

January 13, 2022

By E-Mail

Regional Municipality of Niagara
Planning and Development Services Department 1815
Sir Isaac Brock Way
P.O. Box 1042
Thorold, Ontario
L2V 4T7
Attn: Ms. Michelle Sergi, Commissioner

Dear :Commissioner Sergi,

Re: Niagara Region Municipal Comprehensive Review - Settlement Area Boundary Expansion - 171 Gorham Road, Fort Erie (Trails of Ridgeway)

We act for 2779103 Ontario Limited and 2779347 Ontario Inc., the owners of a 20.2 hectare parcel of land at 171 Gorham Road, located at the north-west quadrant of the intersection of Gorham and Farr Avenue, bounded by the Friendship Recreation Trail to the north, within the Town of Fort Erie. Our clients are seeking to include these lands in the settlement area through the Region's current Municipal Comprehensive Review process.

We have had an opportunity to review the Regional Planning reports on this to date. We have also had a very positive initial meeting with planners from the Region, and are pleased to see that our submissions will be seriously considered.

The inclusion of the Trails of Ridgeway lands in the Region's Settlement Area can be achieved in conformity with the Growth Plan for the Greater Golden Horseshoe. In addition, it is consistent with the Region's choice to having a "made in Niagara" approach to growth. Their inclusion will also implement a clear stated preference of the planners and Council of the local municipality, the Town of Fort Erie.

A letter addressed to you from our planner, Murray Evans, is enclosed - and sets out a detailed planning rationale in support of including the Trails of Ridgeway lands in the settlement area.

Trails of Ridgeway Can be Included in Settlement Area While Maintaining Conformity With Growth Plan

The policies of the Growth Plan for the Greater Golden Horseshoe permit the inclusion of the subject lands within the settlement area.

1). Niagara will be in conformity with the the Schedule 3 population forecasts if the Trails of Ridgeway lands are included. Growth Plan policy 5.2.4.2 provides that these forecasts are

minimums - which policy Niagara has already availed itself of with the “made in Niagara” approach to the population forecasts.

- 2). The Region would meet it’s intensification targets.
- 3). The Region will be able to meet its designated greenfield area targets.
- 4). The inclusion of the lands would move Niagara closer to satisfying the Land Needs Assessment Methodology requirement to provide a market-based supply of housing.

Inclusion of the Lands Would Achieve a Number of Important Growth Plan Policy Objectives and Provincial Policies

The inclusion of the Trails of Ridgeway lands in the settlement area would help the Region to better achieve a number of policy objectives from the Growth Plan and the Provincial Policy Statement.

- 1). The site meets the Growth Plan criteria for determining an appropriate location for settlement area expansion.
- 2). There is readily available water servicing infrastructure.
- 3). There is readily available waste water servicing infrastructure.
- 4). There are no servicing capacity issues.
- 5). The development of the lands would result in an efficient use of infrastructure.
- 6). The site delivers a high level of connectivity - especially for active transportation - through the trail infrastructure connections it will provide.
- 7). The inclusion of these lands will help to ensure a more complete community in Ridgeway, in view of the several neighbouring retail uses including a grocery store.
- 8). The inclusion of additional housing in this part of the Niagara Region market area will help achieve a greater supply of ownership housing that is in financial reach for young families, due to its location. This is an important objective of the Growth Plan, and provincial policy.

The Inclusion of the Trails of Ridgeway is a Stated Preference of the Town of Fort Erie

The Land Needs Assessment Methodology indicates that upper-tier municipalities are to work together with local municipalities in the identification of lands for inclusion in the settlement area.

The Town of Fort Erie has already completed a planning study - endorsed by Council - to identify which lands were most appropriate for inclusion in the settlement area pursuant to the Growth Plan. The Trails of Ridgeway lands were identified as a priority by the Town for inclusion in the settlement area, and scored very highly on the Town’s assessment criteria.

The established and stated interest of the Town in including these lands in the settlement area should be respected by the Region in deciding where settlement expansion should occur.

The Inclusion of the Lands Would Achieve Important Fort Erie Priorities Regarding Establishment of a Trail System

The Town of Fort Erie has made achieving a comprehensive trail system for active transportation an important planning priority. The subject site offers the opportunity to achieve several key linkages - which are now “missing links” - in that trail system.

In particular, the site offers a connection to the Friendship Trail along the north side of the property, as well as an important north-south connection from that trail that will lead ultimately down to Lake Erie. In addition, connected small naturalized trails will be achieved within the site.

The Inclusion of the Lands in the Settlement Area Represents Good Planning

For a number of additional reasons, it makes good planning sense to include the Trails of Ridgeway land in the settlement area to become a part of the Ridgeway community.

- 1). The size of the landholding is sufficient to allow for comprehensive urban planning.
- 2). The property has multiple points of access to adjacent road network.
- 3). The land is largely free of environmental constraints.
- 4). Portions of the lands are currently within the existing settlement area.

We Look Forward to Discussing this Submission Further with Regional Planning Staff

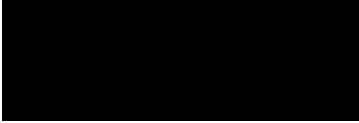
The proponents of the Trails of Ridgeway are confident that the inclusion of these lands in the settlement area is in conformity with the Growth Plan and provincial policy. These lands can simply be added to the settlement area without any compromise to the Region’s policy objectives and meeting necessary targets. It represents good planning, that will strengthen the community of Ridgeway. It will deliver growth on a site that the Region’s planners have already concluded is promising: in their words, “From a planning perspective, this location displays the potential for growth.”

We look forward to the opportunity to meet with Regional planning staff to further discuss this submission. In the interim, we would be happy to provide any additional information you may require.

January 13, 2022
Page 4

Yours truly,

AIRD & BERLIS LLP



Hon. Peter Van Loan
Partner

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