

**Delivered Electronically**

February 28, 2019

Charles O'Hara  
Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing

**Re: Comments Regarding Proposed Amendment No. 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 Environmental Registry of Ontario No. 013-4504**

This correspondence is submitted in response to Environmental Registry of Ontario No. 013-4504, being the proposed Amendment No. 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017* (the "Amendment"). The Community and Development Services Department of the Town of Niagara-on-the-Lake (the "Town") acknowledges the coordinated submission of the Region of Niagara in respect of the proposed Amendment, and wishes to reinforce the following points as they pertain to the Town of Niagara-on-the-Lake:

**Niagara's Gateway Economic Zone & provincially significant employment zones**

New provincially significant employment zones are proposed in the GGH, although none are proposed in Niagara.

The current and proposed Growth Plan identify a Gateway Economic Zone and Gateway Economic Centre that apply only to the Region of Niagara, intended to "...support economic diversity and promote increased opportunities for cross-border trade, movement of goods, and tourism." (at s. 2.2.5.15).

The Gateway Economic Zone is a subset of the Niagara Region's federally recognized Foreign Trade Zone and is unique due to its close proximity to major goods movement corridors, such as the Welland Canal, and international border crossings.

The Niagara Region may desire to identify all or part of the Gateway Economic Zone and Gateway Economic Centre as provincially significant employment zones.

The Town concurs that the Region should be granted the authority to designate provincially significant employment zones within the Gateway Economic Zone and Gateway Economic Centre, without amendment to the Growth Plan.

Granting the Region this authority will enhance Niagara's ability to respond to market conditions. It will also secure the province's economic competitiveness through ensuring

the protection of existing and emerging employment areas located both within and outside settlement area boundaries in close proximity to cross-border trade routes/facilities, leveraging the efficient movement of goods, and opportunities for tourism.

The Town supports the following suggested revision to the Growth Plan:

Amendment Policy #	Niagara's revisions to proposed Growth Plan Amendment
Definition:  'Gateway Economic Zone'	<p><del>Text</del> = Province removed      <u>Text</u> = Province added  <del>Text</del> = Niagara removed      <u>Text</u> = Niagara added</p> <p><del>Settlement areas identified in this Plan within the zone that is conceptually depicted on Schedules 2, 5, and 6, that, The geographic area within the Niagara Region consisting of Fort Erie, Niagara Falls, Port Colborne, Thorold, and Welland. The Gateway Economic Zone is a subset to the Niagara Region's federally recognized Foreign Trade Zone and is unique</del> due to their proximity to major <u>goods movement corridors, such as the Welland Canal, and</u> international border crossings, <del>have unique economic importance to the region and Ontario</del> <u>Within this area, provincially significant employment zones can be identified by the Region of Niagara without amendment to this Plan.</u></p>

**Ancillary uses to major goods movement facilities**

The Town and the Region seek to promote the economic competitiveness of the Niagara District Airport, located in Niagara-on-the-Lake.

The expanding role of the GGH is driving the need to protect for potential expansions to major goods movement facilities, such as Niagara District Airport, in order to respond to the needs of the projected population and employment growth of the Region.

This can be done by updating the Growth Plan to clarify that parcels adjacent to or near major goods movement facilities should be protected for infrastructure and uses ancillary to the principle use.

The Town supports the Region's suggestion of a new policy in Section 2.2.5 *Employment* that provides direction on the need to reserve land adjacent to major goods movement facilities for uses that support the principal transportation use, and reinforces the need to avoid or mitigate adverse impacts to surrounding agricultural uses.

The Town supports the following suggested new policy for the Growth Plan:

Amendment Policy #	Niagara's revisions to proposed Growth Plan Amendment
	<p><del>Text</del> = Province removed      <u>Text</u> = Province added  <del>Text</del> = Niagara removed      <u>Text</u> = Niagara added</p>

<p>Proposed new policy:</p> <p>Section 2.2.5 – Employment</p>	<p><u>To support economic development and competitiveness of the GGH, lands adjacent to or near major goods movement facilities and corridors, including those outside of settlement areas and/or within the Greenbelt Plan area shall:</u></p> <p>a) <u>be protected for the expansion or development of infrastructure and uses ancillary to that of the principle major goods movement facility and/or corridor use;</u></p> <p>b) <u>avoid, or where avoidance is not possible, minimize and mitigate adverse impacts to the Agricultural System or other sensitive land uses vulnerable to encroachment;</u></p> <p>c) <u>require an Agricultural Impact Assessment during instances where infrastructure or uses ancillary or principle to major goods movement facilities are proposed within, adjacent to, or near the Greenbelt Area or Agricultural System; and,</u></p> <p>d) <u>be considered by upper- and single-tier municipalities for designation as provincially significant employment zones.</u></p>
---	--

### Harmonizing provincial plans and communication between provincial entities

In the past, Niagara has faced challenges between municipal and provincial staff when trying to interpret and implement provincial policy. There is an opportunity for a fresh start with the new government.

Niagara has experienced a lack of coordination and conflicting directive on matters involving the Growth Secretariat and Ministry of Municipal Affairs and Housing. Niagara has had instances where inconsistent technical or procedural views have been taken that do not advance the objectives of the provincial plans.

The Town supports the Region’s two suggestions in this regard.

First, it is suggested that the Province explore a single-window approach to address issues encountered by municipalities during the interpretation of provincial plan policy, with clear, publicly-available terms of reference to address such issues.

Second, it is recommended that provincial plans be better harmonized to ensure consistent application of objectives, policy, and definitions. For example, there are inconsistencies between the Growth Plan and the Greenbelt Plan, some of which are highlighted in our materials, that should be resolved at this time.

On an administrative note, the Town is troubled by the general reluctance of provincial staff to provide written interpretation and direction with respect to the policies of provincial plans, where municipal staff have inquired regarding interpretation of the same. In these cases, provincial staff have been willing to speak verbally about interpretation of provincial policies, however, for reasons that are not clear, are adverse to providing advice in writing to support municipalities in administering clear and efficient planning processes. The Town submits that this reluctance to provide written interpretation of provincial policies needs to change immediately. Any concern about refraining from providing written advice to municipal staff in an effort to limit exposure of provincial staff in local planning processes and/or in LPAT proceedings is misguided

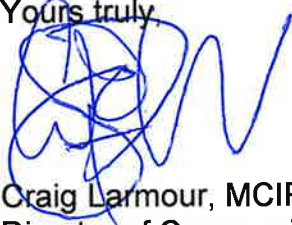
and unacceptable, and is truly unbecoming of a Government for the People.

## **Conclusion**

The above comments are submitted by staff of the Community and Development Services Department of the Town of Niagara-on-the-Lake, to inform the proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017. Additional comments from Council of the Town of Niagara-on-the-Lake may be provided at a later date.

Please feel free to contact the undersigned at 905.658.6865 or [craig.larmour@notl.com](mailto:craig.larmour@notl.com) should you require any further information or clarification in respect of the above comments.

Yours truly,

A handwritten signature in blue ink, appearing to be 'CL', with a long horizontal stroke extending to the right.

Craig Larmour, MCIP, RPP  
Director of Community and Development Services