



October 7th, 2022

Environmental Registry of Ontario
Alejandra Perdomo
Municipal Services Office - Central Ontario
16th floor, 777 Bay Street
Toronto, ON M7A 2J3

Dear Ms. Perdomo;

RE: ERO number 019-5717
Ministry reference number 25-OP-171748

NPG Planning Solutions Inc. are planning consultants to Phelps Homes, owners of multiple parcels of land in Niagara Region. We are providing this letter as comments on the Niagara Region Official Plan that is currently available for comment. Our comments are as follows.

1. Housing – Niagara Region has committed to implementing the Growth Plan population and employment targets and identified areas for settlement area boundary expansions. These expansion areas are appropriate for new housing. At the same time, the Region has committed to 60% intensification within the Built-up Area. Local municipalities must implement both expansion areas (where they occur) and intensification at densities to achieve the housing needed for Niagara’s population growth. The policies of the Plan must require conformity – there can be no waivering on intensification and no prohibition of intensification by regulation at the local level. While the latter may be beyond the Minister’s decision on the NROP, it is very clear that many municipalities waiver in the

face of opposition to intensification which will have the result of failure to achieve the housing targets. Policies must require local intensification strategies, no down designation of intensification sites/areas, and timeframes for implementation.

2. Growth Management – the implementation of the Region’s growth management strategy requires local municipalities to implement the growth through sub watershed studies, secondary plans, and infrastructure planning. All are appropriate tools for implementing growth. The policies of the NROP must support this with key requirements:
 - a. The Natural Heritage System must be the Provincial NHS and not Option 3c as adopted. Option 3c is creating features in a new system, not reinforcing what exists on the landscape.
 - b. Refinement of natural heritage systems, features and buffers must occur as more detailed implementation occurs. The landscape changes over time and as this is a 30-year plan, new information and studies must be incorporated into future development as more detailed implementation occurs. The Natural Heritage System cannot be established in 2022 and frozen in time. Moreover, as the Natural Heritage System is done at a Regional scale, refinement through detailed studies at the local level must be supported by Regional policy.
 - c. Local municipalities cannot be more restrictive than the Regional Official Plan with regard to any policies and most especially natural heritage. With the Region’s adoption of Option 3c, which creates features and expands the system, allowing local municipalities to be more restrictive compounds what is already a troubling natural heritage approach with even more created features required by local municipalities. What this will mean is needing to increase densities on the remaining lands to the point where the provision of market-based housing could be in jeopardy, contrary to the PPS. Further, this will place inordinate pressure on local municipalities to address density with the consequential experienced pushback from local residents.
 - d. There is an urgent need for the full range of housing in Niagara to support citizens and those in the various economic sectors in Niagara. There must be timelines for local municipalities to implement the New NROP and there must be consequences if that

work isn't done. Local municipalities must prioritize implementation with staffing and funding.

We trust these comments are of assistance. Please do not hesitate to contact the undersigned for any clarification.

Sincerely,



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