

Table 2: Niagara Region Staff Detailed Analysis and Comment on the Proposed 2023 Provincial Planning Statement (PPS)

Proposed Change / Integration	Niagara Region Staff Analysis/Response
Aggregates	
<p>The proposed PPS (2023) has not made significant changes to the aggregate resources section. References to rehabilitation in speciality crop areas have been removed – however rehabilitation in these areas would be directed by the Greenbelt Plan and Niagara Escarpment Plan where applicable. [Proposed section 4.5]</p>	<p>Niagara Region staff note that the Growth Plan (2019) included a number of detailed and prescriptive policies related to aggregates resources – most of which were in regards to the interaction between aggregates and the Growth Plan Natural Heritage System. As the proposed natural heritage policies have not been released, we cannot comment on natural heritage-aggregates policies at this time.</p> <p>It is the recommendation of Niagara Region staff that consultation on the proposed PPS (2023) be paused until such time that the natural heritage polices are released and the impact of the complete policy set can be considered.</p>
Agriculture	
<p>The proposed PPS (2023) eliminates the requirement to use the provincially-mapped Agricultural System. Municipalities would now lead the designation of prime agricultural areas, including speciality crop areas. Using the provincial mapping remains an option. [Proposed policy 4.3.1]</p>	<p>An agricultural system approach based on provincial-mapping has historically been employed in Niagara’s regional official plan to designate lands based on priority for protection. After the release of the proposed agricultural system mapping by the Province (2018), Niagara Region through the Municipal Comprehensive Review (MCR) process, undertook extensive consultation with local municipalities to identify mapping refinement opportunities in the proposed land base.</p>

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	<p>Niagara Region staff believe the mapping approved through the Niagara Official Plan (2022) is accurate and best represents a continuous land base and systems approach. Niagara Region staff support the continued use of the approved agriculture land-base mapping in Niagara.</p>
<p>The proposed PPS (2023) expands the definition of “on-farm diversified uses” to include all “land-extensive energy facilities”, such as ground-mounted solar or battery storage, whereas previously only ground-mounted solar facilities were identified. [Proposed definition of “on-farm diversified use”]</p>	<p>OMAFRA’s <i>Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas</i> states that “on-farm diversified uses should be related to agriculture, supportive of agriculture or able to co-exist with agriculture without conflict”. Provided these uses are still subject to other criteria and guidance for on-farm diversified uses (i.e. limited in area, secondary to the principal use, etc.), the expanded definition may align with Provincial and Regional policies that support the transition to net-zero communities.</p> <p>However, Niagara Region staff are concerned that given these uses are referred to as “land-extensive” it may mean they are meant to apply to more significant portions of a farm parcel.</p> <p>It is the recommendation of Niagara Region staff that the province consider whether “land-extensive” energy facilities are an appropriate land use in prime agricultural areas.</p>
<p>Agricultural Area Housing</p>	
<p>In addition to a principal dwelling associated with an agricultural operation in prime agricultural areas, the proposed PPS (2023) permits up to two additional residential units as subordinate to the principal dwelling. [Proposed policy 4.3.2.5]</p>	<p>The Niagara Region Official Plan has a provincially-approved 0.4 ha size requirement for all lot creation in rural areas. This lot size reflects the area necessary to support on-site private water supply and long-term operation of a private sewage disposal system.</p>

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	<p>Niagara Region staff are concerned the addition of 2 residential units on each parcel would require upgraded private servicing, which may not be possible on lots that were created for only a single residential unit.</p> <p>In addition, Niagara Region staff are concerned that proposed policy 4.3.2.5 refers broadly to “sewage and water services” being provided, whose definition includes “municipal sewage services and municipal water services”; especially coupled with the removal of policy wording that states the extension of partial services into rural areas is only permitted to address failed individual on-site sewage and individual on-site water services for existing development from proposed Section 3.6.</p> <p>To ensure both environmental sustainability and responsible financial investments in infrastructure, it is the recommendation of Niagara Region staff that extensions of municipal services outside of urban boundaries should not be permitted to service intensification of non-agricultural uses.</p> <p>It is also recommended that a set of parameters or guidelines be developed to help determine whether these uses “demonstrate that the use are compatible with, and would not hinder, surrounding agricultural operations” (Proposed Policy 4.3.2.5 c).</p>
<p>Agricultural Area Lot Creation</p>	
<p>The proposed PPS (2023), through a new policy, now permits the creation of up to three residential lots from an existing parcel in the prime agricultural area. [Proposed policy 4.3.3.1]</p>	<p>Niagara Region staff do not support of the proposed policy for lot creation in prime agricultural areas.</p> <p>Prime agricultural areas are identified and protected with high priority to support the preservation of agricultural lands and the agricultural industry. It is the opinion of Niagara Region staff that the proposed policies of section 4.3.3</p>

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	<p>will severely impact the long-term protection and viability of these lands. The proposed policy will lead to fragmentation of the agricultural land-base, and could result in an estimated loss of approximately 4,500 to 5,000 hectares of Niagara’s prime agricultural area to residential lot creations. This could have an annual economic impact (loss) of \$20-\$23 million in farm revenue per year.</p> <p>The proposed policy 4.3.3.1, effectively allows lot creation in prime agricultural areas generally equivalent to that permitted in rural lands, where lot creation is more appropriately considered.</p> <p>The new lot creation policy, coupled with proposed policy 4.3.2.5 permitting two additional residential units subordinate to a principal dwelling on any new lot created, will likely increase demand for lots larger than the 0.4 ha required to accommodate private servicing. This will further eroding prime agricultural areas.</p> <p>Additionally, the concentration of private sewage systems needed to service up to three new lots and up to three residential units on each lot poses a risk to private water supply and the natural environment. This is especially true for the portion of the Niagara Region that is in a highly vulnerable aquifer area.</p> <p>Furthermore, the encroachment of urban land uses in the agricultural area can negatively impact the “geographically continuous agricultural land base” and “the long-term economic prosperity and productive capacity of the agri-food network” encouraged in policy 4.3.1.1. Fragmented, higher density, small lots in predominantly farmed areas, will inevitably lead to an increase in urban-rural land use incompatibilities and disputes.</p> <p>Niagara Region staff also highlight the potential for additional requirements on both hard and soft municipal services caused by a substantial increase in rural</p>

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	<p>lots, including for example, increased demand for road maintenance services, garbage pick-up and septage disposal. Rural tax rates may not be adequate to fund the expected increase in rural municipal service demand, therefore increasing pressure on overall municipal service budgets. Similar concerns are also cited for increased responsibilities of school boards to provide busing services across widespread rural areas.</p> <p>Finally, Niagara Region staff note there is a lack of clarity on the total number of lot creation permissible in policy 4.3.3.1.a).2. It is our understanding that 3 new lots plus the existing lot are permitted, but other interpretations of the policy suggest it is a total of 3 lots (including the existing lot). Should the Province decide to move forward with this policy, against the recommendation of Niagara Region staff, it is recommended that the wording be revised to clarify intent.</p> <p>Overall, it is the recommendation of Niagara Region staff that the proposed policies (4.3.3) for agricultural lot creation be removed as they are not in the best interest of the agricultural industry or the protection of limited and valuable agricultural lands in Niagara.</p>
<p>The proposed PPS (2023) includes a policy which would prevent municipalities from being more restrictive than policy 4.3.3.1 a) (i.e. preventing municipalities from restricting agricultural lot creation in their Official Plans and Zoning By-laws) except to address public health and safety concerns. [Proposed policy 4.3.3.2]</p>	<p>Niagara Region staff do not support the inclusion of this type of policy in the proposed PPS (2023).</p> <p>This type of policy contradicts 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”.</p>

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Built Boundary	
<p>The proposed PPS (2023) has not carried forward the concept of delineated built-up areas previously contained in the Growth Plan.</p>	<p>The removal of the “built-up area” and associated intensification rates may make it more difficult for municipalities to use tools and practices available to them to “support general intensification and redevelopment to support the achievement of complete communities” as outlined in Section 2.3.3. This change also does not encourage the efficient use of infrastructure.</p> <p>Similarly, the removal of a definition and policy set for “designated greenfield areas”, including associated density targets, will make it difficult for municipalities to push for increased densities and housing options in the remaining undeveloped, but serviced, areas of the municipality.</p> <p>Additionally, if settlement area boundaries can expand without the requirement for a land needs assessment to demonstrate the need for additional urban land, this will discourage intensification and encourage urban sprawl. This will create implications for providing fiscally responsible infrastructure.</p>
Cultural Heritage and Archaeology	
<p>A number of definitions referenced in the Cultural Heritage and Archaeology section of the proposed PPS (2023) have been revised. [Proposed definition of “built heritage resource”, “conserved”, “cultural heritage landscape”, “heritage attributes”, “protected heritage property” and “site alteration”]</p>	<p>Many of the revisions are minor or provide additional clarification/protection for cultural heritage and archaeological resources. Niagara Region staff does not have a concern with the revisions to these definitions.</p>

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<p>The proposed PPS (2023) has also changed to policy term from “significant built heritage resource and significant cultural heritage landscape” to “protected heritage property” [Proposed policy 4.6.1]</p>	<p>Niagara Region staff are supportive of the proposed change in terminology and the new definition, which now includes archaeological resources.</p>
<p>The proposed PPS (2023) includes revised policy language pertaining to engagement with indigenous communities, requiring that engagement occur early with an increased emphasis on consideration of their interests. [Proposed policy 4.6.5]</p>	<p>Niagara Region staff supports early engagement with indigenous communities, which has been identified as a corporate priority. The emphasis on early engagement and specification in terms of the interests of indigenous communities included in the proposed PPS will be helpful from an implementation perspective.</p>
<p>Employment Areas</p>	
<p>The proposed PPS (2023) changes the definition of “employment areas”. The focus of the definition is now on what would be considered traditional employment uses such as heavy industry, manufacturing, and large scale warehousing. [Proposed definition of “employment areas”]</p> <p>A corresponding change to the Planning Act is also being proposed through Bill 97.</p>	<p>Niagara Region staff do not support the proposed change in definition as it will potentially hinder Niagara’s municipalities’ ability to achieve the employment forecasts set out to 2051, given that it will be difficult to protect the amount of land required to accommodate the number of jobs projected.</p> <p>The recently approved Niagara Official Plan includes different categories of employment areas. While the Region’s “Core Employment Area” designation may meet the revised definition, “Dynamic Employment Area” and “Knowledge and Innovation Employment Areas” would not meet the revised definition. As such, the revised definition has the potential to remove approximately 2,175 hectares of “employment area” lands (approximately 46% of total employment area lands based on preliminary analysis), putting at risk the existing and jobs planned for these lands.</p>

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	<p>It is the recommendation of Niagara Region staff that the definition of “employment areas” not be changed as it will limit the ability of municipalities to protect employment areas in the long-term.</p>
<p>The proposed PPS (2023) includes a policy that would allow for a range of mixed land uses, including residential, in employment lands outside of employment areas (the revised/now limited definition of employment areas) [Proposed policy 2.8.1.3]</p>	<p>Niagara Region staff do not support this proposed policy.</p> <p>The Growth Plan and the Niagara Official Plan (4.2.5.1) both contain provisions to ensure that any proposed development of non-employment uses on employment land, outside of employment areas, shall retain space for a similar number of jobs on site.</p> <p>Niagara Region staff recommend that this policy not be included, and that the proposed PPS include greater protection for long-term employment uses.</p>
<p>The proposed PPS (2023) includes a policy that would prevent municipalities from being more restrictive than policy 2.8.1.3(i.e. preventing municipalities from restricting residential uses on employment lands outside of employment areas) except to address public health and safety concerns. [Proposed policy 2.8.1.4]</p>	<p>Niagara Region staff do not support the inclusions of this type of policy in the proposed PPS (2023), given the inability to restrict residential uses on employment lands in any capacity may negatively impact existing employment uses by limiting their ability to expand, and may preclude certain employment uses such as light industrial from establishing. Niagara Region staff have significant concerns on land use compatibility issues in the long term.</p> <p>Further, this type of policy contradicts 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”.</p>

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<p>Employment Land Conversions</p>	
<p>The proposed PPS (2023) allows municipalities to consider (and landowners can apply for) the removal of land from employment areas outside of a municipal comprehensive review. The tests to be met include that there is a need for the removal, and the land is not required for employment uses over the long term.</p> <p>Currently, the PPS 2020 requires planning authorities to protect and preserve employment areas for current and future uses and permits conversions within employment areas to non-employment uses only where it had been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.</p> <p>The Growth Plan requires that conversions of lands within employment areas may only be permitted through a municipal comprehensive review where the applicant has satisfied certain criteria.</p> <p>In the proposed PPS 2023, an employment conversion request can happen at any time. Applicants do not need to wait until a</p>	<p>Niagara Region staff do not support this proposed policy.</p> <p>Without the criteria to maintain sufficient employment lands to accommodate forecasted employment growth over time, it will be difficult to ensure that the employment forecasts set out can be achieved.</p> <p>Further, urban boundary expansions for employment areas occurred in the Region solely to accommodate forecasted employment growth. If these lands are converted and do not accommodate employment uses, further expansions will have to take place to provide sufficient space to accommodate forecasted employment.</p> <p>Allowing employment area conversions at any point in time is problematic. Holding the evaluation of employment area conversion requests until a municipal comprehensive review allows municipalities to examine all requests as part of one review to select the most appropriate areas for conversion. It also allows municipalities the ability to identify land needs in tandem with reviewing employment area requests to understand how potential employment area conversions will impact the need for settlement area expansions.</p> <p>Employment area lands are strategically located to accommodate employment uses that require access to goods movement corridors. If these lands are converted, it will reduce the number of sites available to attract employers to the Region, which may negatively impact employment growth.</p> <p>The development of employment uses requires significant investment. Removing the long-term protection of lands for such uses can significantly reduce the ability to achieve a return on this investment.</p>

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<p>municipality is undertaking a municipal comprehensive review. [Proposed policy 2.8.2.4]</p>	<p>Household income is a significant factor for housing affordability. While the proposed direction in Section 2.8 is intended to allow further flexibility for residential development on employment lands, it can mean there are less investments made to ensure well-paying jobs are available in the community for current and future residents.</p> <p>Niagara Region staff recommend that the Province instead carry forward Growth Plan policy 2.2.5.9 c) which provides long-term protection for employment uses.</p>
<p>Growth Management</p>	
<p>The proposed PPS (2023) has not carried forward the Growth Plan (schedule 3) requirement for municipalities to plan to specific population and employment targets for a horizon year.</p> <p>The expectation is that municipalities will continue to use the 2051 targets at a minimum. Over time, municipalities will be expected to carry out their own forecasting.</p> <p>Policy 2.1.3 references “where planning is conducted by an upper-tier municipality the land and unit supply maintained by the lower-tier shall be based on and reflect the allocation of population and units by the upper-tier” [Proposed section 2.1 & policy 2.1.3.]</p>	<p>Inconsistent forecasts and/or methodologies to achieve such forecasts will impact the Region’s ability to plan for investments in infrastructure and the coordination of regional public services between local municipalities.</p> <p>In a similar vein, it impacts the Province’s ability to adequately plan for its investments in infrastructure between regional municipalities and to manage growth.</p> <p>It is the recommendation of Niagara Region staff that all upper-tier municipalities continue to retain responsibility for growth management functions to ensure a coordinated approach across regional market areas.</p>

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<p>The proposed PPS (2023) requires municipalities, when updating official plans, to have enough land designated for at least 25 years (a change from up to 25 years), with planning expressly allowed to extend beyond this horizon for infrastructure, employment areas and strategic growth areas. [Proposed section 2.1.1]</p>	<p>Niagara Region staff have no concern with the proposed change, however, with the repeal of the Growth Plan there will no longer be a consistent approach to completing land needs assessments, and therefore inconsistent approaches to analysis and decision-making regarding land needs requirements which can lead to challenges associated with planning for infrastructure.</p>
<p>Housing</p>	
<p>The proposed PPS (2023) expands the definition of “housing options”, to specifically include more examples of “soft intensification” and broader housing arrangements and forms. [Proposed definition of “housing options”].</p> <p>The tracked changes definition of “housing options” is:</p> <p>Housing options: means a range of housing types such as, but not limited to single detached, semi-detached, rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, <u>laneway housing</u>, <u>garden suites</u>, <u>rooming houses</u>, multi- residential buildings, <u>including low- and mid-rise apartments</u>. The term can also refer to a variety of housing arrangements and forms such as, but</p>	<p>Niagara Region staff are not opposed to an expanded definition of “housing options”; however, the proposed definition may be beyond what is appropriate for a land use planning document.</p> <p>It is the recommendation of Niagara Region staff that the Province review the proposed definition to ensure it is appropriate and can be implemented through land use planning policies.</p>

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<p>not limited to, life lease housing, co- ownership housing, co-operative housing, community land trusts, land lease community homes, affordable housing, housing for people with special needs, <u>additional needs housing</u>, multi-generational housing, student housing, farm worker housing, <u>culturally appropriate housing, supportive, community and transitional housing</u> and housing related to employment, <u>educational, or institutional or educational uses, such as long-term care homes.</u></p>	
<p>The proposed PPS (2023) removes the definition of “affordable”. The PPS 2020 generally defined “affordable” as a function of income for ownership and rental housing. This approach is consistent with the province’s proposed changes to the inclusionary zoning regulation. [Proposed definitions]</p>	<p>Niagara Region staff do not support the proposed change as it may result in inconsistent definitions used for affordability, which in turn make it difficult to monitor, incentivize and plan for affordable housing.</p> <p>Further, the proposed PPS (2023) removes the requirement for municipalities to establish targets and provide direction for the provision of affordable housing altogether outlined in the Growth Plan. While the overall addition of a range of housing options can help the supply and demand for housing over the long-term, the removal of this Provincial direction can make it more difficult for municipalities to push for more affordable options in their communities.</p> <p>Niagara Region, like much of Ontario, has experienced significant increases in rent and purchase prices, as well as a decrease in overall vacancy rates.</p> <p>It is the recommendation of Niagara Region staff that proposed PPS (2023) address the important issues of housing affordability in the Province.</p>

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Intensification	
<p>The proposed PPS (2023) establishes broader permissions for residential intensification. The proposed PPS 2023 provides three specific examples of residential intensification, to facilitate future development: (1) the conversion of existing commercial and institutional buildings for residential use, (2) development and introduction of new housing options within previously developed areas, and (3) redevelopment that results in a net increase in residential units. [Proposed policy 2.2.1.b) 2.]</p>	<p>Niagara Region staff are concerned with the conversion of existing commercial buildings for residential use as this can cause long-term economic implications for job growth and erode employment areas, especially those primarily comprised of office uses.</p> <p>It is recommend that local municipalities be given flexibility to identify areas appropriate for residential conversion rather than permitting that conversion as of right for all existing commercial and institutional uses.</p>
<p>The proposed PPS (2023) removes mandatory intensification and density targets for all municipalities. The Growth Plan required municipalities to meet specific intensification and density targets to accommodate forecasted growth. This requirement has not been carried forward, except for the density targets for MTSAs in large and fast-growing municipalities. Instead, municipalities are encouraged to establish density targets “as appropriate, based on local conditions.” Large and fast-growing municipalities are also encouraged, but not required, to plan for a minimum density target of</p>	<p>Niagara Region staff are concerned with the proposed change. 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, and further impact any progress on climate change mitigation.</p> <p>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.</p>

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<p>50 residents and jobs per gross hectare. [Proposed policy 2.3.5]</p>	
<p>Land Use Compatibility</p>	
<p>The proposed PPS (2023) removes requirement for proponents of sensitive land uses to demonstrate need or evaluate alternative locations for sensitive land uses where avoidance of adverse effects is not possible. [Proposed section 3.5]</p>	<p>Niagara Region staff do not support the proposed change. Niagara staff recommend that the policy requirement for the proponent of sensitive land uses to demonstrate the need for the proposed use, and evaluate alternative locations, minimized and mitigation adverse effects be reinstated.</p>
<p>Major Transit Station Areas</p>	
<p>The proposed PPS (2023) carries forward the concept of major transit station areas from the Growth Plan, with the definition and minimum density targets being generally the same. [Proposed definition of “major transit station area”]</p>	<p>Niagara Region staff support moving forward with the concept of major transit station areas (MTSA). However, it is noted that proposed policy 2.4.2.2 would result in a higher density target for the Niagara Falls and St. Catharines MTSA compared to what is been identified in the recently approved NOP (i.e. an increase from 125 to 150 residents and jobs combined per hectare).</p>
<p>Natural Heritage</p>	
<p>The proposed PPS (2023) does not include natural heritage policies. These policies and related definitions remain under consideration by the government at the time of the April 6, 2023</p>	<p>Natural Heritage policies have not been provided as part of this ERO posting. It is therefore difficult to provide a complete response to the proposed PPS (2023).</p>

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<p>release. The indication is that the natural heritage policies will be released through a separate ERO posting at a future date. [See note after proposed section 4.1]</p> <p>The vision statement in the proposed PPS 2023 suggests a shift in focus from conserving biodiversity and protecting essential ecological processes to one that balances the use and management of natural resources with attention to appropriate housing supply. [Proposed Vision]</p>	<p>It is the recommendation of Niagara Region staff that consultation on the proposed PPS (2023) be paused until such time that the natural heritage policies are released and the impact of the complete policy set can be considered.</p>
<p>The Growth Plan introduced a “Natural Heritage System For the Growth Plan” including mapping, definitions, and policies that were required to be implemented by municipalities through Official Plan updates. It is unclear if the Province intends to carry forward the requirements of the Natural Heritage System for the Growth Plan into the PPS (2023). [See note after proposed section 4.1]</p>	<p>The introduction of the Natural Heritage System for the Growth Plan represented a shift in land-use planning in Ontario. Whether or not this system and associated policies is carried forward into the proposed PPS is a major consideration.</p> <p>Niagara Region staff support in principle the concept of a provincial natural heritage system, as long as there is the appropriate level of flexibility for implementation at the municipal-level. For example, through the recent Niagara Region Official Plan, the Region included policies for additional agricultural and other exemptions in the Growth Plan Natural Heritage System (which were not approved by the province). Niagara Region staff note that the Growth Plan Natural Heritage System was fully integrated into the Region’s natural environment system, and would be a complicated task to separate.</p> <p>It is the recommendation of Niagara Region staff that consultation on the proposed PPS (2023) be paused until such time that the natural heritage</p>

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	<p>polices are released and the impact of the complete policy set can be considered.</p>
<p>Provincially Significant Employment Zones</p>	
<p>The proposed PPS (2023) has not carried forward Provincially Significant Employment Zones, which were introduced to the Growth Plan in 2019. Lands designated as PSEZ are protected from conversion to non-employment uses, except where demonstrated to be appropriate through a full municipal comprehensive review. The implementation document suggests alternative approaches to protect these lands, possibly through the use of minister’s zoning orders.</p>	<p>Niagara Region staff have no comments as there are no PSEZs in Niagara Region.</p>
<p>Sewage, Water, and Stormwater</p>	
<p>The proposed PPS (2023), has introduced new (undefined) terminology for municipal decentralized servicing systems and provided for additional flexibility for allowing on-site or private communal systems. [Proposed policy 3.6]</p>	<p>It is the recommendation that municipal decentralized servicing systems should be a defined term in the proposed PPS to provide clarity.</p> <p>Niagara Region staff are also concerned about policy changes that may increase the use of communal systems and therefore increase the liability and responsibilities of regions and municipalities should these systems fail. Staff would recommend that the PPS be revised so that communal systems be a last resort in servicing new developments.</p>

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Schools	
<p>The proposed PPS (2023), establishes schools as an element of a “complete community” and directs collaboration between planning authorities and school boards. [Proposed policy 2.1.4 & 6.2.4]</p>	<p>Niagara Region staff support the proposed change and are in agreement that schools are part of a complete community.</p> <p>Niagara Region staff are supportive of collaboration between planning authorities and school boards. Niagara Region staff recommend that Provincial funding for School Boards be aligned to support this requirement.</p>
<p>The proposed PPS (2023) acknowledges and encourages the use of non-traditional school locations where appropriate for the community. [Proposed section 3.1.6]</p>	<p>Niagara Region staff support the proposed policy.</p>
Soils	
<p>The proposed PPS (2023) removes policy 3.2.3 which directs planning authorities to support, where feasible excess soil management.</p> <p>The Growth Plan stated that municipal planning policies and relevant development proposals will incorporate best practices for soil management.</p>	<p>While municipalities can include policies addressing excess soil management, Niagara Region staff are concerned that the requirement for development proposals to incorporate best practices for excess soil management has been removed from provincial direction.</p>
Settlement Area Expansions	
<p>The proposed PPS (2023) eliminates alternative evaluations for settlement area expansions. Under the PPS 2020, a proposed settlement</p>	<p>Niagara Region staff do not support the proposed change. Requiring alternative evaluations is an important tool in protecting valuable and high-quality agricultural land.</p>

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<p>area expansion into prime agricultural areas required an evaluation of alternative locations for expansion.</p>	<p>It is the recommendation of Niagara Region staff that alternative evaluations continue to be required for proposed settlement area expansions.</p>
<p>The proposed PPS (2023) removes the requirement to demonstrate “need” for a settlement area expansion. The proposed PPS 2023 also reduces the criteria that a municipality must consider before identifying a new settlement area or allowing a boundary expansion, focusing on whether there is sufficient capacity in infrastructure and public service facilities to support the expansion or new settlement area, and avoiding or minimizing impacts on agricultural land and operations. [Proposed section 2.3.4]</p>	<p>Niagara Region staff do not support the proposed change.</p> <p>The requirement to demonstrate need for an urban boundary expansion is a fundamental consideration in land use planning. The requirement to demonstrate need is an essential policy tool to encourage infill and intensification and to discourage sprawl. Infill and intensification are lower-cost growth alternatives in the long term and better achieve the vision of complete communities. The requirement to demonstrate need is also an important policy test to avoid or minimize impacts on agricultural land and operations.</p> <p>It is the recommendation of Niagara Region staff that “need” be included as a policy test for settlement area expansions in the proposed PPS (2023).</p>
<p>The proposed PPS (2023) has not carried forward the concept of a municipal comprehensive reviews which was a cornerstone policy of the Growth Plan as a way to plan the expansion of settlement areas in an orderly fashion.</p> <p>The implication of this change is that municipalities may consider settlement area expansions at any time. There is no limitation on</p>	<p>Past experience demonstrated that there is a need for integrated and coordinated growth planning at the municipal-level.</p> <p>Niagara Region staff understand that there needs to be certain improvement to the planning system in Ontario to implement the province’s goal of 1.5 million new homes by 2031. However, Niagara Region staff do not agree that minimizing coordinated municipal growth management for short term gain, at long-term costs, is the appropriate solution.</p> <p>It is the recommendation of Niagara Region staff that a mechanism similar to MCRs be maintained to ensure that municipalities grow in an integrated and coordinated manner.</p>

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<p>the ability of landowners to apply for an expansion. [Proposed section 2.3.4]</p>	
<p>The proposed PPS (2023) would allow for the creation of new settlement areas. Previously this was not permitted. [Proposed section 2.3.4]</p>	<p>Similar to the above response related to settlement areas, it is recommended that the proposed PPS include a requirement to demonstrate need as well as other policy tests related to servicing and other infrastructure to ensure that Ontario communities are growing in a sustainable, efficient, and cost-effective way.</p>
<p>Large and Fast-Growing Municipalities</p>	
<p>The proposed PPS (2023) introduces and identifies “large and fast-growing municipalities” (Niagara Falls and St. Catharines in Niagara) that must grow based on Growth Plan directions. [Proposed definition of “large and fast-growing municipalities” and Proposed Appendix – Schedule 1]</p> <p>“Large and fast-growing municipalities” will be required to identify strategic growth areas in their official plans [Proposed section 2.4.1.1] and are encouraged to plan for a minimum density target of 50 residents and jobs per hectare. [Proposed section 2.3.5]</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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Proposed Change / Integration	Niagara Region Staff Analysis/Response
Strategic Growth Areas	
<p>The proposed PPS (2023) has carried forward / integrated the concept of strategic growth areas from the Growth Plan. They are to be identified in official plans, and should be the focus of growth. They include major transit station areas. [Proposed section 2.4 and proposed definition of “strategic growth area”]</p>	<p>Niagara Region staff are supportive of strategic growth areas continuing to be part of the planning framework in Ontario.</p>
Watershed Planning	
<p>The proposed PPS (2023) includes significantly less emphasis on the need for watershed planning and subwatershed planning to inform land-use planning.</p> <p>The Growth Plan included numerous references to watershed and subwatershed planning – and the requirement for these to inform land use planning.</p> <p>With the exception of proposed policy 4.2.3, which encourages watershed planning, there are no other references. There are no references to subwatershed planning in the proposed PPS (2023). [Proposed section 4.2.3]</p>	<p>Through the exercise with conformity with the Growth Plan, the recently provincially-approved Niagara Official Plan included significant references to sub watershed planning, and identified sub watershed planning as an important tool to inform land use planning.</p> <p>Niagara Region staff are concerned that the proposed changes will limit the applicability of watershed planning, and as such will result in negative impacts to the natural environment and the ability to achieve complete communities.</p> <p>It is the recommendation of Niagara Region staff that as the province is finalizing the natural heritage policies, that additional consideration be given to how sub watershed planning and watershed planning can be incorporated efficiently into the land use planning framework in the province.</p>