

## **Regional Estimates of Need do not Justify Urban Boundary Expansions**

In report PDS-33-2021 the Niagara Region released its current projection of need on which urban expansion should be based. It clearly indicates that there is no justification for any urban boundary expansion in Niagara. Specifically, regarding residential development, the report's most recent figures show there is no additional land need through urban boundary expansions. And, for employment land, it now estimates that there is "a slight over-supply of 20 hectares", to meet the provincial 2051 targets of growth need.

The lack of need for urban expansion is most fully understood when the changing basis for the urban expansion of the City of Welland is considered. In the past this was approved on the assumption that there would be a reduction in the southern extent of the urban boundary in a community known as Dain City. However, there is no evidence of such a reduction now actually being contemplated. This expansion, which unlike others being contemplated, is within the south-central area of Niagara long favored for growth in regional planning studies and easily serviced by transit, should be expected to accommodate any need that might be determined by some future study in the current plan review process.

Rather than need, the faulty assumption behind urban boundary expansion seems to be, 'Zone it and growth will come'. Comments by Fort Erie state that "*businesses in Transportation and Warehousing, as well as Wholesale Trade, are generally connected to provincial highways.*" This is simply a rationale of what Fort Erie is planning to do i.e. allow sprawl along the Queen Elizabeth Highway. Such an approach would leave brownfields throughout Niagara empty. Employment lands which could be cleaned up for such needs will be based on planning assumptions of preference for greenfield development along expressways, and remain vacant.

## **Fort Erie Wrongly Claims Autonomy in Urban Boundary Expansions from the Niagara Region.**

Aware of the lack on a regional- need basis to legitimate its proposed urban expansions, Fort Erie wrongly asserted that it has the "*ability to legislatively advance*" such actions without the approval of the Niagara Region. PALS agrees strongly with the region's response that, "*Only the Region can expand urban boundaries.*"

## **Natural Heritage System is not Protected by Proposed Expansion.**

Unlike the urban expansion of Welland, those supported by other municipalities, notably West Lincoln, Niagara Falls, and Fort Erie, lack an application of the Natural Heritage Policies of the Provincial Policy Statement. In contrast, Welland not only identified and protected all the individual components, such as significant woodlands over two

hectares in size, but connected them together and linked them to remaining open lands outside of the urban boundary.

The comment by West Lincoln disputing comments by PALS, is based on its failure to connect components of the Core Natural Heritage System within its proposed area for an urban boundary expansion. At a Zoom meeting on the proposed expansion, a consultant indicated that having such linkages would remove too much land from development. The consultant further indicated that such features could be removed.

These features are protected provincially significant wetlands which are forested and provide breeding habitat for amphibians. The consultant indicated that such lands could be replaced by others outside of the area proposed for expansion.

The failure to connect components of the Natural Heritage System, is one of the reasons that the Ontario Municipal Board (OMB), rejected a 40 -hectare urban boundary expansion in north- west Niagara Falls. Part of the reason , along with the quality of the farmland in the area, for the opposition by PALS to the expansion, was a wildlife movement corridor on the subject lands. The reality of the existence of such a corridor was confirmed in a site visit by experts representing all parties, when two deer were witnessed in the area that the Regional Official Plan identified as a wildlife corridor.

The background reports by the Fort Erie Planning Department admit the existence of numerous wildlife corridors in the Town's and the Region's Official Plan in several areas proposed for urban expansion. This is among the reasons why the Town admits that its urban expansion proposals should be subject to a review of an Environmental Impact Study. This correct understanding is ample reason for delaying any urban boundary expansion approved by a lower- tier municipality for three years, since this is a reasonable time period for the studies to be conducted and reviewed by the public and go through a possible peer review process.

### **Comments From Fort Erie Ignore Previous Work of Environmental Studies Regarding the Canadian Motor Speedway.**

Comments from the Fort Erie Planning Department on what it identifies as the Canadian Motor Speedway, (CMS) lands, ignore Species –at- Risk findings which were reported in a past review of the now apparently defunct raceway proposal. It describes Bobolink and Monarch Butterfly locations as being probable here and not actually sighted in published studies.

However, both species were identified in extensive studies produced by Colville and Associates of the CMS proposal. There is another At -Risk Species, which has been recently identified as having significant breeding habitat here, the Meadowlark. Although identified as being at one time present, (the species disappeared following conversion of pasture to cropland), another Species-At Risk Meadowlark has nested here for one summer.

## **Approval of Urban Boundary Expansions Should Await Future Watershed and Climate Change Studies.**

Watershed studies, even under the current Niagara Regional Plan, are supposed to be undertaken in the advent of an urban boundary expansion. Most of the urban boundary expansions being supported by lower-tier municipalities will have a significant impact on watersheds, which will increase because of the realities of anthropogenically induced climate change.

For instance, the Twenty Mile Creek will be heavily impacted by the urban boundary expansion proposed by West Lincoln. During dry summer periods, some of the stream bed is already completely dry. Fortunately, before winter freezing takes place, what were isolated pockets of water become connected by precipitation events, allowing fish and amphibians to survive. Urban expansion in the watershed of this fragile watercourse would seriously impact the life forms which depend upon it, which include Species At-Risk, such as the Snapping Turtle and the Grass Pickerel. The threats to the Twenty Mile Creek, Black Creek and Frenchman's Creek from urban expansion are all among the needs to "*address impacts from climate change*" and to protect "*water resources and natural areas*" in the future Climate Change policies of the new official plan.

Implications of the Climate Change reports now being developed as part of the Niagara Official Plan Review, are not supportive of the proposed urban boundary expansions. The guidelines for these expansions would prohibit all but a few residential expansions in generally built-up areas of Fort Erie. These guidelines call for communities that "*are compact, walkable and have transit service*". Transit in Fort Erie is quite limited and Smithville is without any transit service. And, shockingly, West Lincoln makes its urban boundary expansion a way to demand another road crossing of the Niagara Escarpment but makes no mention in its extensive comments of any plans for transit service, which it currently lacks.

### **Summary**

To summarize our comments it is clear that in addition to there being no need for urban expansions, the impacts would be highly detrimental to at-risk and natural habitats. Urban expansions would in reality, negate any positive turn in Niagara towards healing damaged environments.