



June 24, 2024
Project No. 23207

Ms. Mackenzie Ceci, MCIP, RPP
Acting Senior Manager of Current Planning
Planning, Building & Development
City of Niagara Falls
4310 Queen Street
Niagara Falls, ON, L2E 6X5

Dear Ms. Ceci,

**RE: PLOPZB20240330, Official Plan Amendment and Zoning By-law Amendment Application
7302 Kalar Road, Niagara Falls
Planning Justification Report Addendum No. 1**

In response to your Letter of Incomplete Application, June 16, 2024, to Mr. Peter J. Lesdow, Architect, regarding the Official Plan and Zoning By-law Amendment Application for 7302 Kalar Road, an addendum to Urban & Environmental Management Inc. (UEM)'s Planning Justification Report (April 26, 2024) is attached with this letter. This addendum addresses Part 1, Section 4.4 of the Niagara Falls Official Plan.

We trust this is satisfactory in addressing the comment included in the Letter of Incomplete Application. If you have any questions or require further information, please contact me at (905) 358-6873, or by email at gtaras@uemconsulting.com.

Yours very truly,
URBAN & ENVIRONMENTAL MANAGEMENT INC.

A handwritten signature in blue ink that reads 'Greg Taras'.

Greg Taras, RPP
Senior Planner

Encl: Planning Justification Report (UEM, April 26, 2024), Addendum No. 1

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Addendum to Planning Justification Report
Review of City of Niagara Falls Official Plan Policy: Part 1, Section 4.4

Policy Identifier	Policy Text	Is the Proposed Development Consistent with this Policy?
<p>Part 1, Section 4.4 – Vision and Goals for Housing</p>	<p>Applications for an Official Plan Amendment, Zoning By-law Amendment, Draft Plan of Subdivision, and Draft Plan of Condominium shall include, as part of a complete application, the submission of a housing impact statement, either as a standalone report for large-scale projects, or as a section within a planning justification report for small-scale projects, demonstrating how the proposal implements the City’s Housing Strategy. The housing impact statement shall include the following:</p> <p>a) The proposed housing mix by dwelling type and number of bedrooms, as applicable;</p> <p>b) How the proposal contributes to achieving the City’s annual housing targets as outlined in Part 1, Section 4, Policy 4.8 a) and b);</p>	<p>The proposed development will introduce 412 new residential apartment units to the City of Niagara Falls. The units will be comprised of 88 one-bedroom and 324 two-bedrooms units. This will result in a total of 736 bedroom units.</p> <p>As identified in Part 1, Section 4.8 of the Official Plan, the City anticipates 20,220 new residents to Niagara Falls between 2021 and 2051, which results in a requirement for 674 new residential housing units annually. The increase for the property from the current zero (0) residential units to the proposed 412 residential units will greatly contribute to meeting housing targets for the City. The development will meet 61% of an annual residential housing requirement and 2.0% of the residential housing requirements over the 30 year planning horizon. Further, the increased residential housing supply is anticipated to contribute to lowering housing costs by meeting the goals of all levels of government to increase housing supply in order to reduce housing costs through supply and demand economics.</p>

Policy Identifier	Policy Text	Is the Proposed Development Consistent with this Policy?
	<p>c) The estimated rents and/or sales prices of the development, indicating where they are either above or below the threshold for affordable as defined by the Niagara Region and the City;</p>	<p>The units are intended to be offered for rent, with monthly rental prices estimated to range from approximately \$2,000 to \$2,600.</p> <p>The following definition is included in the Niagara Falls Official Plan for “affordable housing:”</p> <p>“In the case of rental housing, the least expensive of:</p> <ul style="list-style-type: none"> i) a unit for which the rent does not exceed 30 percent of gross annual household income for low and moderate income households (as defined in the Provincial Policy Statement); or (ii) a unit for which the rent is at or below the average market rent of a unit in the regional market area (as defined in the Provincial Policy Statement).” <p>According to the October 2023 Rental Market Survey carried out by the Canadian Mortgage and Housing Corporation (CMHC), the average rental price for a one-bedroom apartment in Niagara Falls (remainder) was \$1,197 and the average rental price for a two-bedroom apartment was \$1,409.</p> <p>According to a draft updated Table 3-5 of the City of Niagara Falls Housing Needs Study (provided by City of Niagara Falls staff), 2022 income was estimated based on available average 2021 Niagara Region annual income, with the CPI increase for 2021 to 2022 applied. UEM has similarly applied the 2022 to 2023 CPI increase to estimate 2023 income. Based on a CPI increase of 3.9%, average low income ranged from \$24,799 to \$50,832, representing an affordable housing maximum monthly rental rate of \$670 to \$1,271. Medium income ranged from \$67,327 to \$107,611, representing an affordable housing maximum monthly rental rate</p>

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	<p>d) Where construction of the units is expected to occur in phases, information regarding the number of housing units that would meet Niagara Region's and the City's definition of affordable to be provided per phase, where applicable; and,</p> <p>e) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long-term affordability of units, where applicable.</p>	<p>of \$1,682 to \$2,690.</p> <p>The least expensive option in this scenario overall would be option ii). Therefore, as the proposed apartment units have estimated rents higher than the average rents for one and two-bedroom units for Niagara Falls, the proposed development does not meet the criteria for affordable housing.</p> <p>Not applicable. The proposed development will be constructed in a single phase.</p> <p>Not applicable. The proposed development does not meet the City's definition of "affordable housing."</p>