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February 28, 2019

Hon. Steve Clark
Ministry of Municipal Affairs and Housing
Office of the Minister
777 Bay Street, 17th Floor
Toronto, Ontario M5G 2E5

**RE: Amendment 1 to the Growth Plan for the Greater Golden Horseshoe
(ERO 013-4504, 013-4505, 013-4506, 013-4507)**

Dear Minister Clark,

Thank you for the opportunity to provide comments on Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 (Growth Plan). We also appreciate the updates your office has been providing the City of Welland on the Province's Plans to streamline the development approval process and to increase the supply of housing. We also acknowledge your comment that Municipalities should consider an interim pause on some planning decisions or reviews of major planning document until the Province's work is completed on streamlining the development approval process.

We have reviewed Amendment 1 to the Growth Plan and generally support the proposed changes. The following list comprises the recommend changes by the City by policy theme area:

a) Employment Planning

With reference to Appendix I – the City is recommending that lands identified as Proposed Provincially Significant Employment Lands on the attached map be designated as Provincially Significant Employment Lands.

These lands are largely designated as Gateway Economic Zone and Gateway Economic Centre in the City's Official Plan and the Niagara Gateway Community Improvement plan. In addition, some of these lands adjacent to the active Welland Canal and should also be considered as Provincially Significant Employment Zones given the economic opportunities their location presents. Although some of these lands are designated Agricultural by the City's Official Plan their strategic locations along the Welland Shipping Canal, adjacent to rail lines, and Provincial Highways require them to be protected for future employment uses.

b) Settlement Area Boundary Expansions

With reference to Appendix II – Staff recommends that with the approval of Amendment 1, lands within the Northwest Area of the City be included within the City’s urban area boundary.

These lands are appropriate for future urban development due to following characteristics:

- The presence of existing and planned infrastructure (including two Elementary Schools, a School Board Headquarters and water and sewer infrastructure);
- The suitability of the area for development relative to stormwater drainage, water and sewer services, environmental impacts and integration with existing and proposed development in the City and with the abutting municipalities of Pelham and Thorold has been demonstrated multiple times;
- Contain lands designated Built-Up Area in the Growth Plan;
- Proximity to existing urban and built-up areas in Welland, the Town of Pelham and the City of Thorold;
- The ability to contribute to orderly, sequential and continuous development; and
- The City has met and exceeded the current minimum intensification requirements and will meet and exceed the proposed minimum. Staff is of the opinion that urban expansion only should be permitted where minimum intensification requirements have been met.

Including these lands in the Urban Area for Welland will help the City move forward with completing the Secondary Plan for this area in consultation with various stakeholders and allow for the creation of more shovel ready housing opportunities in the City, Region and Province. The current process for Urban Expansions is complex, inefficient and not a wise use of taxpayer dollars.

c) Intensification and Density Targets

The City’s supports the proposed changes to the intensification and density targets proposed by Amendment 1 to the Growth Plan.

It should be noted that the City has achieved higher intensification and density targets than those proposed by Amendment 1. As well, it should be noted that the targets are minimums and therefore, higher targets can be achieved thereby continuing to encourage the development of complete communities and achievement of economies of scale.

d) Transition Matters

With reference to Appendix III, the City recommends that as part of the Transition Matters, the Province withdraw its appeal of Regional Policy Plan Amendment (RPPA) 4-2013.

The subject lands are intended for employment purposes and were justified for inclusion as part of our 2010 Official Plan Review. We are also recommending these lands be considered as Provincially Significant Employment Lands given their proximity to the active Welland Canal, Highway #140, Highway #58A, Highway #406 and active rail lines.

The Appeal of these lands to the Ontario Municipal Board makes no sense from a Planning or Economic Development Perspective. Limited government resources should be spent on promoting the area for Economic Development rather than costly OMB processes.

In conclusion, the City would like thank you and the Province for affording us the opportunity to comment on this proposed Amendment to the Growth Plan. Please consider the City's recommendations as outlined in this letter. We look forward to working with the Province in streamlining the development approval process. Welland is a leader in streamlined development approvals and we look forward to providing comments on how this can be achieved at the Municipal, Regional and Provincial level.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Champion". The signature is written in a cursive, flowing style.

Frank Champion
Mayor

Encl.