



Greg Bowie

Planner

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Niagara Region

1815 Sir Isaac Brock Way, Thorold, ON, L2V 4T7

RE: 4810 Garner Road, Niagara Falls - Review of Niagara Region Land Needs Assessment

Parcel Economics Inc. ("Parcel") has been retained by DCC Lands Inc. to review the *Niagara Official Plan 2051 Land Needs Assessment*, June 2022 (the "LNA"). DCC Lands Inc. are the owner of lands located at 4810 Garner Road, in the City of Niagara Falls. As part of the ongoing Municipal Comprehensive Review ("MCR"), DCC Lands Inc. has submitted an expression of interest in having their lands included within the City of Niagara Falls settlement area boundary to accommodate Community Area growth to 2051.

The purpose of our review has been to determine if the methodology and assumptions used in preparing the LNA are consistent with *Land Needs Assessment Methodology for the Greater Golden Horseshoe* (the "Provincial Land Needs Methodology"). Based on our review of the LNA and supporting documentation, it is evident that the Designated Greenfield Area ("DGA") Community Area expansion of 320 hectares, which is identified in Table 13 of the LNA, is not sufficient to accommodate the growth allocated to the City of Niagara Falls to 2051. This shortfall in land will result in housing shortages that would lead to housing affordability issues, as identified in the Provincial Land Needs Methodology.

Our primary concerns with the LNA relate to 1) the amount of unplanned designated lands that are available to accommodate growth, and 2) errors in calculating the DGA density target. Our concerns with these components of the LNA are expanded upon in the following sections.

Unplanned DGA Land Supply

The LNA includes a revised land supply, which has reduced the amount of unplanned designated lands in comparison to the 160 hectares of unplanned designated lands that were included in the *December 2021 Niagara*

Official Plan 2051 Land Needs Assessment. The revision to the unplanned land supply is associated with the removal of 70 hectares of land that were constrained due to proximity to a phosphine plant.¹

However, we continue to have concerns that the supply of unplanned designated lands in the LNA is not sufficient to accommodate population and employment growth on Community Area lands in Niagara Falls to 2051, as some of the remaining lands have significant constraints that will impede or limit development over the horizon of the new Official Plan.

Based on correspondence between Parcel and Regional Planning staff, the location of the “Unplanned Developable Area” is shown in Figure 1. This figure also shows the approximately 70 hectares that was removed from the unplanned designated land supply as lands labeled “Encumbered Unplanned Area”, which are within the 2-kilometre radius of the Cytech Phosphine Plant, also known as the Cytec Arc.

As shown as Area A on Figure 1, the LNA includes approximately 25 hectares of Unplanned Developable Area on the south side of McLeod Road that are outside of the 2-kilometre radius of the Cytec Arc. However, the Grand Niagara Secondary Plan states under Cytec Canada Inc. Setback Policies:

2.3.1 Notwithstanding any other policy of this Plan, an approximate 200 metre setback from the 2km Cytec Arc, as shown on Schedule A-4 – Land Use, is established for the purposes of limiting development on lands designated Residential Low/Medium Density within this setback to single detached dwelling units on larger lots. The building height shall be a maximum of 2.5 storeys or 8 metres, whichever is the lesser, in accordance with the implementing zoning by-law.

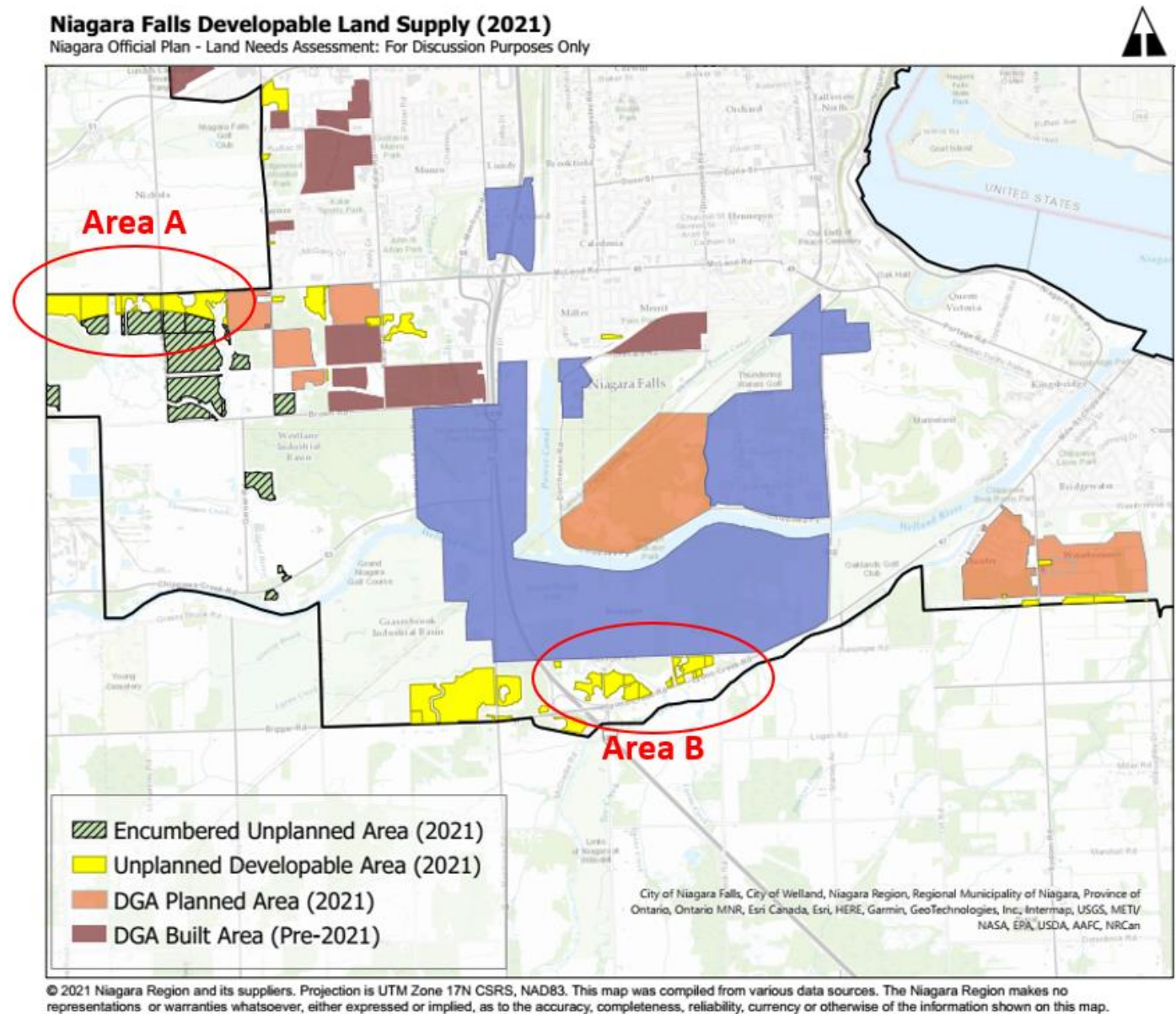
The 25 hectares of Unplanned Developable Area in Area A are within the 200-metre setback from the Cytec Arc. Therefore, based on Policy 2.3.1 of the Grand Niagara Secondary Plan, these lands have constraints that will limit the development to “single detached dwelling units on larger lots”. It does not appear that the constraints on the development of these lands are considered by Regional staff, as the LNA has proposed a DGA density target of 65 persons and jobs per hectare.

Further, the Unplanned Developable Area lands located south of McLeod Road and west of Garner Road (Area A in Figure 1) are designated as Industrial in Schedule A to the City of Niagara Falls Official Plan. Therefore, as these lands are designated Industrial, they are not available to accommodate Community Area population growth to 2051.

¹ Page 30, 2051 Land Needs Assessment, June 2022.

Figure 1

Niagara Falls Vacant DGA Lands



Source: Parcel based on information from Niagara Region.

Figure 1 also includes approximately 17 hectares of Unplanned Developable Area lands located in the area of Reixinger Road and Dell Road (shown as Area B in Figure 1). These lands are directly south of the proposed sewage treatment facility, which is considered a major facility based on the definition in the Provincial Policy Statement ("PPS"). Therefore, if the new sewage treatment facility is located north of the Area B lands, they could be within the

potential influence area. If these lands are within the potential influence area, they would not be developable for residential purposes, as residences are considered a sensitive land use based on the definition in the PPS. Section 1.2.6 of the Provincial Policy Statement ("PPS") address land use compatibility issues, which states:

1.2.6.1 Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.

1.2.6.2 Where avoidance is not possible in accordance with policy 1.2.6.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures:

a) there is an identified need for the proposed use;

b) alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;

c) adverse effects to the proposed sensitive land use are minimized and mitigated; and

d) potential impacts to industrial, manufacturing or other uses are minimized and mitigated.

It is clear from policies in the Niagara Falls Official Plan and the PPS that a large portion of the Unplanned Developable Area lands identified in Niagara Falls are either limited or not available to accommodate residential growth to 2051 and should therefore be removed from the unplanned land supply in the LNA. The removal of these Unplanned Developable Area lands from the land supply will necessitate a larger expansion of the settlement area boundary in Niagara Falls than the 320 hectares identified in Table 13 of the LNA.

Errors in Calculating the DGA Density Target

In addition to reducing the unplanned designated lands in Niagara Falls, the LNA has also increased the DGA Community Area jobs forecast to 4,210 jobs, which is a significant increase over the 1,065 DGA Community Area job in the *December 2021 Niagara Official Plan 2051 Land Needs Assessment*.

At the same time, the LNA continues to forecast 10,010 new housing units in the DGA between 2021 and 2051, with nearly 77% of these units being single-detached and semi-detached, as shown in Figure 2. These 10,010 new housing units would accommodate 27,115 persons based on person per unit ("PPU") forecasts in the recently released *Development Charges Background Study, Regional Municipality of Niagara*, May 30, 2022. This results in a total of 31,325 persons and jobs in the DGA between 2021 and 2051, as shown in Figure 2.

Figure 2

DGA Population and Job Growth, Niagara Falls

	Single/Semi	Row	Apartment	Total
DGA Household Growth ¹	7,660	2,040	310	10,010
Persons Per Unit ²	2.92	2.08	1.68	
Persons on DGA Lands 2021-2051	22,342	4,252	522	27,115
DGA Job Growth 2021-2051 ³				4,210
Total Persons and Jobs				31,325

¹ Based on Table 10 of the LNA

² Based on Development Charges Background Study, Regional Municipality of Niagara, May 30, 2022.

³ Based on Table 11 of the LNA

Source: Parcel based on Niagara Region Official Plan, 2051 Land Needs Assessment, June 2022 and Development Charges Background Study, Regional Municipality of Niagara, May 30, 2022.

Based on our review of the LNA, the Region has made an error in calculating the Community Area DGA lands needed to accommodate population and community area job growth between 2021 and 2051. Table 2 of the LNA assumes a planned DGA density of 65 persons and jobs per hectare on vacant DGA lands in Niagara Falls. However, as shown in middle column of Figure 3, based on a forecast of 31,325 persons and jobs in the Community Area between 2021 and 2051, an expansion of 362 hectares would be required to accommodate growth, rather than the 320 hectares shown in Table 13 of the LNA. Therefore, an additional 42-hectare expansion would be required to meet the density target of 65 persons and jobs per hectare.

As shown in the far-left column of Figure 3, the expansion of 320 hectares shown in Table 13 of the LNA is based on a density of 71 persons and jobs per hectare. It is our opinion that it would not be possible to meet either the 65 persons and jobs per hectare or 71 persons and jobs per hectare density target included in the LNA. As noted earlier in Figure 2, approximately 77% of household growth in the DGA is forecast to occur in single-detached and semi-detached units.

The density target of 50 persons and jobs per hectare that was included in the *December 2021 Niagara Official Plan 2051 Land Needs Assessment* is a reasonable target based on the share of growth allocated to single-detached and

semi-detached units. Therefore, for reference, we have included the additional Community Area lands that would be required based on a density target of 50 persons and jobs per hectare in the far-right column of Figure 3. As shown, under this scenario, a Community Area expansion of 507 hectares would be required to accommodate growth to 2051.

Figure 3

Niagara Falls Community Area DGA Density and Land Needs

	LNA Scenario (71 persons and jobs per hectare)	65 persons and jobs per hectare	50 persons and jobs per hectare
Total Persons and Jobs	31,325	31,325	31,325
Overall DGA Area 2021-2051	440	482	627
Density (persons and jobs per hectare)	71	65	50
Existing DGA Lands	120	120	120
Need for Additional Community Area Lands	320	362	507

Source: Parcel based on Niagara Region Official Plan, 2051 Land Needs Assessment, June 2022

By not expanding the settlement area boundary by more than 320 hectares, it will result in housing shortages that would lead to housing affordability issues, as identified in the Provincial Land Needs Methodology. It would also result in Niagara Region not planning to achieve the population and employment forecasts identified in Schedule 3 of the Growth Plan.

Sincerely,

Parcel

Parcel Economics Inc.



Craig Ferguson

Principal