters of importance to a specific community”. The proposed PPS a province-wide document. It needs to provide opportunities to address matters of local significance and cannot be one-size fits all.

Based on the recent announcement, Niagara Region staff understands that the Province will take a closer look and reconsider the proposed agricultural lot creation and employment polices. Region staff strongly encourage the Province to maintain the existing severance policy structure and limit severances to surplus farm dwellings resulting from farm consolidation.

## **Ad Hoc Nature of Settlement Area Expansion and a Lack of Minimum Intensification Targets**

Niagara Region staff are concerned with proposed policies of the PPS which will result in the loss of integrated and coordinated growth planning. Of specific concern are the policies which would allow for settlement area expansions without the requirement to demonstrate need and without a municipal comprehensive review or a similar coordinated process.

Niagara Region staff are also concerned that the proposed PPS has removed minimum intensification targets. Not having a minimum intensification target or a “built-up area” at the Provincial level, combined with the ability to expand settlement area boundaries at any time, may discourage intensification and encourage sprawl. If sprawl is prioritized over intensification, it will become costly to extend and maintain servicing to greenfield areas, with existing infrastructure not being optimized.

It is the recommendation of Niagara Region staff that the province maintain minimum intensification and density targets with clear direction that municipalities may exceed the targets based on local conditions.

---

## **Elimination of the Definition of “Affordable” Housing**

The proposed PPS has eliminated the definition of “affordable” as it relates to housing. Niagara Region staff are concerned that this may result in inconsistent definitions used for affordability, which in turn make it difficult to monitor, incentivize and plan for affordable housing.

Niagara Region, like much of Ontario, has experienced significant increases in rent and purchase prices, as well as a decrease in overall vacancy rates, and it is recommended that proposed PPS address the important issues of housing affordability in the Province including definitions, targets, policies, and indicators as appropriate.

## **Deferral of Natural Heritage Policies**

The proposed PPS does not include natural heritage policies; therefore, it is difficult to provide a meaningful response to the other rural and resource-related policies given the interrelationship and overlapping land uses.

It is the recommendation of Niagara Region staff that consultation on the proposed PPS be paused until such time that the natural heritage policies are released and the impact of the complete policy set can be considered comprehensively – as they are intended to be applied.

We thank you again for the opportunity to provide comments on the proposed Provincial Planning Statement and look forward to continuing to work with the Province on improving the efficiency of the land use planning system and achieving the goal of providing more housing across Ontario.

If you have any questions about this submission please contact Angela Stea, MCIP, RPP, Director of Community and Long Range Planning ([Angela.Stea@niagararegion.ca](mailto:Angela.Stea@niagararegion.ca)).

Respectfully,

Signed by Angela Stea on behalf of

Michelle Sergi, MCIP, RPP  
Commissioner, Growth Strategy and Economic Development  
Niagara Region