

August 14, 2023

UCC File No. 22218

To: Alexa Cooper MCIP, RPP
Planner 2
City of Niagara Falls
4310 Queen Street
Niagara Falls, ON L2E 6X5

**Re: Addendum to Planning Justification Report
OPA 149 – New Niagara Falls Housing Policies
5640 Stanley Avenue and 5609 & 5619 Buchannan Avenue**

As requested by City of Niagara Falls Planning Staff on August 3, 2023, this addendum letter has been prepared to provide additional planning analysis pertaining to the recently approved City of Niagara Falls Housing Policies. These new policies were approved by City of Niagara Falls Council on January 17, 2023 through Official Plan Amendment 149. The required analysis of these policies was inadvertently omitted in the previously submitted Planning Justification Report as the new policies are not yet integrated into the consolidated Official Plan that is available online.

This additional planning analysis should be read in conjunction with the Planning Justification Report prepared by the Upper Canada Consultants dated July 2023.

PLANNING ANALYSIS – OPA 149 HOUSING POLICIES

Vision and Goals

The City's new housing policies that were approved by City Council via OPA 149 were prepared in response to the findings and directions of the City's Housing Directions Study (2020). The policies were prepared to direct the municipality (corporation) and guide private applications with regard to housing affordability and supply within the City.

The overall vision new policy set is to ensure that within the City of Niagara Falls that there is a safe, stable and appropriate range of housing choices and opportunities that meet residents physical and financial needs throughout a lifetime.

The goals that are used to implement this vision pertain to housing availability, diversification of supply, prices and tenure types, the removal of barriers for alternative housing forms, the commitment to monitoring of supply and to work with partners and agencies to advance actions set out in the housing strategy.

Policy Analysis

The submitted Zoning By-law Amendment will facilitate the redevelopment of commercial hotel property and two detached dwelling lots for higher density residential housing within a mixed-use building. In total, 162 new residential dwelling units, inclusive of five (5) live-work units, are proposed. A large commercial unit is also proposed at grade at the corner of Stanley Avenue and North Street.

Policy 4.3 directs that opportunities for a choice in housing type, tenure, cost and location shall be provided within the City. To achieve this, the City will support:

- Multiple Unit Developments, smaller lot sizes and innovative housing forms.
- Development of vacant lands, and more efficient use of under-utilized parcels and existing housing stock.
- The full utilization and consolidation of properties to achieve larger scale and more comprehensive residential development.
- Development of housing in conjunction with commercial developments in order to create walkable neighbourhoods.
- Accessory Dwelling units within ground based dwelling forms (i.e. singles, semis, townhouses).

The application conforms with this policy direction as it contemplates the creation of 162 new apartment dwelling units (i.e. multiple unit development). The subject lands have been consolidated from an underutilized hotel property with large surface parking area and two small-scale detached dwellings to achieve a significant increase in housing supply on-site.

The development plan contemplates one (1) commercial unit and five (5) live/work units at grade. These commercial elements will benefit the planned apartment dwelling units and existing low-density residential land uses in the immediate area. The applicant is proposing to provide streetscape improvements along the Stanley Avenue interface with the site which will also improve the pedestrian experience and facilitate walkability.

Policy 4.4 requires that applicants provide detailed information about new housing projects as part of applications for Official Plan Amendment, Zoning By-law Amendment and Draft Plans of Subdivision and Condominium. As the submitted application is for a Zoning By-law Amendment, the following relevant criteria must be addressed:

- a) The proposed housing mix by dwelling type and number of bedrooms, as applicable
- 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).
- 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;

The proposed housing mix on the property is being changed from two single detached dwellings (Buchanan Avenue Lots) to 162 residential apartment dwellings (100% of housing type). This represents a net increase of +160 new residential housing opportunities feet on the subject lands. The provision of differently sized apartment dwelling units (ranging in size from 506 square feet to 1492 square feet) provides a beneficial and necessary range mix of housing opportunities in this portion of the neighbourhood which predominantly consists of a mix of ground based dwelling forms such as single detached dwellings and more recently developed townhouse units.

The proposed units will vary in form between one- and two-bedroom units. Provisionally the architect has confirmed that a configuration inclusive of fifty-one (51) one-bedroom units and one-hundred-eleven (111) two-bedroom units can be achieved within the current building design.



Based on current market conditions and anticipated construction costs, the units may have a selling price range between \$725-\$900 per square foot. Using the smallest and largest unit areas shown on the provided floor plans, this would equate to a potential sales price range between \$366,850.00 (506 sq. ft) and \$1,342,800.00. These estimated prices reflect a range and mix of pricing, which is desirable from a housing perspective.

At this time, the exact proportion of proposed units that may meet the definition of affordable is unknown. However, the smaller sized units may be more attainably priced than ground-based dwellings found throughout the municipality, especially in the suburban subdivision areas. Depending on the final design of the building, there may be additional opportunities for this development to contribute units to the annual affordable housing targets set forth in Policies 4.8 a) and b) of OPA 149.

As outlined within this letter, the submitted Zoning By-law Application is considered to conform with the intent and purpose of the housing policies of OPA 149 by introducing additional housing supply with a range of selling prices and unit sizes. Although the exact extent of reasonable or dedicated affordable housing opportunities within the proposed apartment building is not known at this early stage in the approvals process, the proposed dwelling forms are expected to be more competitively priced and attainable than new and existing low-density housing forms within the City.

If any further planning analysis is required, please contact the undersigned.

Respectfully submitted,

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Daljit Goraya, Owner