

Table 1: Niagara Region Staff Responses to ERO 019-6813 Questions

| ERO Questions | Niagara Region Staff Response |
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| <p>1. What are your thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?</p> | <p>Niagara Region staff understand that some changes to provincial policy are required to support the goal of creating 1.5 million new housing units in the Province by 2031 and streamlining the planning process.</p> <p>Niagara Region staff however note that land use planning requires the consideration of a number of important priorities. The development of housing should not take ultimate priority over all other land uses and considerations.</p> <p>Niagara Region staff have significant concerns with the proposed policies regarding employment areas and agriculture. Niagara Region staff are concerned that the proposed policies favouring housing development significantly reduce the protection and long-term viability of agricultural land, and the protection of employment areas and land. Detailed analysis and comments are included in Table 2.</p> |
| <p>2. What are your thoughts on the proposed policy direction for large and fast-growing municipalities and other municipalities?</p> | <p>Niagara Region staff support the identification and specific policies for “large and fast-growing municipalities”.</p> <p>Niagara Region staff would however recommend that in policy 2.3.5. “large and fast-growing municipalities” be <u>required</u> to plan for a minimum density of 50 residents and jobs per hectare, as opposed to only being encouraged to do so.</p> |

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| <p>3. What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?</p> | <p>Niagara Region, like the rest of Ontario, has seen significant increases in rents and purchase prices, as well as a decrease in overall vacancy rates. The proposed PPS should address how planning authorities can help to support the provision of affordable housing options for all residents.</p> <p>The proposed document instead has removed the definition of affordable, as well as other policies that would require targets, tools, or other approaches for affordability to be identified. As a result, the proposed PPS document provides no meaningful direction for how municipalities are to provide for “housing affordability needs”.</p> <p>In addition, there are concerns that by removing intensification rates and density targets for undeveloped urban areas, planning authorities would have less support to require a greater range of housing options, especially housing forms and tenures that support affordability.</p> <p>Household income is a significant factor for affordability and accessibility to housing. While proposed policies with regards to employment lands and employment land conversions are intended to allow further flexibility for residential development, it can mean there is less investment made to ensure well-paying jobs are available for current and future residents in their community, as well as increase conflicts between land uses thereby reducing the quality of life of those residents and the ability for business and expand.</p> |

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| <p>4. What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?</p> | <p>The proposed PPS includes polices that would allow for lot creation in prime agricultural areas. Niagara Region staff are concerned that this change will lead to fragmentation of farmland and increase the number of non-compatible uses in the agricultural area. This concern is compounded by flexible settlement area expansion policies being proposed. Detailed analysis and comments are included in Table 2.</p> <p>Natural heritage policies have not been provided as part of this ERO posting; therefore, it is difficult to provide a meaningful response to the other rural and resource-related polices given the interrelationship and overlapping land-uses.</p> <p>It is the recommendation of Niagara Region staff that consultation on the proposed PPS be paused until such time as the natural heritage polices are released and the impact of the complete policy set can be considered.</p> |
| <p>5. What are your thoughts on the proposed policies regarding planning for employment?</p> | <p>Niagara Region staff have significant concerns and are not supportive of the proposed changes to employment policies.</p> <p>Niagara Region staff are concerned that limiting the definition of employment areas, allowing for residential and institutional uses in employment lands outside of employment areas, and limiting the policy tests for employment land conversions in support of residential development will have a significant impact on economic development in the Region and Province. Detailed analysis and comments are included in Table 2.</p> |

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| <p>6. Are there any other barriers to, or opportunities for, accelerating development and construction (e.g., federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?</p> | <p>Much of the recent discussion on accelerating development and construction in the Province has been on the processes and roles of municipalities. As part of any initiative to accelerate development and construction, it is recommended that the Province complete a process review and mandate timelines for all provincial permits and approvals (e.g. species-at-risk, MTO permits, Records of Site Condition, archaeological clearances, etc.).</p> <p>Instability in planning legislation and policy in Ontario is also becoming a barrier to development and construction in the province. Since the revised Growth Plan and Greenbelt Plan were released in 2017 there has been constant change. Municipal planners and the development community are spending a significant amount of time responding to this change, rather than the day-to-day work of planning and approving applications. It is recommended that the Province allow time for changes to be implemented and to provide a period of stability in the sector to allow us to move forward with advancing the Province’s housing goals.</p> <p>Further, additional incentives should be consider for land owners/proponents to develop urban lands that have been approved for residential development but remained undeveloped for decades, or consequences for not developing lands that have been approved for development. In Niagara for example, there are numerous examples of subdivision which have draft plan approval but have not moved forward to development.</p> |