

PLANNING JUSTIFICATION REPORT

PROPOSED MIXED USE DEVELOPMENT
STACKED TOWNHOUSES WITH GROUND FLOOR COMMERCIAL
858 NIAGARA STREET

PREPARED FOR:

RPDS INTEGRATED DESIGN FIRM

PREPARED BY:

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1.0 BACKGROUND

RPDS Integrated Design Firm has retained the services of Robert Russell Planning Consultants Inc. to provide a Professional Planning Opinion related to a proposal to Amend the City of Welland Official Plan and Zoning By-law at 858 Niagara Street.

The Subject Property is owned by Rohit Parmer and was most recently used for what appears to be single detached residential purposes according to the historical aerial photography available through Google Earth and the review of current and past uses in Section 6.1 of the Phase 1 ESA completed by Hallex Environmental Ltd dated August 1, 2019. However, the previous dwelling appears to have been demolished about 8 years ago. Please note that this is contrary to Niagara Region's belief that the property previously contained commercial uses as stated during the pre-consultation.

Raj Patel of RPDS Integrated Design Firm requested a Pre-Consultation with the City of Welland that is dated August 17, 2023 to present a proposed site plan for a new mixed use development consisting of stacked townhouse residential units and ground floor commercial fronting onto Niagara Street.

2.0 SITE DESCRIPTION AND CONTEXT

As noted above the Site is located at 858 Niagara Street in the City of Welland in the Regional Municipality of Niagara. The legal description is Part of Township Lot 230, Thorold.

The Subject Property is near the north limit of the municipality of Welland near the boundary with Thorold. More specifically it is located on the east side of Niagara Street, approximately 80 m north of Lancaster Drive. The property is generally rectangular in shape, however, the south east corner of the rectangle has a notch created by what appears to be a private amenity space that belongs to the Doral Tower and Lancaster Park Apartments. Lot width along Niagara Street is 39.5 m and total lot depth is 250 m except at the south east corner. The total property area is 9,309.34 square metres.

The land is generally flat a slight slope down to the east. The west portion of the property that previously contained the single detached dwelling and outdoor private amenity space is generally vegetated with ornamental landscaping, such as grass and individual trees. The east half of the property is more heavily vegetated and is contiguous with a larger wooded area that measures slightly less than 1 hectare on the aerial photography.

The Subject Property is within an established commercial corridor along Niagara Street with residential uses surrounding the commercial sites. The commercial corridor includes the Seaway Mall and several large

format retail establishments. Rounding out the commercial corridor are travel accommodation uses, restaurants, automotive retail, building supply, and multi-tenant plazas.

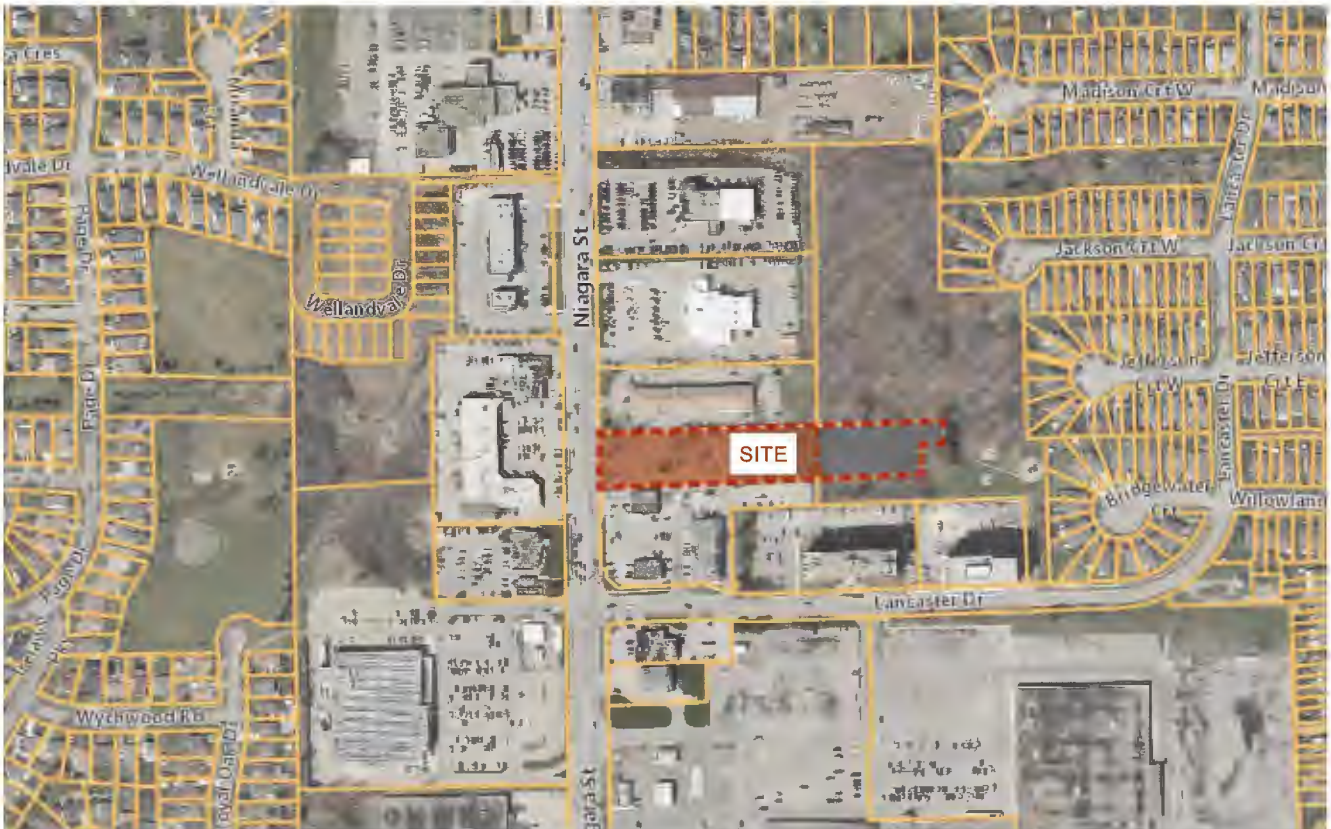


Figure 1: Aerial Photograph and Site Context

The surrounding residential uses are predominantly ground oriented low density units, including single detached, semi-detached, and limited townhouses on the periphery. However, within close proximity to the Subject Property are two high density residential properties along Lancaster Drive, each containing a 9 storey apartment building.

3.0 PROPOSED DEVELOPMENT

Rohit Parmer proposes to construct a mixed use commercial and residential development in a stacked townhouse typology consisting of 4 individual blocks. The commercial component of this development will provide 2 commercial units with a total GFA 129.76 m². The residential component of the development consists of 67 units with a total GFA of 4,748.48.5 m² located in 3 storey buildings. The commercial units are located on the ground floor of Building A adjacent to Niagara Street with the future commercial

businesses having direct pedestrian access to the Niagara Street sidewalk. Above these commercial uses will be 4 stacked townhouse units. The remaining 63 townhouse units are provided in a more traditional stacked townhouse configuration.

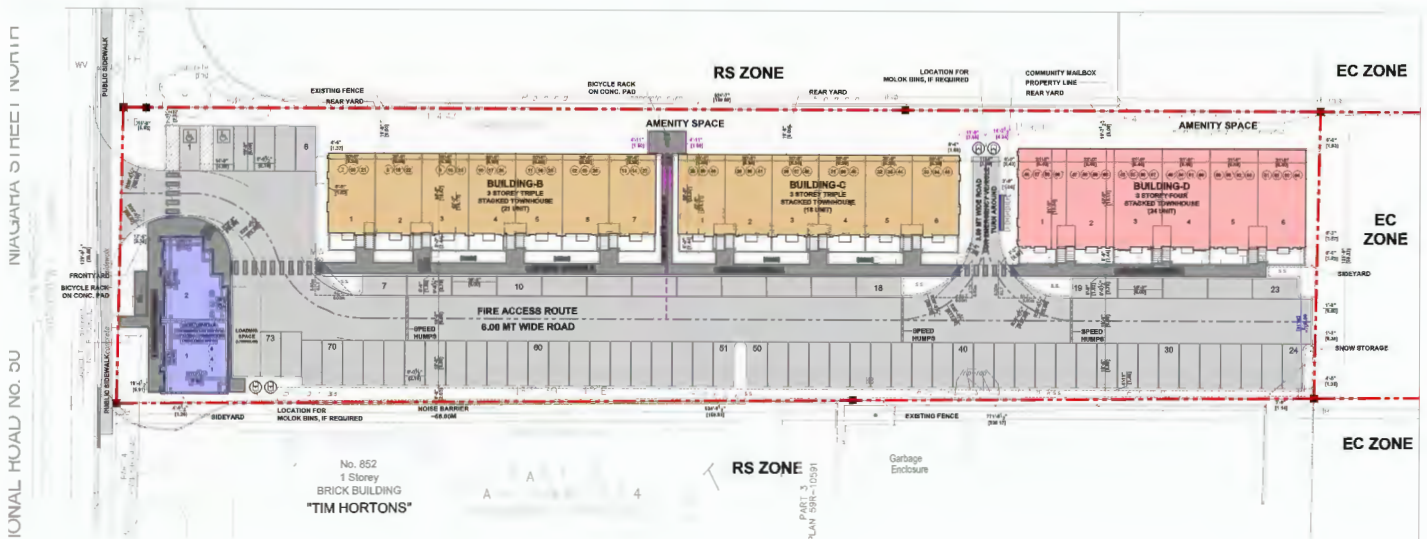


Figure 2: Conceptual Site Plan

Outdoor amenity space is provided to the north of Buildings B, C, and D between the rear facade and the property line.

4.0 PLANNING POLICY

The proposed development as depicted on the Site Plan prepared by RPDS Integrated Design Firm and dated February 6, 2024 is used as the basis for the following policy analysis. The existing Official Plan designation and Zone permit commercial uses. Given that the principal of land use is established for the proposed commercial uses, the policy analysis will be scoped somewhat to limit discussion in that regard. However, any policies related to development or site specific issues will still be reviewed and discussed.

4.1 Provincial Policy Statement

The Province of Ontario Provincial Policy Statement (PPS) came into effect May 1, 2020 and applies to all *Planning Act* approvals made after that date.

It is acknowledged that the Province has released a new draft Provincial Planning Statement on the environmental registry for comment until August 4, 2023. This new Provincial Planning Statement would combine the Growth Plan policies and PPS policies in a single document, with some modifications. As such, at the time this application is to go before City of Welland Council for consideration, there will likely be a revised policy regime that must be reviewed.

However, a review of the draft Provincial Planning Statement suggests that the new policies will not have a material impact on the outcome of the policy analysis below.

The following key Provincial Policy Statement policies are most relevant to the proposed Site Specific Official Plan Amendment and proposed Zoning By-law Amendment.

“1.1.1 Healthy, livable and safe communities are sustained by:

- a) promoting efficient development and land use patterns which sustain the financial well-being of the province and municipalities over the long term;*
- b) accommodating an appropriate affordable and market-based range and mix of...residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons),...to meet long term needs;...”*
- h) promoting development and land use patterns that conserve biodiversity;...”*

1.1.2 ...Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas....”

The proposed development would make use of under-utilized land and vacant land that has already been identified and designated by the City of Niagara Falls for commercial and residential and ancillary uses. The development itself provides a compact form incorporating a complimentary mix of land uses.

The proposed redevelopment of the Subject Property will improve servicing efficiency given that it will be constructed in a location that is currently serviced, but is unused and vacant. It will also introduce additional housing options, and will reduce the need for greenfield expansions, thus preserving biodiversity surrounding the built up area of Welland and Niagara Region.

“1.1.3.1 Settlement areas shall be the focus of growth and development.”

The proposed development is within a settlement area in accordance with the above policy.

“1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which:

- a) efficiently use land and resources;*
- b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;...*
- f) are transit-supportive, where transit is planned, exists or may be developed;...*

Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.”

As noted previously, the proposed redevelopment of this site will substantially improve the efficiency of the existing municipal services and infrastructure and is located on an Arterial Road. Niagara Region Transit operates Bus Route 509 along Niagara Street adjacent to the Subject Property. This route operates at a 30 minute service interval, which is considered to be basic transit service. The Ministry of Transportation of Ontario has published Transit Supportive Guidelines which include a table suggesting the neighbourhood density required to support varying levels of transit service. The net site density that would result from the proposed development is 108.1 units per net hectare. This level of density would support a subway per the Transit Supportive Guidelines if the rest of the neighbourhood was developed at a similar rate. As such, the proposed development is transit supportive, located on an existing transit route and within a commercial node, all of which will contribute to the efficiency of Niagara Region Transit.

“1.1.3.5 Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions. However, where provincial targets are established through provincial plans, the provincial target shall represent the minimum target for affected areas.”

The City of Welland has identified that stacked townhouses are a Medium Density use as per Policy 4.2.2.3.B, however, the density is capped at a maximum of 60 units per net hectare in accordance with Policy 4.2.2.2.3.A. This is discussed in more detail in Section 4.4 City of Welland Official Plan. The development proposal is for stacked townhouse with a net density of 108.1 units per net hectare, which would fit within the permitted density range for High Density Residential as per policy 4.2.2.4.A, although stacked townhouses are not a permitted use as per Policy 4.2.2.4.B. As such, the proposed development does not conform with either of the residential land use categories. However, given that the proposed development would provide a density of 108.1 units per hectare it meets the minimum density requirement of both policies and the provincial density target and as such, is consistent with the PPS is this regard.

“1.4.3 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:...

- b) permitting and facilitating:*
 - 1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and*
 - 2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;...*
- d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;*
- e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations;...”*

The proposal to develop stacked townhouses on the Subject Property provides a housing option that is not represented in the surrounding neighbourhood. Stacked townhouses can provide densities similar to mid-rise apartments, in a built form that may appeal to a broader segment of the population and that can be constructed at lower cost to the future inhabitants. Thus the proposed development will broaden the range of housing options in accordance with the above policy. As previously noted, the densities proposed for this development site are transit supportive and make efficient use of existing municipal infrastructure.

- “1.6.3 Before consideration is given to developing new infrastructure and public service facilities:
a) the use of existing infrastructure and public service facilities should be optimized;...”*

As per the policy above, intensification of this site, should be given priority over greenfield developments that require extensions to municipal infrastructure.

- “1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.”*

The proposed development does not propose any material changes to the land use pattern of the neighbourhood, as it is a redevelopment that would intensify the density of an existing under-developed site. The subject property is situated in a neighbourhood within a major commercial neighbourhood providing easy access to a complete range of retail options including grocery, clothing, and general retail. The commercial corridor extends approximately 400 m north of the subject property and 600 m south. This represents less than a 5 minute walk to the north for future residents to access restaurants and neighbourhood commercial and a 5 – 10 minute walk to the south. Furthermore, the proposed development will incorporate commercial space along the Niagara Street frontage providing additional convenience for the future residents. The broad mix of land uses within a small radius will support active transportation and help reduce vehicle trips.

- “1.7.1 Long-term economic prosperity should be supported by:...
b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;...”*

As previously noted, the proposed development, if approved, would result in a site density of 108.1 units per hectare, which is similar to low and mid-rise apartment uses. However, design and construction costs are substantially lower for stacked townhouses, resulting in a more affordable housing option that can be designed and constructed faster than an apartment type structure. As such, this housing option can respond quickly to changing market needs and can provide housing for those who want to live and work within the settlement boundary of the City of Welland.

Given the above examples, and a review of the remaining policies within Part V Sections 1, 2 and 3 of the PPS, we are of the opinion that the proposed Official Plan Amendment and Zoning By-law Amendment are consistent with the policies related to Building Strong Healthy Communities, Wise Use and Management of Resources and Protecting Public Health and Safety.

4.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe

The Growth Plan for the Greater Horseshoe was originally released in 2006. It has been updated and revised a number of times since then. The most recent update came into effect August 28, 2020.

Schedule 2 – A Place to Grow Concept indicates that the Subject Property is within the Delineated Built Up Area. Which is further confirmed on Schedule B – Regional Structure of the 2022 Niagara Official Plan.

Schedule 5 – Moving People – Transit appears to show that the Subject Property is within the Gateway Economic Centre.

The following key Growth Plan policies are most relevant to the proposed Official Plan Amendment and Zoning By-law Amendment.

- “2.2.1.2 Forecasted growth to the horizon of this Plan will be allocated based on the following*
- a) the vast majority of growth will be directed to settlement areas that:*
 - i) have a delineated built boundary;*
 - ii) have existing or planned municipal water and wastewater systems;*
 - and*
 - iii) can support the achievement of complete communities;...”*

The City of Welland has a delineated built boundary as noted above, and this property is within that boundary. The development site is within a previously developed part of Niagara Falls with existing services located on Niagara Street. Although the immediately surrounding neighbourhood is predominantly commercial in keeping with the Regional Shopping Node function, the broader neighbourhood, that is within the 5 – 10 minute walking distance is reasonably complete.

- “2.2.1.4 Applying the policies of this Plan will support the achievement of complete communities that:*
- a) feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities;...*
 - c) provide a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;...*
 - e) provide for a more compact built form...”*

Townhouses and more specifically, stacked townhouses, are an underrepresented housing form in the surrounding community, and the proposed development will increase the diversity of residential uses.

Furthermore, providing additional residents within a community that contains a mix of commercial and residential uses will help support the financial viability of existing local businesses and employers. As noted previously, the stacked townhouse typology provides a high level of density without some of the more problematic impacts of taller apartments, such as shadows, privacy and built form compatibility with surrounding low rise uses.

- “2.2.2.1 By the time the next municipal comprehensive review is approved and in effect, and for each year thereafter, the applicable minimum intensification target is as follows:*
- a) A minimum of 50 per cent of all residential development occurring annually within each of the Cities of Barrie, Brantford, Guelph, Hamilton, Orillia and Peterborough and the Regions of Durham, Halton, Niagara, Peel, Waterloo and York will be within the delineated built-up area;...”*

The approval and construction of the proposed development will contribute to the Region’s intensification target.

- “2.2.6.1 Upper-and single-tier municipalities, in consultation with lower-tier municipalities, the Province, and other appropriate stakeholders, will:*
- a) support housing choice through the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan by:*
 - i) identifying a diverse range and mix of housing options and densities,...”*

The City of Welland Official Plan has identified a minimum density for residential various residential uses and the proposed development exceeds the minimum required density of all categories.

Given the above examples, and a review of the remaining policies within Sections 2, 3, 4 and 5 of the Growth Plan for the Greater Golden Horseshoe, we are of the opinion that the proposed Official Plan Amendment and Zoning By-law Amendment are consistent with the Growth Plan policies as it facilitates the efficient use of developable land, and supports the existing complete community.

- “6.1.2.3.B Development and site alteration within the Core Natural Heritage System and in adjacent lands , where potentially permitted by policies elsewhere in this Plan, shall be subject to the Healthy Landscape Policies in Section 6.1.3.1 as well as the Core Natural Heritage System Policies”*

4.3 Niagara Official Plan

Niagara Official Plan was initially adopted by Niagara Region Council in June 2022 and was approved with modification by the Province November 4, 2022. On October 23, 2023, the Province of Ontario announced that the Provincial changes to various adopted Official Plans would be rescinded, with the intention to revert

to the version of those plans as adopted by the relevant municipal Council's with Provincial modifications only imposed where needed to ensure conformity with current legislation and Provincial policy. A 45 day commenting period is available to the municipalities regarding this latest Provincial decision. It assumed that until the commenting period is complete and the Niagara Official Plan is revised and re-approved by the Province that the November 4, 2022 version is in force and effect.

Schedule B – Regional Structure designates the Subject Property as being within the Delineated Built Up Area of the City of Welland.

Schedule C1 – Natural Environment System Overlay appears to include the woodlot within and adjacent to the Subject Property as being part of the Natural Environment System Overlay.

Schedule C2 – Natural Environment System: Individual Components and Features appears to indicate that the woodlot within and adjacent to the Subject Property as being a Significant Woodland. However, the scale of the schedule makes it difficult to confirm with any certainty.

Schedule D – Tertiary and Quaternary Watersheds seems to show the Subject Property and surrounding parts of Welland and Thorold as being within the Lake Ontario Tertiary Watershed, but external to the mapped Quaternary Watersheds. However, similar to Schedule C2 the mapping scale makes it difficult to review the fine details and it is possible that the Welland Canal South Quaternary Watershed extends north of West Main Street along the Welland Recreational Waterway

Schedule I –Petroleum Pools shows that there are Natural Gas Pools located to the north and south of the Subject Property, but the Subject Property itself does not appear to contain any Natural Gas Pools underneath it.

Schedule J1 – Transportation Infrastructure shows that Niagara Street is identified as a Regional Road

The Niagara Official Plan provides general guidance for Urban areas, and will rely on the local municipal Official Plans to provide the specific policies for land use such as identified more specific land uses such as residential areas, commercial areas, open space, and recreation.

The proposed development will facilitate the achievement of the Region's objectives to provide intensification, density and a range of affordable housing options in accordance with Growth Management Objectives 2.2(b), 2.2(e), 2.3(a), and 2.3(b).

- “2.2.1.1 Development in urban areas will integrate land use planning and infrastructure planning to responsibly manage forecasted growth and to support:...*
- b. a compact built form,...and a mix of land uses...to support the creation of complete communities;*
 - c. a diverse range and mix of housing types, units sizes, and densities to accommodate current and future market-based and affordable housing needs;*

- d. *social equity, public health and safety, and the overall quality of life for people of all ages, abilities, and incomes by expanding convenient access to:*
 - i. *a range of transportation options including public transit and active transportation;...*
- e. *built forms, land use patterns,...that minimize land consumption, reduce costs of municipal water and wastewater systems/services,....*
- f. *opportunities for transit-supportive development pursuant to Policies 2.2.2.17, 2.2.2.18 and 2.2.2.19;*
- g. *opportunities for intensification, including infill development...*
- h. *opportunities for ... a mix and range of housing options that considers the character of established residential neighbourhoods;*
- i. *the development of a mix of residential built forms in appropriate locations, such as local growth centres, to ensure compatibility with established residential areas;...*
- l. *mitigation and adaptation to the impacts of climate change by:...*
 - iii. *Promoting built forms, land use patterns, and street configurations that improve community resilience and sustainability, reduce greenhouse gas emissions, and conserve biodiversity.”*

The proposed development of 4 stacked townhouse buildings with 67 total residential units represents a density of 108.1 units per hectare. As such, this proposal is compact, transit-supportive, and provides additional and affordable housing choices that reduce land consumption. The incorporation of local commercial uses into the development project will provide additional commercial opportunities that can expand the choices within an established Regional Shopping Node, thus reducing the need for vehicle trips for the future residents of this development in addition to those existing residents in the surrounding community. Furthermore the subject property is located adjacent to existing municipal water and wastewater services, and located on an existing transit route.

“2.2.2.1 Within urban areas, forecasted population growth will be accommodated primarily through intensification in built-up areas...”

The proposed development will provide population growth in the form of intensification within the built-up area in accordance with this policy.

“2.2.2.5 A Regional minimum of 60 per cent of all residential units occurring annually will be within built-up areas.”

This Regional policy provides a target that exceeds the Growth Plan minimum as discuss in Section 4.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe. However, Table 2-2 indicates that the target that will be applied to the City of will be 75% intensification. The policy analysis provided in the preceding sections remains valid given the intensification rate provided in Table 2-2 of the Niagara Official Plan. It appears that the relatively high intensification target for Welland is intended to balance out the low intensification targets for other Niagara Region municipalities, such as West Lincoln, Pelham, Thorold and

Niagara on the Lake, all of which are below the Provincial target, thus necessitating a higher target rate for other municipalities in order to average out the rate across the Region.

“2.3.1.1 The development of a range and mix of densities, lot and unit sizes, and housing types, including affordable and attainable housing, will be planned for throughout settlement areas to meet housing needs at all stages of life.”

The proposed development provides another housing option type that is under-represented in the community, and may meet the definitions of attainable or affordable, however, the developer does not intend to intentionally create affordable or attainable units.

“2.3.1.4 New residential development and residential intensification are encouraged to be planned and designed to mitigate and adapt to the impacts of climate change by:
a. facilitating compact built form; and
b. incorporating...energy conservation standards, ... and low impact development.”

The proposed development is compact in accordance with the above policy. Drought tolerant landscaping is proposed to address low impact design requirements.

“2.3.1.5 New residential development and residential intensification should incorporate universal design standards...”

The nature of stacked townhouses makes them inherently unfriendly to the incorporation of universal design standards. Residents and visitors must travel up or down stairs to access each and every unit. The provision of one or more elevators would also necessitate a corridor to access the units, and once a corridor is provided, the building becomes an apartment rather than stacked townhouse.

“2.3.2.3 To encourage the development of affordable housing, the following minimum targets will be implemented to the horizon of this Plan, unless local targets are higher in which case those apply:
a. 20 per cent of all new rental housing is to be affordable; and
b. 10 per cent of all new ownership housing is to be affordable.”

Purchase prices have not yet been established, and as such, conformity with this policy cannot be determined at this time. There is potential that some units could be affordable and this will be reviewed through the Site Plan process when costs and market conditions can be more accurately estimated. At this time the anticipated unit sale price is in the range of \$400,000 to \$500,000.

“3.5.1.6 Opportunities will be considered to include electric vehicle charging infrastructure in new development...”

The proposed development will include electric vehicle charging locations.

Sections 3.5.3 and 3.5.4 provide policies related to the transition to net-zero communities and climate resilient communities. The first paragraph of each of those Sections states that the policies in these sections are a consolidation of policies that are found elsewhere in the Niagara Official Plan. As such, given that the policies in Section 3.5.3.1 and 3.5.4.1 are a duplication, those policies will not be analyzed under this section, but are analyzed elsewhere in this Planning Justification, under the original Sections where each of the policies are found.

- “5.1.2.2 The expansion of public transit across the region will be supported by:...*
b) providing public transit to areas that have achieved ... transit-supportive residential ... densities...”

The Subject Property is on an Arterial Road with an established Transit Route. As noted in Section 4.1 Provincial Policy Statement the site density of the proposed development would support high order transit service. As such, the proposed development could assist in supporting the expansion of more frequent transit service on Niagara Street.

- “6.2.1.8 The Region shall promote:...*
d. well-designed buildings, high quality streetscapes, and attractive public spaces that create neighbourhood character and strengthen community identity and diversity;...”



Figure 3: Conceptual Elevation: Building A - Commercial

- “6.2.3.3 *The Region shall:*
- a. *require development, ... to use the Region’s Model Urban Design Guidelines in the absence of Local municipal design guidelines, as applicable;...”*

The pre-consultation notes from Niagara Region dated August 17, 2023 do not request an Urban Design Brief or Guidelines. However, in lieu of an Urban Design Brief a Landscape Plan Concept was requested as part of a complete submission to accompany the Official Plan Amendment and Zoning By-law Amendment applications, with the detailed landscape plan to be provided when the Site Plan application is prepared.



Figure 4: Conceptual Elevation: Building B - Residential



Figure 5: Conceptual Elevation: Building D - Residential

It should be noted that there are a number of repeating policies and themes in the Niagara Official Plan. Specifically related to the Region's desire for compact built form, higher density, transit-supportive uses and active transportation. Several of these policies that merely repeat a previous policy without adding any new requirements have not been specifically noted in the analysis above. However, all policies have been reviewed and it is my Professional Planning Opinion that based upon my review of the entirety of the Niagara Official Plan (2022), including the specific policies referenced above, therefore, I conclude that the proposed development conforms to the Niagara Official Plan.

4.4 City of Welland Official Plan

The November 4, 2019 Consolidation of the City of Welland Official Plan, as available from the City's website, was used in the following analysis.

Schedule A – City Structure indicates that the Subject Property is within the Built Boundary & Built Up Area. It also appears to show the woodlot on, and adjacent to, the Subject Property as Environmental Conservation Area

Schedule B – Land Use Map designates the west portion of the property as Commercial and refers to Schedule B2, the east portion of the property is designated as Core Natural Heritage System



Figure 6: Excerpt from City of Welland Official Plan Schedule B

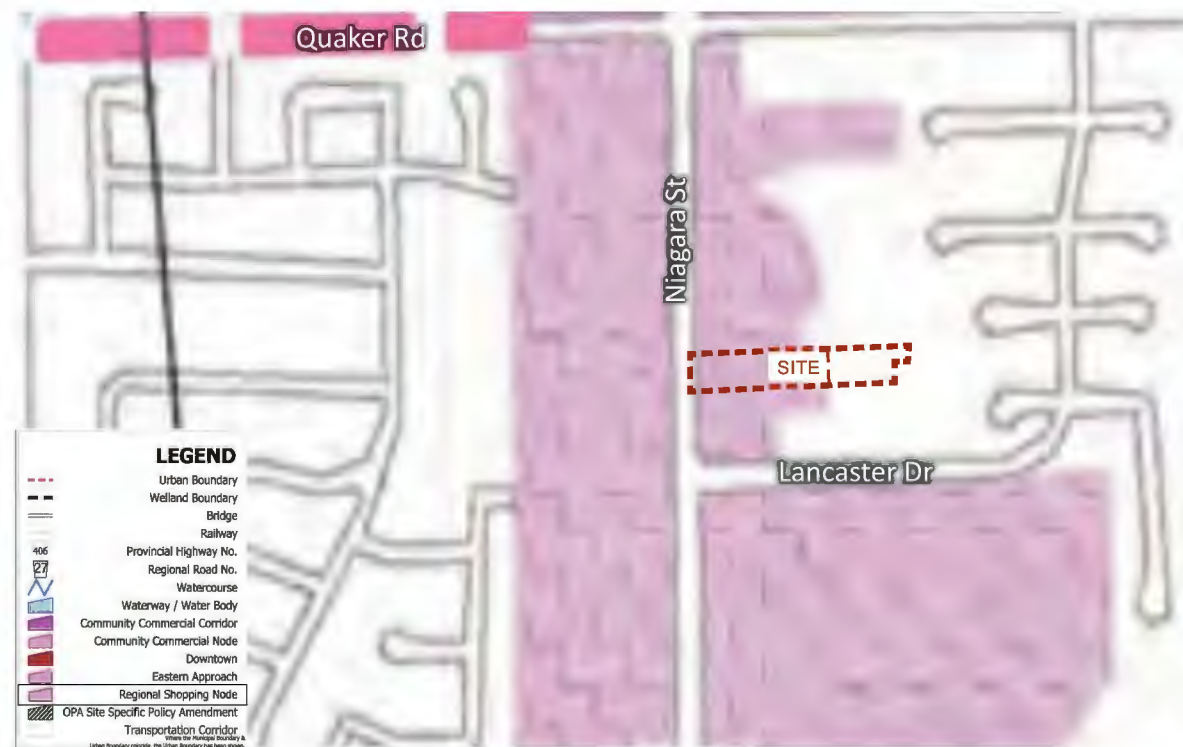


Figure 7: Excerpt from City of Welland Official Plan Schedule B2

Schedule B2 – Commercial Hierarchy Land Use Map refines the previously noted Commercial designation as Regional Shopping Node

Schedule C – Core Natural Heritage System repeats the information from Schedule A and indicates that the woodlot on, and adjacent to, the Subject Property is Environmental Protection Area

Schedule C1 – Components of the Natural Heritage System identifies the woodlot on, and adjacent to, the Subject Property as a Significant Woodlot

Schedule D – Serviced & Un-Serviced Lands shows the Subject Property as having Sanitary & Water Services available

Scheduled E – Road Hierarchy confirms the Arterial Road status of Niagara Street

Schedule F – Planned Road Widening identifies Niagara Street in front of the Subject Property for a future widening

Appendix 1 – Map 2 – Vulnerable Groundwater Area shows a Highly Vulnerable Aquifer in the vicinity of the Subject Property. It is likely that this area is slightly north of the Subject Property but at the map scale it is difficult to be certain

Welland's Strategic Directions related to Sustainability as outlined in Section 2.5 of the Official Plan speak to promoting and implementing measure to plan neighbourhoods to reduce greenhouse gas emissions, reduce or avoid negative impacts to local air quality, and that Welland will consider climate change impacts. The proposed development provides additional residential units within a well serviced commercial area, which will encourage the reduction of many private vehicle trips, and will contribute to Welland's efforts in meeting these strategic directions.

The Planning Objectives provided in Section 3.2 of the Official Plan indicate that

- Urban growth is to be located within the Urban Area;
- Stable neighbourhoods are to be protected by locating development with higher density in localized intensification areas; and,
- The City should build compact, mixed-use; transit supportive, and pedestrian friendly areas.

The proposed development is within the Urban Area, away from stable residential neighbourhoods and provides a compact built form that meets the stated objectives.

Policy 3.4.4.1.C of the Official Plan indicates that while intensification is beneficial and is generally desired throughout the City of Welland, said intensification should be focused within the Downtown, on brownfield sites, along the Welland Recreational Waterway and along key transit corridors as illustrated on Schedule A.

The Subject Property is not within an intensification area as portrayed on Schedule A, however, given that this policy encourages intensification throughout the Built Up Area, it conforms with this policy.

Policy 3.4.4.1.D indicates that the target intensification rate in the Region's Official Plan is 40% and the City of Welland has adopted that target. Given that this Official Plan consolidation predates the Niagara Region Official Plan, this policy does not reflect the current intensification target of 75% for Welland.

Policy 3.4.4.1.E provides strategies for implementing the intensification target. Subsection (iii) in this policy indicates that the policies contained within the Official Plan will "...allow for appropriate infilling throughout the Built-Up Area." This Planning Justification Report discusses those policies below.

Housing and Residential objective 4.2.1.2 indicates that development should be compact and efficient. The proposed development with a residential density of 108.1 units per hectare on a site with existing municipal services available meets these objectives.

Housing and Residential objective 4.2.1.3 states that the Official Policies should permit an appropriate range of residential uses. As noted previously, stacked townhouses are under-represented in the surrounding area and the proposed development will broaden, and provide more nuance to the range of appropriate residential uses in accordance with this objective.

Housing and Residential objective 4.2.1.8 indicates that the City is to promote opportunities for intensification and redevelopment. Given that the proposed development provides appropriate intensification on a redevelopment property, the City should be supportive of the proposed development in accordance with this policy.

The Low Density Residential, Medium Density Residential, and High Density Residential policies in sections 4.2.2.2, 4.2.2.3, and 4.2.2.4 establish the permitted uses and densities for residential development in the City of Welland. The built form of the proposed development would comply with the Medium Density Permitted uses in Policy 4.2.2.3.B, however, the proposed density of 108.1 units per net hectare would only be permitted in the High Density Residential designation in accordance with 4.2.2.4.A. Neighborhood Commercial uses are permitted in both of these residential designations. Given the context and location of the Subject Property, within a Regional Shopping Node that also functions as a commercial corridor, and adjacent to existing apartment residential uses, my opinion is that the description of the residential component of the uses would be High Density Residential.

Commercial Area objective 4.4.1.6 indicates that the City will promote opportunities for mixed use development in strategically located nodes and corridors. In consideration of the analysis provided in this Planning Report, the Subject Property within the Regional Shopping Node is in a strategic location and can support the proposed mixed use development.

The Planned Function of the Regional Shopping Node is described in Policy 4.4.2.3.A which states:

"The Regional Shopping Node is intended to serve as the principal focus of commercial activity, providing retail commercial services, entertainment and office uses for residents within the regional trade area. The term regional refers to the trade area and not Niagara Region. The Regional shopping node serves an area which includes the City of Welland, the City Port Colborne, the Town of Pelham, the Township of Wainfleet and parts of the Township of West Lincoln and the City of Thorold."

Permitted uses are listed in Policy 4.4.2.3.B and include:

- Retail uses
- Business and Professional Services
- Personal Services
- Entertainment Uses
- Food Stores
- Restaurants

Residential development is not listed in either of these two policies. However, objective 4.4.1.6 suggest that residential uses could be considered. As such, the proposed development does not comply with the list of permitted uses for the Regional Shopping Node designation that currently applies to the Subject Property.

In contrast to the current Regional Shopping Node designation, the Community Commercial Corridor permitted uses provided in Policy 4.4.2.6.B allow the following uses that serve the travelling public:

- Retail
- Office
- Service Commercial
- Specialty Retail
- Specialty Food, but excluding a supermarket
- Business and Professional Services
- Personal Services
- Automotive Commercial, but excluding auto wreckers
- Places of Worship
- Hospitality
- Places of Entertainment
- Restaurants
- Private and Commercial Schools

The floor space provided for commercial uses is located within the building adjacent to Niagara Street and as such, is somewhat limited in area and more appropriate for the range of uses provided in the Community Commercial Corridor designation. As such, the proposed applications seek to amend the Official Plan to redesignate the Subject Property as Community Commercial Corridor.

Furthermore, in consideration of the discussion above regarding the built form and density of the proposed development, I believe a site specific exception to the proposed Community Commercial Corridor

designation is required to allow High Density Residential Uses in the form of a stacked townhouse generally in conformance with the High Density Residential policies provided in 4.2.2.4 of the Official Plan.

The planned function of the Core Natural Heritage designation that applies to the east portion of the property is described in Policy 6.1.2.1.A which states:

The planned function of the Core Natural Heritage System is to provide for the protection, maintenance, restoration and, where possible, enhancement of Welland's natural systems, ecological health, integrity and biodiversity. The Core Natural Heritage System is also intended to provide a framework for establishing the linkages among natural heritage features, within the system and major surface water resources.

Permitted uses are listed in Policy 4.4.2.3.B and include:

- Forest, Fish and Wildlife Management
- Conservation and flood or erosion control
- small scale, passive, recreational uses and accessory uses

It is proposed that the portion of the property designated as Core Natural Heritage will be maintained in its current state and will not be developed in accordance with these permitted uses. The Core Natural Heritage lands are known as the Lancaster Woodlot.

Policies 6.1.2.2.A and 3.1.2.2.B both provide guidance related to the delineation of boundaries of the Core Natural Heritage System. The development limits of the Subject Property appear to encroach into the feature as it is mapped in the Official Plan. However, the proposed development limits match that which was previously accepted through a conditional site plan approval for an apartment building on the Subject Property. It is assumed that the refinement of the limit of the Significant Woodland was reviewed and accepted through that previous process. Given the previous approvals it is my opinion that the proposed development is in conformance with these policies of the Official Plan.

Policy 6.1.2.2.E provides the criteria for designation of a Significant Woodland. These criteria are:

- “Contain threatened or endangered species or species of concern;*
- In size, be equal to or greater than 2 hectares, if located within or overlapping the Urban Area Boundary or 10 hectares, if located within the Agricultural and Rural Area;*
- Contain interior woodland habitat at least 100 metres in from the woodland boundaries;*
- Contain older growth forest and be 2 hectares or greater in area;*
- Overlap or contain one or more of the other significant natural heritage features listed in Policies 6.1.2.1.C; or,*
- Abut or be crossed by a watercourse or water body and be 2 ha or more in area.”*

Based on a rough measurement from the aerial photography, the contiguous woodland, excluding the portion on the Subject Property that is within the limits of development, is approximately 2.9 hectares. Given that this woodland is within the Urban Area Boundary it meets the requirements of 6.1.2.2.E(ii) as quoted above and that is sufficient to classify this woodland as Significant. There may also be a small area in the centre of the woodland, in line with Jefferson Court that is more than 100 m from the woodland

boundaries. These are general assumptions as a detailed analysis of the woodlot is not within the scope of this Planning Justification Report.

In consideration of the above confirmation regarding the status of the Woodland, Policy 6.1.2.3.C would apply as the proposed development would propose site alteration. This policy states that:

“Development and site alteration may be permitted without an amendment to this Plan in Environmental Conservation Areas, Natural Heritage Corridors, and on all adjacent lands (set out in Table 6-1) if it has been demonstrated that, there will be no negative impact on the natural features or their ecological functions. The proponent shall be required to prepare an Environmental Impact Study (EIS) in accordance with the Policies of this Plan (see Policy 7.11.5).”

Table 6.1 does not list Significant Woodlands and as such does not recommend that an EIS would be required. An EIS is not provided with this application in accordance with this policy.

Policy 6.1.2.3.H indicates that a Tree Saving Plan would be required within the Core Natural Heritage System or adjacent lands in accordance with Table 6-1. As with the preceding analysis, a Tree Saving Plan would appear to not be required as Significant Woodlands are not included on Table 6-1. However, Policy 6.1.3.2.B indicates that

“Where a woodland is greater than 0.5 hectares in size is located on, or adjacent to, lands which are the subject of an application for a plan of subdivision, a consent, site plan approval or a development permit, the applicant shall be required to prepare a Tree Saving Plan as a condition of approval.”

It is anticipated that the City of Welland will require a Tree Saving Plan as part of the Site Plan process in accordance with this policy, however, the Tree Saving Plan is not required at this time.

Policy 6.4.2.1.C indicates that the planned minimum right-of-way width for Niagara Street and all arterial roads is 30.0 metres. Table 6-3 lists the roads that may require widenings and Niagara Street is included in this list. However, the Niagara Region pre-consultation comments states that the existing right-of-way width meets current Official Plan requirements. As such, no widening is required from the Subject Property.

- “6.4.2.2.D** *The City shall encourage the use of public transit by:*
- i. Encouraging intensification in the vicinity of established transit routes, as well as in, and around, the Welland Transit Terminal;...”*

As previously noted, Niagara Street adjacent to the Subject Property is serviced by Niagara Transit Route #509. The proposed development will provided intensification adjacent to this established transit route and should be encouraged in accordance with this policy.

- “6.4.2.2.G** *Reduced parking requirements may be supported for development fronting corridors which have major transit service, as a means to encourage transit ridership and transit cost-effectiveness.”*

The proposed site specific parking reduction is supported, in part, by this policy. Transit usage will be more convenient given the fact that the established route is adjacent to the Subject Property, and the parking reduction will further encourage transit ridership.

The Official Plan includes a number of policies related to Accessibility and accessible design. Stacked townhouses are inherently not accessible. The lack of interior public corridors and requirement that all dwelling units have their own exterior access doors at grade precludes the opportunity for elevators and usually results in the need for stairs between exterior grade and all unit entrances. If elevators and interior corridors were to be provided, the development would be classified as an apartment, which would be subject to different provisions in the Official Plan and Zoning By-law and have substantially increased building cost due to Ontario Building Code requirements. However, at the Site Plan stage it may be appropriate to consider some accessible design considerations including curb cuts. Designated parking spaces for persons with disabilities are shown on the conceptual site plan in conformance with the Zoning By-law requirements.

The at grade commercial units will be designed to comply with the barrier free access requirements in the Ontario Building Code.

The proposed development will be connected to the municipal water supply and municipal sanitary sewers in accordance with policies 6.5.2.4.B and 6.5.2.4.E as detailed in the Functional Servicing Report prepared by J.H. Cohoon Engineering Limited. Water and Sanitary connections are available adjacent to the south side of the property within an existing servicing easement that eventually connects to Lancaster Drive.

A Stormwater Management Plan, prepared by J.H. Cohoon Engineering Limited, has been provided with this application. The drainage from a majority of the site will be controlled on site for quantity and quality and will outlet to an existing storm sewer in an easement located on the south side of the Subject Property.

Servicing stubs for all municipal services noted above are located within the existing municipal easement on 852 Niagara Street.

Based upon my review of the entirety of the City of Welland Official Plan as consolidated November 4, 2019 including the specific policies referenced above, I conclude that upon approval of the site specific Official Plan Amendment the proposed development conforms to the City of Welland Official Plan.

4.6 City of Welland Zoning By-law 2017-117, as amended

Zoning Map C3 of Schedule A of the City of Welland Zoning By-law 2017-117 split zones the Subject Property as Regional Shopping Node (RS) and Neighbourhood Open Space (O1). The Neighbourhood Open Space zone also has an Environmental Conservation Overlay.

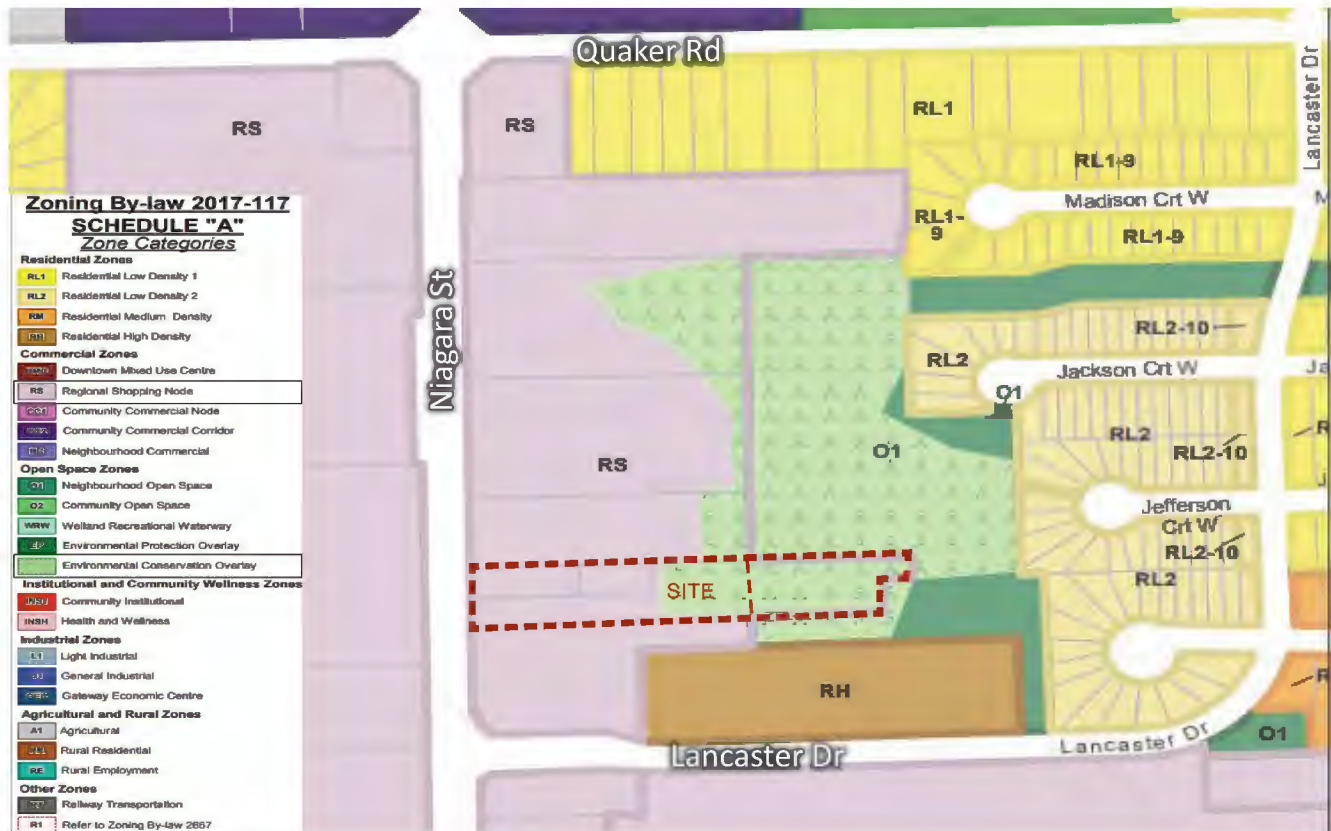


Figure 8: Excerpt from City of Welland Zoning By-law 2017-117, Schedule A, Map C3

The Neighbourhood Open Space zone is generally consistent with the existing woodland area on the east portion of the subject property and this zone will be maintained.

The Regional Shopping Node zone does not permit residential uses, and as such, the developable west portion of the Subject Property will need to be rezoned to facilitate the proposed development.

Upon review of all of the existing zones within Zoning By-law 2017-117, the Community Commercial Corridor Zone (CC2) appears to be the most appropriate fit as it permits the proposed retail/commercial units and the proposed residential units.

The zoning conformity analysis provided in Table 1 only reviews the proposed development. No development is proposed within the woodland area and the existing zoning will be maintained on portion of the Subject Property, as such, there is no need to review the zoning conformity of the Neighbourhood Open Space Zone.

As illustrated in Figure 8: Excerpt from City of Welland Zoning By-law 2017-117, Schedule A, Map C3, the O1 zone extends into the developable area of the Subject Property. However, the City of Welland's online interactive GIS zoning maps differ from that depicted in the PDF printed version included in this figure. The rear portion of the property is labeled as an EP zone in the interactive GIS maps, and the limit between the EP zone and the current RS zone is consistent with the dashed red line on Figure 8.

Table 8.2.1 of Zoning By-law 2017-117 lists the permitted uses in the CC2 zone, which include the following relevant uses:

- Accessory Uses, Building and Structures
- Health Related Retail Use
- Pet Care Establishment
- Retail Establishment
- Commercial School
- Day Care Centre
- Social Services Establishment
- Medical Office or Clinic
- Office
- Survey, Engineering, Planning or Design Business
- Athletic/Fitness Establishment
- Block Townhouse
- Dwelling, Multiple
- Dwelling Units Above Permitted Uses

Section 4 – Definitions of the Zoning By-law identifies that Stacked Townhouses are considered to be Dwelling, Multiple for the purposes of defining the land use.

The table below provides a full zoning conformity analysis. The gray highlighted rows identify those zoning provisions that would require site specific exceptions to facilitate the conceptual site plan.

Zoning Section	Standard	Required	Provided
Table 8.3.1	Lot Area (min)	NA	0.62 ha (excludes O1 zone)
Table 8.3.1	Lot Frontage (min)	NA	39.52 m
Table 8.3.1	Front Yard (min)	0.0 m	5.34 m
Table 8.3.1	Front Yard (max)	3.0 m	5.34 m
Table 8.3.1	Side Yard Interior (min)	0 m	1.2 m
Table 8.3.1	Rear Yard (min)	3.0 m	1.5m
Table 8.3.1	Building Height (max)	24.0 m	12.81 m
Table 8.3.1	Landscaped Area (min)	15 %	30.19 %
Table 8.3.1	Lot Coverage (max)	50 %	29.13 %

Zoning Section	Standard	Required	Provided
5.4(a)	Apartment unit location	Apartment unit(s) shall be located in the second or higher storey of commercial buildings	Dwelling units may be permitted anywhere within a Building containing Stacked Townhouse units, except for the ground floor of a Building adjacent to and fronting on a Niagara Street
5.6.1 & 5.6.2(b)	Definition of Lot Lines for Standard and Vacant Land Condominiums	Front Lot Line for each unit shall be deemed to be that lot lien abutting the internal driveway portion of the common element or the lot lien abutting the public street	The front lot line shall be the Niagara Street frontage. The required minimum and maximum yard dimensions will be based on establishing the Niagara Street lot line as the front lot line. The development is to be considered as a whole, rather than individual units, when determining zoning compliance.
5.14 (b)	Garbage and Refuse Storage and Enclosures	No person shall store garbage or refuse on any lot except within the main building on the lot or within a wholly enclosed accessory building or structure or enclosed waste management container or specialized partially underground waste container system.	Partially underground waste container system (Molok)
5.21	Multiple Zones on a Lot	Where a lot is divided into more than one Zone under the provisions of this Bylaw, each such portion of the lot shall be used in accordance with the permitted uses and Zone regulations of the applicable Zone as if it were a separate lot.	All CC2 zone and City-wide zone provisions have been applied to the developable portion of the property that is zoned CC2.

Zoning Section	Standard	Required	Provided
5.39	Snow Storage Areas	An area equivalent to two percent of parking areas, loading spaces, private streets and driveways shall be required for snow storage for commercial, industrial or institutional uses, and residential uses where four or more parking spaces are required	8.49 % of parking, loading, private streets and driveways (214 m ²)
6.1.3(d)	Location of Required Parking	Unless otherwise regulated in this By-law, parking spaces and aisles, giving direct access to abutting parking spaces, excluding driveways extending directly from the street, shall not be located within 3.0 metres of a street line, and subject to a 3.0 metre wide planting strip being required and permanently maintained between the street line and the said parking spaces or aisle.	5.63 m planting strip at Niagara Street
6.1.6(a)	Parking Space Dimensions	(i) 2.75 m by 5.5 m (90 degree spaces with minimum 6.0 m aisle) (v) 2.75 m by 6.0 m (Parallel parking spaces with minimum 4.5 m aisle)	(i) 2.75 m by 6.0 m (6.0 m aisle) (v) 2.75 m by 6.0 m (6.0 m aisle)
6.1.8(b)	Aisle Width and Access Driveways	(b) The minimum width of an aisle providing access to a parking space within a parking area is 6.0 metres. (c) The aisle giving access to a parallel parking space shall have a minimum width of 3.6 metres for one-way traffic and a minimum width of 6.0 metres for two-way traffic	(b) 6.0 m (c) 6.0 m
Table 6.4.1	Residential Parking – Required Parking Spaces	Multiple Dwelling – 1 space per unit = 67 spaces	67 spaces

Zoning Section	Standard	Required	Provided
Table 6.4.2	Commercial Parking – Required Parking Spaces	1 space per 30 m ² of GFA (for most of the permitted uses in the CC2 zone) = 6 spaces	6 spaces
Table 6.5.1	Barrier Free Parking	2 spaces if required parking is between 50 and 100 spaces	2 space (based on 73 total required parking spaces)
6.5.2	General Provisions for Barrier Free Parking Spaces	4.5 m by 5.5 m	4.5 m by 6.0 m
6.6(a)	Loading Spaces	(a) A minimum of one off-street loading space shall be provided in conjunction with every principal building, including a mixed use building, but excluding residential buildings less than four storeys high (b) The minimum dimensions of a loading space are 3.5 metres in width and 12.0 metres in length, with a minimum vertical clearance of 4.2 metres. (c) A loading space shall abut the building for which the loading space is provided.	(a) 1 loading space provided (b) 3.72 m by 12.0 m (c) Located at the rear wall
Table 6.7.1	Minimum Required Bicycle Parking Spaces	Multiple Dwelling 0.25 spaces per unit = 16.75 spaces rounded up to 17 spaces	17 spaces
Table 6.7.1	Minimum Required Bicycle Parking Spaces	Office, Retail, other non-Residential uses 1 space per 1,000 m ² GFA = 1 space	1 spaces
6.7.2(e)	Minimum size of Bicycle Parking spaces	0.6 m by 1.8 m	0.6 m x 1.8 m

Zoning Section	Standard	Required	Provided
6.7.2(g)	Location of Bicycle Parking spaces	Any bicycle parking areas and associated aisles shall be located and designed such that they are directly accessible by cyclists from a driveway or parking aisle designed in accordance with the provisions of Subsection 6.1.8.	Bicycle parking may be accessible by cyclists from any walkway or path that is connected to a public street, private aisle or private driveway
6.17	Landscaping Provisions for Parking Lots	<p>Minimum of 10% of parking lot area</p> <p>(a) A landscaped buffer must be provided between the perimeter of the parking lot and a lot line in accordance with Table 6.17.1. A driveway may cross the landscaped buffer.</p> <p><u>Table 6.17.1</u> <i>1.5 m not abutting a street</i> <i>2.0 m abutting a street</i></p> <p>(c) All outdoor loading and refuse collection areas contained within a parking lot must be:</p> <p>(i) Located at least 3.0 metres from a lot line abutting a public street</p> <p>(ii) Located at least 1.0 metres from any other lot line; and</p> <p>(iii) Screened from view by an opaque screen with a minimum height of 2.0 metres; unless the refuse collection system is a specialized partiality semi-underground waste container system</p>	<p><u>Table 6.17.1</u> 0.38 m not abutting a street 5.63 m abutting a street</p> <p>(c) Loading and refuse collection:</p> <p>(i) 14 m to loading space (behind Building A)</p> <p>(ii) 1.2 m</p> <p>(iii) Refuse collection is partially underground (Molok). Loading space screened from Niagara Street by Building A</p>

Table 1: Zoning Conformity Analysis

The proposed front yard depth exceeds the maximum permitted by the CC2 zone. The proposed depth is appropriate for this mixed use development for a number of reasons. The primary factor is that there is an

existing easement along the front property line that pushes the building and 1.5 m internal walkway further from the front lot line. Additionally, some of the proposed bicycle parking is provided in the front yard of the mixed use building to increase the convenience for the cycling public. This bicycle parking occupies some of the front yard depth. Furthermore, the existing built form on the adjacent properties is set back further from Niagara Street. The proposed development, although exceeding the maximum front yard depth will provide a stronger street presence and more pleasing streetscape aesthetic than the adjacent quick service restaurant and travel accommodation uses adjacent to the Subject Property.

In accordance with Sections 3.5 and 5.21 of the Zoning By-law all zoning standards, with the exception of parking rates, are calculated in accordance with the area of the property to be zoned CC2, and exclude the O1 Zone area.

Although Zoning section 5.4(a) appears to be specific to Apartment Units, the proposed Zoning By-law amendment includes a provision to ensure that dwelling units can be located on any level of a stacked townhouse development with the exception of the mixed use building fronting onto Niagara Street to avoid any potential misinterpretation or confusion.

When applying zoning provisions, stacked townhouse buildings and units are closer in similarity to apartment buildings and units. As such, it is more appropriate to create and apply zoning standards based on the entirety of the development block, rather than per individual unit. This position is further supported by the existing provisions in the CC2 zone which could result in inappropriate development concepts for townhouses of any typology, that lack appropriate yards and setbacks.

The proposed site specific amendment to the required location for bicycle parking is appropriate for different reasons, depending on which bicycle parking location is being considered. The bicycle parking proposed for the front yard of the commercial units is accessible from the public street to allow convenience and ease of use for employees and patrons of the future businesses. The bicycle parking located between Buildings B and C is removed from the general view of the public and should be more secure for the residents and their visitors. Both bicycle parking locations are provided with a minimum 1.5 m sidewalk that connects with the private driveway aisle.

The row of perpendicular parking spaces is not parallel with the south lot line. The parking is located 2.03 m setback from the south lot line near the west side of the property, but reduces to 1.14 m near the west limit of development. As such, most of this parking meets the minimum setback of 1.5 m to the south property line, however, a portion, near the east side of the development site is deficient. This reduction is justified given the adjacent land uses. The east half of the adjacent property at 852 Niagara Street is used for parking related to the commercial uses on that site. Upon review of a number of aerial photographs the adjacent parking on 852 Niagara Street is under utilized and usually empty. The parking aisle extension at the back of the site, adjacent to the EP zone is located only 0.38 m from the zone boundary. In accordance with Section 5.21 of the zoning by-law, where more than one zone exists on a property, the zone standards for each zone are to be evaluated against that portion of the property as if it was a separate parcel. As such, the 0.38 m from the parking aisle to the zone boundary would meet the criteria to be defined as the landscape buffer required by Section 6.17. Given that the adjacent uses, within the same legal parcel, are

open space in nature and the woodlot itself is a landscape feature, the need for additional buffer from a parking area is not required from a land use perspective.

Given the above details, and a review of the remaining standards within the City of Welland Zoning By-law 2017-117, as amended, we are of the opinion that the proposed Zoning By-law Amendment is relatively minor in nature, site specific and meets the general intent of the Zoning By-law.

6.0 SUMMARY

The proposed development of a mixed use, commercial and residential stacked townhouse condominium providing 67 residential units and 2 commercial units, will implement the planned vision for the City of Welland as documented in the City of Welland Official Plan. Furthermore the development of the Subject Property will replace a vacant, under-developed and under-utilized property with an efficient and compact built form that will contribute to the vitality of the surrounding neighbourhood with the provision of additional residents and local commercial space.

As thoroughly reviewed in the preceding sections of this planning analysis, the Proposed Development is consistent with the Provincial Planning Statement and Growth Plan for the Greater Golden Horseshoe, Furthermore, it conforms with the policies of the Region of Niagara Official Plans, and is in general conformity with the City of Welland Official Plan. Therefore, it is our opinion that the proposed Official Plan Amendment and Zoning By-law Amendment represents good and sound planning and is appropriate for this property.

Yours Truly,

ROBERT RUSSELL PLANNING CONSULTANTS INC.



Rob Russell, MCIP, RPP
President