



Project No. 20359

August 25, 2021

Isaiah Banach  
Planning and Development  
Niagara Region  
1815 Sir Isaac Brock Way  
P.O. Box 1042  
Thorold, ON L2V 4T7

Via e-mail: [isaiah.banach@niagararegion.ca](mailto:isaiah.banach@niagararegion.ca)

Dear Mr. Banach,

***Re: Urban Area Boundary Expansion Request – Black Creek Commons  
Additional Clarity on Request and Mapping***

---

As you are aware, we are the planning consultants for Jukic Group Inc. who are “the Owners” of 10 parcels located between the Stevensville Secondary Plan area and the Douglas Town-Black Creek Secondary Plan area, including the property municipally addressed as 2900 College Road (“subject lands”). We have attached a map of the subject lands for your easy reference. The purpose of this letter is to clarify our requested urban boundary expansion and to support the staff recommendation in Report No. PDS 33-2021.

On July 2, 2021 we submitted a request to have 67.34 hectares from the subject lands added as urban area within the Town of Fort Erie. That request follows the mapping referenced above, which again is attached, and on August 11, 2021 we submitted a letter to you reiterating our request and confirming our support for the Region’s re-evaluation of their growth forecasts and land needs as it pertains to additional community and employment land areas.

Our request to have 67.34 hectares from the subject lands added as urban area within the Town of Fort Erie would contribute to the Region’s land needs to the year 2051. However, we feel it is necessary to clarify that the request does in fact include that the entirety of the 371.74 hectares be brought into the urban area boundary in order to create a cohesive connection between and expansion of the Stevensville Secondary Plan area and the Douglas Town-Black Creek Secondary Plan area. More specifically, of the 371.74 hectares requested to be brought into the urban area, only the 67.34 hectares would contribute to the net developable area within that urban area. Our

August 11, 2021 request to have the Regional mapping updated was intended to clarify the difference between the urban area boundary and the net developable forming the request. The remaining area would be maintained as is without the introduction of new urban land use designations.

In this regard, the attached map shows two things: 1) the subject lands which include 371.74 hectares to form a newly expanded urban area boundary (shown in pink with red boundary outlines); and 2) 67.34 hectares (shown in purple) representing the net developable area of land that will be made available to accommodate Regional population and job growth to 2051. I trust the above provides some additional measure of understanding with respect to our request.

In addition, as is outlined in our letter dated August 11, 2021, we support staff's recommendation as it relates to the "Made-in-Niagara Forecast and the Revised Land Needs Assessment". We commend the Region for re-evaluating their growth forecasts and land needs as it pertains to additional community and employment land areas and support Regional planning staff in their recommendation to include an additional 35 hectares of community area land and 210 hectares of additional employment area land.

We agree with the Made-in-Niagara Forecast and the Revised Land Needs Assessment and ask that Regional Council approve the revised community and employment land needs areas.

Should you require any additional information or clarification, please feel free to contact Evan Sugden at [esugden@bousfields.ca](mailto:esugden@bousfields.ca) or 905-549-3005 Ext. 259 or the undersigned.

Respectfully submitted,  
**Bousfields Inc.**



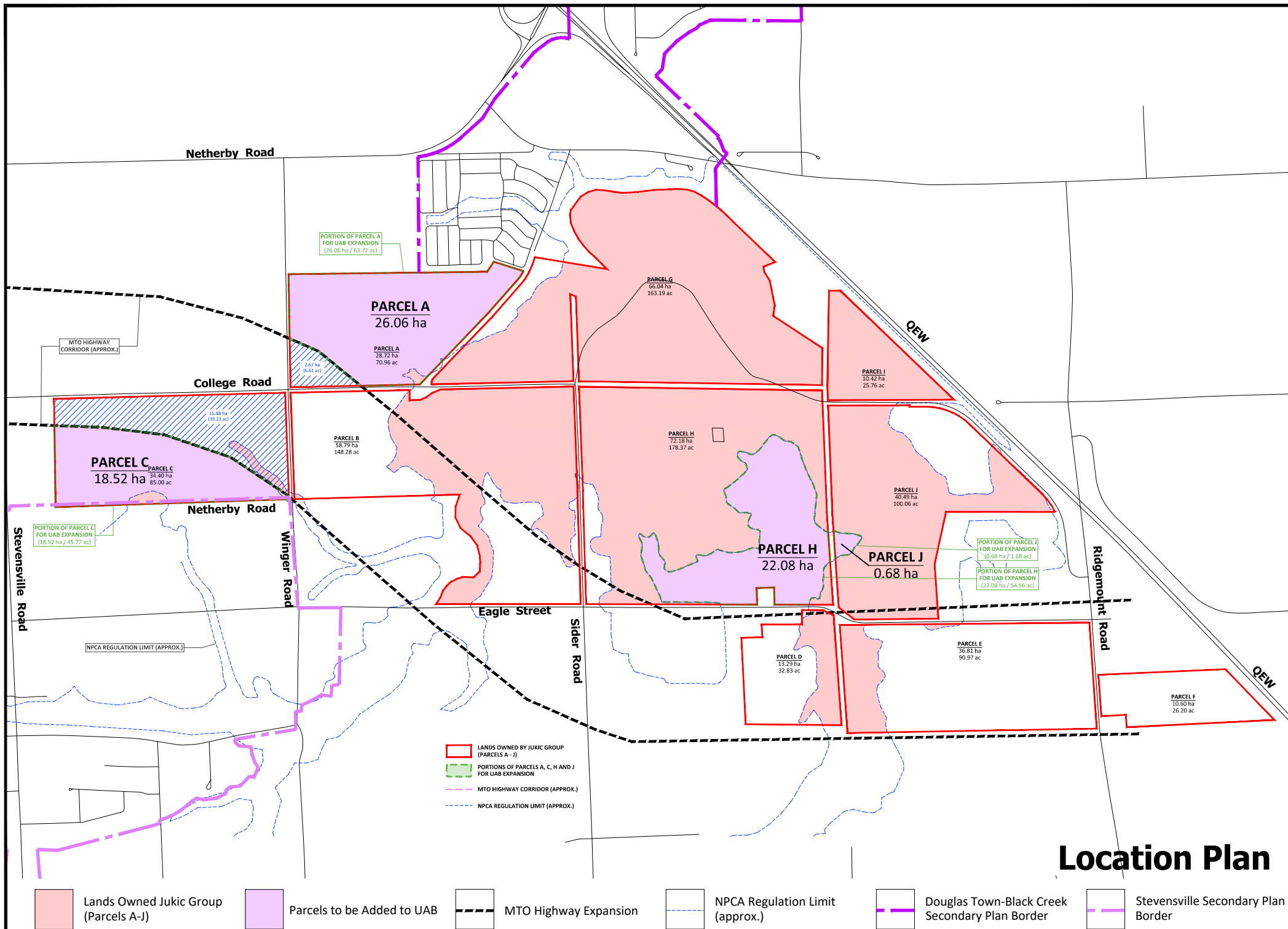
**David Falletta MCIP, RPP**  
Partner

ES/df:jobs

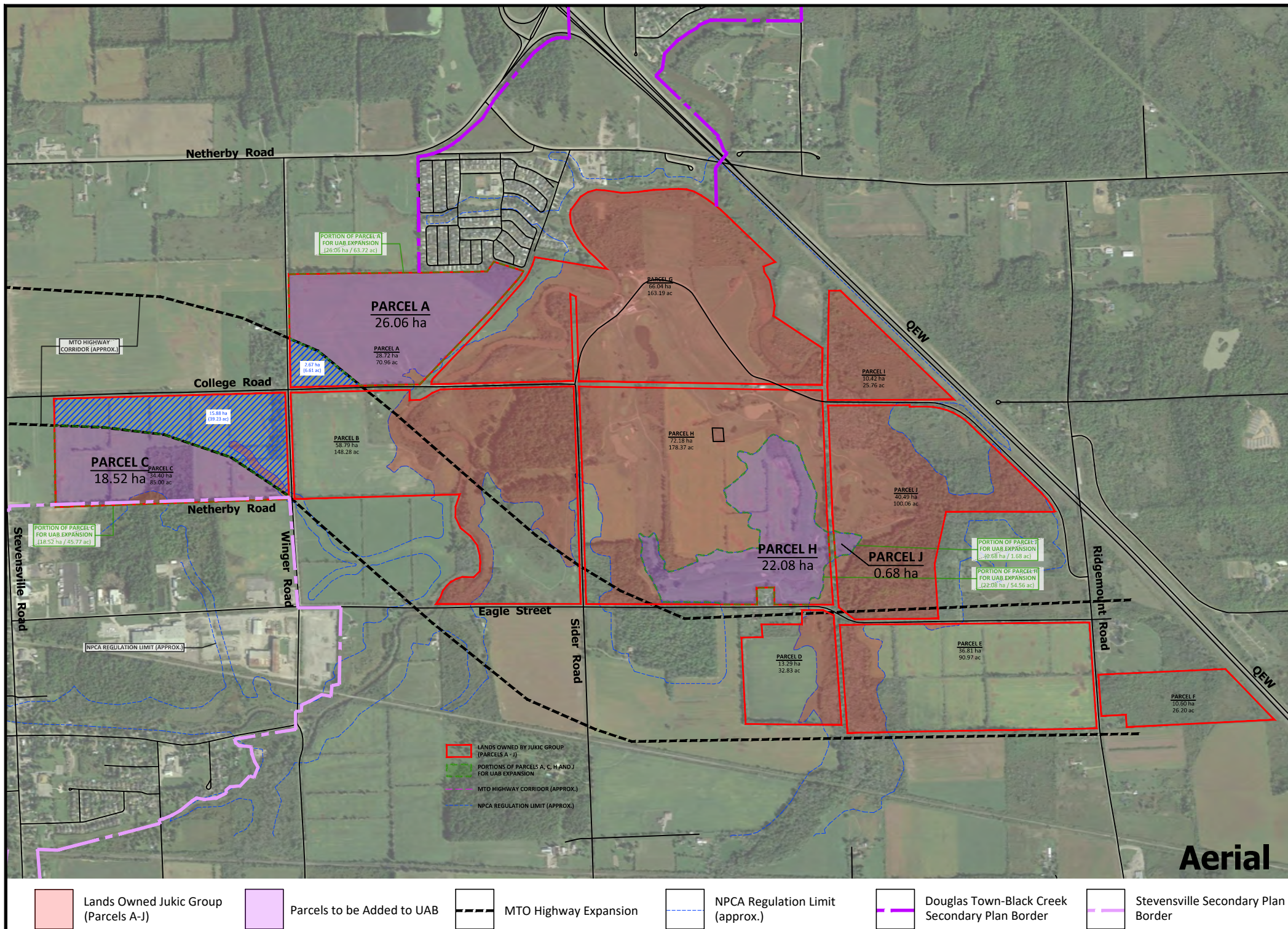


Attachment (1)

Cc. *Client*  
*Stikeman Elliott*  
*Greg Bowie*  
*Town of Fort Erie*









# MASTER PLAN



Netherby Rd

Winger Rd

VILLAGE

College Rd

GOLF

Queen Elizabeth Way

Eagle St

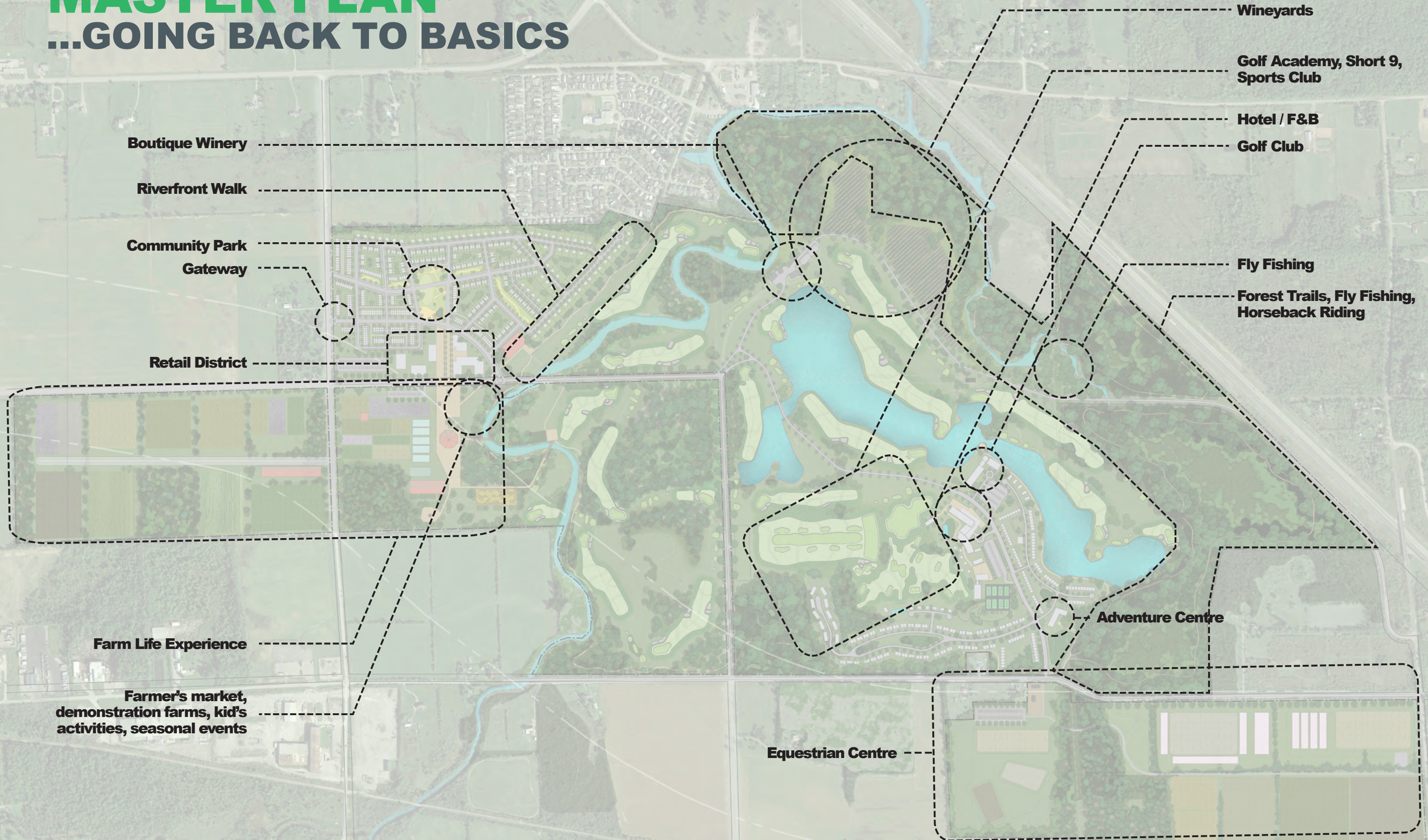
Sider Rd

RESORT



# MASTER PLAN

## ...GOING BACK TO BASICS







Project No. 20359

August 11, 2021

Isaiah Banach  
Planning and Development  
Niagara Region  
1815 Sir Isaac Brock Way  
P.O. Box 1042  
Thorold, ON L2V 4T7

Via e-mail: [isaiah.banach@niagararegion.ca](mailto:isaiah.banach@niagararegion.ca)

Dear Mr. Banach,

***Re: Urban Area Boundary Expansion Request – Black Creek Commons  
Response to Niagara Region Official Plan Update Report No. PDS 33-2021***

---

## **INTRODUCTION**

As you are aware, we are the planning consultants for Jukic Group Inc. who are “the Owners” of 10 parcels located between the Stevensville Secondary Plan area and the Douglas Town-Black Creek Secondary Plan area, including the property municipally addressed as 2900 College Road (“subject lands”). We have attached a map of the subject lands for your easy reference.

As you are also aware, on July 2, 2021 we submitted a request to have 67.34 hectares from the subject lands added as urban area within the Town of Fort Erie. That request follows the mapping referenced above, which again is attached.

## **SUMMARY OF URBAN AREA EXPANSION REQUEST**

The Owners' land holdings include 10 parcels of land located between the Stevensville Secondary Plan and Douglastown-Black Creek Secondary Plan areas, which total 371.74 hectares and is home to the International Country Club of Niagara (the “ICC”), regulated Natural Heritage Area lands, and vacant and agricultural lands. The proposal, is to create Black Creek Commons, a one-of-a-kind destination that includes a residential village as an extension to Douglastown and a resort that will reimagine ICC into the Niagara National Golf and Country. Black Creek Commons is a complete community with a mix of housing options, accommodation, commercial amenities, outdoor recreation and adventure activities, farm-to-table functions, parkland and





event space. In addition to Black Creek Commons a portion of the subject lands are intended to be added to the Region and Town's employment land inventory.

The proposed development will help accommodate a portion of the Region and Town's population and employment growth forecast by adding a variety of housing options in what will be a desirable location, creating a variety of diverse job opportunities and boosting the local economy by adding permanent and seasonal residents, tourists, commercial amenities and a variety of agriculturally related uses and recreational amenities.

For the reasons outlined in our July 2<sup>nd</sup>, 2021 request, we again are recommending the following:

1. That 26.06 hectares of the subject lands (a portion of Parcel A) be added to the Urban Area Boundary for community area lands (Black Creek Commons Village) to be utilized as part of the 105 hectares of land allocated to the Town to accommodate population growth to 2051;
2. That 22.76 hectares of the subject lands (portions of Parcels H and J) be added to the Urban Area Boundary to accommodate the Black Creek Commons Resort. In. our opinion, these lands would be in excess of the required 105 hectares of community lands and the 130 hectares of employment lands required to accommodate population and job growth to 2051, given that these lands would accommodate seasonal residences and resort facilities; and,
3. That 18.52 hectares of the subject lands (a portion of Parcel C) be added to the Urban Area Boundary for employment area lands to be utilized as part of the 130 hectares of land allocated to the Town to accommodate job growth to 2051.

From a planning perspective, the proposed expansion areas are located immediately adjacent to the existing urban boundary and their inclusion within the urban area would result in a rounding out of the urban boundary to logical limits. As well, the three sites are small infill parcels, which can be easily serviced by urban infrastructure through extension and improvements. Their development for urban purposes will complete an existing community and integrate with the surrounding rural area by including agriculturally related uses and recreational amenities.



The proposal will accommodate a minimum of 1120 people and is expected to generate approximately 867 jobs for the Black Creek Commons Village and Resort lands and the Parcel C lands as employment, which will optimize the use future urban land supply.

In terms of overall urban land needs, it is our opinion that establishing an urban boundary should not be a purely mathematical exercise. Instead, it should fundamentally be a strategic exercise that considers questions about how the City should best grow and evolve. In this context, land needs calculations should be viewed as an input into that exercise and not as the final outcome. We believe that, if land needs calculations are considered flexibly and strategically, there is planning merit in including the lands from a land needs perspective as a minor rounding out of the boundary and will result in a number of significant public benefits, including:

1. Creation of new permanent housing supply to accommodate the Town and Region's forecasted growth to 2051 and additional seasonal housing supply;
2. Establishment approximately 589 new jobs (full time equivalent) jobs on the Black Creek Commons Village and Resort parcels and at least 278 jobs on the employment parcel (i.e. Parcel 'C') based on the Region's Vacant Employment Area Density Target of 15 jobs per hectare;
3. The proposed development would help support new commercial uses to serve existing and future residents in the Douglastown-Black Creek Secondary Plan area.
4. The re-imagination of the ICC into the Niagara National Golf and Country, as a key destination in the Town and Region;
5. The proposal will reduce the need for long distance commuting by creating new jobs
6. and adding new commercial, tourism and recreational amenities near existing residential areas in the Town and with excellent access to the QEW and Regional Road 25, which provides strong transportation connections to Niagara Falls, St. Catharines, and Welland; and,
7. The strengthening of the local economy through the addition of new commercial, tourism and outdoor recreation and adventure activities, as well as agriculturally related and agri-tourism uses.



**REVIEW & RESPONSE TO REPORT NO. PDS 33-2021**

We received notice from the Region that staff Report No. PDS 33-2021 had been released complete with three appendices, a presentation, and online mapping. Based on our review Report No. PDS 33-2021 expands upon the May 2021 Regional Land Needs Assessment, and provides updated growth forecasts, which are referred to as the “Made-in-Niagara” growth forecasts. Report No. PDS 33-2021 recommends approval of the “Made-in-Niagara” growth forecast to 2051. The Forecast is a land needs assessment (“LNA”) derived from the Provincial Land Needs Methodology.

Furthermore, we now understand that the Made-in-Niagara forecasts and updated LNA result in a Region-wide net community area land need of 495 hectares and net employment area land need of 210 hectares. This represents an increase of 35 hectares of additional land, or a 7.6% increase, required to meet population growth to 2051, since the May 2021 growth forecasts and LNA.

These areas are used to make decisions about changes to urban and rural boundaries.

On behalf of the Owners, we commend the Region for re-evaluating their growth forecasts and land needs as it pertains to additional community and employment land areas and support Regional planning staff in their recommendation to include an additional 35 hectares of community area land and 210 hectares of additional employment area land.

Our request to have 67.34 hectares from the subject lands added as urban area within the Town of Fort Erie would contribute to the Region’s land needs to the year 2051. In our opinion, and based on our July 2<sup>nd</sup>, 2021 submission, the 26.06-hectare portion of Parcel A would be utilized as part of the 105 hectares of land allocated to the Town of Fort to accommodate population growth to 2051. The 22.76-hectare portions of Parcels H and J would be in excess of the required 105 hectares of community lands and the 130 hectares of employment lands required to accommodate population and job growth to 2051 for Fort Erie, given that these lands would accommodate seasonal residences and resort facilities. Lastly, the 18.52-hectare portion of Parcel C would contribute to employment area lands to be utilized as part of the 130 hectares of land allocated to the Town of Fort Erie to accommodate job growth to 2051.

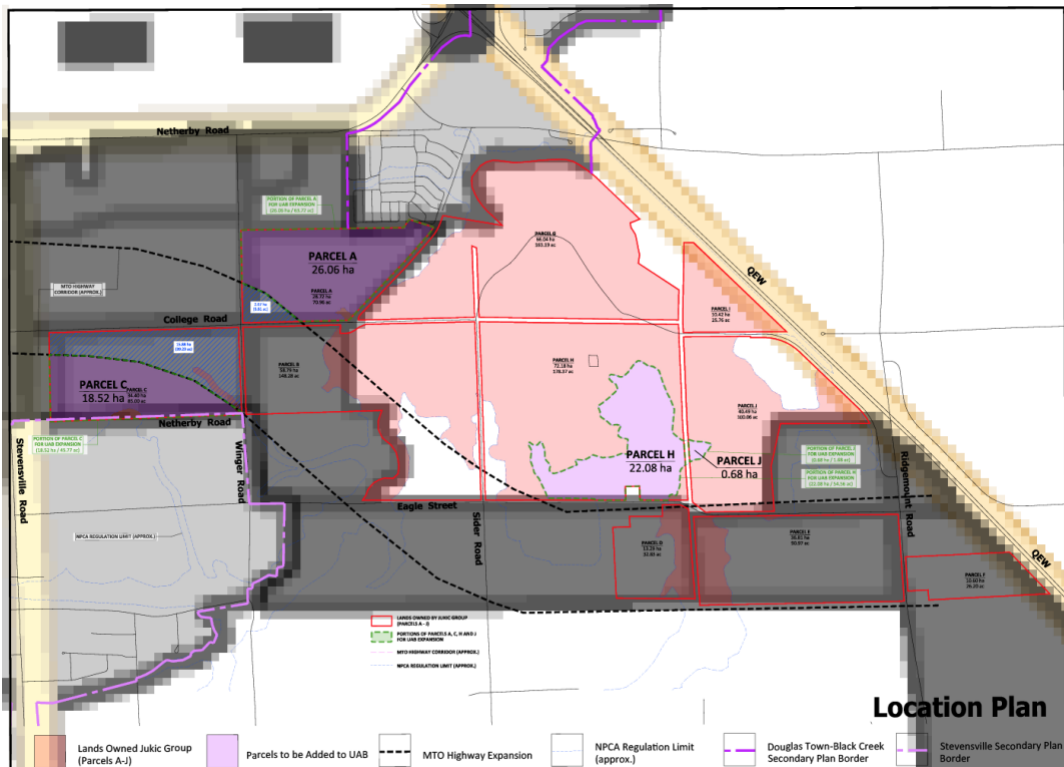
Further to our review, we did notice two discrepancies with the Region’s mapping. Specifically, the mapping shown on slide 12 of the Region’s presentation on the Made-



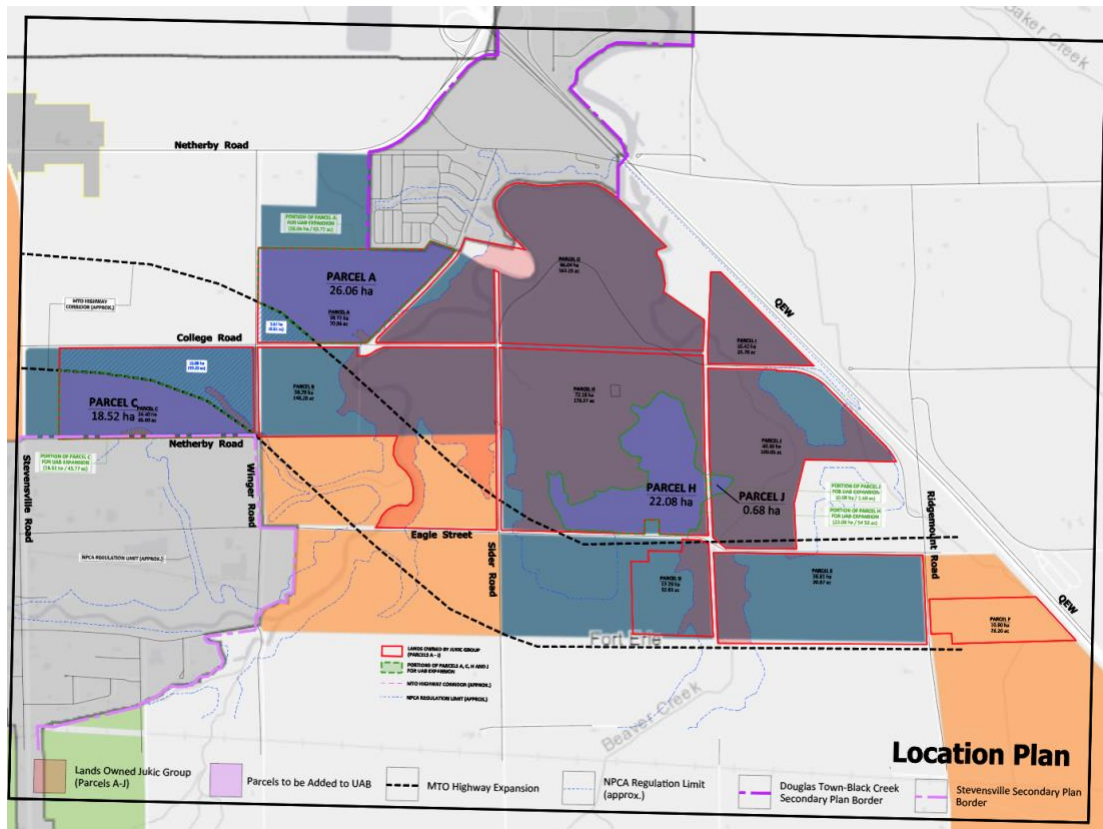
in-Niagara forecast and land need's assessment does not illustrate an accurate representation of what our request specifically is. As well, the online web mapping application that the Region provided which also shows all urban boundary expansion requests also does not illustrate an accurate representation of what our request specifically is. Furthermore, where the entirety of the subject lands are illustrated in the Region's mapping, they tend to be illustrated in a way that would suggest all of the 371.74 hectares are being asked to be brought into the urban area boundary. When in fact, only 67.34 hectares from the subject lands are requested to be added as urban area, with some as community area and some as employment area, as described above and in our July 2<sup>nd</sup>, 2021 submission.

In this regard, we have prepared two mapping overlay figures which illustrate our requested urban boundary expansion on top of the Region's presentation map (Figure 1 below) and on top of the Region's online web mapping application (Figure 2 below). Note that images are based on materials provided by the Region and are not high resolution. Our overlay is based on a survey prepared by an Ontario Land Surveyor. The subject lands are outlined in red, with the requested urban area expansions shown in purple.

**Figure 1 – Overlay of UAB Expansion Request Against Map on Slide 12**



**Figure 2 – Overlay of UAB Expansion Request Against Online Mapping**



In this regard, we respectfully request that Region update their mapping to more accurately reflect the specifics of our urban area boundary expansion request which was submitted on July 2<sup>nd</sup>, 2021.

## CONCLUSIONS

I trust the above provides some additional measure of understanding with respect to our request. On behalf of the Owners, we also ask that you please circulate a copy of our original UAB expansion request (submitted July 2<sup>nd</sup>, 2021) and this letter to Regional Council for review and the record.

Should you require any additional information or clarification, please feel free to contact Evan Sugden at [esugden@bousfields.ca](mailto:esugden@bousfields.ca) or 905-549-3005 Ext. 259 or the undersigned.



Respectfully submitted,  
**Bousfields Inc.**



**David Falletta MCIP, RPP**  
Partner

ES/df:jobs

*Cc. Client*  
*Stikeman Elliott*  
*Greg Bowie*  
*Town of Fort Erie*

