



April 17, 2024

Mackenzie Cici, Senior Planner (Current Development)  
Planning, Building and Development  
City of Niagara Falls  
4310 Queen Street  
Niagara Falls, Ontario L2E 6X5

Dear Mackenzie,

***Re: Official Plan Amendment and Zoning By-law Amendment Applications  
(City File No. AM-2024-003)  
Addendum to Planning and Urban Design Rationale (February 2024)  
6546 Fallsview Boulevard and 6519 Stanley Avenue***

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As you are aware, we are the planning consultants for Hennepin's View Inc. (the "owner") with respect to the above-noted applications for the sites located at 6546 Fallsview Boulevard and 6503-6519 Stanley Avenue (the "subject sites").

On February 21, 2024, Official Plan and Zoning By-law Amendment applications were filed by Bousfields Inc. to permit a mixed-use development on the subject sites, including two 58-storey hotel, residential, and commercial buildings on the 6546 Fallsview Boulevard property and an associated 7-storey parking structure on the 6503-6519 Stanley Avenue property.

Subsequently, the City of Niagara Falls issued a notice of incomplete application on March 27, 2024. This addendum letter intends to respond to the comments contained within this notice. Additionally, the report summarizes a small number of changes to the proposed development in response to comments received from the City as a part of the incomplete notice.

### **Changes to Proposed Development**

Following the receipt of the notice of incomplete application, the applicant has slightly modified the proposed development in response to comments received. Specifically, the applicant has revised the proposed supply of residential and vacation rental unit parking spaces to comply with the existing zoning by-law requirements for the two uses. Specifically, residential parking has been increased

to 177 parking spaces (1.4 spaces per unit) and vacation rental unit parking has been increased to 252 spaces (2.0 spaces per unit). All residential parking spaces would continue to be provided on the 6546 Fallsview Boulevard site, with the additional amount (0.6 spaces per unit) required to allow for VRU units to be provided in the proposed parking structure at 6519 Stanley Avenue. These changes have resulted in the removal of the site-specific parking rates in the proposed zoning by-law amendment, as well as vacation rental units being added to the list of uses permitted to utilize off-site parking locations. We note that as the application as originally submitted on February 21, 2024 had an excess supply of parking over by-law requirements, the total amount of parking proposed within the development remains unchanged at 1,320 parking spaces. No other changes to the application have been made at this time.

### **Housing Analysis**

Among the items deemed incomplete in the notice, the City of Niagara Falls identified:

*The Planning Justification Report notes that the proposed residential dwelling units are not anticipated to be affordable. The applicant is required to demonstrate how the proposal will implement the City's Housing Strategy. If affordable units are not proposed, justification should be provided as to why it's not possible or appropriate in this location. Please provide more detail in the Planning Justification Report.*

We note that the original Planning and Urban Design Rationale (the "Planning Rationale") addressed all criteria set out in the Official Plan for a Housing issues report. As outlined in the Planning Rationale, the proposed development does not anticipate providing any affordable housing units in accordance with the definitions provided by the City of Niagara Falls Official Plan. We note that the City of Niagara Falls Official Plan, through Policy 4.4, does not require the provision of affordable housing, only that an application identify how a proposal contributes to the City-wide affordable housing targets. As identified in the Planning Rationale, the proposed development does not anticipate qualifying as affordable, and as such does not anticipate contributing to the City's affordable housing targets.

We note that several features of the proposed development limit its ability to contribute to the City of Niagara Falls' affordable housing targets. Specifically, the residential units are:

- located on the uppermost floors of the project and offering unimpeded views over the Horseshoe and American Falls and into the United States;
- located in the centre of the Fallsview Tourist District with strong access to local amenities and attractions; and
- located within the wider development, which consists of an up-market hotel and entertainment complex.

These factors mean that the units within the proposed development are expected to be of higher value, especially when compared to housing units across the entire Region of Niagara. The proposed residential component intends to serve the luxury apartment market within the region in a manner which has not historically occurred within the City of Niagara Falls, and as such are not anticipated to qualify as affordable under the Official Plan's definitions.

Additionally, we note that the City of Niagara Falls saw 97.5% of townhouse and apartment new build construction permits issued in 2023 being categorized as affordable for moderate income households<sup>1</sup>. As there were 246 apartment and townhouse permits issued in 2023, this represents approximately 240 affordable residential units constructed, well in excess of the 135 annual unit target identified in Policy 4.8 of the Official Plan.

We additionally reiterate that the number of annual affordable units identified in the Official Plan is an annual target, not a requirement, and emphasize that the targets are to be measured on a City-wide basis and not on an individual application. Given the proposed development's location and proposed amenities, the proposed development would not be the most appropriate location for affordable housing within the wider City of Niagara Falls, nor is the inclusion of affordable units within the proposed development necessary for the City to reach its intended target, which the City is meeting through the existing supply of housing in other areas of the City<sup>1</sup>.

We also note that the proposed residential apartment units represent a small component of a much larger mixed-use development that will include shared

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<sup>1</sup> According to the City of Niagara Falls 2023 Housing & Growth Monitoring Report – Year in Review (PBD-2024-012) presented to Niagara Falls City Council on April 9, 2024

amenities that will add to the cost of housing. This, in our opinion, would also prevent the proposed residential units from achieving the affordable housing threshold.

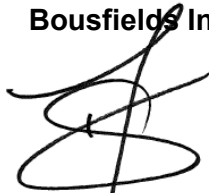
### **Conclusions**

Based on the analysis set out above and in our original Rationale, it is our opinion that the proposed development is appropriate and desirable. It continues to be our opinion that the proposed development is in keeping with the planning and urban design framework set out in the Provincial Policy Statement (2020), the Growth Plan for the Greater Golden Horseshoe (2019), the Region of Niagara Official Plan, the City of Niagara Falls Official Plan, as well as relevant urban design guidelines.

We trust that this letter is satisfactory for your review. If you have any questions and/or comments regarding this addendum letter, please do not hesitate to contact the undersigned at your convenience.

Respectfully Submitted,

**Bousfields Inc.**



David Falletta MCIP, RPP

CV/df:jobs

cc. *Client*