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June 7, 2017

RE: Comments on Niagara 2041

To: Members of the Public Works Committee, Niagara Regional Chair Alan Caslin, Members of Niagara Regional Council:

Niagara Sustainability Initiative (NSI) welcomes the opportunity to comment on Niagara 2041. NSI is the go to organization for sustainability in the Niagara region. Our mandate is to advance sustainability measures, both at the corporate and community levels. To do this, we offer some comments towards improving the planning framework for Niagara 2041 “How We Grow, How We Flow and How We Go”.

Our comments and recommendations are outlined below.

How We Grow – Municipal Comprehensive Review

1. **Population Growth Forecast:** The population growth forecasts used as the basis for Niagara 2041 show an increase of 154,000 (1.35%) over the next 25 years. This anticipates a higher growth rate than has been experienced in the last 25 years. For example, Phase 1 and 2 key findings from the Municipal Comprehensive Review (MCR) indicate that Niagara is not growing at the projected rate¹, which manifests itself as a decline in the young adult population, but remaining attractive to people over 60².

We would appreciate some clarity on the rationale for using a higher than historical rate of population growth.

2. **Reconsideration of Settlement Area Boundaries:** Urban density should be increased before any boundaries are considered for expansion. The recently released Growth Plan for the Greater Golden Horseshoe (2017) prohibits the establishment of new settlement areas. Where existing Settlement Area Boundaries are being considered for realignment, this should only occur where prime agricultural lands, significant wetlands, and tender fruit land (Unique Agricultural Lands) are protected. Opportunities for greenfield development should be minimized and intensification should be focused on existing designated urban areas.

¹ <https://www.niagararegion.ca/2041/municipal-comprehensive-review/phase1-2.aspx>

² <https://www.niagararegion.ca/2041/pdf/mcr-pic1-summary.pdf>



Overall, designated urban areas need to provide strong, defensible rationale where expansions are considered. With recently released Provincial policy reinforcing the need for intensification through redevelopment, the need for urban boundary area reconsideration seems limited, at best.

How We Go – Transportation Master Plan

1. Active Transportation: NSI encourages the promotion of active transportation (hiking, bicycling, walking) and healthy communities (complete communities which focus on non-vehicular activities) at the community level. Permitting new development on greenfield lands is contrary to the principles of active transportation. This highlights the need for improved urban design especially within active land development applications.
2. Scalable Public Transit Service: Gaps in transit service, including routes and schedules needs to be improved. The use of Light Rapid Transit (dedicated bus lanes, trams, surface rail) should be seriously considered. This supports the concept of regional transit, which would attract talented workforce and protect agricultural lands.

Scale in public transit is important. Full sized buses may not be appropriate to serve mid and smaller sized communities in Niagara. Using more innovative services involving mini-buses, passenger vans, and even private ride services like Uber should be seriously considered. Using this scalable approach will lead to improved scheduling, a key factor in customer choice.

Linkages between urban areas need to be consistent and reliable in order to minimize travel times, and improve efficiency at transfer points.

3. NGTA/Mid-Peninsula Highway: The provincial Growth Plan for the Greater Golden Horseshoe notes that balanced transportation options should be promoted to reduce car reliance. Promotion of the NGTA highway/mid-peninsula highway would seem to be inconsistent with the Growth Plan policies.

The Growth Plan also states that public transit planning should be a top priority for transportation infrastructure planning and major investments. We recognize these policies are focused on designated urban areas. However, the environmental impacts and loss of prime agricultural lands likely outweigh the benefits from NGTA Highway, especially when the alignment directly affects agricultural lands and sensitive natural features.

Planning for the NGTA Highway seems contrary to the principles of sustainable transportation. However, we recognize the planning of the NGTA is intended to help relieve congestion due to increased demand on the Queen Elizabeth Way. While this could offer greater opportunity for more efficient rates of travel, the Regional Government must seriously weight improved traffic flow against the loss of agricultural lands, loss of wooded area (carbon reduction feature) and potential for increased growth opportunities in the urban areas serviced.



We suggest that the Region place an emphasis on determining alternative opportunities to promote more sustainable transportation options.

4. Travel Demand Management (TDM): This is a good initiative and the key recommendations outlined are in-line with NSI's values and initiatives.

NSI recognizes that personal vehicles will continue to be widely used for some time to come. We, however, believe that their use should be considered less in the planning of major highway infrastructure that may not be built for at least 20 years. Greater effort should be placed on developing innovative and scalable forms of public transit that will be less costly to implement, require lower operating budgets and result in acceptable servicing levels for their regional customer base.

How We Flow – Water and Wastewater Master Servicing Plan

1. Combined Water and Wastewater Infrastructure: The continued use of infrastructure in combination carries increased risk of flooding and sewer overflows. The cost associated with managing sewage overflow is not financially sustainable and allows for effluent to flow directly into Lake Ontario. This results in unexpected impacts, increasing the cost and effort when incidents occur.
2. Managed Sewage Overflows: NSI believes that in addition to managing sewage overflow related to projected increased flooding and water levels associated with climate change, plans should also be in place to manage all water-related impacts in the Niagara Region. These include more frequent and intensive thunderstorms, higher and more frequent spring flooding, and road/pipe failure resulting from conveying sewage flows that are beyond their design flows, including safety factors.

The focus of “How We Flow” should include more than just the two components of water and wastewater and should include all water, wastewater, and storm water concerns within the Region. Water and waste water infrastructure is being replaced based on outdated and ineffective design standards, which do not reflect today's more extreme climatic conditions. The results: local flooding, road failure, and sewage backups, are reported with increasing regularity by the media. It is time that the Region recognizes this increased risk and takes action to ensure that our communities are safe for their citizens.

General Public Consultation

1. Project Documentation: Project reports and documentation are not easily accessible and it is difficult to find complete information on many components of Niagara 2041 (How We Grow, How We Go, and How We Flow).

All publicly-available information including plans, reports, and summaries needs to be readily available on the project website. Some PIC summaries are missing appendices that are listed throughout the report and not all information is available on the website. This makes it difficult to provide thorough comments on certain aspects of the project.



2. Consistency of Public Information: Information on display boards and summaries presented at Project Information Centres is inconsistent. (e.g., population growth forecasts have been noted as 154,000 and 168,000). This inconsistency causes confusion which could result in loss of trust.

This is particularly relevant when background information used for growth projections is not provided.

NSI understands the Region has followed a very aggressive timeline with this important initiative, involving three (3) significant reports. This approach makes the dissemination and public access to valid and consistent information even more important. The lack of reliable information, for whatever reason, results in a negative public perception of this entire undertaking. Those members of the public willing to commit the time and energy to commenting on the Region's information, as presented, will likely get discouraged based on the lack of consistency and availability.

Closing

The NSI Board and staff are grateful for this opportunity to comment on Niagara 2041. We trust our comments are constructive and will be taken in the positive light by which they were offered. After all, we all seek a stronger, better, more sustainable Niagara Region in the future, which can be handed to future generations with confidence and pride.

We welcome the opportunity to discuss these comments further. Please contact the undersigned to determine how and when to meet.

Sincerely,



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Niagara Sustainability Initiative

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