

APPENDIX A  
RESPONSE TO COMMENTS REPORT

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## 1.0 INTRODUCTION

**G**rowth can be an exciting and tumultuous experience for municipalities. On the one hand municipalities look forward to the benefits that come with growth, such as an expanding economy, a rejuvenated population base and more vibrant communities. On the other hand municipalities must also come to grips with a series of questions whose potential outcomes can have serious environmental, financial and social implications for the future health of the municipality. Where do we grow? How do we grow? What does growth mean for the health of our natural environment? How will we pay for the infrastructure that is needed to accommodate growth? These are just a few questions that municipalities need to address when planning for long term growth and a Growth Management Strategy can help provide answers to these complicated questions.

### 1.1 What is a Growth Management Strategy?

A Growth Management Strategy (GMS) is a process that examines land use and supporting infrastructure to better understand how and where municipalities should grow over a long term planning horizon. The Region of Niagara and its member municipalities recognize the importance of planning for long term growth. The Region's GMS is a response to the desire for growth to occur in a sustainable manner that addresses economic, social and environmental considerations. The GMS will focus on higher level regional concerns such as population and employment allocations, servicing systems, transportation corridors and regionally and provincially significant agricultural lands and environmental features.

This GMS also fits within the legislative context of the Province's *Places to Grow* plan, which mandates upper tier and single tier municipalities to undertake further sub-area assessment.

### 1.2 Regional GMS Process

The Region's GMS is divided into five main phases:

1. Understanding Niagara;
2. Anticipating Niagara;
3. A Range of Options;
4. Develop and Refine Preferred Option; and,
5. Regional Policy Plan Update & Subsequent Strategies and Actions.

The first phase of the GMS, Understanding Niagara, documented a series of existing conditions in Niagara for nine key disciplines. The nine key disciplines addressed in Understanding Niagara were:

1. Legislative base;

2. Natural heritage base;
3. Agricultural base;
4. Population and housing base;
5. Communities base;
6. Residential land supply;
7. Economic development base;
8. Social and cultural base; and
9. Infrastructure base.

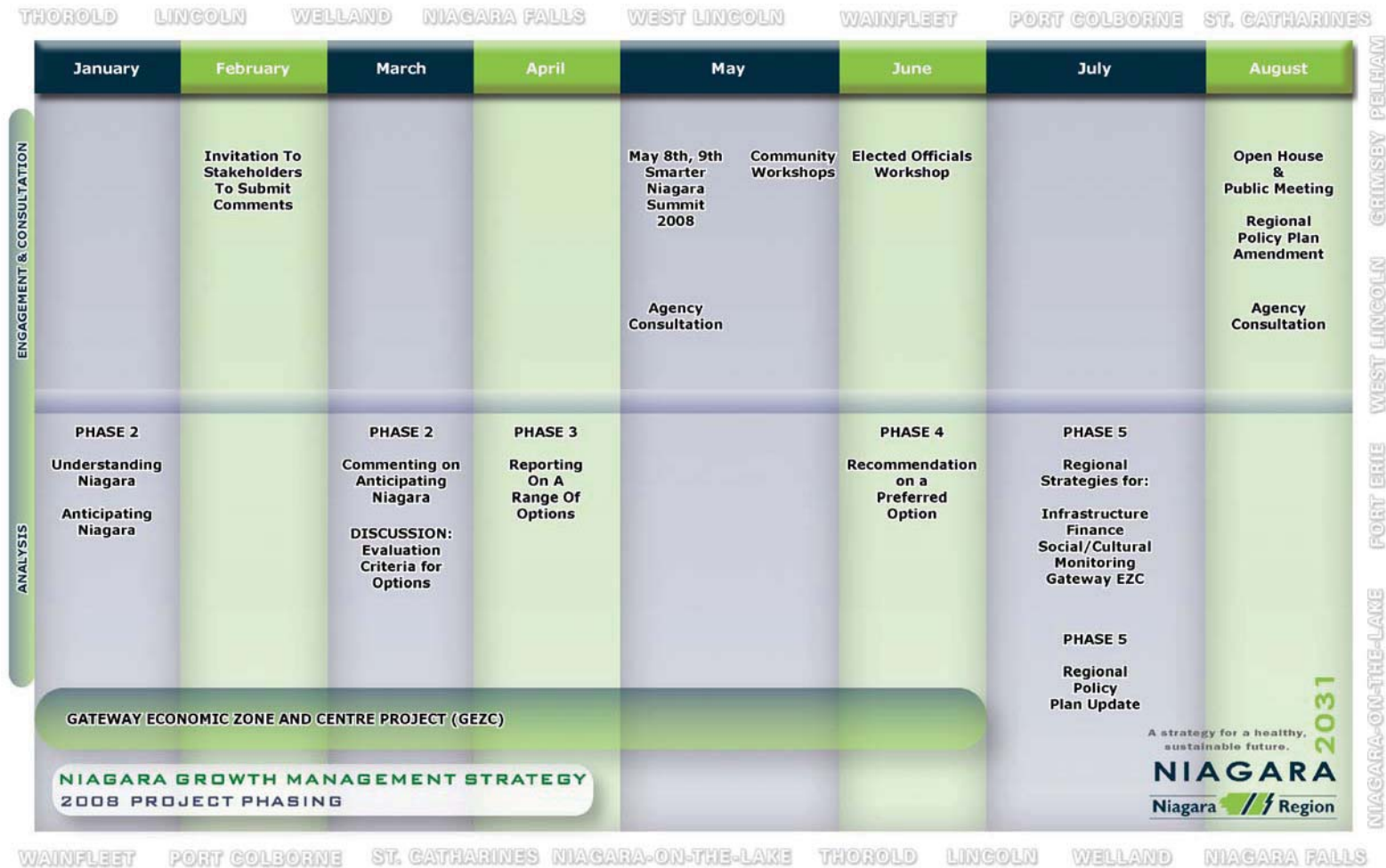
The second Phase of the GMS, Anticipating Niagara, reviewed and analyzed three long term population and employment scenarios for Niagara. **Figure 1-1** on the following page conceptually illustrates the overall GMS process (the consultation activities are displayed on the top and the project phases are shown on the bottom).

As **Figure 1-1** illustrates, the GMS also includes a consultation program which features a household survey, community engagement (with Riverside Quest and Niagara Quest), community workshops and public meetings. The consultation activities are occurring in conjunction with the preparation of the GMS and are intended to inform key assumptions and recommendations provided throughout this exercise.

### 1.3 Report Purpose

Since the release of the Understanding Niagara and Anticipating Niagara reports in January 2008, the Region has received a number of comments from the lower tier municipalities, government agencies, members of the public and other interested stakeholders. The purpose of this Report is to formally document these comments, identify any issues and provide responses.

Figure 1-1 GMS Process



## 2.0 RESPONSE TO COMMENTS ON UNDERSTANDING NIAGARA AND ANTICIPATING NIAGARA REPORTS

The comment period on Understanding Niagara and Anticipating Niagara formally began January 23, 2008 with presentations to the Planning Review Committee and the Technical Support Committee. The majority of comments received at both the Planning Review Committee and Technical Support Committee presentations were positive and supported the principal recommendations of Anticipating Niagara – that the Medium Growth Scenario be carried forward to the third phase of the GMS for the creation of growth options. In addition to feedback received at these initial presentations, the Region has also received a number of comments from a wide range of stakeholders. **Table 2.1** provides a synthesis of comments received to date on both the Understanding Niagara and Anticipating Niagara Reports.

<b>Comment</b>	<b>Response</b>
City of Niagara Falls – Recommended that the Region include the lands of the Northwest Community Landowners Group within the GMS as a future growth area and involve the City in the process of examination of the allocation of expansion areas.	The examination of expansion areas will depend on the outcome of supply-demand analysis and will be undertaken in Phase 3 of the GMS.
City of Welland – Staff and Council endorsed the use of the Medium Growth Scenario in the GMS as recommended in Anticipating Niagara.	Comment received.
Town of Niagara-on-the-Lake – Staff and Council endorsed the use of the Medium Growth Scenario in the GMS as recommended in Anticipating Niagara.	Comment received.
Town of Fort Erie – Planning staff generally agree with the selection of the Medium Growth Scenario forecast and the rationale as opposed to the Low and High Scenarios. Staff are concerned that the forecast of 7,200 employment land jobs may be too low and the allocations to Fort Erie will also be too low to meet its long-term employment and economic development needs. The Town has also expressed the concern that the estimate of vacant employment land for Fort Erie as documented in Understanding Niagara may be too high.	Growth projections for local municipalities will be based on a wide range of factors, including consideration of special “designations” identified in the <i>Growth Plan</i> , such as the Gateway Economic Zone.  We have revised the estimate of vacant employment lands for Fort Erie and several other municipalities to reflect more detailed environmental constraint mapping

**Table 2.1 Comment-Response Table**

Comment	Response
	provided by the Town and other municipalities.
Town of Grimsby – Will population projections recommended in Anticipating Niagara take into consideration potential growth limitations faced by municipalities such as Grimsby in the very near future as a result of the Greenbelt Plan which has limited any potential urban boundary expansions? Does the recommended growth scenario reflect these restrictions?	The Medium Growth Scenario is a regional scale forecast. Phase 3 of the GMS will look at options for meeting the forecast and will consider the affects of limited land supply on municipalities such as Grimsby.
Township of West Lincoln - Staff endorsed the use of the Medium Growth Scenario in the GMS as recommended in Anticipating Niagara. Subsequent to this, West Lincoln’s Council has recommended that the Regional Growth Strategy use the Low forecast as the preferred forecast for the GMS.	Comment received. Staff is recommending the use Medium Scenario for the next Phase of the GMS.
<p>Region of Niagara, Members of the Healthy Active Living Corporate Steering Committee (HAL) – HAL was created in 2007 to “provide leadership and direction on the development and implementation of a 4 year operational plan pertaining to a comprehensive Healthy Active Living Strategy focused on environmental supports and policy, paying particular attention to the Corporation’s internal actions and areas of influence”. The Committee considered the potential impact of the Medium Growth Scenario on Niagara and have forwarded a number of questions and comments for consideration related to:</p> <ol style="list-style-type: none"> <li>1. Opportunities and challenges for enhancing support for healthy active living;</li> <li>2. Potential for impacting the “Niagara community” (distinct from the Regional Government);</li> <li>3. Potential impacts on the Regional Government in terms of service provision of programs and/or facilities; and,</li> <li>4. What the Region could consider doing to respond to the opportunities and challenges identified.</li> </ol> <p>HAL also provided some specific comments with respect to employment projections:</p> <ul style="list-style-type: none"> <li>▪ Will additional employment come from industrial sector which may impact the environment or health of employees?</li> <li>▪ Will additional employment affect the amount of green space in the Region or will green space be protected within the GMS?</li> </ul>	<p>Comments are received and will be considered, where appropriate, in the next phases of the GMS. Specific responses to the questions related to employment projections are provided below:</p> <ul style="list-style-type: none"> <li>▪ A portion of new employment will come from the industrial sector;</li> <li>▪ Green space identified in the Region’s Official Plan, local Official Plans and provincial plans (i.e. Greenbelt Plan and Niagara Escarpment Plan) should be respected and are not considered to be appropriate places for future development;</li> <li>▪ The evaluation of growth options will consider the impacts of commuting;</li> <li>▪ Niagara will see growth in a wide range of sectors, including tourism, primary resources, manufacturing, education and health care etc. The evaluation of option considers the impacts of</li> </ul>

**Table 2.1 Comment-Response Table**

Comment	Response
<ul style="list-style-type: none"> <li>▪ Will additional employment be needed to support the population growth from outside the Region? If so, environmental impacts related to increased number of commuters needs to be considered, such as air quality.</li> <li>▪ Increased population will further the need for regional transit services; and,</li> <li>▪ Will additional employment remain in similar sectors? In other words, if Niagara continues to rely on lower paying jobs and it is predicted that the average income of Niagara residents will remain lower than our neighbouring municipalities, will more emphasis be placed on designing Niagara communities that suit people who live here – a more affordable one, with more low income housing, better transit etc.</li> </ul>	<p>growth on social infrastructure.</p>
<p>Region of Niagara Ecological and Environmental Advisory Committee (EEAC) - EEAC is a technical advisory committee appointed by Regional Council and is comprised of local residents, with environmental expertise. The EEAC strongly supports the principle of developing the Growth Management Strategy and the current considerations for natural heritage, agriculture, brownfield redevelopments and infrastructure bases impacting the environment. The Committee believes further consideration should be to:</p> <ul style="list-style-type: none"> <li>▪ Green house gases and climate change;</li> <li>▪ Regional forest coverage;</li> <li>▪ Criteria air contaminants (CACs) and smog;</li> <li>▪ Alternative energy options;</li> <li>▪ Sustainable building designs;</li> <li>▪ Soil quality and land use;</li> <li>▪ Landfill and recycling; and,</li> <li>▪ Water quality and source protection.</li> </ul>	<p>Phase 3 of the GMS will identify evaluation criteria for assessing the growth options. The evaluation criteria will consider a wide range of considerations, including a number of the items noted by the EEAC.</p>
<p>The Preservation of Agricultural Land Society (PALS) - A letter submitted to the Region by Dr. John Bacher (PhD) on behalf of PALS made the following comments:</p> <ul style="list-style-type: none"> <li>▪ The thrust of the Niagara Growth Management Strategy is to undermine the intent of the Provincial growth management plan (Places to Grow);</li> <li>▪ Provincial estimates themselves likely overstate growth pressures outside the City of Toronto in the</li> </ul>	<p>Niagara reached the P2G 2011 population forecast in 2006. The thrust of the Growth Management Strategy is to recognize growth trends and plan for future growth in a sustainable manner. Phases 3, 4 and 5 of the Region’s GMS aim to produce an Amendment to Regional</p>

**Table 2.1 Comment-Response Table**

Comment	Response
<p>Greater Toronto Region;</p> <ul style="list-style-type: none"> <li>▪ Regional study does not plan better than Province regarding growth outside Toronto;</li> <li>▪ Too much stress is placed upon the Niagara to GTA Corridor as a growth stimulant;</li> <li>▪ Tourist development is overstated; and,</li> <li>▪ Dillon Consulting’s work should be discharged and the remainder of the work be done by Planning Department.</li> </ul>	<p>Official Plan which conforms to all other aspects of Places to Grow. The GMS will be consistent with the PPS.</p>
<p>Ministry of Public Infrastructure Renewal – The Ministry received copies of Understanding Niagara and Anticipating Niagara Reports and has recommended that conformity with the Growth Plan Schedule 3 Population and Employment forecasts should be used as the basis for planning.</p>	<p>Staff is recommending the use of the Medium Growth Scenario for the next Phase of the GMS.</p>
<p>Niagara Area Planners Meeting – On Friday, February 15<sup>th</sup>, 2008 at a meeting of the Niagara Area Planners members were offered the opportunity to provide additional comments on Understanding Niagara and Anticipating Niagara Reports. The following items were noted in the meeting minutes:</p> <ul style="list-style-type: none"> <li>▪ Many people were comfortable with the Medium Growth Scenario;</li> <li>▪ J. Morezek (Town of Fort Erie) indicated that the amount of industrial land detailed in the Understanding Niagara Report may be too high because it doesn’t consider all environmental constraints;</li> <li>▪ A. Herlovich (City of Niagara Falls) indicated that Niagara Falls Council will request the northwest area of Niagara Falls (near Club Italia) be considered for urban area expansion; and,</li> <li>▪ A. Gummo (Region of Niagara) indicated that NEDCorp would like to see the high population scenario used.</li> </ul>	<p>The following responses are related to the four adjacent bullet points:</p> <ul style="list-style-type: none"> <li>▪ No response required;</li> <li>▪ The amount of vacant industrial land has been refined since the completion of the Understanding Niagara to reflect environmental constraints where detailed data has been provided;</li> <li>▪ See response to formal comment from the City of Niagara Falls; and,</li> <li>▪ No response.</li> </ul>

### 3.0 NEXT STEPS

**D**uring the next phase of the GMS, a range of criteria will be used to assess the three different growth options, based on the Medium Growth Scenario. The three growth options and analysis will be taken to the public for review at a series of workshops to be held in May, 2008. Upon the selection of a preferred growth option, the amount, type and location of growth will be quantified from 2006 to 2031 in five year increments for both population and employment.