



April 19, 2023

1815 Sir Isaac Brock Way
Thorold
ON, L2V 4T7

RE: Lot 186 Kalar Road – OPA/ZBA Land Use Compatibility
(Region Files: D.10.04.OPA-22-0029, D18.04.ZA-22-0056)

Dear Mr. Morrison,

Please consider this letter as additional justification in response to comments received from the Region of Niagara pertaining to the Land Use Compatibility Analysis included in the Planning Justification Report (PJR) prepared by NPG Planning Solutions dated September 7, 2022, submitted with Applications for Official Plan Amendment and Zoning By-law Amendment for Lot 186 & 7640 Kalar Road (Region Files: D.10.04.OPA-22-0029, D18.04.ZA-22-0056).

Regional comments dated February 24, 2023, indicate that the Land Use Compatibility Analysis in the PJR contains limited rationale for determining the Class II facility status under the Ministry of the Environment, Conservation and Parks D-Series Guidelines for uses identified as Roman Cheese Products, Niagara Peninsula Energy Inc., and Coach Canada Transportation Services. Regional comments further suggest that an addendum to the PJR be submitted to further investigate on the extent of on-site operations for the identified Class II facilities. The Region has requested specific information on the types of day-to-day on-site practices, vehicle / truck equipment movement, materials storage, potential fugitive emissions, or standard operating hours of the facilities.


This letter is intended to respond to Regional comments and should be read in conjunction with the previously submitted PJR.

Description of Surrounding Industrial Use

There are three Industrial Sites located within 400 metres of the Subject Lands. These sites are as follows:



NPG Planning Solutions
4999 Victoria Ave | Niagara Falls, ON L2E 4C9
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Roman Cheese Products

Roman Cheese is located at 7770 Canadian Drive, Niagara Falls, approximately 255 metres from the Subject Lands. The Roman Cheese facility operates as a warehouse and distribution centre for frozen products and produce. There is also a small office component near streetview. An informal telephone interview was conducted with Roman Cheese staff on March 2, 2023, to gain an understanding of the site use.

Niagara Peninsula Energy Inc.

Niagara Peninsula Energy Inc. (NPEI) is located at 7747 Pin Oak Drive, Niagara Falls. The NPEI site features a mix of office and industrial uses. Standard operating hours for NPEI are between 7AM and 4:30PM. However, as NPEI is a utility company, they will operate beyond regular business hours if required. An informal telephone interview was conducted with a NPEI staff member on March 2, 2023, to gain an understanding of the site use.

Coach Canada

The Coach Canada site is located at 7302 Kalar Road, Niagara Falls, approximately 360 metres from the Subject Lands. Coach Canada shares this site with Phoenix Equipment Rentals, Alington Crane, and Pilot Truck Training School. The site is predominantly vacant and used as vehicular storage for a Class 8 heavy duty vehicles (cranes and semi-trailer trucks). The Coach Canada facility is operational daily between 8AM and 5PM and the other businesses are not regularly staffed. A site visit was conducted on March 2, 2023, with an informal interview being conducted on-site with a Coach Canada staff member to gain an understanding regarding site use.

Analysis of Industrial Categorization Criteria (D-6-1)

The following section and tables within provide a guide for land use planning authorities when determining the required classification of industrial facilities. The tables categorize industrial facilities into three Classes according to the objectionable nature of the outputs of the facility, scale of the facility, processes contained within the facility and the intensity of the operation on the site. Class I facilities can be considered the least intensive and Class III can be considered the most intensive use. The following section will investigate each industrial site against the criteria within.

Criteria: Outputs

The first criteria used in determining the Class of industrial facility is regarding outputs which investigates the noise, dust and vibrations created by the industrial facility.

Class I	Class II	Class III
<ul style="list-style-type: none"> • Noise: Sound not audible off property • Dust and/or Odour: Infrequent and not intense • Vibration: No ground-borne vibration on plant property 	<ul style="list-style-type: none"> • Noise: Sound occasionally audible off property • Dust and/or Odour: Frequent and occasionally intense • Vibration: Possible ground-borne vibration, but cannot be perceived off property 	<ul style="list-style-type: none"> • Noise: sound frequently audible off property • Dust and/or Odour: Persistent and/or intense • Vibration: Ground-borne vibration can frequently be perceived off property

Analysis:

Roman Cheese Products

All operations at Roman Cheese occur indoors with the exception of the movement of trucks. Based on this sound is generally contained but will occasionally be heard off property.

As operations occur indoor dust is infrequent and would not be considered intense.

Due to the frequent movement of large trucks, there is possible vibration on the site. However, the vibration has a low likelihood of being perceived off property.

Niagara Peninsula Energy Inc.

The Niagara Peninsula Energy facility is used for electricity distribution operations and features an office and the frequent movement of large trucks and service vehicles. The movement of these trucks/vehicles may result in ground-borne vibration, frequent movement of dust and sound occasionally heard off property.

Coach Canada

The vehicles stored on site are heavy duty, therefore sound may occasionally be heard off property when these vehicles are moving.

The Coach Canada facility operates infrequently, therefore dust movement is also infrequent.

There is the possibility of ground-borne vibration on the site during the movement of these vehicles but is unlikely to be perceived off property.

Summary:

Based on the outputs the nearby industrial facilities can be considered Class II.

Criteria: Scale

The following table provides the D-6-1 Industrial Categorization Criteria related to the scale of industrial operations.

Class I	Class II	Class III
<ul style="list-style-type: none"> No outside storage Small scale plant or scale is irrelevant in relation to all other criteria for this Class. 	<ul style="list-style-type: none"> Outside storage permitted Medium level of production allowed. 	<ul style="list-style-type: none"> Outside storage of raw and finished products Large production levels

Analysis:

Roman Cheese Products

There is no outdoor storage on the Roman Cheese site.

The Roman Cheese facility packages frozen meats for distribution. Due to the size of the facility, it can be considered as a medium level of production.

Niagara Peninsula Energy Inc.

The Niagara Peninsula Energy facility features the outdoor storage of service vehicles, electricity poles, transformers, electricity meters, switches and more.

There is no manufacturing production on site.

Coach Canada

The Coach Canada facility features many vehicles stored outside.

There is no manufacturing production on site, only minor vehicle servicing.

Summary:

Based on their scale the above noted industrial facilities can be considered Class II.

Criteria: Process

The following table provides the D-6-1 Industrial Categorization Criteria related to the process of industrial operations.

Class I	Class II	Class III
<ul style="list-style-type: none"> • Self contained plant or building which produces/stores a packaged product. • Low probability of fugitive emissions 	<ul style="list-style-type: none"> • Open process • Periodic outputs of minor annoyance • Low probability of fugitive emissions 	<ul style="list-style-type: none"> • Open process • Frequent outputs of major annoyances • High probability of fugitive emissions

Analysis:

Roman Cheese Products

The Roman Cheese facility is self contained and is unlikely to output significant annoyances. The facility operates as a distribution centre for packaged products.

There is a low probability of fugitive emissions based on the distribution centre characteristic of the facility.

Niagara Peninsula Energy Inc.

The Niagara Peninsula Energy facility is self contained and is unlikely to output significant annoyances. Emissions produced at the facility are limited to vehicular emissions operating on gas and diesel which have a low probability of being fugitive.

Coach Canada

There is no production on-site.

During the movement of vehicles and the operation of the commercial truck driving school there is the possibility of periodic output of minor annoyances. These annoyances can be characterized primarily as minor noise annoyances due to their infrequent nature.

Emissions produced at the facility are limited to vehicular emissions operating on gas and diesel which have a low probability of being fugitive.

Summary:

Based on their processes the above noted industrial facilities can be considered Class II.

Criteria: Operation/Intensity

The following table provides the D-6-1 Industrial Categorization Criteria related to the operation/intensity of industrial operations.

Class I	Class II	Class III
<ul style="list-style-type: none"> • Daytime operations only • Infrequent movement of products and/or heavy trucks 	<ul style="list-style-type: none"> • Shift operations permitted • Frequent movement of products and/or heavy trucks with the majority of movements during daytime hours 	<ul style="list-style-type: none"> • Continuous movement of products and employees • Daily shift operations permitted

Analysis:

Roman Cheese Products

Roman Cheese features shift operations, beginning at 5AM and concluding at 11:30PM.

This Roman Cheese facility operates as a distribution centre and features frequent movement of heavy trucks during daytime hours.

Niagara Peninsula Energy Inc.

The Niagara Peninsula Energy Facility generally operates with standard daytime working hours (8AM-4:30PM) but must also be available for emergency calls 24 hours a day.

The majority of truck movement occurs during daytime hours.

Coach Canada

The Coach Canada facility generally operates with standard daytime working hours (8AM-4:30PM). The other businesses on site are not regularly staffed.

The site features the frequent movement of heavy trucks during daytime hours.

Summary:

Based on their operation/intensity the above noted industrial facilities can be considered Class II.

Conclusion

Based on the above, the surrounding industrial facilities can be considered Class II industrial facilities. These facilities are compatible with the proposed development at Lot 186 Kalar Road. We trust the above is satisfactory, and should you require anything further or have any questions, please do not hesitate to contact the undersigned.

Sincerely,



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Appendix A: Roman Cheese Site Photos



Appendix B: Niagara Peninsula Energy Inc. Site Photos



Appendix C: Coach Canada Site Photos



