

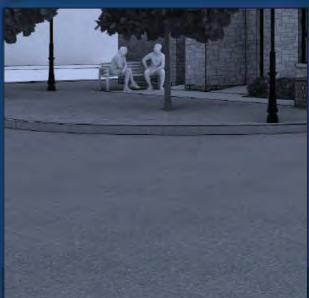
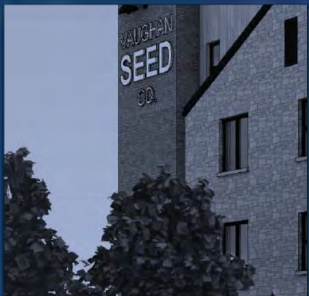


# PLANNING & URBAN DESIGN RATIONALE REPORT

111 Victoria Street, Welland, Ontario

Official Plan and Zoning By-law Amendment

Prepared for: 111 Victoria Street Inc.



June 2025

Description

PROJECT No.:

DATE:



1:5000

CHECKED BY:

MP

SCALE:

DP-00



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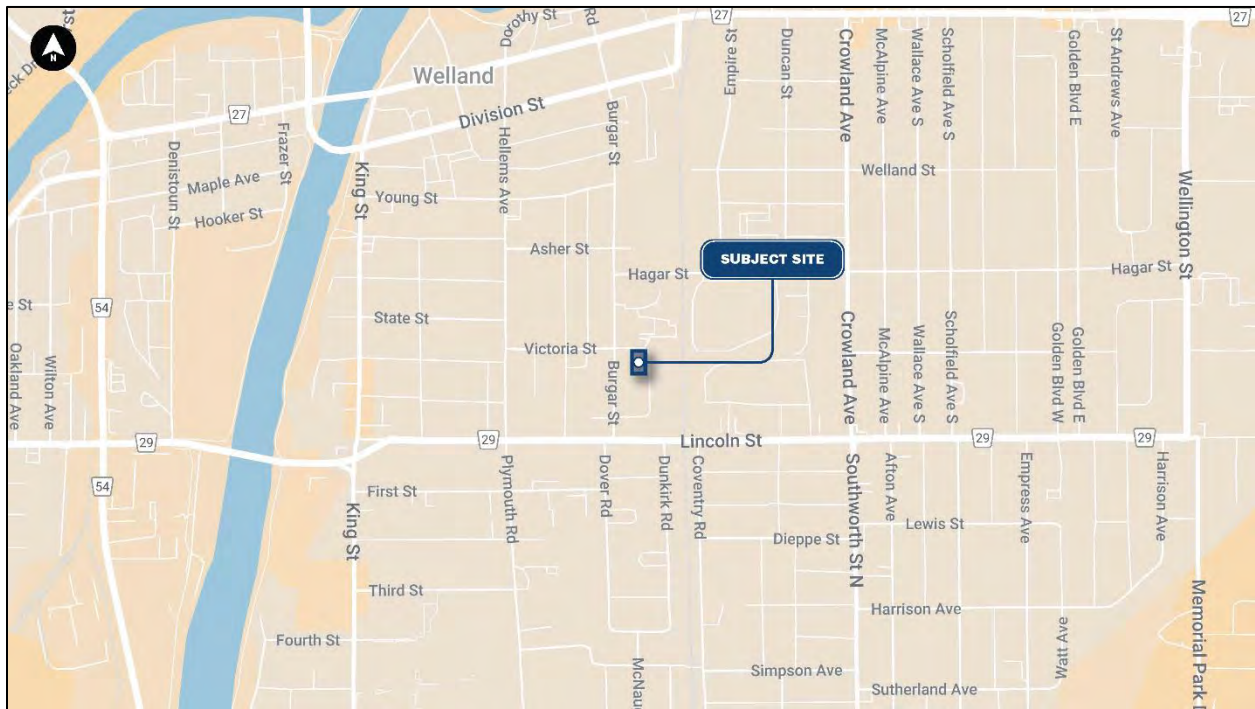


# 1.0 INTRODUCTION

This Planning Rationale Report has been prepared in support of applications for an Official Plan Amendment (“OPA”) and Zoning By-law Amendment (“ZBA”) (“the Applications”). The Applications are being filed by 111 Victoria Street Inc. (the “Owner” and “Applicant”) to permit the development of a 4-storey purpose-built rental building, located at 111 Victoria Street in the City of Welland (the “subject site” or “site”).

The subject site is located on the south side of Victoria Street and on the west side of Hester Lane, north of Lincoln Street, and east of Bugar Street (see **Figure 1 – Location Map** below).

*Figure 1 - Location Map*



The Applications seek to facilitate the infilling of the subject site for a new mid-rise apartment building with 35 new rental housing units, and the potential for affordable units if subsidy and other funding options come to fruition following the necessary approvals. Parking will be provided on-site, in compliance with zoning, including 6 electric vehicle parking spaces and 2 barrier free spaces + 9 short-term bicycle parking spaces outside the building and an additional 13 long-term bicycle parking spaces inside the building (“the Proposal”).

The Proposal will redesignate the subject site from industrial to residential and will capitalize on the site’s redevelopment and intensification / infill potential as a vacant brownfield lot with convenient walking access to existing bus transit. The vision for the redevelopment proposal is built around four key principles:

- provision of new purpose-built rental housing units;
- transit-supportive development,
- brownfield revitalization; and
- overall land use efficiency on an underutilized site.

This report is a key supporting document submitted as part of the Applications to explain how the Applications and the Proposal are appropriate. Its purpose is to provide a clear and structured justification for the Applications / Proposal by evaluating consistency with the Provincial Planning Statement, general conformity with relevant Official Plans, general compliance with Zoning By-laws, and other applicable planning documents. The report outlines the appropriateness of the proposed land use, built form, and intensity, and demonstrates how the proposal contributes to orderly, efficient, and context-sensitive development.

From a land use planning perspective, the Proposal is consistent with the Provincial Planning Statement, conforms with the Niagara Region Official Plan, and meets the general purpose and intent of the City of Welland Official Plan and Zoning By-law. Among other matters, these policy and regulatory documents all promote the efficient use of land and infrastructure and intensification of underutilized sites within built-up urban areas, particularly in locations which are well-served by existing municipal infrastructure, including public transit.

The Proposal will intensify and infill the vacant subject site and utilize land more efficiently by capitalizing on its location at the edge of an established neighbourhood in proximity to public transit.

From a built form and urban design perspective, the Applications will facilitate a Proposal that will represent a high-quality addition to the area in terms of mid-rise residential architecture and street-level presence. The proposal will represent appropriate intensification for the subject site in keeping with the Official Plan's vision of evolution along the edges of established neighbourhoods and located within the Community Improvement Area. The Proposal will not detract from the existing character of the neighbourhood to the west, but rather, will revitalize an underutilized site currently vacant through the introduction of a mid-rise built form oriented towards to the site's northeastern corner.

In our opinion, the Proposal represents an appropriate design response to the rectilinear shape of the site, which will establish a human-scaled street presence along Victoria Street repairing a broken frontage along the street.

It is our opinion that the Proposal represents good and appropriate land use planning and urban design and reflects an important opportunity to redevelop an underutilized site with new rental housing, which will increase housing options in the area and support the development of complete communities within the neighbourhood.



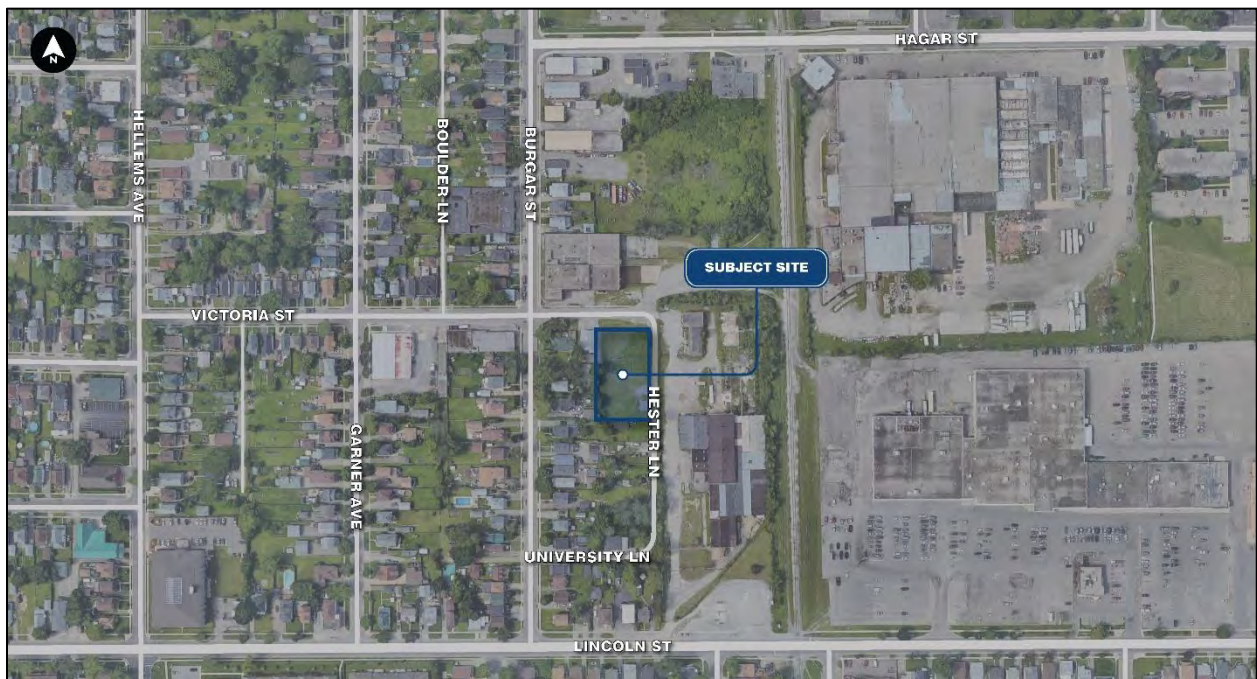
# 2.0 SITE LOCATION & CONTEXT

## 2.1 Subject Site

The subject site is located centrally in the City just southeast of the downtown, within the Market Square neighbourhood and part of Ward 5. The subject site is located on the south side of Victoria Street and on the west side of Hester Lane, north of Lincoln Street, and east of Bugar Street. The site is legally described as: *Part of Lot 24, Concession 5, in the Geographic Township of Crowland; and Lots 150, 151, 152 and 153 on Plan 573; Welland.*

The subject site has an area of 2,157.5 square metres and form rectangular lot shape with a frontage of approximately 35.5 metres of frontage along the south side of Victoria Street and approximately 60.6 metres of frontage along the west side of Hester Lane. Victoria Street is identified as a local road in the City of Welland Official Plan and is municipally serviced. Hester Lane is an unpaved approximately 6-metre-wide laneway that runs adjacent to the eastern side of the subject site and connects to University Lane, a gravel lane to the south of the subject site, linking both Victoria and Bugar Street. Generally, the lands form a modestly sized vacant and underutilized parcel at the edge of both an existing residential and industrial neighbourhood (see **Figure 2 – Zoomed-In Aerial Context** below).

*Figure 2 - Zoomed-In Aerial Context*



*Subject Site looking Southeast from Victoria St*



*Subject Site looking South from Victoria St*



*Subject Site looking West from Hester Ln*



*Subject Site looking Northwest from Hester Ln*



*Interface between Subject Site and Hester Ln*



*Subject Site looking Northwest from Site*

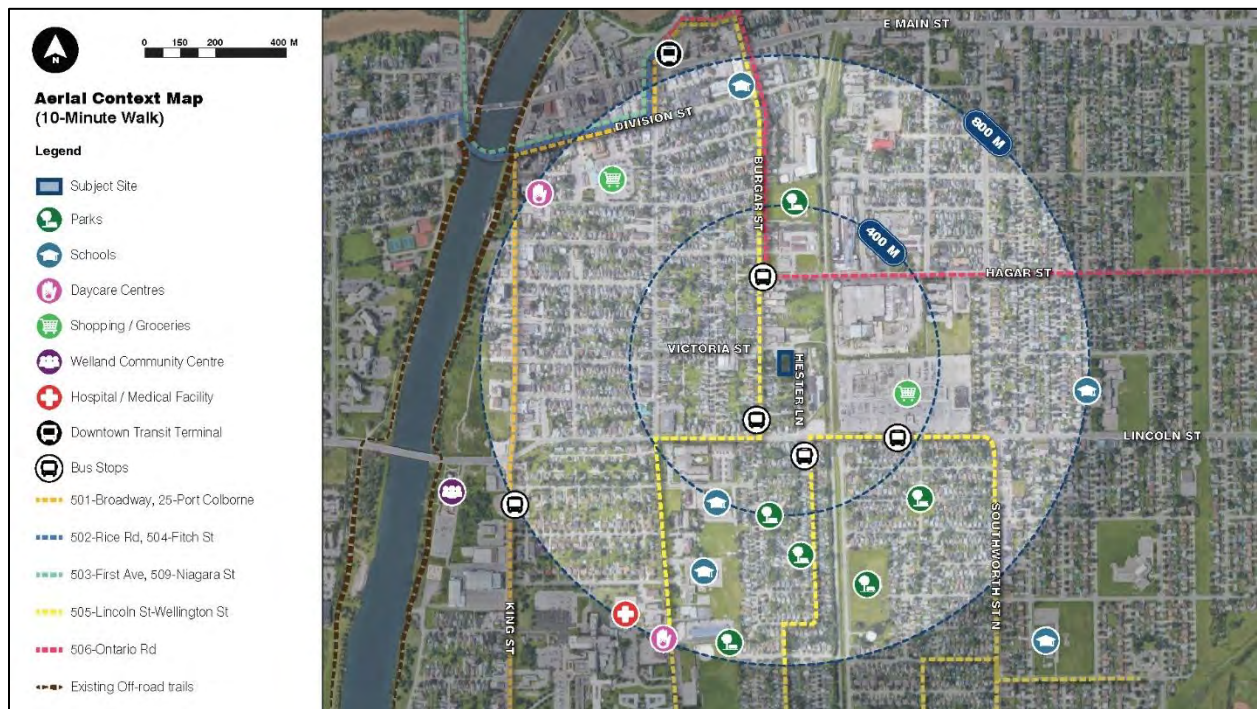


## 2.2 Surrounding Context

The subject site is located within the Market Square neighbourhood, which generally is bounded by the Welland Canal and Merritt Island Trail to the west, Downs Road to the north, an irregular eastern boundary near Duncan Street and the rail corridor beside Coventry Road, and Lincoln Street to the south. It includes the historic downtown core and adjacent residential and commercial areas along the canal. This neighbourhood can generally be described as a mixed used neighbourhood with a diversity of residential, commercial, and industrial lands uses. The site generally exists in a location within the neighbourhood where residential and industrial uses meet (see **Figure 3 - Aerial Context Map** below).



Figure 3 - Aerial Context Map



At approximately 95 metres east of the subject site lies an operational rail corridor for freight. This rail corridor, running north-south through Welland is operated by Trillium Railway, and is known as the Canal Spur, formerly part of Canadian National's Canal Subdivision. Trillium Railway, a short line operator based in Welland, manages this corridor, providing freight services to local industries and connecting to larger rail networks. The subject site and the Canal Spur of the Trillium Railway are separated by an existing factory building at 123 Victoria Street.

The area west of the Canal Spur consists largely of residential development that has a suburban built form and predominantly includes single-detached homes, one to three-storeys in height. East of the Canal Spur and North of Lincoln Street, there is a mixed-use area of industrial and commercial uses. At present, residential building typologies in the immediate area around the subject site are low density in nature, and the site exists west of the Canal Spur at the confluence of residential and industrial / commercial uses. The following descriptions of the immediate surrounding context and the associated figures aim to provide a clearer picture of the areas around the Subject Lands.

To the **north**, is a former factory at 236–244 Bargar Street that has been repurposed into a mixed-use building, currently home to the Clubhouse Café and several other tenants. While the building is no longer used for its original factory purpose, signs of adaptive reuse—such as the café—are beginning to emerge in this building. Further north are low-rise residential dwellings followed by a few industrial and manufacturing uses (e.g., sheet metal contractor). Generally, Bargar Street, north of the site represents somewhat of a dividing line between the industrial and residential interface. Approximately 335 metres to the north (roughly a 5-minute walk) is Bargar Park just north of Hagar Street, which contains a baseball diamond. Further north still is Division Street followed by East Main Street, which represents the eastern limits of the downtown. This area consists of a mix of uses



from low-rise residential to low-rise commercial plazas. Eventually, the Welland Recreational Canal can be found around 1.3 kilometres north and includes Merritt Island Park.

*Figure 4 - Lands North of Subject Lands*



Source: Google Maps, 2025

*236 – 244 Burgar St on North Side of Victoria St*



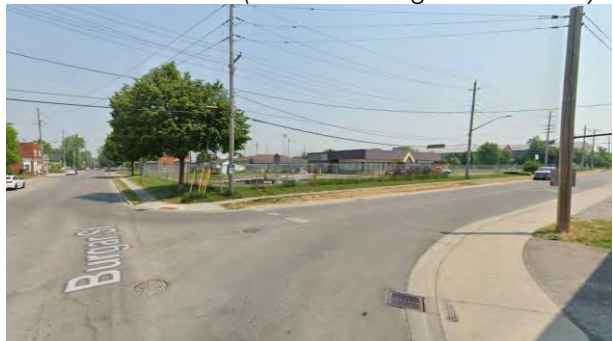
*Uses Along Burgar St Northwest of Site*



*236 – 244 Burgar St on North Side of Victoria St*



*Uses North of Site (Source: Google June 2023)*





To the **east**, is a low-rise factory building at 123 Victoria Street which contains a welding and a manufacturing business followed by the Canal Spur. Beyond that is a large commercial shopping centre at 300 Lincoln Street, that includes a nail salon, fitness center, insurance agency, pizza restaurant, grocery store, and a fast-food coffee shop, among other businesses. Just south of the commercial shopping centre is Lincoln Street which represents a dividing line between the commercial uses on the north side of the street and a residential subdivision on the south side of the street. To the northeast is a car repair and maintenance service establishment. Further east beyond the commercial shopping centre are more homes within a low-density residential subdivision.

*Figure 5 - Lands East of Subject Lands*



Source: Google Maps, 2025

*Hester Ln East of Site*



*Employment Use at 123 Victoria St*





*Employment Use at 123 Victoria St*



*Employment Use at 123 Victoria St*



To the **south** of the subject site is mostly characterized by single-detached residential dwellings ranging from one to three storeys in height, with low-rise institutional and commercial uses dispersed throughout. Plymouth Public School is located approximately 330 metres southwest, followed by St. Mary Catholic School just a bit further. There are also at least five parks within a 5 to 10 minutes walk of the site to the south and southeast. There is a small neighbourhood park at the terminus of Wavell Court, Hennepin Avenue, and Commando Street. This park is around 470 metres (straight line distance) from the site and is under a 10-minute walk. There is Dover and Dunkirk parks between 340 and 440 metres to the south, and there is Bemus Park around 460 metres to the southeast. Further still but still within the 800-metre (i.e., 10-minute walking distance) is Plymouth Park, also south of the site. Within the area south of the subject site, the Welland Hospital is an approximately 16-minute walk from the subject site. Further south is the Ontario Road Right of Way ("ROW"), with a diversity of residential and commercial plaza's fronting the ROW. Further south is the large currently vacant industrial lands, approximately 1.5 kilometres from the subject site.

*Figure 6 - Lands South of Subject Lands*



Source: Google Maps, 2025



*Hester Lane South of Site*



*University Lane South of Site*



*Apartment at Corner of Hester & University Lane*



*Abutting Dwelling & Shed Abutting Site*



*Figure 7 - Lands West of Subject Lands*



Source: Google Maps, 2025



*Pet Groomer at 97 Victoria St*



*Victoria Street ROW looking West*



*Typical Single-Detached Homes Southwest of Site*



To the **west**, is a predominantly low-rise residential neighbourhood, characterized by single-detached homes with large rear yards and mature vegetation. Along Bugar Street, homes are set back from the road with driveways and front lawns, reflecting a stable, mid-20th century residential fabric. Further west, Niagara Peninsula Homes and a few light industrial or commercial uses front onto Victoria Street, suggesting a gradual transition from residential to mixed uses in that area. Eventually the King Street ROW emerges and beyond that is the Welland Recreational Canal. Further west of the Welland Canal is a mid-rise residential development with buildings up to 8-storeys.

## 2.3 Transportation & Transit Network

### 2.3.1 Transportation Network

The subject site fronts onto Victoria Street to the north and Hester Lane to the east. While both are identified as Local Roads on Schedule E (Road Hierarchy) of the City of Welland Official Plan, only

Victoria Street functions as a standard public street—it is paved and supports two-way traffic. In contrast, Hester Lane is an approximately 6-metre-wide gravel laneway that operates more like a private driveway than a municipal road. It lacks shoulders and sidewalks and directly abuts the side lot lines of adjacent properties with no boulevard.

Neither Policy 6.4.2.1.E (Planned Widenings) nor Schedule F (Planned Road Widenings) of the City of Welland's in-force Official Plan identify Victoria Street or Hester Lane for future widening or upgrades. This is further reinforced by the City's Draft New Official Plan, which, although continuing to classify Hester Lane as a Local Road, also does not schedule any improvements or expansions.

The City's Zoning By-law 2017-117, as amended, provides clear definitions that distinguish between streets and laneways. A "laneway" is defined as a public thoroughfare not exceeding 9.2 metres in width, providing only secondary access to abutting properties. A "public street," by contrast, must be owned and maintained year-round by a public authority. Based on its physical condition, function, and title, Hester Lane more appropriately meets the definition of a laneway rather than a public street under the Zoning By-law.

Moreover, the Zoning By-law defines an "exterior lot line" as any lot line, other than a front lot line, that abuts a street. Conversely, an "interior lot line" is any lot line that is not a front, rear, or exterior lot line. As Hester Lane does not meet the criteria of a street, the lot line abutting it does not qualify as an exterior lot line.

Accordingly, for the purposes of this site and the associated Applications, Hester Lane should not be considered a public street. It is neither scheduled for improvement nor meets the functional or legal definitions of a street. Therefore, the lot line abutting Hester Lane should be considered an interior side yard.

Victoria Street, conversely, represents the site's only true frontage along a public street. Victoria Street, a Local Road, has an existing paved right-of-way ("ROW") width of approximately 20 metres with a sidewalk on the north side of the street, which connects pedestrians to the sidewalks along Bugar Street and other sidewalks through the neighbourhood to the north, west, and south. On-street parking is permitted along Victoria Street.

Bugar Street, about 35 metres west of the subject site, runs north south and has an existing ROW width of approximately 20 metres and is identified as a *Collector* Road on Schedule 'E' of the in-force City of Welland Official Plan and as a street planned for road widenings on Schedule F. Bugar Street provides two lanes running one-way, directed northbound and pedestrian sidewalks on both sides of the street. A designated road parking lane also permits on-street parking along Bugar Street. According to the City of Welland Official Plan, Collector Roads are undivided roads where traffic movements and land access are of equal importance and serving moderate volumes of traffic at moderate speeds. Generally, the planned minimum right-of-way widths for *Collector* Roads is 24.5 metres.

University Lane is located about 92 metres south of the subject site and connects to and is similar in nature and functionality as Hester Lane. Beyond that, Lincoln Street is located approximately 143 metres south of the subject site and is identified an *Arterial* Road on Schedule E of the in-force City of Welland Official Plan. Lincoln Street has an existing ROW of approximately 20 metres. According to the Welland Official Plan Arterial Roads are divided or undivided roads primarily used for traffic

movement and servicing moderate to large volumes of inter-City and/or through traffic at moderate speeds. Generally, the planned minimum right-of-way widths for *Arterial Roads* is 30 metres.

### 2.3.2 Transit and Active Transportation Network

#### Transit

Transit services in Welland are operated by Niagara Region Transit ("NRT"), which has unified all municipal transit systems across Niagara Region. In 2024, the Niagara Transit Commission unified NRT OnDemand, Niagara Specialized Transit, and FAST services under the new name "Niagara Region Transit" to enhance the transit experience.

Within the City of Welland, residents have access to several fixed-route bus lines that connect key destinations such as Downtown Welland, Niagara College's Welland Campus, residential neighborhoods, and commercial areas, with the Welland Bus Terminal serving as a local transit hub. Regionally, Welland is connected to neighboring communities through NRT routes such as Routes 60, 60A, 60C, 65, 65A, and 65C to Niagara Falls, Routes 70 and 75 to St. Catharines, and Route 25 to Port Colborne, facilitating access to major institutions like Brock University and regional shopping and employment centers. For areas not served by fixed routes, NRT MicroTransit / OnDemand provides a flexible, app-based transit option, while specialized transit ensures accessibility for residents with disabilities. Students benefit from a U-Pass program allowing unlimited travel during the school year, and all riders can plan trips and track buses in real-time through the Transit App or Google Maps. NRT MicroTransit / OnDemand is an app-based on-demand transit service that allows passengers to book rides to specific points within designated service areas. If a trip requires travel beyond the local zone, a MicroTransit vehicle will take passengers to the nearest access point, where they can transfer to a conventional bus for further travel. This multi-modal approach ensures flexible and convenient transit options for residents and visitors in Welland.

The subject site is located within a 5-minute-walk of several bus stops including stops along Bugar Street for NRT route 505 (Lincoln–Wellington) and route 506 (Ontario Road) which has stops along Bugar and Hagar Streets. A little further, but still within a 10-minute-walk, there are other bus route options available via routes 501, 502, and 503 along Division Road. These routes are all illustrated on **Figure 3** above.

The 505 Lincoln–Wellington bus route, the closest stop to the site, operates in a loop connecting the Downtown Welland Bus Terminal to the southeastern and southwestern residential areas via East Main Street, Wellington Street, Lincoln Street, Southworth Street, Sutherland Avenue, and Bugar Street, serving key locations such as Lincoln Plaza and Welland Community General hospital. Accessible service is provided on this route, and all buses are equipped with bike racks. The route operates seven days a week, every 30 minutes with some limited hours of operation (ending at around 6:00 pm) on the weekend and holidays. The route offers reliable daytime service to Welland's central and eastern neighbourhoods, making it a vital connection for shopping, community services, and residential travel.

The 506 Ontario Road bus route, the next closest stop to the site, operates a loop between the Downtown Welland Bus Terminal and the Ontario Road and Southworth Street area, traveling through residential and commercial areas along King Street, Memorial Park Drive, and Hagar Street, with stops at Rose City Plaza and Welland County General Hospital. Accessible service is provided

on the route, and bike racks are available on all buses. The route runs seven days a week every 30 minutes with some limited hours of operation on the weekend and holidays. The 506 offers consistent and reliable service connecting southeast Welland to the downtown core, commercial areas, and essential services.

### **Active Transportation**

In terms of active transportation, the subject site is situated in a part of the City where most surrounding streets are equipped with pedestrian walkways on one or both sides. Victoria Street, which runs adjacent to the site, includes a sidewalk on the north side for two blocks westward, after which sidewalks are provided on both sides. These sidewalks, along with those across from and around the site, offer active transportation connections in most directions—north, south, and west—providing safe and convenient access to nearby amenities such as Burgar Park (north), Plymouth Park (south), and the Welland Farmers' Market (northwest).

Appendix 4 (Trail Network) of the Draft New Welland Official Plan identifies several proposed active transportation routes within a five- to ten-minute walk of the site. These include a future trail along the Canal Spur rail corridor, located approximately 95 metres east of the site, and cycling infrastructure planned for Lincoln Street, about 143 metres to the south.

Further details are provided in Map 6 of the City's Community Trails Strategy, which refines the proposals from Appendix 4 by identifying the Canal Spur as a candidate for a four-season multi-use trail and Lincoln Street as a location for on-road cycling facilities (i.e., bike lanes). These same routes are reinforced in the City's Transportation Master Plan (Map ES-2 – Proposed Active Transportation Cycling Network).

Altogether, the subject site is well served by an integrated network of existing and planned sidewalks, multi-use trails, and cycling facilities, contributing to a walkable environment with even greater enhancements envisioned for the future.

## **2.4 Community Services & Facilities**

Within a 5- to 10-minute walk (approximately 400 metres) of the subject site, the surrounding area includes a variety of community services and facilities that support daily living through amenity density. Immediately adjacent to the site to the southeast is a shopping plaza offering convenient access to groceries and retail services. A school is located to the southeast (Plymouth Public School, while several neighbourhood parks and parkettes are situated to the north, south and southwest (Burgar Park, Dover Park, Dunkirk Park, Bemus Park, respectively), providing access to green space and recreational opportunities.

Additional parks, such as Plymouth Park further to the southwest, provide expanded access to open space and recreation. Three other schools and a daycare centre are located within the wider 10-minute radius, supporting families in the area, including St David's Co-Op Nursery School to the north, St. Mary Catholic School to the southwest, Princess Elizabeth Public School to the east, for example. The Welland Farmers' Market is located to the northwest also within a 10-minute walk, and the Niagara Health Welland Hospital is situated to the southwest of the site, offering nearby access to medical services. The Welland Community Centre, located west of the site near the Welland Recreational Canal, provides recreational, cultural, and community programming. Additional grocery

stores and retail options are available along King Street and Lincoln Street. The Welland Downtown Transit Terminal is located just beyond a 10-minute walk, enhancing access to the city's broader public transit network. Together, these features contribute to an amenity dense and walkable community with strong access to essential services and mobility options. Many of these community services and facilities are illustrated on **Figure 3** above.

With respect to school accommodation specifically, the subject site is served by both the District School Board of Niagara ("DSBN") and the Niagara Catholic District School Board ("NCDSB"). Under the DSBN, the site falls within the attendance areas of several schools offering a range of educational programs. Plymouth Public School is the designated home school for regular programming from Junior Kindergarten to Grade 8. Eastdale Secondary School provides Grades 9 to 12 programming and includes a Specialized School-to-Work program. French Immersion is offered at Princess Elizabeth Public School (Grades 1–8), with students continuing at Welland Centennial Secondary School for Grades 9–12. Welland Centennial also serves as the designated secondary ESL/ELD site. Collectively, these schools provide a comprehensive pathway from kindergarten through secondary graduation.

According to the DSBN's Long-Term Accommodation Plan (2023–2032), several of these schools are experiencing or approaching overcapacity. Plymouth Public School is projected to exceed capacity by 2027 and reach 107% by 2032. While no capital expansions are planned, portable classrooms and possible boundary or program changes are under consideration. Princess Elizabeth Public School is already significantly over capacity and projected to remain so, with similar interim strategies in place and a new site potentially required. Eastdale Secondary School, by contrast, is underutilized but expected to grow modestly, prompting consideration of program relocation or partnerships to optimize space. Welland Centennial Secondary School is projected to grow from 115% to 144% utilization by 2032, with boundary and program adjustments proposed to manage the pressure. In general, the DSBN plans to address capacity issues through portable accommodation, boundary reviews, and long-term options such as new school construction, subject to funding approvals. In the short term, future students from the subject site may be accommodated through portables, boundary changes, or temporary redirection to holding schools.

Under the NCDSB, students may attend St. Mary Catholic Elementary School (JK–Grade 8) and Notre Dame College School (Grades 9–12). According to the NCDSB's Long-Term Accommodation Plan (2024–2029), St. Mary is currently underutilized and able to absorb future growth, with no specific improvements planned but ongoing monitoring in place. Notre Dame College School is over capacity, with 1,082 students in a facility built for 1,017 (106% utilization), and enrolment is expected to continue to grow slightly to 2033. While no expansion is currently planned, the NCDSB will monitor enrolment trends and adjust accordingly.

Overall, there is limited but sufficient capacity in the area to support infill-related growth at the subject site, though some students may need to be accommodated through interim measures. Long-term solutions, including school additions or new builds, remain subject to school board approval and provincial funding. The NCDSB also collects education development charges to support long-term accommodation planning.



# 3.0 PROPOSAL

## 3.1 Description of Proposal

The “Proposal” seeks to redevelop the vacant subject site with a four-storey purpose-built residential apartment building, introducing 35 new rental housing units. Pending the necessary approvals, the project may include affordable units if subsidies or other funding sources become available. The development has been named Vaughan Seed Flats, a tribute to the former Vaughan Seed Company building that once occupied the site but was destroyed by fire in 2008. The Vaughan Seed Company was founded by Marshall “Mark” Vaughan—Welland’s first elected mayor and a long-serving MPP. The proposal’s name references his legacy.

The proposed unit mix includes 15 studio units (43%), 14 one-bedroom units (40%), and 6 two-bedroom units (17%). Average unit sizes are 33.4 square metres (359.7 square feet) for studios, 50.7 square metres (546.1 square feet) for one-bedroom units, and 67.3 square metres (724.8 square feet) for two-bedroom units. Under the City of Welland’s Zoning By-law, units under 50 square metres (538.2 square feet) are defined as “small units.” As such, 22 of the 35 proposed units qualify as “small units” which have slightly different parking requirements.

The City of Welland 2022 Development Charges Background Study & By-law(s) (August 2, 2022) contains specific metrics for persons per unit (“PPU”) used in its development charge calculations. For apartments these equate to occupancy rates and the PPU for apartments are based on bedroom count. Accordingly, for apartments with 2 or more bedrooms the metric is 2.11 PPU, and for apartments with bachelor suites or one-bedroom units the metric is 1.20 PPU. Using these metrics, it can be assumed that the resultant number of people living on site will be approximately 48 people based on Welland’s 2022 Development Charges Background Study. The Niagara Region 2022 Development Charges Background Study provides a slightly different assumptions for persons per unit (PPU). The study assumes an overall PPU of 1.690 for high-density housing (apartments), with more detailed values of 1.991 for apartments with two or more bedrooms and 1.214 for one-bedroom or bachelor units. Accordingly, the resultant number of people projected to be living on site would equate to about 47 people using the bedroom-specific metric or about 59 people using the general metric. Overall, it is anticipated that the proposal will result in between 47 and 59 people on site at full occupancy.

As well, the Niagara Region 2022 Development Charges Background Study does mention that 8% of Niagara’s workforce worked from home in 2016 (p. 3-10), this data is historical and not projected forward. The study notes that work-from-home employment is reflected in the population-based forecast rather than assigned its own employment category or service needs. Therefore, while residential population metrics are clearly defined, the amount of people working from home on site at full occupancy would need to be an assumption using 8% as a metric. Accordingly, it can be assumed that roughly 4 or 5 people would be working from home on site at full occupancy.

A total of 23 surface parking spaces will be provided on site in accordance with zoning requirements. These include six electric vehicle charging spaces, two barrier-free spaces, nine short-term bicycle

parking spaces outside the building, and thirteen long-term bicycle spaces inside. The Zoning By-law distinguishes parking requirements based on unit size: standard apartment units require one parking space per unit, while small units require 0.3 spaces per unit. Based on this, 13 parking spaces are required for the standard units and 7 for the small units, totalling 20 required spaces. With 23 spaces proposed, the development exceeds the minimum parking requirement.

Architecturally, the proposed building is a contemporary mid-rise residential structure that incorporates a variety of materials and detailing to create visual interest and articulation. The exterior features a neutral and earth-toned masonry veneer paired with vertically oriented wood or fiber cement siding in contrasting shades, complemented by black window frames that emphasize the fenestration pattern. Balconies are provided for several units—particularly on the upper floors—offering private outdoor space and contributing to the articulation of the façades. The massing is broken up through the use of varied rooflines, stepped façades, and vertical elements to reduce visual bulk and create a more interesting pedestrian-oriented scale. Ground-level entrances and large windows activate the street edge, while surface parking and landscaping at the side and rear of the building support a cohesive site layout. A distinctive brick tower bearing the signage “Vaughan SEED Co” further reinforces the site’s historical reference.

*Figure 8 - Conceptual Rendering of Proposal*



Source: Matthew Schmid Architecture Inc.

The building has been strategically located toward the northeast corner of the site, achieving several positive planning and design outcomes. This siting provides a more sensitive transition to the low-rise single-detached homes to the west and south, maximizing separation between the proposed mid-rise form and the surrounding residential context. It also helps frame the Victoria Street and Hester Lane frontages while accommodating surface parking and enhanced landscaping. Importantly, although there is no municipal requirement for mid-rise buildings to adhere to an angular plane, the design has been tested against a 45-degree angular plane taken from the shared property lines to the west and south. The entire building falls beneath this plane, serving as an elective transitional measure that further supports compatibility with the surrounding neighbourhood.



Figure 9 - Conceptual Site Plan



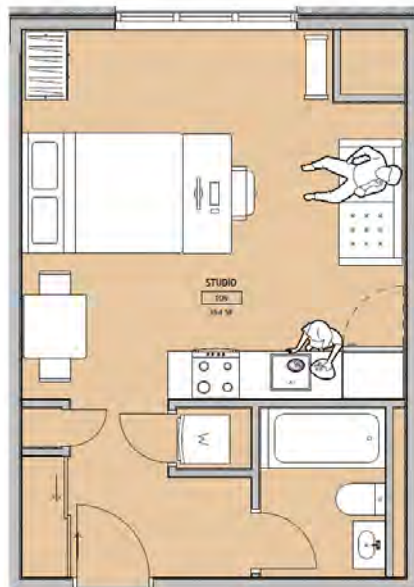
Source: Matthew Schmid Architecture Inc.

Figure 10 - Typical Floor Plan



Source: Matthew Schmid Architecture Inc.

Figure 11 - Typical Unit Layouts



**2 STUDIO**  
SCALE: 3/8" = 1'-0"



**3 1 BEDROOM**  
SCALE: 3/8" = 1'-0"



**1 2 BEDROOM**  
SCALE: 3/8" = 1'-0"

Source: Matthew Schmid Architecture Inc.



Figure 12 - Conceptual Elevations of Proposal



Source: Matthew Schmid Architecture Inc.

Figure 13 - Angular Planes



Source: Matthew Schmid Architecture Inc.

## 3.2 Key Statistics

Table 1 - Key Statistics

<b>Site Area</b>	2,157.5 m <sup>2</sup> (0.21575 ha)
<b>Building Footprint</b>	639.6 m <sup>2</sup>
<b>Gross Floor Area</b>	2,545.0 m <sup>2</sup>
<b>Density</b>	162.2 unit per hectare
<b>Floor Space Index</b>	1.18
<b>Lot Coverage</b>	30.8 %
<b>Height</b>	16.15 m 4-Storeys
<b>Units</b>	35 units
<b>Tenure</b>	Purpose-Built Rental
<b>Affordable Units</b>	Intended
<b>Common Indoor Amenity Space</b>	61.0 m <sup>2</sup>
<b>Common Outdoor Amenity Space</b>	29.0 m <sup>2</sup>
<b>Private Outdoor Amenity Space</b>	21.0 m <sup>2</sup>
<b>Overall Amenity Area</b>	111.0 m <sup>2</sup>
<b>Amenity Area Ratio</b>	3.2 m <sup>2</sup> / unit
<b>Vehicle Parking (Overall)</b> Resident Visitor	<b>23 spaces</b> 20 spaces 3 spaces
<b>Barrier-Free (Accessible) Parking</b>	2 spaces (included within overall spaces)
<b>Electric Vehicle Parking</b>	6 spaces (included within overall spaces)
<b>Bicycle Parking (Overall)</b> Short Term Long Term	<b>22 spaces</b> 9 spaces 13 spaces
<b>Loading Spaces</b>	1 Space (Temporary)
<b>Landscaped Area</b>	586.0 m <sup>2</sup>

## 3.3 Required Approvals

Based on a review of the proposed development in the context of all applicable provincial and municipal requirements, and in consultation with City of Welland Staff, Official Plan Amendment (“OPA”) and Zoning By-law Amendment (“ZBA”) applications are required to facilitate the proposed development, followed by a Site Plan Application (“SPA”) which would be filed subsequent to the approval of the OPA / ZBA applications. To advance the planning approvals, the need for a Record of Site Condition (“RSC”), is requested to be deferred to the Site Plan Stage, in which the future SPA will address the RSC requirement.

The proposed OPA will redesignate the subject site from *Light Industrial* to *Residential* on Schedule B (Land Use Map) and will add the subject site as *Medium Density Residential* on Schedule B1 (Residential Hierarchy Land Use Map) in the in-force City of Welland Official Plan, as amended. Furthermore, the OPA will provide site-specific exceptions for density (exception to Policy 4.2.2.3.A) and permission for a 4-storey building within the low-rise apartment housing land use permission (site-specific permission within Policy 4.2.2.3.B).

Given the advanced state of the Draft New Welland Official Plan, not yet in force and effect, the proposed OPA would also see a change to the Draft New Welland Official Plan. Specifically, the subject site would be redesignated from *Light Industrial* to *Medium Density Residential* on Schedule B (Land Use) of the Draft New Welland Official Plan. Furthermore, the OPA will provide one site-specific exception for density (exception to draft Policy 4.2.2.3.1). A site-specific exception to clarify height is not required to the Draft New Welland Official Plan as draft new Policy 4.2.2.3.3 clarifies that mid-rise developments of 4 to 8 storeys is contemplated.

The proposed ZBA will rezone the subject site from the Light Industrial “L1” zone to the Residential Medium Density “RM” zone with site-specific exceptions to facilitate the proposal.

Draft implementation by-laws have been prepared for the OPAs and the ZBA and are enclosed with the complete application.

Following the approval of the OPA and ZBA Applications, a SPA will be submitted to facilitate the development of the subject site as proposed.

The Proposal conforms with the Niagara Region Official Plan and no amendment is required.

# 4.0 POLICY & REGULATORY CONTEXT & RESPONSES

## 4.1 Planning Act

The Planning Act, R.S.O. 1990, c. P.13 (the “Planning Act”) is the primary piece of legislation that governs land use planning in Ontario. It provides the legal foundation for how land can be used, developed, and protected, and ensures that planning decisions are made in a way that promotes orderly growth, environmental sustainability, and the public interest. Section 2 of the Planning Act outlines the matters of provincial interest for which the council of a municipality, a local board, a planning board and the Tribunal shall have regard to, in carrying out their responsibilities pursuant to the legislation. Matters of provincial interest include, among others:

- the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;
- the orderly development of safe and healthy communities;
- the adequate provision of a full range of housing, including affordable housing;
- the adequate provision of employment opportunities;
- the appropriate location of growth and development;
- the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;
- the promotion of built form that is well designed, encourages a sense of place and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant; and
- the mitigation of greenhouse gas emissions and adaptation to a changing climate.

Accordingly, we have set out the criteria for evaluating development applications that decision-makers must have regard to when carrying out their planning responsibilities (Section 2 of the Planning Act), and have provided a response to each criteria below:

***Table 2 - Section 2 Planning Act Criteria & Responses***

Criteria Section 2 of the Planning Act	Responses
(a) the protection of ecological systems, including natural areas, features and functions;	Not applicable. There are no ecological systems, including natural areas, features and functions within or adjacent to the subject site. An Environmental Impact Assessment has not been requested as supporting material. The subject site also does not contain any Niagara Peninsula Conservation Authority regulated areas.
(b) the protection of the agricultural resources of the Province;	Not applicable. The Proposal would result in the intensification of land within the City of Wellands Urban Boundary and the Proposal does not impact existing

	agricultural land as designated in both the Niagara Region and Welland Official Plans.
(c) the conservation and management of natural resources and the mineral resource base;	Not applicable. There are no natural or mineral resources within the or adjacent to the subject site.
(d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	<p>The subject site was previously designated under Part IV of the Ontario Heritage Act, R.S.O. 1990, c. O.18 ("OHA") by By-law 2002-123, passed by City Council on July 16, 2002, recognizing the former Vaughan Seed Company building for its architectural and historical value. The building, completed in 1909, was a rare, intact example of early 20th-century industrial architecture, notable for its original wooden post-and-beam construction, preserved interior features, and seed processing machinery. It also held associative value through its founder, Marshall "Mark" Vaughan, a prominent local political figure. <u>The building was destroyed by fire on June 8, 2008, and City Council subsequently repealed By-law 2002-123.</u> At the time the structure burned down it was unoccupied. As a result, the site no longer holds heritage designation or status under the OHA. The previous building on site (prior to its destruction by fire) is shown below)</p>  <p>Source: Welland Heritage Advisory Committee &amp; Welland Historical Museum. (2017). <i>Reminiscing About Welland</i>.</p>
(e) the supply, efficient use and conservation of energy and water;	Upper Canada Consultants ("UCC") was retained to assess servicing and stormwater management for the Proposal. The supply, efficient use and conservation of energy and water was part of their preliminary work. UCC found that the proposed development will be adequately serviced by existing municipal infrastructure, with a new 150mm water connection for domestic water service and fire protection tied to the watermain on Victoria Street. The proposed building will be constructed to the new Ontario Building Code standards which significantly improves energy efficiency standards, aligning closely with the performance of LEED Silver in some areas, particularly for building envelope, HVAC, and energy use intensity; however, while it raises the baseline over



	<p>previous codes, it does not fully meet LEED Silver requirements. In addition, the proposed building will be 4-storey wood-frame apartment building. Wood-frame construction is inherently energy efficient due to the natural insulating properties of wood, and mid-rise buildings typically have lower heating and cooling demands per unit compared to single detached homes. Additionally, compact multi-unit developments reduce water consumption through shared plumbing systems and more the use of efficient fixtures (e.g., low flow faucets and toilets, energy efficient lighting and appliances, etc.), contributing to reduced resource use and operational efficiency across the building lifecycle.</p>
(f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	<p>See response above regarding water services. UCC also found that sanitary flows will directed to an existing 300mm sanitary sewer with ample capacity, and stormwater managed through on-site controls that discharge to an existing 600mm storm sewer on Victoria Street. Fire flow requirements are met by nearby hydrants, and stormwater quality will be enhanced to MECP standards using CB Shield devices. Satisfactory arrangements will be made with utility and telecommunications providers during the site plan stage.</p>
(g) the minimization of waste;	<p>The Proposal represents a form of infill and intensification of lands within the Urban, Built Boundary and Built-Up Area of the City. Intensification and infilling within urban, built-up areas minimize waste by maximizing the use of existing infrastructure and land, reducing the need for urban sprawl. This limits the consumption of undeveloped land and resources, decreases energy and material waste from extending services, and promotes more efficient land use, reducing urban sprawl and its associated environmental impacts.</p>
(h) the orderly development of safe and healthy communities;	<p>The Proposal within the Urban, Built Boundary of the City contributes to the orderly development of safe and healthy communities by integrating seamlessly with existing infrastructure, services, and transportation networks. It promotes efficient land use, supports walkability, and ensures access to essential services like schools, parks, shops, and healthcare. By concentrating development within the urban, built-up area, it contributes towards creating a sense of community, places where growth where growth is intended, and enhances safety through well-planned streets and public spaces, ultimately supporting a healthier and more cohesive urban environment.</p>
(h.1) the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;	<p>Full accessibility for persons with disabilities was considered for within the proposed building and across all applicable public realm interfaces within the Proposal. Adequate accessible parking stalls have been included within the</p>

	Proposal and further accessible design will be addressed at site plan approval.
(i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;	<p>The Proposal will be well-served by nearby facilities, including multiple schools, daycare, and recreational amenities. Overall, there is limited but sufficient capacity for schools in the area to support infill-related growth at the subject site, though some students may need to be accommodated through interim measures. Long-term solutions, including school additions or new builds, remain subject to school board approval and provincial funding. The NCDSB also collects education development charges to support long-term accommodation planning.</p> <p>Social and cultural services, such as the Welland Historical Museum, and the Welland Farmers Market ensure a balanced provision of educational, health, and community resources within either a 15-minute walk or quick car or bus trip.</p>
(j) the adequate provision of a full range of housing, including affordable housing;	<p>The Proposal will contribute 35 purpose-built rental units, helping to diversify the local housing stock. It is also intended that a portion of these units be offered as true affordable housing. However, this can only be achieved through financial support from the Canada Mortgage and Housing Corporation (CMHC), which requires certain prerequisites—such as planning approvals—to be met prior to funding approval.</p> <p>Even if CMHC funding is not secured, the proposed purpose-built rental units will still provide more attainable housing options. While they may not meet the definition of affordable housing, rental units generally serve as a more accessible entry point into the housing market, offering lower-cost alternatives to traditional ownership options such as single-detached homes, semi-detached homes, townhouses, and condominiums.</p>
(k) the adequate provision of employment opportunities;	Not applicable.
(l) the protection of the financial and economic well-being of the Province and its municipalities;	The Proposal efficiently utilizes underused, serviced land for residential intensification, contributing to municipal tax base growth without the need for major new infrastructure investments.
(m) the co-ordination of planning activities of public bodies;	The Proposal maintains the general purpose and intent of the City of Welland's Official Plan and Zoning By-law, and will undergo coordinated municipal review through the site plan approval process, ensuring alignment with public agency requirements.

(n) the resolution of planning conflicts involving public and private interests;	There is no indication of unresolved planning conflicts, suggesting that any potential conflicts have been or will be addressed through the planning process. In addition, development respects neighbourhood character and mitigates compatibility concerns by adhering to a 45-degree angular plane and providing increased setbacks to adjacent low-rise homes.
(o) the protection of public health and safety;	The Proposal meets Ontario Building Code standards and incorporates barrier-free design, a well-lit pedestrian site, and a drive aisle and fire access route intended to support resident safety and accessibility.
(p) the appropriate location of growth and development;	The site is within the Urban, Built-Up area and serviced urban boundary, representing appropriate infill in proximity to existing services, transit, and amenities, consistent with provincial intensification goals and making it an appropriate location for growth and development.
(q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;	The Proposal reduces reliance on cars. The subject site is in close proximity to multiple transit routes, including the 501, 505, and 506 routes. The Proposal also includes short and long-term bicycle parking spaces creating transportation demand management solutions to help reduce dependence on vehicles. As well, the Proposal includes walkable connections to nearby streets with sidewalks, promoting modal shift and compact, transit-supportive residential growth.
(r) the promotion of built form that, (i) is well-designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;	The mid-rise form is visually articulated, integrates materials that reflect historic context, and incorporates a homage to historical uses, and streetscaping that contribute to identity, site beautification, and pedestrian experience.
(s) the mitigation of greenhouse gas emissions and adaptation to a changing climate.	The inclusion of EV-ready parking, small unit sizes, walkability, and bike facilities supports a lower-carbon lifestyle and adaptation to climate goals through compact, energy-conscious design.

## Conclusions

Based on the foregoing, it is our opinion that the Proposal has had appropriate regard for the matters of provincial interest set out in Section 2 of the Planning Act.

## 4.2 Provincial Planning Statement

On August 20, 2024, the Ministry of Municipal Affairs and Housing (“MMAH”) released a new Provincial Planning Statement (“2024 PPS”). The 2024 PPS is intended to be a streamlined land use policy framework that replaces the Provincial Policy Statement 2020 and the Growth Plan for the Greater Golden Horseshoe 2019. It builds on housing-supportive policies from both documents and provides municipalities with the tools and flexibility to increase housing supply, align development

with infrastructure for a competitive economy, support rural viability, and protect agricultural lands, the environment, and public health and safety.

The 2024 PPS provides policy direction on matters of provincial interest related to land use planning and development. As a key part of Ontario's policy-led planning system, the 2024 PPS sets the policy foundation for regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians. The 2024 PPS came into force and effect on October 20, 2024.

## Planning for People and Homes

Section 2.1 of the PPS provides policy direction on planning for people and homes, with the overall intent of building homes, and sustaining strong and competitive communities.

In this regard, Policy 2.1.3 provides that sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon. Accordingly, Policy 2.1.4 states that, to provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

- a) *maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and*
- b) *maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*

The Proposal is consistent with Policies 2.1.3 and 2.1.4 of the 2024 PPS. The proposed Official Plan and Zoning By-law Amendments will facilitate a development that will create 35 new purpose-built rental units. This will diversify the housing stock and support residential growth and intensification within the urban area. The Proposal also aligns with servicing capacity requirements, providing new homes land with available servicing that has capacity to accommodate the growth.

Policy 2.1.6 states that planning authorities should support the achievement of complete communities by:

- a) *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated childcare facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*
- b) *improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and*
- c) *improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.*

The Proposal supports the achievement of complete communities by contributing to the range and mix of housing options within the community. This will increase the number of residential dwellings in close proximity to multiple transit routes, schools, daycares, parks and community services.

## Housing

Section 2.2 of the 2024 PPS provides policy direction with respect to housing in Ontario. Accordingly, Policy 2.2.1 states that planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- a) *establishing and implementing minimum targets for the provision of housing that is affordable to low- and moderate-income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;*
- b) *permitting and facilitating:*
  - 1. *all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and*
  - 2. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
- c) *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
- d) *requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.*

The PPS defines housing options as a range of housing types such as, but not limited to single-detached, semidetached, rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, laneway housing, garden suites, rooming houses and multi-residential buildings, including low-and mid-rise apartments. The term can also refer to a variety of housing arrangements and forms such as, but not limited to, life lease housing, co-ownership housing, co-operative housing, community land trusts, land lease community homes, affordable housing, additional needs housing, multigenerational housing, student housing, farm worker housing, culturally appropriate housing, supportive, community and transitional housing and housing related to employment, educational, or institutional uses, such as long-term care homes.

The PPS also defines "Affordable", which refers to housing that is financially accessible to low- and moderate-income households. For ownership housing, it means the least expensive option between a home that costs no more than 30% of a household's gross annual income or one priced at least 10% below the average resale price in the municipality. For rental housing, it refers to the lower cost between a unit with rent that does not exceed 30% of a household's gross annual income or one with rent at or below the average market rent in the municipality.

The Proposal is consistent with Policy 2.2.1 of the PPS as it contributes to an appropriate range and mix of housing options and densities within the regional market area. The development introduces



35 purpose-built rental units, including a significant proportion of small-format units, which help meet the needs of low- and moderate-income households and respond to changing demographics such as smaller household sizes and aging populations. While not all units are formally designated as affordable, the project has been intentionally designed to allow for the inclusion of affordable housing units (per the PPS definition) subject to funding from the CMHC, demonstrating alignment with the goal to bring true affordable housing to market. The Proposal facilitates residential intensification through the redevelopment of a vacant, previously developed urban site, resulting in a net increase in housing supply and the more efficient use of land and infrastructure. The four-storey mid-rise building achieves a compact built form that is well-suited to its context and efficiently utilizes existing municipal servicing and public facilities. Its design promotes active transportation through the inclusion of bicycle parking and a walkable site layout, and the site is located within proximity to local transit, supporting transit-oriented development. Overall, the Proposal supports this policy by promoting compact, diverse, and transit-supportive housing that addresses both current and future housing needs.

## Settlement Areas

Section 2.3 of the 2024 PPS provides policy direction with respect to settlement areas in Ontario, which is a defined term. Settlement areas are urban areas and rural settlement areas within municipalities (such as cities, towns, villages and hamlets). Ontario's settlement areas vary significantly in terms of size, density, population, economic activity, diversity and intensity of land uses, service levels, and types of infrastructure available. Settlement areas are: a) built-up areas where development is concentrated, and which have a mix of land uses; and b) lands which have been designated in an official plan for development over the long term.

The subject lands are located within the City of Welland which is considered a settlement area as per the 2024 PPS.

According to Policy 2.3.1.1, settlement areas are the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas. In this regard, Policy 2.3.1.2 states that land use patterns within settlement areas should be based on densities and a mix of land uses which:

- a) *efficiently use land and resources;*
- b) *optimize existing and planned infrastructure and public service facilities;*
- c) *support active transportation;*
- d) *are transit-supportive, as appropriate; and*
- e) *are freight-supportive.*

Furthermore, Policies 2.3.1.3 to 2.3.1.6 provides that planning authorities should promote intensification and redevelopment to create complete communities by planning for diverse housing options and prioritizing investment in infrastructure and public service facilities. They must set minimum targets for intensification within built-up areas and are encouraged to establish density targets in designated growth areas. Phasing policies may be implemented to ensure orderly development and align it with the timely provision of infrastructure and public services.

The subject site is located within a settlement area as defined by the PPS. The Proposal is consistent with the general policies for settlement areas under Section 2.3.1 by focusing growth within a

designated settlement area, promoting efficient land use patterns, and optimizing existing infrastructure. The Proposal contributes to intensification and redevelopment, aligning with policies that promote complete communities by contributing to the range and mix of new housing options. Additionally, the Proposal supports orderly development as the Subject Site, within the *Urban, Built-Up* area of the City provides a logical location for residential development as a transition between residential and industrial land uses. Growth is aligned with infrastructure provision, as the subject lands are located in the *Urban, Built-Up* area of the City with existing and available municipal water and wastewater services to service the Proposal.

### **Strategic Growth Areas**

Section 2.4 of the 2024 PPS provides policy direction with respect to Strategic Growth Areas in Ontario. Strategic growth areas are locations within settlement areas, nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating intensification and higher density mixed uses in a more compact built form. Strategic growth areas include major transit station areas, existing and emerging downtowns, lands in close proximity to publicly assisted postsecondary institutions and other areas where growth or development will be focused, that may include infill, redevelopment (e.g., underutilized shopping malls and plazas), brownfield sites, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.

Policy 2.4.1.1 states that planning authorities are encouraged to identify and focus growth and development in strategic growth areas. [

Policies 2.4.1.2 and 2.4.1.3 provide that, in order to support complete communities, strategic growth areas should be planned to accommodate significant population and employment growth, serve as hubs for education, commerce, and recreation, and support the transit network. These areas should also prioritize affordable and accessible housing. Planning authorities are encouraged to focus infrastructure and public service investment in these areas, define appropriate development types and scales, promote redevelopment of underutilized commercial spaces for mixed-use residential, and consider a student housing strategy when planning for strategic growth areas.

Although the subject site is not formally located within a designated strategic growth area, it exhibits many of the key characteristics associated with such areas. The site is situated within the City's *Urban, Built-Up* area, where growth through infill and intensification is directed, and is located near multiple existing transit routes, as well as existing major streets at the edge of a residential neighbourhood. Furthermore, the Proposal represents a form of urban infill and brownfield revitalization. Collectively, these characteristics make the site a suitable and desirable location for the proposed development, aligning with the definition and intent for Strategic Growth Areas in the PPS.

### **Employment**

Section 2.8 of the 2024 PPS provides policy direction with respect to employment in Ontario. Specifically, Policy 2.8.1.1 states that planning authorities shall promote economic development and competitiveness by:

- a) *providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
- b) *providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c) *identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
- d) *encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and*
- e) *addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.*

In this regard, Policy 2.8.2 of the PPS provides policy direction for employment areas of the province. Employment areas are those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1)<sup>1</sup> of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above. Specifically, the PPS provides the following policies for employment areas in the province:

*2.8.2.1. Planning authorities shall plan for, protect and preserve employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs.*

*2.8.2.2. Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.*

*2.8.2.3. Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:*

- a) planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;*
- b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;*

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<sup>1</sup> An “area of employment” refers to land designated in an official plan for clusters of business and economic uses such as manufacturing, research and development, warehousing, and related retail or office uses. It excludes institutional uses and general commercial uses, including retail and office functions not directly tied to industrial or economic activities.

*c) prohibiting retail and office uses that are not associated with the primary employment use;*

*d) prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and*

*e) including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.*

*2.8.2.4. Planning authorities shall assess and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas. In planning for employment areas, planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas.*

Locational context is key. While the broader Urban Area supports a mix of uses—including residential, commercial, institutional, and employment—the subject site is not within an area the Region has identified for long-term protection as a strategic employment area. Those areas are directed to lands east of the Welland (Ship) Canal and north of Regional Road 27 between the recreational and ship canals. As such, the Region has not identified the site as a critical component of Niagara’s employment land base that would necessitate the strict protection of industrial or employment-focused functions as now contemplated by the PPS.

Furthermore, with the refined definition of “employment area” in the PPS, the intended purpose of such areas has been narrowed to clusters of business and economic activities specifically tied to manufacturing, warehousing, goods movement, and research and development connected to manufacturing. The subject site is currently designated as *Light Industrial* in the City of Welland Official Plan, which in our opinion, is no longer consistent with the updated 2024 PPS definition of an “Employment Area.”

The purpose and intent of land designated *Light Industrial* is to provide areas for employment through low-impact industrial activities that do not generate adverse effects. These areas are intended to accommodate uses such as light manufacturing, assembly, research and development, warehousing, and related industrial offices. Limited retail and service commercial uses may also be permitted if they support the needs of workers within the area. Light Industrial areas are designed to maintain high standards of building design and landscaping, ensure compatibility with surrounding uses (which in this case is residential), and minimize negative impacts on adjacent sensitive land uses (again, residential).

The PPS definition for employment areas explicitly excludes institutional and general commercial uses such as standalone retail or office functions not associated with industrial activities. The *Light Industrial* designation permits a broader and more flexible range of uses, including minor retail and service commercial uses, which are not consistent with the narrower, employment-focused definition set out in the PPS.

Moreover, the subject site is situated at the interface of a light industrial area and an established residential neighbourhood. While the *Light Industrial* policies aim to minimize adverse impacts, the site’s proximity to sensitive residential uses, in our opinion, would raise compatibility concerns with

future industrial development in the form envisioned by the PPS (e.g., heavy manufacturing) and may be better suited to lands in Welland that are delineated by the Region as *Core Employment*, or perhaps even, *General Industrial* – the City’s prestige employment land use category.

The nature of the site and its context—bordered by residential uses and lacking functional cohesion with larger contiguous industrial blocks—makes it less suitable for future employment uses as envisioned by the PPS.

Given the surrounding context, the lack of existing active industrial use, and the site's physical separation from more viable industrial clusters, we are of the opinion that the subject site is better suited for residential or mixed-use development. Redevelopment would also support broader provincial and municipal objectives for infill, intensification, and housing supply while addressing compatibility at the industrial-residential interface through sensitive site design.

Land outside of delineated employment areas such as the subject site, is not intended to be associated with these primary employment activities, and as such, is not necessary to be protected and preserved, making the site eligible for conversion to residential land. This change in policy direction reinforces the need to differentiate between true “employment areas” and other non-employment areas that may historically have been captured under broader or legacy industrial designations.

### **Sewage, Water and Stormwater**

Section 3.6 of the 2024 PPS identifies policies for sewage, water and stormwater services in Ontario. In this regard, Policy 3.6.1 states that, planning for sewage and water services shall:

- a) *accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services;*
- b) *ensure that these services are provided in a manner that:*
  - 1. *can be sustained by the water resources upon which such services rely;*
  - 2. *is feasible and financially viable over their life cycle;*
  - 3. *protects human health and safety, and the natural environment, including the quality and quantity of water; and*
  - 4. *aligns with comprehensive municipal planning for these services, where applicable.*
- c) *promote water and energy conservation and efficiency;*
- d) *integrate servicing and land use considerations at all stages of the planning process;*
- e) *consider opportunities to allocate, and re-allocate, if necessary, the unused system capacity of municipal water services and municipal sewage services to support efficient use of these services to meet current and projected needs for increased housing supply; and*
- f) *be in accordance with the servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5.*

Accordingly, Policy 3.6.2 sets out that municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services mean a sewage works within the meaning of section 1 of the Ontario Water Resources Act that is owned or



operated by a municipality, whereas municipal water services mean a municipal drinking-water system within the meaning of section 2 of the Safe Drinking Water Act, 2002.

Furthermore, Policy 3.6.8 provides that stormwater management planning should be integrated with sewage and water services, ensuring systems are optimized and financially viable over their life cycle. It should aim to minimize stormwater volumes, contaminant loads, and erosion, while using green infrastructure to maintain water balance. The planning should mitigate risks to human health, property, and the environment, maximize vegetative surfaces, and promote best practices like stormwater reuse and low-impact development. Additionally, it should align with municipal plans that consider stormwater impacts on a watershed scale.

The Proposal aligns with the policies in Section 3.6 by infilling and intensifying land within the urban area on existing municipal sewage services and municipal water services. It leverages existing municipal sewage services and municipal water services, minimizing the need for major servicing upgrades. UCC's servicing report confirms the adequacy of utilities and municipal services for the site, ensuring proper management of sanitary, water, and stormwater needs, while supporting intensification within the settlement area, and confirming that stormwater management will be integrated with sewage and water services, ensuring systems are optimized.

### **Land Use Compatibility**

Section 3.5 of the 2024 PPS provides policy direction with respect to land use compatibility in Ontario. Policies 3.5.1 and 3.5.2 provide that major facilities and sensitive land uses must be planned to avoid or, if not feasible, minimize and mitigate adverse effects such as odour, noise, and contaminants. This also includes minimizing risks to public health and ensuring the long-term viability of major facilities. If avoidance is not possible, adjacent sensitive land uses should only be permitted if potential adverse effects are mitigated, and impacts to industrial or manufacturing facilities are minimized, all in accordance with provincial guidelines and standards.

Major facilities are facilities which may require separation from sensitive land uses, including but not limited to airports, manufacturing uses, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries, energy generation facilities and transmission systems, and resource extraction activities.

The proposed development is subject to Ontario's Ministry of the Environment, Conservation and Parks (MECP) D-series guidelines, such as the D-1 and D-6 Guidelines, for example, which ensures compatibility between industrial and sensitive land uses, like homes. The D-6 Guidelines suggest minimum separation distances for different classes of industrial facilities to mitigate adverse effects, such as noise, odour, and emissions. Given that the subject lands are within 1,000 metres of several industrial activities, a Land Use Compatibility Study was completed by Sonair Environmental (dated December 31, 2024) to ensure compliance with MECP guidelines.

The Land Use Compatibility Study was conducted in accordance with MECP Guidelines D-1, D-6, and NPC-300, and evaluated potential air quality and noise impacts associated with introducing a sensitive land use into a mixed residential, commercial, and industrial area. The assessment reviewed surrounding facilities within a 1,000-metre radius and identified several Class I and II industrial operations. Facilities such as Ward Industrial Equipment Inc., Canada Forgings Inc., and the commercial plaza at 300 Lincoln Street were found to either meet the minimum separation

distance requirements or hold valid environmental approvals. Site visits confirmed no significant concerns related to dust, odour, noise, or vibration.

The assessment determined that transportation noise from surrounding roads and the adjacent railway would exceed NPC-300 thresholds at several façades. As a result, the study recommended provisions for central air conditioning for affected units and the registration of Warning Clause “C” on title, leases, and purchase and sale agreements. Due to the site’s proximity to industrial operations and the rail corridor, Warning Clause “E” was also recommended for all residential units. A stationary noise assessment of the plaza and Ward Industrial Equipment Inc. confirmed compliance with NPC-300 Class 1 noise limits during all periods.

The study concluded that, with the inclusion of the recommended mitigation measures and warning clauses, the proposed development would be compatible with surrounding land uses and would not constrain the continued operation of nearby facilities. It was further recommended that a follow-up noise assessment be completed at the site plan stage, once details of on-site mechanical systems are finalized, to confirm compliance with applicable noise guidelines.

Furthermore, in our opinion, placing a four-storey mid-rise residential apartment building adjacent to existing low-rise single-detached homes is compatible from a residential to residential land use perspective as it supports a gradual transition in built form and density, consistent with principles of gentle intensification and complete communities. The proposed development maintains a residential use in keeping with the surrounding neighbourhood to the west and south while offering a broader range of housing options to meet diverse demographic and affordability needs. With appropriate design measures—such as setbacks, massing articulation, and landscaping—the development can be integrated sensitively into the existing context without creating adverse impacts related to privacy, shadowing, or character.

Overall, we believe the Proposal is consistent Section 3.5 of 2024 PPS by ensuring compatibility with industrial activities in the vicinity, effectively mitigating potential conflicts and safeguarding public health and safety.

## **Conclusions**

Overall, in our opinion, the Proposal is consistent with the Provincial Planning Statement including the policies outlined for efficient use of land and infrastructure within settlement areas, the provision of a range and mix of housing options, the creation of healthy, active, and inclusive communities, and the assurance that land uses are appropriate and compatible with one another.

## **4.3 MOECP Compatibility**

The Ministry of the Environment, Conservation and Parks (MECP) safeguards Ontario's air, land, and water. In the 1990s, the MECP introduced D-series and other guidelines to determine suitable separation distances between industrial and sensitive land uses (such as homes, schools, or hospitals) to prevent adverse effects from incompatible land use.

MECP Guideline D-1 focuses on land use and compatibility and was developed to guide land use planning authorities in determining whether proposed land uses or developments are appropriate from an environmental and public health perspective. Its primary aim is to prevent or minimize adverse effects—such as noise, odours, air emissions, or vibration—arising from the encroachment

of incompatible land uses, especially where industrial facilities and sensitive land uses may conflict. The guideline applies when changes in land use are proposed, particularly where a new sensitive use is introduced near an existing facility, or vice versa. It encourages the use of separation distances and other buffering measures to achieve compatibility and supports informed planning decisions that supplement existing legislative controls. Although it is not retroactive, the guideline promotes early recognition of compatibility issues during the planning process and provides procedures and definitions to aid implementation and interpretation.

MECP Guideline D-6 focuses on industrial uses near sensitive areas and outlines separation requirements. Industrial facilities are categorized into three classes based on emissions, size, and operations, with specific buffer distances recommended for each class to minimize impacts.

Historically, facilities that do not meet the criteria of the associated category definitions have little to no potential to create nuisance issues resulting in complaints. Recommended minimum separation distance and potential influence area between industrial facilities and sensitive land uses for each class are set out in the D-6 Guidelines. Accordingly, potential influence areas for industrial land uses are generally as follows:

- Class I—70 metres
- Class II—300 metres
- Class III—1000 metres

Environmental Noise Guideline - Stationary and Transportation Sources - Approval and Planning (NPC-300) is another guideline on land use compatibility that focuses on the proper control of sources of noise emissions to the environment. The guidelines NPC-300 ensures sources of emissions to the environment are adequately controlled to prevent potential negative effects.

As previously discussed, a Land Use Compatibility Study has been prepared as the subject site is located within 1,000 metres of existing industrial land uses. The Land Use Compatibility Study, prepared by SONAIR Environmental Inc. and dated December 31, 2024, was completed in support of a proposed four-storey, 35-unit residential development at 111 Victoria Street in Welland. Conducted in accordance with MECP Guidelines D-1, D-6, and NPC-300, the study evaluated potential air quality and noise impacts associated with introducing a sensitive land use into a mixed residential, commercial, and industrial area. The assessment reviewed surrounding facilities within a 1,000-metre radius and identified several Class I and II industrial operations. Facilities such as Ward Industrial Equipment Inc., Canada Forgings Inc., and the commercial plaza at 300 Lincoln Street were found to either meet the minimum separation distance requirements or hold valid environmental approvals. Site visits confirmed no significant concerns related to dust, odour, noise, or vibration.

The assessment determined that transportation noise from surrounding roads and the adjacent railway would exceed NPC-300 thresholds at several façades. As a result, the study recommended provisions for central air conditioning for affected units and the registration of Warning Clause “C” on title, leases, and purchase and sale agreements. Due to the site’s proximity to industrial operations and the rail corridor, Warning Clause “E” was also recommended for all residential units. A stationary noise assessment of the plaza and Ward Industrial Equipment Inc. confirmed compliance with NPC-300 Class 1 noise limits during all periods.

The study concluded that, with the inclusion of the recommended mitigation measures and warning clauses, the proposed development would be compatible with surrounding land uses and would not constrain the continued operation of nearby facilities. It was further recommended that a follow-up noise assessment be completed at the site plan stage, once details of on-site mechanical systems are finalized, to confirm compliance with applicable noise guidelines.

## 4.4 Niagara Region Official Plan

The Niagara Region Official Plan (NROP) serves as the strategic planning framework for growth in the Niagara region, guiding development through 2051. Initially approved in June 2022, it underwent 45 modifications by the Minister of Municipal Affairs and Housing in November 2022. Bill 150, enacted in 2023, reversed many of these changes to align with the province's housing goals while maintaining public trust. Key modifications pertained to policies on agriculture, residential development, and natural resources. Bill 162 later introduced additional adjustments, with the NROP's May 2024 consolidation now in effect. Bill 23 also made changes to Niagara Region's role in land use planning. As of March 31, 2025, the NROP is no longer a Regional Plan, and is now considered to be a local official plan for the 12 local municipalities in Niagara, including Welland.

Accordingly, the subject site is subject to the policies within the NROP, requiring conformity.

The subject site is identified within the settlement area of the City of Welland on Schedule A – Local Area Municipalities and are designated as *Delineated Built-Up Area*, one of the Region's urban area designations on Schedule B - Regional Structure (see **Figure 8** below). Furthermore, the site is not identified as having any natural heritage resources as per Schedule C1 (Natural Environment System Overlay and Provincial Natural Heritage Systems) of the NRP (see **Figure 9** below).

In addition, the subject site is located outside of any of the Region or City's employment areas as delineated on Schedule G (Employment Area), and instead the site is shown as *Urban Areas* (see **Figure 10** below). The subject site is not located along any provincial or regional roads, nor is it found within the conceptual planned corridor or the area of influence of the Niagara Central Dorothy Rungeling Airport on Schedule J1 (Transportation Infrastructure) of the NROP (see **Figure 11** below).

Lastly, the subject site has not been identified as being a part of any urban expansion areas or future employment areas as per Appendix 2 (Urban Expansion Areas and Future Employment Areas) of the NROP (see **Figure 12** below).

Figure 14 - NROP Schedule B (Regional Structure)

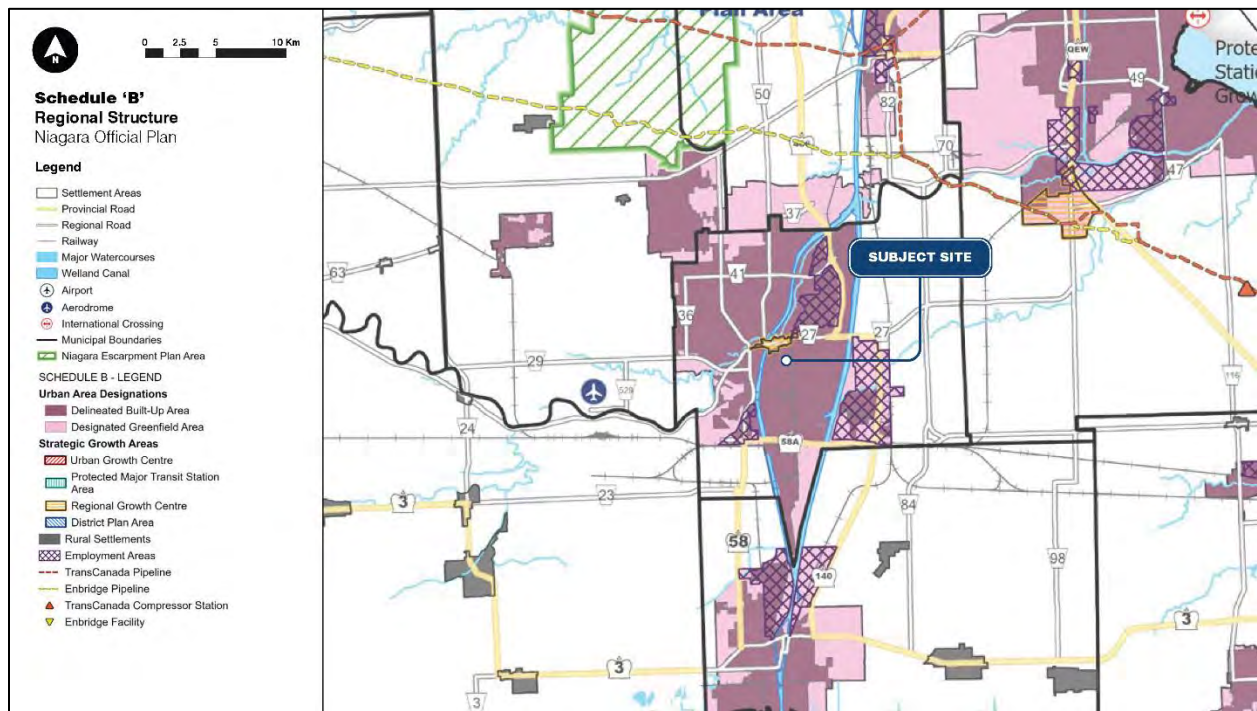


Figure 15 – NROP Schedule C1 (Natural Environment System Overlay and Provincial Natural Heritage Systems)

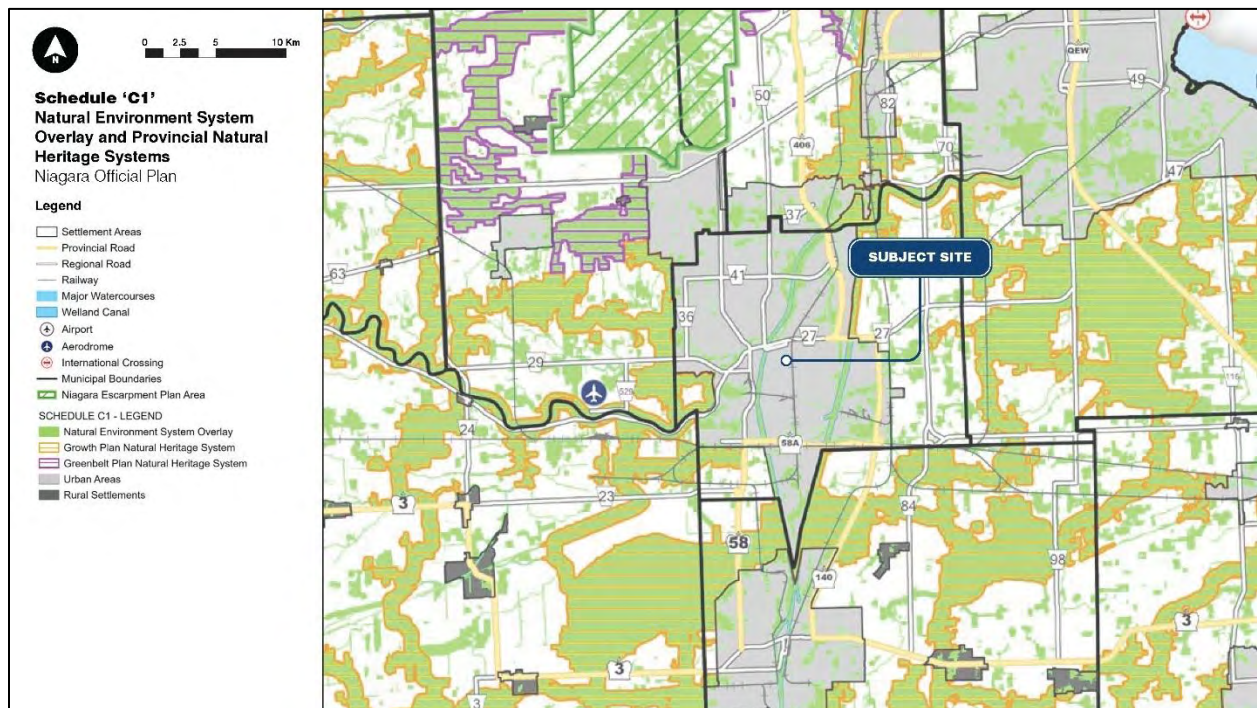




Figure 16 - NROP Schedule G (Employment Area)

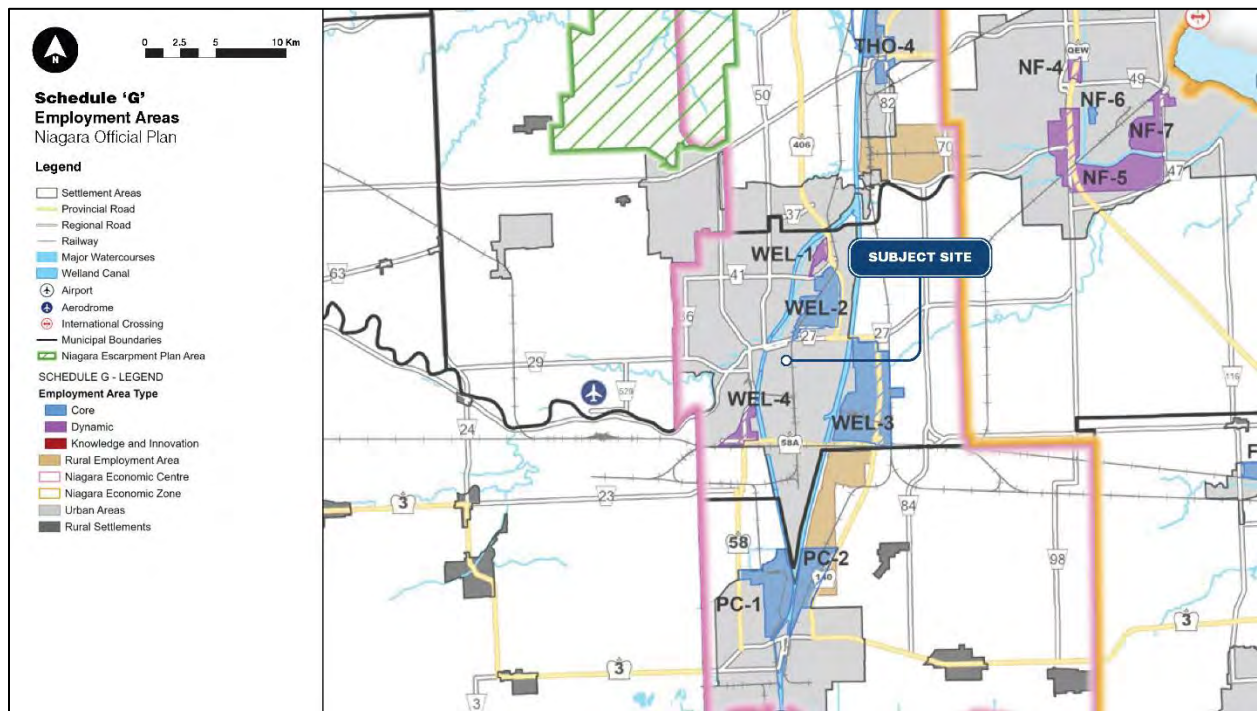


Figure 17 - NROP Schedule J1 (Transportation Infrastructure)

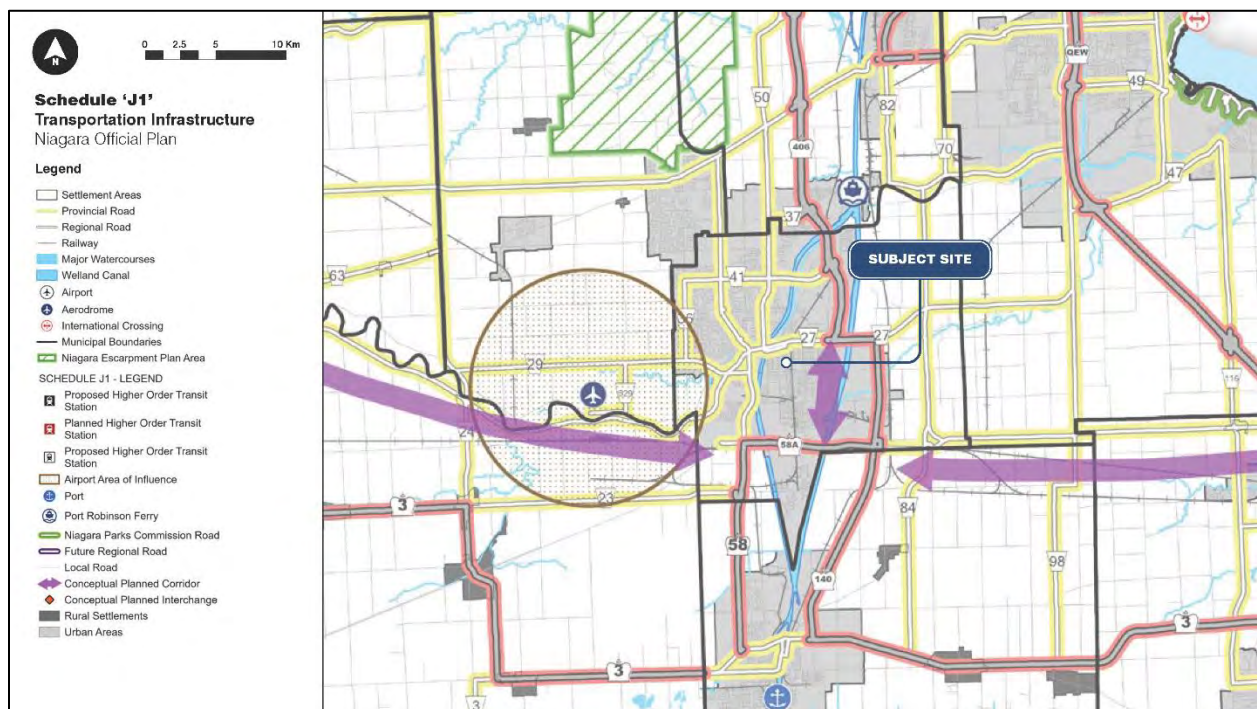
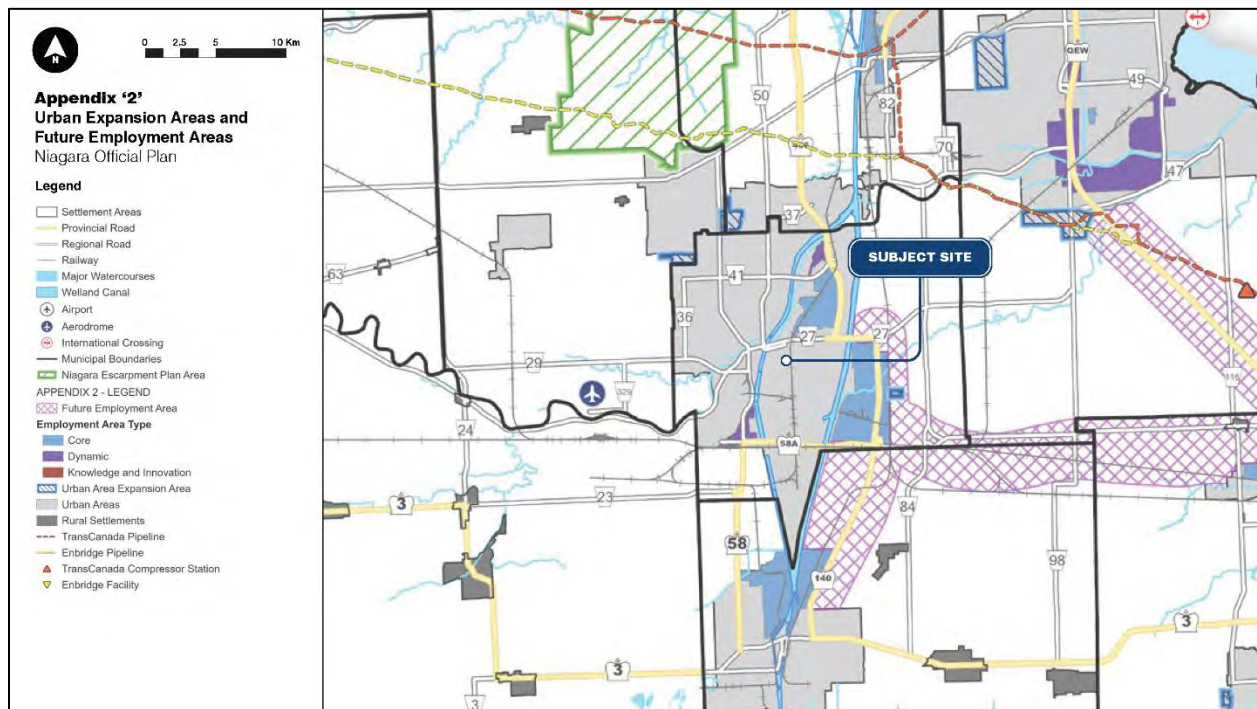


Figure 18 - NROP Appendix 2 (Urban Expansion Areas and Future Employment Areas)



Section 2.1.1 sets out policies for Regional Growth Forecasts. Specifically, policy 2.1.1.1 identifies population and employment forecasts for all lower tier municipalities that are the basis for all land use decisions to 2051. Table 2-1 of the NROP identifies that by 2051 the City of Welland is forecasted to have a population of 83,000 and 28,790 jobs. Policy 2.1.1.2 states that forecasts in Table 2-1 are a minimum. Further, policy 2.1.1.4 states that forecasts in Table 2-1 are used to determine the location and capacity of infrastructure, public service facilities, and the delivery of related programs and services to 2051.

Section 2.2 of the NROP provides that most development will occur in urban areas, where municipal water and wastewater systems/services exist or are planned, and a range of transportation options can be provided. Policy 2.2.1.1 provides that development in urban areas (which includes designated the delineated built-up areas) will integrate land use planning and infrastructure planning to responsibly manage forecasted growth and to support (among others):

- the intensification targets in Table 2-2 and density targets outlined in the NROP;
- a compact built form, a vibrant public realm, and a mix of land uses, including residential uses, employment uses, and public service uses, to support the creation of complete communities;
- a diverse range and mix of housing types, unit sizes and densities to accommodate current and future market-based and affordable housing needs;
- built forms, land use patterns and street configurations that minimize land configurations that minimize land consumption, reduce costs of municipal water and wastewater systems/services, and optimize investments in infrastructure;
- opportunities for transit-supportive development;

- opportunities for intensification, including infill development, and the redevelopment of brownfields and greyfield sites;
- opportunities for the integration of gentle density, and a mix and range of housing options that considers the character of the established residential neighbourhoods;
- the development of a mix of residential built forms in appropriate locations, such as local growth centres, to ensure compatibility with established residential areas; and
- orderly development in accordance with the availability and provision of infrastructure and public service facilities.

The proposed OPA and ZBA will facilitate a development that will conform with Section 2.1.1 and 2.2 of the NROP by supporting population and employment growth forecasts through 2051. The development integrates with urban areas, utilizing existing and planned infrastructure such as municipal water, wastewater services, and transportation. It contributes to accommodating intensification targets, provides an intensified residential use, and supports compact, transit-oriented development. Additionally, the Proposal provides a diverse built form and housing option, and encourages orderly development in line with available infrastructure and public services.

### **Strategic Intensification and Higher Densities**

Section 2.2.2 of the NROP provides policy direction with respect to the Region's strategy and locations for intensification and higher density developments.

Accordingly, Policy 2.2.2.1 states that, within urban areas, forecasted population growth will be accommodated primarily through intensification in built-up areas with particular focus on the following locations:

- a. *strategic growth areas, including:*
  - i) *Downtown St. Catharines urban growth centre;*
  - ii) *protected major transit station areas;*
  - iii) *regional growth centres; and*
  - iv) *district plan areas identified in Section 6.1;*
- b. *areas with existing or planned public service facilities;*
- c. *other locations with existing or planned transit service, with a priority on areas with existing or planned frequent transit service; and*
- d. *local growth centres and corridors, as identified by Local Area Municipalities.*

Furthermore, Policy 2.2.2.5 provides that a Regional minimum of 60 percent of all residential units occurring annually will be within built-up areas, while Policy 2.2.2.6 states that local area municipalities (such as the City of Welland) must establish intensification targets in their official plans that meet or exceed the targets identified in Table 2-2. In this regard, Table 2-2 sets out the Region's minimum residential intensification targets by local area municipality between 2021 to 2051. It is noted that local area municipalities may also plan for additional intensification units and higher intensification rates within built-up areas than those identified in Table 2-2 for infrastructure purposes as it reflects development trends and land use permissions at the time of local conformity. Table 2-2 requires a minimum residential intensification target of 75% and 10,440 units for Welland.

NROP Policy 2.2.2.10 requires local intensification strategies to be implemented through official plans and zoning by-laws, identifying areas for development with compact built forms, supporting

complete communities. These strategies should prioritize growth centres, promote higher densities, mix land uses, and support transit infrastructure. They also emphasize preserving cultural heritage, and revitalizing underutilized areas. Additionally, intensification opportunities, including infill and brownfield redevelopment, should be considered, alongside the efficient provision of water and wastewater services while assessing fiscal impacts on municipalities.

The proposed OPA and ZBA, if approved, would facilitate a development that conforms with NROP Policy 2.2.2 by developing on vacant and underutilized land within the urban, built-up area of Welland, an area where forecasted population growth is to be primarily accommodated. The subject site is in an area with existing public service facilities and transit services, and the resulting 4-storey apartment building will help contribute to a more compact built form. The Proposal contributes towards achieving Welland's minimum intensification target (75% and 10,440 units by 2051), set out in Table 2-2 by providing up to 35 new residential units. Additionally, the Proposal supports infill development and brownfield remediation, cleaning up previously industrial land, optimizing water and wastewater infrastructure, and all while creating new housing.

## Housing

Section 2.3 of the NROP sets out policy direction with respect to housing in the Region, ensuring an adequate housing supply as an essential for quality of life. A diverse range of housing types, sizes, and tenures is needed to meet evolving community needs. The Region aligns with its Housing and Homelessness Action Plan, promoting diverse housing options that foster complete communities and economic growth. Land use tools and targets aim to increase housing accessibility, encourage innovation, and mitigate climate change impacts. Objectives include providing diverse, affordable housing and using planning tools to achieve housing goals.

Section 2.3.1 of the NROP sets out policies to provide a mix of housing options. Specifically, policy 2.3.1.1 states that 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. Policy 2.3.1.3 provides that the forecasts in Table 2-1 will be used to maintain, at all times: a. the ability to accommodate residential growth for a minimum of 15 years through residential intensification, and lands designated and available for residential development; and b. where new development is to occur, land with servicing capacity to provide at least a three-year supply of residential units through lands suitably zoned to facilitate residential intensification, and lands in draft approved or registered plans.

Policy 2.3.1.4 states that new residential development and residential intensification are encouraged to be planned and designed to mitigate and adapt to the impacts of climate change by facilitating compact built form and incorporating sustainable housing construction materials or practices, green infrastructure, energy conservation standards, water efficient technologies, and low impact development.

The Proposal conforms with these policies by providing purpose-built rental units in various sizes all within a more compact apartment and in a context dominated by single-detached homes. The intent for the apartment is to include a proportion of the units as true affordable apartment rentals. This aligns with the Region's focus on ensuring an adequate supply of affordable housing for low and moderate-income households across the planning horizon and for provide a more diverse selection of housing options for future residents. The Proposal also supports the creation of complete



communities by offering a different housing type that caters to varying needs of current residents and future residents while repairing a section of broken street frontage. It also emphasizes climate change resilience through compact design and wood construction at new Ontario Build Code requirements which are close to LEED Silver status, aligning with policies promoting energy conservation and efficient use of resources; as well as policies promoting intensification and brownfield remediation. Moreover, it ensures sufficient land and servicing capacity to accommodate long-term residential growth, adhering to the NROP's housing objectives.

Section 2.3.2 and 2.3.3 of the NROP provide policies pertaining to the provision of affordable and attainable housing and the tool for achieving the same.

The NROP provides policy direction that generally aligns with the Region's Housing and Homelessness Action Plan to meet housing needs, including affordable and specialized housing. Minimum targets are set at 20% affordable rental housing and 10% affordable ownership housing. The Region collaborates with municipalities and agencies to identify surplus lands for housing and prioritizes brownfield and greyfield redevelopment for mixed-use intensification. Affordable housing should be near transit, water systems, and public services. Local policies must regulate rental conversions to protect affordable housing supply, considering vacancy rates and housing affordability.

The NROP outlines tools to support affordable and attainable housing development. These include allowing flexible housing forms, streamlining approvals, offering financial incentives like grants and tax reductions, and promoting mixed unit sizes in developments. Reduced site standards for additional residential units and inclusionary zoning in transit areas are also encouraged. Local municipalities must allow up to two additional residential units by right and are encouraged to develop housing strategies that include specific targets, planning tools, and performance indicators to address local housing needs.

The proposed OPA and ZBA will facilitate a development that will result in the creation of 35 new purpose-built rental units, with the goal of setting aside a proportion of the units as true affordable housing. However, this can only be achieved through financial support from the Canada Mortgage and Housing Corporation (CMHC), which requires certain prerequisites—such as planning approvals—to be met prior to funding approval. Even if CMHC funding is not secured, the proposed purpose-built rental units will still provide more attainable housing options. While they may not meet the definition of affordable housing, rental units generally serve as a more accessible entry point into the housing market, offering lower-cost alternatives to traditional ownership options such as single-detached homes, semi-detached homes, townhouses, and condominiums.

Additionally, the purpose-built rental tenure of the proposed development, aligns with the flexibility encouraged for attainable housing under the NROP's planning tools. This adaptability allows the project to potentially contribute to rental housing supply over time, supporting long-term attainability goals. Overall, the Proposal conforms with the general purpose and intent of the NROP by offering a varied unit sizes and price points, further contributing and diversifying the housing mix of the neighbourhood; as well as, providing the opportunity for future rental housing development, which aligns with the Region's objectives for inclusive and accessible housing options.

## Employment Land Conversion

Section 4.0 of the NROP outlines the Region's approach to planning for employment, with the goal of protecting lands to accommodate the Province's forecasted employment growth. The NROP defines "employment land" as lands that are designated in Local official plans or zoning by-laws for employment uses. Employment lands may be within and outside of employment areas. Employment areas on the other hand, are defined as areas designated in an official plan for clusters of business and economic activities including, but not limited to manufacturing, warehousing, offices, and associated retail and ancillary facilities.

The overarching objectives are to designate and protect employment areas, support economic resilience, accommodate a diverse mix of employment types, and guide the redevelopment of employment lands. Employment areas are classified into Core, Dynamic, and Knowledge and Innovation types, with uses and densities tailored accordingly. Policies 4.2.1.1 to 4.2.4.10 establish detailed land use permissions, minimum density targets, compatibility considerations with sensitive land uses, and directions for future employment areas and economic gateways.

These policies apply specifically to lands identified as employment areas on Schedule G and Appendix 2 of the NROP. The subject site, however, is located outside any delineated Employment Area on Schedule G and is not designated as a future employment area or urban expansion area in Appendix 2. The site is instead identified as within the Urban Area, which signals its intended function as part of a broader community accommodating residential and mixed-use development.

Given that the subject site is not shown as an existing or future employment area on Schedule G or Appendix 2, and it does not fall within the Niagara Economic Gateway or any of the Region's designated employment clusters, the general employment policies in Section 4.2.1 to 4.2.4 are not directly applicable to the site. These policies are tailored to the planning, protection, and intensification of lands specifically designated for employment. Since the site was never intended to function as such in this NROP, its conversion to a non-employment use does not undermine regional employment objectives. Instead, the site's designation within the Urban Area and its absence from employment mapping support the appropriateness of alternate land uses, such as residential development, which would contribute to complete communities and align with the NROP's growth management framework.

Section 4.2.5 of the NROP addresses the redevelopment of employment lands located outside of designated Employment Areas. It states that if non-employment uses are proposed, the redevelopment must retain space to accommodate a similar number of jobs on-site. Local official plans may establish their own criteria for evaluating such proposals; if they do not, the Region and municipalities may apply the Region's Employment Land Redevelopment Criteria Guideline (Appendix 3). Additionally, the Region and municipalities are directed to discourage any redevelopment that would hinder the operation or expansion of nearby existing or planned employment uses.

Appendix 3 of the NROP outlines the criteria for employment lands conversion that proposes criteria concerned with the impacts, maintaining an appropriate mix of uses and usage of infrastructure. Accordingly, we have outlined the criteria for evaluating the conversion of employment lands in table form, and have provided a response to each criteria below:

Criteria	Responses
<p>1. Minimize the risk to public health and safety by mitigating any potential adverse impacts from odour, noise, vibration, and other contaminants, and to ensure the long-term operational and economic viability of land uses that may require separation from sensitive land uses in accordance with Provincial guidelines, standards and procedures.</p>	<p>A Land Use Compatibility Study was completed by SONAIR Environmental Inc. (Dec 2024) in accordance with MECP Guidelines D-1, D-6, and NPC-300. The study confirmed that all nearby industrial uses were compliant with environmental approvals and that no adverse air, odour, or noise impacts are expected. Transportation noise exceedances were addressed with mitigation measures including central air conditioning and the use of warning clauses. The study also concluded that, with the inclusion of the recommended mitigation measures and warning clauses, the proposed development would be compatible with surrounding land uses and would not constrain the continued operation of nearby facilities.</p>
<p>2. There is an identified need for the proposed uses.</p>	<p>There is a clearly identified need for new homes in the City of Welland, as outlined in the Growth Management Background Review (September 2021) prepared as part of the City's Official Plan Review. Between 2021 and 2051, Welland is forecast to grow by 26,790 people, requiring 13,930 new housing units (p. 2, Section 2). Of these, 10,440 units are directed to the Built-Up Area (where the site is located) and of those 40% is forecasted as apartment units, supporting a 75% intensification target (p. 3, Section 2). Intensification is to be focused on Downtown Welland, identified as a Regional Growth Centre with a planned density of 125 residents and jobs per hectare (p. 7, Section 4), as well as other key areas such as brownfields, the Recreational Waterway, and transit corridors (p. 10, Section 5). The City's 115 hectares of designated DGA land, largely in Northwest Welland (OPA #29), is sufficient to accommodate this growth, with no need for additional Community Area expansion (p. 3 and 9, Sections 2 and 5).</p> <p>The Niagara Region Official Plan 2051 Land Needs Assessment (June 2022) also identifies a need for new homes in Welland. The Niagara Region Official Plan 2051 Land Needs Assessment concludes that Welland is forecast to grow to a population of 83,000 by 2051, requiring 37,540 households—an increase of approximately 13,930 new units between 2021 and 2051 (p. 11, Table 1). Of these, 75% (10,440 units) are directed to the Built-Up Area, where the site is located (p. 22, Table 8). Within the Built-Up Area, housing will primarily be medium- and high-density forms, including 3,330 townhouses and 4,190 apartments (p. 23, Table</p>

	<p>9). Growth within the Built-Up Area will be focused in and around Downtown Welland, which is identified as a Regional Growth Centre with a minimum planned density of 125 people and jobs per hectare by 2051 (p. 21, Table 7). While the document discusses the Region's broader aim to address core housing need and improve housing affordability—particularly through the promotion of higher-density forms like row houses and apartments—it does not provide specific targets or mandates for purpose-built rental or affordable rental housing in Welland. However, it notes that increased supply of these forms is essential to reducing core housing need (p. 17, “Housing Affordability”).</p>
<p>3. Alternative locations for the proposed uses have been evaluated and there are no reasonable alternative locations.</p>	<p>The subject site is a vacant and underutilized parcel within the Built-Up Area. Redevelopment here avoids further greenfield consumption. Alternative sites are not available to the owners of the site, and other site's would not necessarily offer the same level of transit access, integration with community services, locational benefits, or alignment with intensification and brownfield redevelopment objectives.</p>
<p>4. Adverse effects to the proposed sensitive land use(s) are minimized and mitigated.</p>	<p>All air and noise impacts were reviewed and confirmed that any impacts can be mitigated through setbacks, building design, and warning clauses. In addition, the building itself falls entirely under a 45-degree angular plane from adjacent homes, with landscape buffering and building articulation reducing visual impacts.</p>
<p>5. Potential impacts to industrial, manufacturing or other uses are minimized and mitigated.</p>	<p>The Land Use Compatibility Study found no constraints imposed on existing industrial uses. With mitigation, the proposed residential use will not introduce conditions that would impede their continued operation or expansion.</p>
<p>6. The proposed use(s) will maintain or improve the appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs.</p>	<p>The previous industrial building on site was unoccupied when it burnt down in 2008, and record of the true number of jobs from the previous industrial use on site has been lost. The subject site has remained vacant for over 16 years, having not been developed or occupied since prior to 2008. As a result, there are currently no jobs on site that require preservation. The longstanding vacancy highlights a lack of market interest in traditional employment uses on this portion of the corridor, despite its designation locally in Welland. The proposal to redevelop the site introduces a new use that will help fulfill the broader intent of the area by contributing to a more complete, mixed-use urban fabric. In doing so, it will restore a broken section of street frontage that has detracted from the cohesion and functionality of the surrounding area. By introducing active uses where</p>



	<p>none have existed for over a decade, the proposal supports a more diverse and adaptable land use pattern, better aligning with long-term planning objectives for a complete community.</p> <p>Notwithstanding, the City of Welland 2022 Development Charges Background Study uses persons per unit (PPU) metrics of 2.11 for apartments with two or more bedrooms and 1.20 for bachelor or one-bedroom units, resulting in an estimated on-site population of about 48 people. The Niagara Region 2022 Development Charges Background Study provides similar but slightly different PPU values: 1.991 for two-bedroom apartments, 1.214 for one-bedroom units, and a general high-density average of 1.690, yielding a projected population of 47 to 59 people depending on the metric used. While the Niagara study notes that 8% of the workforce worked from home in 2016, it does not project this forward. Based on this figure, it can be assumed that approximately 4 to 5 residents may work from home at full occupancy, thereby maintain some degree of employment on site.</p>
<p>7. The proposed use(s) will support opportunities for a diversified economic base and take into account the needs of existing and future businesses.</p>	<p>The previous industrial building on site was unoccupied when it burnt down in 2008, and record of the true number of jobs from the previous industrial use on site has been lost. The subject site has remained vacant for over 16 years, having not been developed or occupied since prior to 2008. Its prolonged vacancy demonstrates that traditional employment uses have not found the site viable or attractive, despite its designation. As well, the Proposal introduces population growth that will support local businesses and services. Construction and property management will create ongoing job opportunities, while infill development adds to the long-term economic resilience of the area. Rather than displacing existing jobs—which do not exist on the site—the proposal enhances the conditions for existing and future businesses by reintegrating the property into the urban framework of the area. This adaptive use of a long-underutilized site reflects changing market realities while supporting broader goals for a resilient and mixed-use economy.</p> <p>With respect to opportunities for a diversified economic base, see response above, but based on PPU metrics from the 2022 Welland and Niagara Region DC Studies, the proposal is expected to house 47–59 people at full occupancy. Using Niagara's historical 8% work-from-</p>

	home rate, approximately 4 to 5 residents may work from home.
8. The proposed use(s) are compact mixed-use development that incorporates compatible employment uses to support livable and resilient communities.	<p>While the proposal does not include dedicated employment uses, it represents a compact residential infill development on a site that has remained vacant for over 16 years, since prior 2008. The redevelopment will repair a long-standing gap in the urban streetscape, enhancing the continuity and livability of the surrounding community. By bringing new residents to the area, the proposal will help support nearby businesses and services, many of which rely on a stable residential base for economic viability. Though not mixed-use in itself, the project contributes to a more complete community by reactivating a site that has failed to attract employment uses for over a decade, in turn supporting the broader goal of creating resilient, well-utilized urban land.</p> <p>The previous industrial building on site was unoccupied when it burnt down in 2008, and record of the true number of jobs from the previous industrial use on site has been lost. With respect to incorporating compatible employment uses, see response above, but based on PPU metrics from the 2022 Welland and Niagara Region DC Studies, the proposal is expected to house 47–59 people at full occupancy. Using Niagara's historical 8% work-from-home rate, approximately 4 to 5 residents may work from home.</p>
9. The site has necessary infrastructure to support current and projected needs.	UCC confirmed existing water, wastewater, and stormwater infrastructure is sufficient. Stormwater will be treated with CB Shields and directed to existing municipal infrastructure on Victoria Street.
10. The proposed use(s) will retain space for a similar number of jobs to remain accommodated on site. Similar number of jobs should be demonstrated by: the existing and/or planned number of jobs for the subject site. The existing number of jobs would be known if the site is developed. The planned number of jobs should be based on applicable land use policies, including any minimum and maximum planned as-of-right employment densities. Employment densities must be converted to number of jobs; and	<p>The subject site has remained entirely vacant since 2008—over 16 years—and has not supported any jobs during that time. As such, there is no existing employment to be retained. While the site is designated for light industrial or employment uses, the persistent lack of development interest since the last use ceased highlights a clear market disconnect between the site's designated function within Welland as <i>Light Industrial</i> and its realistic employment-generating potential.</p> <p>Although employment densities under current land use policies could theoretically support a certain number of jobs, those jobs have not materialized in over a decade and a half. The proposal does not include employment uses, but it responds to this underperformance by introducing a viable residential use that activates the</p>

<p>b. whether the proposed number of jobs is similar to what was existing and/ or planned for the subject site. Similar means like; alike; having general mutual resemblance but not necessarily identical. The amount of retained space should be based on a review of the as-of-right employment uses and permitted space requirements for these uses. The median space requirement of the as-of-right permitted uses should be the threshold for the minimum amount of retained space for employment uses within the proposal.</p>	<p>site and contributes to the local economy indirectly by supporting nearby commercial areas. In this context, the proposal replaces a long-inactive space with a land use that better aligns with surrounding development patterns and community needs, while still contributing to the economic vitality of the area, albeit not through direct job creation on site. Given the prolonged vacancy and lack of realized employment, the proposed number of jobs (zero) is effectively similar to what currently exists—none.</p>
<p>11. The land is not identified as provincially significant through a Provincial plan exercise or as regionally significant by the Region or its affiliated economic development corporation.</p>	<p>Confirmed by NROP Schedules G and Appendix 2, the site is not within or identified as Employment Area or Future Employment Area.</p>
<p>12. The site does not offer direct access to major goods movement facilities and/or corridors.</p>	<p>The site lacks direct access to highways or intermodal transport infrastructure. Hester Lane is a laneway, and Victoria Street is a local road. The site is not viable for goods movement-based industry.</p>
<p>13. All or part of the site is restricted from development or redevelopment by natural heritage feature(s).</p>	<p>No. The site is not constrained by any natural heritage features or regulated areas (per NPCA mapping, NROP Schedule C1, and Welland Official Plan Schedules C, C1, and C2 which identify natural heritage features.).</p>
<p>14. All or part of the site is restricted from development or redevelopment by physical man-made features or other hazardous conditions.</p>	<p>Yes. The site is bordered by a narrow laneway and residential dwellings, limiting access and creating compatibility constraints for larger employment uses, especially those as now defined by the PPS (e.g., heavy manufacturing).</p>
<p>15. The site has qualities or characteristics that makes it less desirable / marketable for employment uses.</p>	<p>Yes. Small lot size, irregular access, surrounding residential interface, and lack of visibility or truck access make the site less marketable for employment or industrial use.</p>
<p>16. The proposed uses are compatible with existing and planned surrounding land uses located within and adjacent to the employment area, including land uses located outside of the urban settlements.</p>	<p>Yes. The design, massing, and siting provide appropriate transition to low-rise homes, while avoiding conflict with adjacent light industrial and commercial uses. The proposal supports a stable, mixed-use context. The Land Use Compatibility Study confirms that the proposal will be compatible for the site through appropriate mitigation and that it will not preclude or</p>

	hinder the continued use or expansion of other nearby employment uses.
17. The proposal is consistent with municipal strategic interests and policies.	Yes. The proposal aligns with the Region and City's growth management goals, intensification targets, and emerging Official Plan policies to accommodate housing and increase density within the Built-Up Area.

## Urban Design

Section 6.2 of the NROP sets out urban design policies. Urban design in the Region of Niagara focuses on creating places that are attractive, functional, and memorable by integrating buildings, outdoor spaces, transportation, and services. The Growth Plan emphasizes enhancing Niagara's natural and built environment through careful design, supporting complete communities with high-quality, compact built forms. The plan outlines regional policies for urban design, transportation, and public spaces, which local municipalities are expected to refine and implement through various tools like official plans, guidelines, and zoning. The key objectives include excellence in design, enhancing public spaces, and promoting active transportation.

The urban design policies are intended to serve as a tool to integrate urban design elements into planning decisions and the preparation of engineering standards undertaken at the Regional scale, such as, the design of Regional Road allowances and public services facilities. At a Local municipal scale, it is expected that the Region's urban design policies will be further refined and implemented through comprehensive Local official plan policies, urban design guidelines, standards, manuals, zoning, and site plan control.

The policies in 6.2.1 emphasize promoting excellence and innovation in urban design by integrating architecture, landscape design, and planning disciplines to create attractive, accessible, and diverse communities. Policies 6.2.1.1 to 6.2.1.2 encourage excellence and innovation in architecture, landscape design, and collaboration among related fields for creating attractive, accessible, and diverse communities. Policies 6.2.1.3 to 6.2.1.8 describe how strategic growth areas should be pedestrian-oriented, supporting mixed-use and vibrant public spaces. Revitalization and sustainable design principles must enhance urban areas, promoting active transportation and compact forms. Policies 6.2.1.9 to 6.2.1.12 provide direction to help foster place-making elements, encourage public art, design public facilities to promote civic pride, and leverage Niagara's waterfront for continuous access and connection.

The policies in Section 6.2.2 focus on designing the public realm and promoting active transportation. Regional roads should adhere to complete streets guidelines, ensuring balanced use for pedestrians, cyclists, and motorists, while prioritizing safety and accessibility. Road networks should minimize travel distances for non-motorists and incorporate sustainable design. Utility infrastructure is encouraged to be buried or co-located underground in intensification areas. Enhancing urban design along Regional Roads includes wayfinding strategies, public art, and pedestrian-friendly infrastructure. Streetscapes should smoothly transition with public spaces and mitigate microclimate impacts like wind and shadowing.

The policies in Section 6.2.3 emphasize the use of urban design tools for implementation. The Region's Model Urban Design Guidelines are intended to align with the Region's Complete Streets



Design Manual, which will eventually be updated to reflect best practices. The Region requires development projects and public works to follow these guidelines, especially when local municipal guidelines are absent. Best practices in accessible design and Crime Prevention through Environmental Design (CPTED) principles will be applied.

In our opinion, the Proposal adheres to NROP's policies on urban design. The Proposal establishes an efficient use of underutilized and vacant land with a well articulated and situated building, providing a higher density in a compact built form.

The proposed 4-storey apartment building has been thoughtfully designed to provide an appropriate and sensitive transition to the adjacent low-rise single-detached homes located to the west and south. Architecturally, the building features a contemporary design with varied materials, including neutral-toned masonry and contrasting vertical siding, which help break up the massing and reduce visual bulk. Elements such as varied rooflines and articulated balconies contribute to a more human-scaled, pedestrian-friendly appearance. The building is strategically sited toward the northeast corner of the property, maximizing physical separation from nearby homes and creating a softer edge along the shared property lines. This siting also supports enhanced landscaping and surface parking at the rear and side of the building, further buffering it from adjacent residential uses. Although not required, the design was tested against a 45-degree angular plane taken from the shared rear and side lot lines; the entire building fits within this plane, demonstrating a deliberate and elective approach to respecting neighbourhood scale and ensuring compatibility with the surrounding low-rise context.

Lastly, due to the nature of the subject site's location, at the interface between residential and industrial lands, the proposed built form acts as an effective transition between the low-rise residential neighbours and the other industrial uses.

### **Conclusions on Conformity with the Niagara Region Official Plan**

In our view, the Proposal conforms with the NROP by aligning with key policies on growth management, intensification, brownfield remediation, housing diversity, compact built form and urban design. It contributes to accommodating population growth targets for Welland, utilizing existing infrastructure and public services while promoting compact, transit-supportive development. The Proposal offers a mix of unit sizes at varying price points, supporting the Region's objective of accommodating affordable housing needs and complete communities. Its design prioritizes pedestrian-friendly environments and sustainable practices, integrating with regional policies on intensification and urban design. Lastly, we believe that each of the Regional criteria for employment land conversions under Appendix 3 have been appropriately satisfied.

## **4.5 Niagara Region Model Urban Design Guidelines**

The Niagara Region Model Urban Design Guidelines ("Model Guidelines") were adopted as part of the Region's Smart Growth initiative to implement ten Smart Growth principles for development and redevelopment. The Guidelines aim to progressively apply these principles through design guidelines for various development types, emphasizing the distinction between public and private realms. The document includes sections on context, public/private realms, sustainability, success factors, and site analysis. Currently, the Region is updating the Guidelines to align with provincial planning policies, focusing on complete communities, resiliency, and sustainability.

In our opinion, the Proposal demonstrates strong alignment with the Niagara Region's Model Urban Design Guidelines by focusing on a compact, residential intensification that prioritizes pedestrian-friendly streetscapes and a utilization of existing infrastructure, while maintaining the character of the surrounding residential neighbourhood. The development incorporates key principles such as a compact built form, diverse building typology, and utilizing efficient land use to support public transit, aligning with Smart Growth objectives. The layout of the proposed development features an efficient use of space on site, enhancement of the Victoria Street and Hester Lane streetscapes and accessibility. The Proposal also promotes higher density development within a predominately low-rise neighbourhood with existing transit, helping to foster a vibrant public realm while preserving the existing character of the surrounding context.

## 4.6 City of Welland Official Plan

The City of Welland Official Plan ("OP") is a comprehensive land use planning document that establishes the long-term vision, goals, and policies to guide growth, development, and resource management in the City over a 20-year horizon. Its purpose is to ensure that Welland evolves as a complete, compact, and sustainable community by managing population, housing, employment, infrastructure, and environmental protection in accordance with provincial and regional policies.

Originally adopted on May 4, 2010, and approved, in part, with modifications and deferrals by Niagara Regional Council on September 15, 2011, the current Official Plan was adopted by Council and approved through a series of amendments, with the consolidated version most recently revised on November 4, 2019. Decisions must conform with the OP, and accordingly, its policies apply to the subject site and the Proposal.

The subject site is located within the City of Welland's *Urban Boundary* and falls inside the *Built Boundary* and *Built-Up Area*, as shown on Schedule A (City Structure) of the Official Plan (see **Figure 13** below). According to Schedule B (Land Use Map), the site is designated *Light Industrial*, while Schedule B1 (Residential Hierarchy Land Use Map) indicates that it is situated adjacent to lands planned for *Low Density* and *Medium Density Residential* uses (see **Figures 14 and 15** below). The site is not identified as containing any natural heritage features on Schedule C (Core Natural Heritage System) (see **Figure 16** below). As per Schedule D (Serviced and Un-serviced Lands), the property is located within the serviced area of the City (see **Figure 17** below). The site is situated along Victoria Street, which is classified as a local road, and lies within approximately 40 metres of Bugar Street, a collector road, as noted on Schedule E (Road Hierarchy) (see **Figure 18** below). Finally, the site is not located along any streets identified for widening on Schedule F (Planned Road Widening) (see **Figure 19** below).

Figure 19 - OP Schedule A (City Structure)

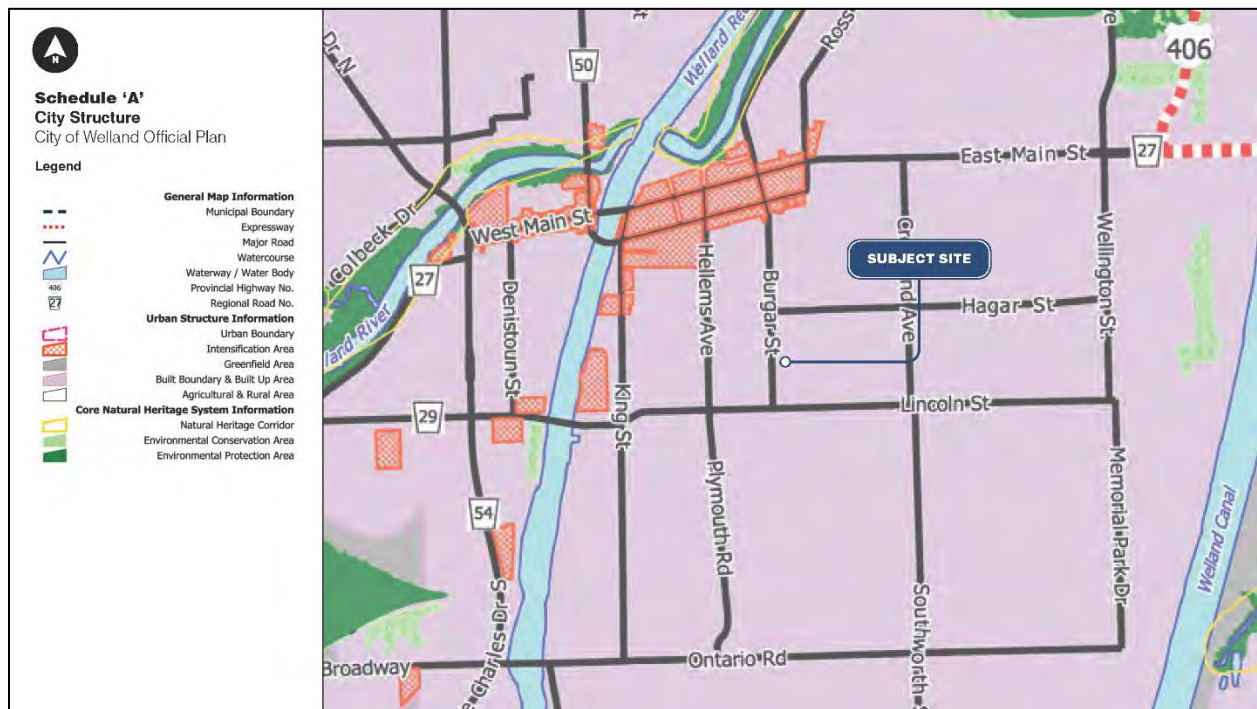


Figure 20 - OP Schedule B (Land Use Map)

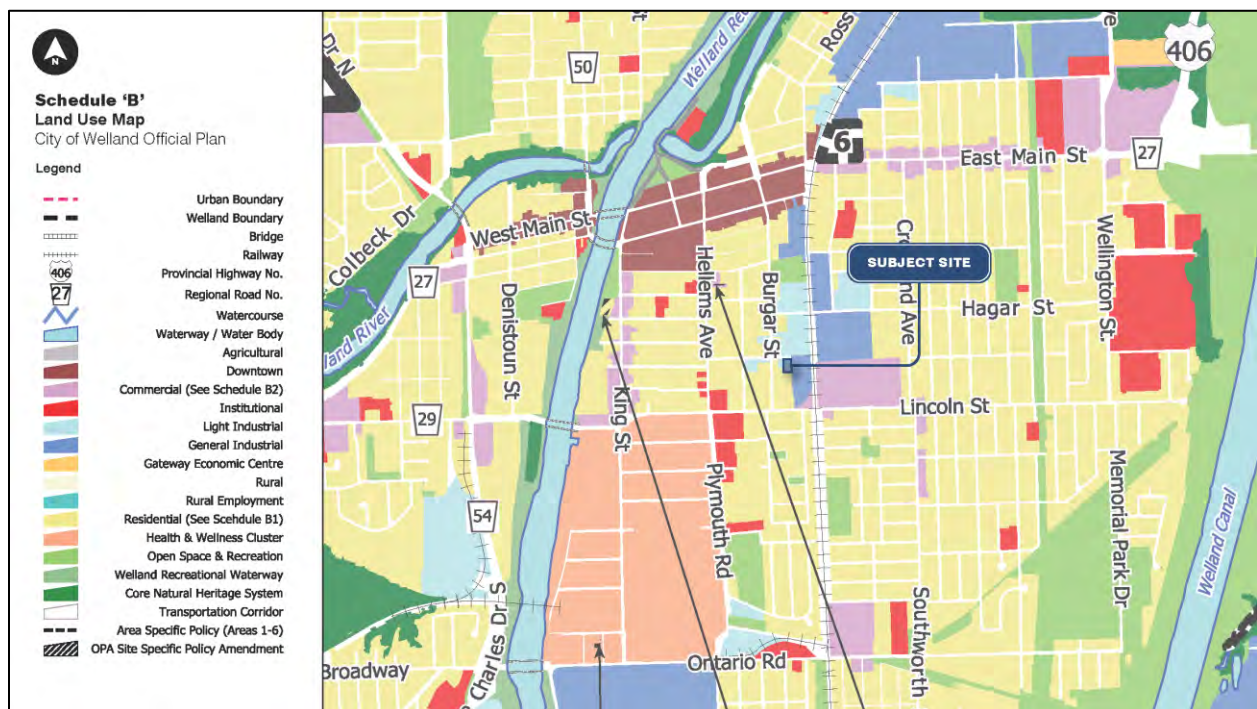




Figure 21 - OP Schedule B1 (Residential Hierarchy Land Use Map)

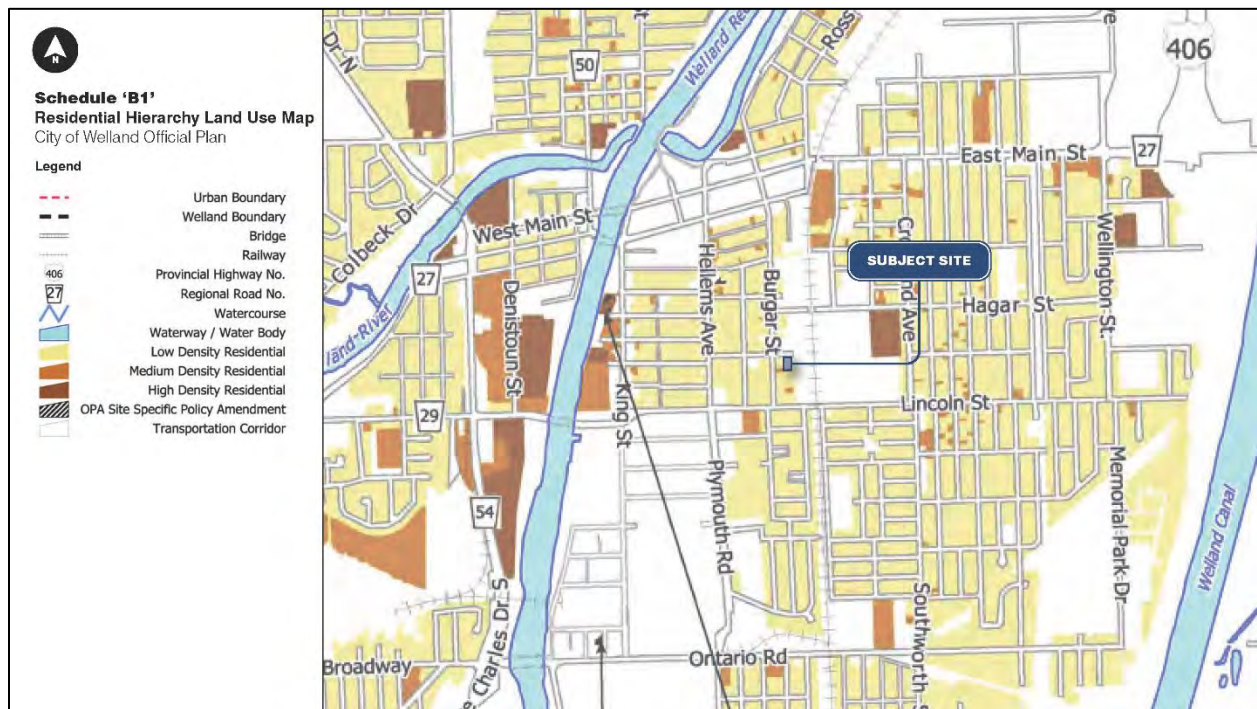


Figure 22 - OP Schedule C (Core Natural Heritage System)

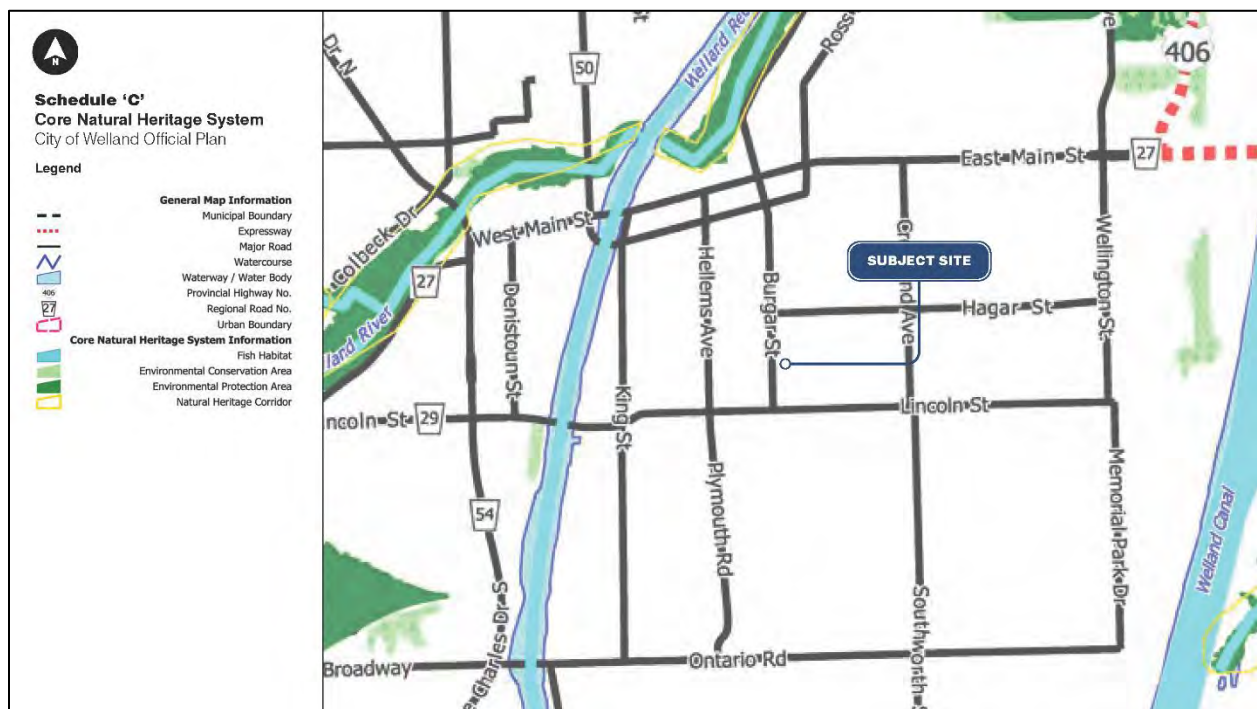




Figure 23 - OP Schedule D (Served and Un-served Lands)

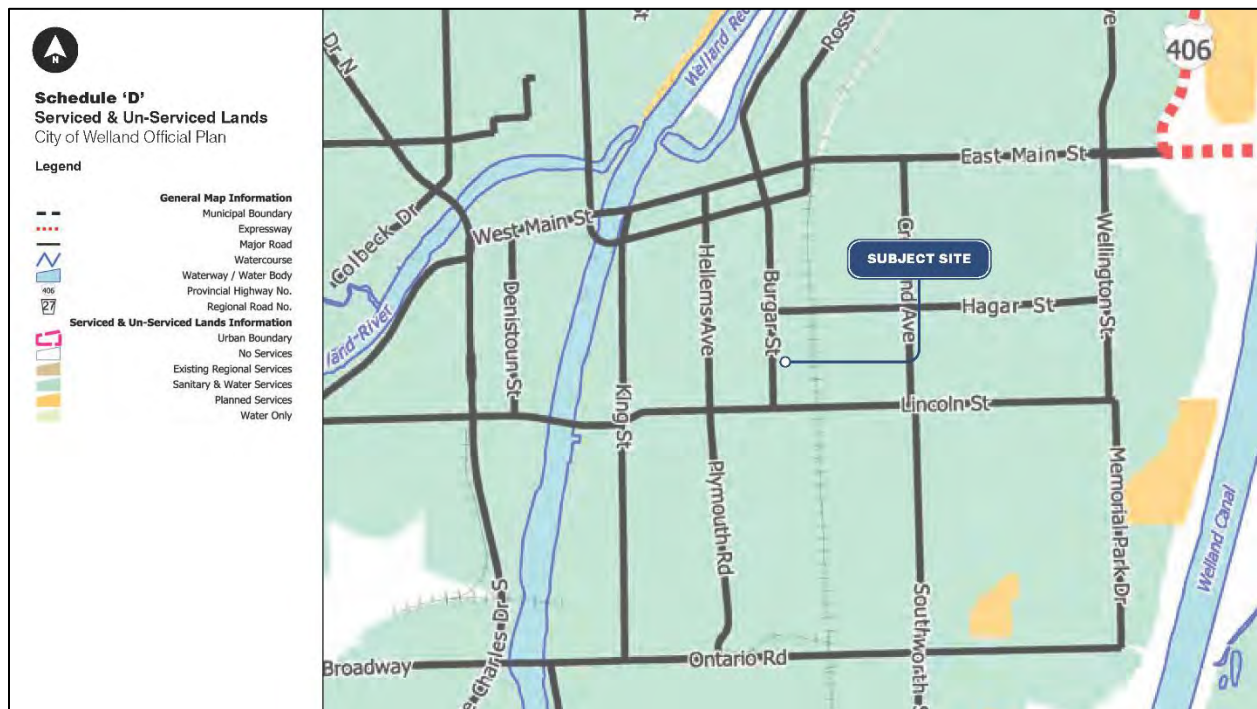


Figure 24 - OP Schedule E (Road Hierarchy)

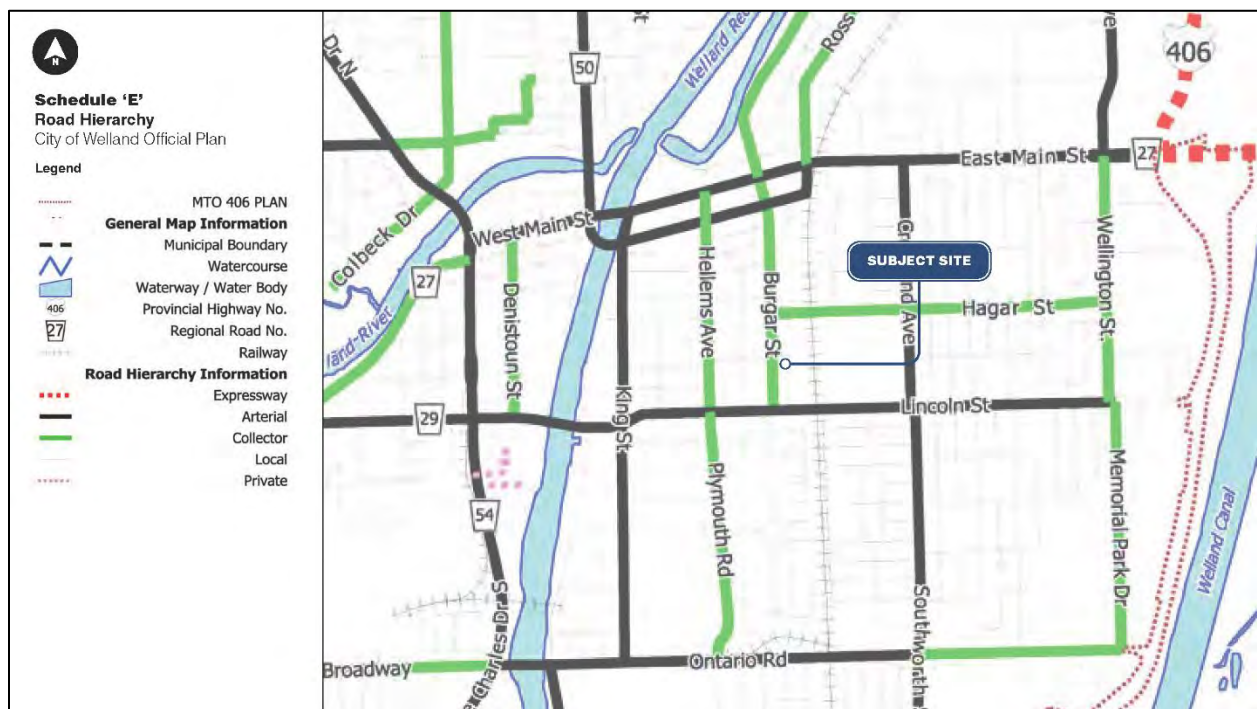
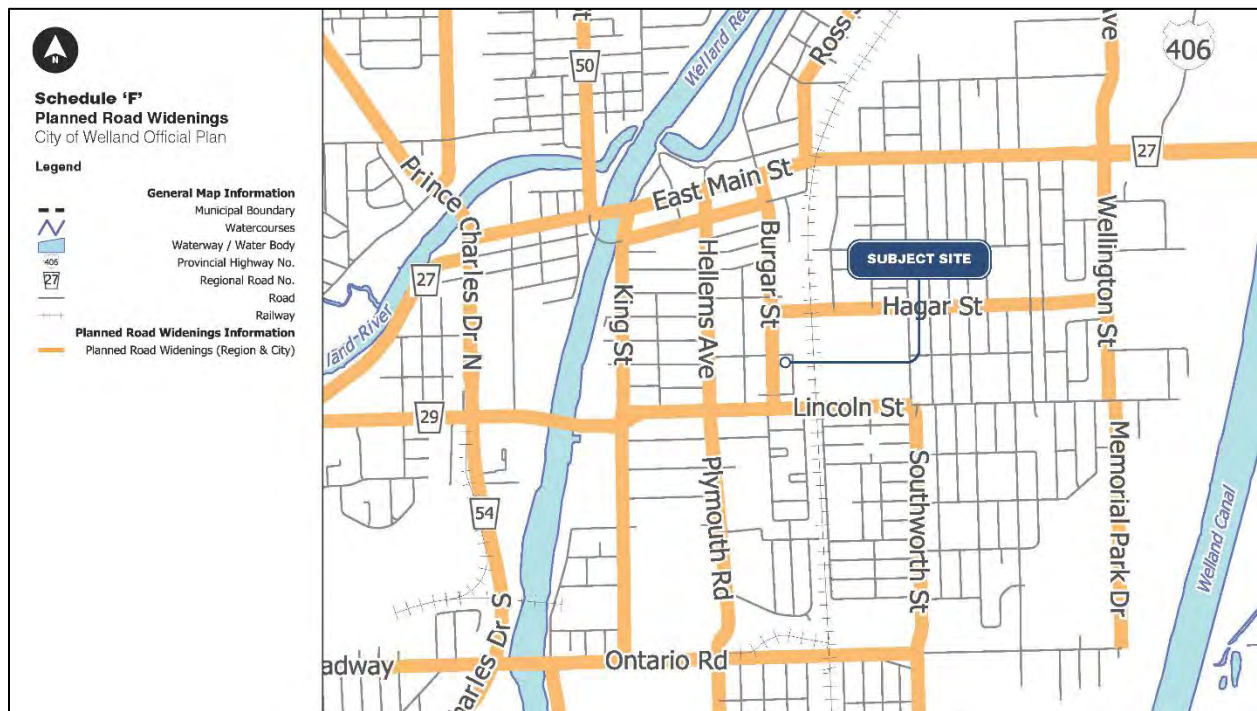


Figure 25 - OP Schedule F (Planned Road Widenings)



Each of the identified characteristics of the subject site carries specific planning implications under the OP, helping to determine the site's development potential, servicing capacity, and relationship to surrounding land uses.

The site's location within the Urban Boundary means it is intended for urban forms of development, supported by full municipal services. Being inside the Built Boundary and Built-Up Area means the site is part of the City's existing developed area and is eligible for intensification, which is a key objective of the City's growth management strategy. This supports redevelopment, infill, and compact urban form.

The Light Industrial designation indicates the site is currently planned primarily for clean industrial, light manufacturing, warehousing, and related uses that have minimal off-site impacts. These areas are important for economic activity but are generally meant to be compatible with adjacent non-industrial uses. However, this designation does not preclude consideration of alternative uses through an Official Plan Amendment, particularly if the site has remained undeveloped or underutilized.

The site's proximity to Low and Medium Density Residential lands suggests a transitional context where residential neighbourhoods are expanding or abutting the industrial designation. This proximity raises considerations for land use compatibility but also supports potential conversion to residential or mixed-use if it contributes to a complete community and is appropriately buffered.

The site's absence of natural heritage features means that development is not constrained by environmental protection policies such as those protecting wetlands, woodlands, or wildlife habitat. This simplifies the development process by reducing the need for environmental impact studies.

Being within the serviced area confirms that the site has or can be connected to municipal water and wastewater infrastructure, which is a precondition for most urban development and redevelopment. This further supports the feasibility of intensification or infill.

The site fronts onto Victoria Street, a local road, and is within 40 metres of Burgar Street, a collector road. Local roads serve lower volumes of traffic and direct site access, while collector roads are intended to carry moderate traffic volumes and link local roads to arterial roads. The proximity to a collector road supports moderate-intensity development with good connectivity and accessibility.

The absence of any planned road widening along the site's frontage means that no future road expansion is anticipated that would impact site design or require land dedication. This adds certainty to the proposed development setbacks and access design.

In summary, the site is a fully serviced, vacant property within Welland's *Built-Up Area* and *Urban Boundary*, adjacent to residential uses, and not subject to environmental or infrastructure constraints. Its current *Light Industrial* designation may be reconsidered through planning applications given its longstanding vacancy and surrounding residential context. Based on this context, the following policies apply.

### **Community Strategic Directions**

The City of Welland Official Plan outlines a series of Community Strategic Directions that collectively guide its long-term vision (Section 2.1.1). These include becoming a leadership community, a complete community, an economic gateway, a sustainable city, a safe and accessible city, a proud and attractive city, and a good neighbour. As a leadership community, Welland aims to lead by example through innovation, adaptability, and collaboration among residents, businesses, and public agencies. It supports pilot projects, the sharing of best practices, and partnerships that promote sustainability across environmental, economic, social, and cultural spheres (Sections 2.2.1–2.2.2).

A complete community is defined as one that meets the daily needs of all residents throughout their lives through a mix of housing, jobs, services, transportation options, and infrastructure such as schools, recreation, and affordable housing (Section 2.3.1). Welland seeks to achieve this by promoting social inclusion, diverse housing, and mixed-use, transit-supportive neighbourhoods. Strategic goals include supporting youth, seniors, and families; encouraging aging-in-place; fostering accessibility; and collaborating with institutions to promote civic engagement and youth employment (Section 2.3.2).

The Plan also promotes sustainability by encouraging decisions that limit negative impacts on the environment, economy, and society for the benefit of future generations (Section 2.5). The City champions green technologies, natural heritage protection, and improved air, land, and water quality. It supports brownfield remediation, water conservation, climate change adaptation, and LEED-based design, while also protecting agricultural land and promoting local food systems.

To foster a safe, healthy, and accessible city, the Plan emphasizes public safety, hazard mitigation, and inclusive design (Section 2.6). Tools like Crime Prevention Through Environmental Design (CPTED) are encouraged, alongside infrastructure investments that address public health risks. Welland also commits to AODA compliance, barrier-free design, and enhanced wellness through recreation and health services.

The Plan envisions a proud and attractive city that values its built and cultural heritage, promotes beautification, and prioritizes quality urban design (Section 2.7). The City supports heritage conservation through the Ontario Heritage Act, encourages cultural expression, and protects archaeological resources. It also emphasizes high-quality design and green spaces to reinforce community identity and livability.

Finally, Welland promotes being a good neighbour through inter-jurisdictional cooperation with the Region, local municipalities, the Niagara Peninsula Conservation Authority, and other partners (Section 2.8). By coordinating efforts in areas like transportation, servicing, environmental stewardship, and economic development—particularly around the Canal and port—the City aims to deliver more efficient, cost-effective services and strengthen regional collaboration.

The Proposal conforms with the strategic directions outlined in Sections 2.1 to 2.8 of the OP. It supports the City's long-term vision (Section 2.1) by contributing to a compact, complete, and sustainable community through the redevelopment of a vacant site within the Built-Up Area. As a leadership community (Section 2.2), Welland encourages innovation and proactive change, which the Proposal reflects by reinvesting in a property that has been vacant for over 16 years. In support of creating a complete community (Section 2.3), the Proposal introduces new housing in proximity to existing residential areas, services, and transit, promoting walkability and inclusive design. The Proposal also advances Welland's goal of becoming a sustainable city (Section 2.5) by utilizing existing infrastructure, minimizing land consumption, and encouraging a compact, walkable urban form.

From a safety and accessibility perspective (Section 2.6), the development repairs a gap in the streetscape and introduces eyes on the street, contributing to public safety and enabling compliance with accessibility standards. The proposal also aligns with the vision for a proud and attractive city (Section 2.7) by transforming a long-neglected lot into a thoughtfully designed infill project that reinforces neighbourhood character and urban design quality. Finally, the project supports Welland's role as a good neighbour (Section 2.8) by aligning with regional growth targets, using existing municipal services efficiently, and contributing to the vitality of the broader regional community through thoughtful and context-sensitive intensification resulting in new homes.

## **Growth Management**

Section 3.1 of the Welland OP provides overarching policy directions for the management of population growth throughout the City. This section identifies that the City will promote the development of lands within the Urban Boundary on land serviced with municipal water and sanitary wastewater services, an appropriate mix of housing types, densities and tenures to meet the diverse needs in Welland, encourages infill and intensification, and encourage compact built form and transit supportive development. Policy 3.3.1 of the OP presents population forecasts to guide land use planning and policy decisions. Welland's population is forecasted to grow from 50,300 in 2006 to 63,900 by 2031, representing an increase of 13,600 people over 25 years. These figures form the basis for the City's land use designations and infrastructure planning to accommodate expected growth. Furthermore, according to Policy 3.3.2, the projected housing growth for the City from 2006 to 2031 is an increase of 6,875 units, rising from 20,715 units in 2006 to 27,590 units by 2031. The Official Plan's land use and policies are designed to accommodate and serve this anticipated housing growth.

In addition, Policy 3.3.3 of the OP outlines the anticipated distribution of future housing growth by unit type. Between 2006 and 2031, the City is expected to add approximately 6,875 new housing units, with 68% being low-density, 22% medium-density, and 10% high-density. These forecasts inform the City's land use designations and policies to ensure a balanced housing mix that accommodates a range of needs and supports the overall growth strategy. In this regard, Policy 3.3.5 of the OP states that the City will ensure a minimum 10-year supply of residential land at all times, based on current or updated population and housing forecasts. This supply will include a mix of intensification and greenfield development areas.

The proposed Official Plan Amendment and Zoning By-law Amendment for 111 Victoria Street conform with the OP policies in Sections 3.1 to 3.3 by facilitating a compact, infill residential development within the Urban Boundary on fully serviced land. The introduction of 35 purpose-built rental units, including a mix of studios, one-bedroom, and two-bedroom apartments, supports the City's population and housing growth forecasts outlined in Policies 3.3.1 and 3.3.2, contributing to the anticipated 13,600-person and 6,875-unit increases by 2031. The proposal aligns with the targeted housing mix in Policy 3.3.3 by adding medium-density housing that responds to local needs. By redeveloping a long-vacant, underutilized site that has been inactive since prior to 2008, the project also supports Policy 3.3.5 by contributing to the City's intensification goals and helping to maintain a sufficient residential land supply. The development promotes compact, transit-supportive growth and a more efficient use of infrastructure in accordance with the OP's growth management framework.

## City Structure

Section 3.4 of the OP explains that the City's structure is shaped by major elements, including its division into an Urban Area and an Agricultural and Rural Area. It is bisected by the Welland Canal, the Recreational Waterway, Highways 406 and 140, and is intersected by natural heritage corridors that make up the Core Natural Heritage System. These components together define Welland's overall city structure, as shown on Schedule A.

The subject site is located within the City's *Urban Area* and is in *Built Boundary* and *Built-Up Area*. Policy 3.4.2 of the OP states that the *Urban Area* is defined by an Urban Boundary, which sets the limits for urban development. This boundary provides clarity for private sector investment by identifying which lands will receive full municipal services during the lifespan of the Plan.

Policy 3.4.2.2 states that the lands within Welland's Urban Boundary are the focus for all urban development and that lands within this area are already serviced, or are intended to be serviced, and include access to major roads, transit and piped sewer and water services. Specifically, Policy 3.4.2.3 of OP explains that the *Built Boundary* marks the extent of existing development and is used to track intensification. Growth within this boundary is considered intensification. Lands between the *Built Boundary* and the *Urban Boundary* are identified as Greenfield Areas—urban lands not yet developed.

Section 3.4.4 of the OP adopts the former 2020 Provincial Policy Statement's definition of intensification as development at a higher density than currently exists. Notwithstanding the outdated PPS reference, this continues to include redeveloping brownfield sites, building on vacant or underutilized lots, infill projects, and expanding or converting existing buildings within already developed areas.



Policy 3.4.4.1.B emphasizes the importance of gentle intensification and brownfield redevelopment for growth management, and identifies it as an appropriate means of accommodating growth since it makes better use of existing serviced land. The increase in housing units and employment created by intensification is also considered a favourable approach to maintaining and improving vibrancy. Policy 3.4.4.1.C further encourages the intensification of residential areas on brownfield sites, throughout the City. Additionally, Policy 3.4.4.2 outlines the City's goals for brownfield redevelopment and remediation. Policy 3.4.4.1.D of the OP establishes a local intensification target of 40%, meaning 40% of new housing from 2016 to 2031 should be built within the *Built-Up Area*, amounting to 1,975 units. Section 3.4.4.1.E outlines the City's strategy to achieve this target through measures such as designating medium- and high-density or mixed-use lands, supporting infill and secondary suites, ensuring land use compatibility, offering financial incentives via Community Improvement Plans, investing in public realm improvements, and identifying Intensification Nodes and Corridors with detailed planning policies.

Policies 3.4.4.1.F to 3.4.4.1.I of the OP outlines the implementation framework for intensification. The OP directs applicants to specific urban design policies depending on the development type and context (e.g., downtown, medium density, infill). The City will maintain an inventory of intensification sites and track progress through a monitoring program (3.4.4.1.G). To support development, zoning amendments may be considered, and Urban Design Guidelines will be developed to ensure quality and neighbourhood compatibility (3.4.4.1.H). Intensification will be phased alongside greenfield development to maintain a balanced growth strategy, coordinated with infrastructure planning (3.4.4.1.I).

With respect to brownfield redevelopment, such as is proposed for the subject site, Policy 3.4.4.2.A of the OP adopts the former 2020 Provincial Policy Statement's definition of brownfields as undeveloped or previously developed properties that may be contaminated, typically former industrial or commercial sites that are underutilized, derelict, or vacant. As outlined in Policy 3.4.4.2.B, these sites are important from an economic development and planning perspective because they represent underutilized, fully serviced lands within the urban area. If left in a derelict state, brownfields can detract from the attractiveness of surrounding areas and negatively impact investment potential.

Policy 3.4.4.2.C affirms the City's support for the reuse and redevelopment of brownfield areas. Approximately 200 hectares of brownfield lands exist across Welland, particularly along the Welland Recreational Waterway. Redevelopment of these lands is identified as a key objective of both the Official Plan and the City's Brownfield Strategy and Community Improvement Plan, approved in April 2007 (Policy 3.4.4.2.D).

To help overcome redevelopment barriers, the City offers several incentive programs under Policy 3.4.4.2.E, including:

- The Environmental Site Assessment Program
- The Brownfield Tax Assistance Program
- The Brownfield Rehabilitation Grant Program
- The Planning and Building Fees Refund Program
- The Development Charges Exemption Program

As per Policy 3.4.4.2.F, the City of Welland will continue to demonstrate municipal leadership and collaborate with developers and entrepreneurs to unlock new brownfield redevelopment opportunities. Finally, Policy 3.4.4.2.G states that the City will maintain and monitor an inventory of brownfield sites, with a focus on encouraging revitalization of priority sites listed in the inventory.

The proposed OPA and ZBA for the subject site will facilitate a mid-rise residential infill development that clearly conforms with Section 3.4 and its related policies in the OP. The subject site is located within the City's *Urban Area*, inside the *Urban Boundary*, and within the *Built Boundary* (Policy 3.4.2), meaning it is already serviced and prioritized for development within the current planning horizon. This location supports the OP's direction that all urban growth be directed to fully serviced areas with access to roads, transit, and piped services (Policy 3.4.2.2). Because the proposal represents the redevelopment of a long-vacant and previously developed property, it constitutes intensification within the *Built-Up Area* under Policy 3.4.2.3 and Policy 3.4.4, which adopt the province's definition of intensification.

The proposal is directly aligned with the intent of Policy 3.4.4.1.B, which emphasizes brownfield redevelopment and gentle intensification as key tools for accommodating population growth while making efficient use of land and infrastructure. The site has been vacant since the former Vaughan Seed Company building was lost to fire in 2008 and has since remained underutilized, making it a qualifying brownfield property under Policy 3.4.4.2.A. Its redevelopment into a compact, purpose-built rental apartment building adds housing within an already developed and serviced area—precisely the form of infill supported by the OP (Policy 3.4.4.1.C). The project introduces 35 new residential units and is expected to accommodate 47 to 59 residents at full occupancy, directly contributing to the City's intensification target of 1,975 new units within the *Built-Up Area* to 2031 (Policy 3.4.4.1.D).

In alignment with Policy 3.4.4.1.E, the proposal implements several of the City's intensification strategies. The OPA will redesignate the site to Medium Density Residential, one of the targeted designations for intensification, and the ZBA facilitates appropriate infill development on a brownfield site. The proposed building has been carefully designed and massed to integrate with surrounding low-rise residential uses, in accordance with the urban design policies referenced in Policy 3.4.4.1.F. Furthermore, the site benefits from public realm investments in nearby parks and transit routes, while its brownfield status makes it eligible for financial incentives under the City's Brownfield Community Improvement Plan, as encouraged in Policies 3.4.4.2.D and 3.4.4.2.E.

By facilitating redevelopment on a long-vacant brownfield property in an established neighbourhood, the OPA and ZBA are directly advancing the City's goals of revitalizing underutilized urban land (Policy 3.4.4.2.B) and unlocking priority intensification sites (Policy 3.4.4.2.G). The proposal reflects strong conformance with the City's broader growth management structure and intensification framework and supports the implementation of both local and regional planning objectives.

## **Urban Area Land Use Policies**

### **Housing & Residential**

Section 4.2 of the Welland OP, Housing and Residential, provides planning objectives and land use policies for residential development throughout the City. In this regard, Policy 4.2.1.2 focuses on ensuring that residential development will occur in a compact, efficient and logical pattern. Policy

4.2.1.3 identifies providing an appropriate range of residential uses which serve the City's diverse population and encouraging different types and tenures of housing units, as a main objective of the OP. Further, Policy 4.2.1.8 identifies another main objective of the City's OP is to encourage and promote opportunities for residential intensification and redevelopment on lands within the Built-Up Area of the City.

Overall, a full range of housing types, tenures, and affordability levels is encouraged to serve diverse household needs, and the City promotes intensification within the *Built-Up Area*, sustainable and pedestrian-friendly neighbourhoods, and revitalization strategies for transitioning areas, while protecting stable residential zones from inappropriate change.

The intent of the proposed Official Plan Amendment is to redesignate the subject site from *Light Industrial* to *Medium Density Residential*. The proposed Official Plan Amendment will facilitate a compact, purpose-built rental apartment building that conforms with the housing and residential objectives of Section 4.2 of the OP. Located within the *Urban Boundary* and *Built-Up Area* on a fully serviced, long-vacant lot, the development supports orderly and efficient growth in a compact urban form, consistent with infrastructure and land use planning goals.

The proposal introduces 35 rental units—mostly studio and one-bedroom units but a few two-bedroom suites—broadening the range of housing types, tenures, and affordability available in Welland, in keeping with Policies 4.2.1.3 and 4.2.1.4. By utilizing a vacant infill site, it supports the City's objectives to prioritize intensification and redevelopment over greenfield expansion (Policy 4.2.1.6 and 4.2.1.8) while contributing to the City's minimum three-year supply of residential land. The project is compatible with the surrounding low-rise context, applying a 45-degree angular plane and sensitive massing, supporting neighbourhood stability and revitalization as directed in Policy 4.2.1.7.

The development also promotes walkability, offering proximity to parks, schools, and transit, and pedestrian-oriented design elements that align with Policy 4.2.1.10. Overall, the OPA will enable a well-designed, appropriately scaled infill project that operationalizes the City's housing, design, and intensification policies.

Policy 4.2.2.1 classifies residential land uses into three land use categories including *Low Density Residential*, *Medium Density Residential* and *High Density Residential*. The proposed development seeks to develop a 4-storey, purpose-built rental apartment building with 35 units under the *Medium Density Residential* designation.

Policy 4.2.2.3.A states that the planned function of the *Medium Density Residential* designation is "intended to provide housing for residential development at a minimum density of 25 dwelling units per net hectare of land and a maximum density of 60 dwelling units per net hectare of land."

The proposed OPA will provide site-specific exceptions for density (exception to Policy 4.2.2.3.C) and permission for a 4-storey building within the low-rise apartment housing land use permission (exception to Policy 4.2.2.3.B).

Policy 4.2.2.3.B outlines the permitted uses within the *Medium Density Residential* designation and a low-rise apartment building is permitted. Policies 4.2.2.3.C and 4.2.2.3.D of the OP state that *Medium Density Residential* developments should be low-rise in scale and designed to avoid significant shadowing or view obstruction on adjacent lots. Design should prioritize landscaping,

covered entrances or front porches, and streetscapes defined by doors and windows rather than garages. Parking should be located at the side or rear, or be structured/underground, and recyclable waste storage must be accommodated on site. Increased density may be permitted with underground or structured parking if the built form aligns with the Plan's design policies.

The proposal conforms with Policies 4.2.2.3.C and 4.2.2.3.D of the OP by introducing a four-storey apartment building that is appropriately scaled and massed to avoid significant shadowing or view obstruction on adjacent lots. The building has been tested against a 45-degree angular plane from the west and south property lines and falls entirely below it, demonstrating a sensitive transition to neighbouring low-rise homes. The design features prominent entrances, landscaped yards, and no attached garages, supporting an active, pedestrian-oriented streetscape. Parking is located at the side and rear of the building, and on-site facilities for recyclable waste collection are included, meeting the Plan's design and sustainability policies.

Additionally, Policy 4.2.3.1 outlines the criteria for a new development within an existing neighbourhood and states that intensification shall reinforce the established character of the existing neighbourhood. Thus, the Proposal conforms to the intent of the outlined policy by providing an appropriately scaled apartment building that aligns with the character of the existing residential neighbourhood, through utilizing similar design and materials.

Policy 4.2.3.6 of the City of Welland Official Plan encourages infill and intensification within built-up residential areas, provided key factors are addressed, including compatibility with neighbourhood character, lot configuration, accessibility, parking, traffic impacts, transit potential, heritage and natural feature protection, infrastructure capacity, and intensification targets. Subject to a Zoning By-law Amendment, height and density may exceed Plan limits by up to 20% without requiring an Official Plan Amendment.

The proposal meets the general purpose and intent of Policy 4.2.3.6 of the OP by delivering compatible residential infill development within the *Built-Up Area* that addresses neighbourhood character, maintains appropriate scale through compliance with a 45-degree angular plane, and meets technical considerations such as access, parking, transit proximity, and servicing capacity. Although the proposed density exceeds the permission for *Medium Density Residential* in the current Plan, both an Official Plan Amendment and Zoning By-law Amendment are being pursued to formally facilitate this modest increase. Notably, the Draft New Welland Official Plan includes Policy 4.2.2.3.3, which permits mid-rise buildings between 4 to 8 storeys, and Policy 4.2.2.3.1, which contemplates densities up to 125 units per net hectare for Medium Density Residential. At four storeys, the proposal conforms with the draft height policy, and while it represents a 29.76% increase in density from the Draft New Welland Official Plan policy, this reflects the efficiency and suitability of the site, not a land use compatibility issue. In fact, we believe the Proposal integrates well into the existing urban fabric, aided by sensitive massing and transitional design. Importantly, density caps can be arbitrary, as they do not always reflect site-specific conditions such as parcel configuration, access, context, or proximity to transit and amenities—factors that this Proposal demonstrably satisfies.

Policy 4.2.3.9 of the City of Welland Official Plan allows medium- and high-density residential units to include live / work spaces, subject to Site Plan Approval and adequate parking. These developments are encouraged along collector or arterial roads or in areas targeted for intensification.

The Proposal conforms with Policy 4.2.3.9 by introducing a *Medium-Density Residential* development within the *Built-Up Area*, where intensification is encouraged. While the building is not explicitly designed as live/work space, at full occupancy, the building is expected to house between 47 and 59 residents. Based on the 8% work-from-home rate cited in the Niagara Region 2022 Development Charges Background Study, it is reasonable to estimate that approximately 4 to 5 residents may work from home. These home-based work opportunities align with the intent of the policy by supporting flexible, mixed-use living arrangements in areas planned for intensification, particularly as work-from-home continues to grow as a component of the modern housing need.

Policies 4.2.3.10 and 4.2.3.11 of the OP aim to ensure the long-term supply of affordable and accessible housing. The City targets 30% of all new housing units to be affordable for low- and moderate-income households, in both intensification and greenfield areas. The City collaborates with regional partners, not-for-profits, and the private sector, and may consider zoning regulations to support affordability. The OP restricts the demolition or conversion of rental buildings with six or more units unless specific conditions, including vacancy rates and replacement provisions, are met. Additionally, the City supports increasing the supply of accessible housing in collaboration with partners and stakeholders.

The Proposal conforms with Policies 4.2.3.10 and 4.2.3.11 by introducing 35 new purpose-built rental units within the Built-Up Area, directly supporting the City's goal of increasing the supply of accessible housing through intensification. While the units are market-based, the project has been designed to accommodate true affordable housing should subsidies or funding become available, aligning with the City's 30% affordability target. Since the site is vacant, there is no loss of existing rental stock, and in fact, the rental housing stock would be increased. Additionally, the project is subject to future Site Plan Approval, enabling review of accessibility features and ensuring that the building can serve a range of residents, including those with physical disabilities.

### Employment Areas

Currently the subject site is designated *Light Industrial Area*, a designation that is planned to provide areas for industrial activities which are intended to have no adverse impacts associated with their operation, as per Policy 4.3.2.3.A. The current designation does not support the proposed development; therefore, an Official Plan Amendment is required to conform to the City of Welland policies, to ultimately facilitate the proposed development.

Policy 4.3.3.1 outlines the criteria needed for employment lands to undergo a conversion to permit non-employment uses. Policy 4.3.1.6 provides that the City will promote intensification and redevelopment within Employment Areas in the *Built-Up Area*, including through tools like the Brownfield Strategy and Community Improvement Plan.

Policy 4.3.1.7 of the City of Welland Official Plan explicitly addresses the conversion of Employment Areas to non-employment uses, stating: "The City will protect its Employment Areas and will require a municipal comprehensive review (MCR) for any proposed conversion to non-employment uses."

This means that employment land conversions are not permitted by default and must be evaluated through a Municipal Comprehensive Review process, as were once controlled under the former Provincial Growth Plan and the Official Plan. An MCR provides a city-wide or region-wide assessment



of employment needs and land supply and is the only mechanism through which conversion to non-employment uses can be formally considered and approved.

So, while Policies 4.3.1.5 and 4.3.1.6 promote intensification and redevelopment within Employment Areas (including brownfield reuse), Policy 4.3.1.7 clearly requires that any conversion to residential or other non-employment uses be undertaken only through a formal MCR process.

Of importance today, is that the new provincial planning framework which is set out through the 2024 Provincial Planning Statement, and which has repealed the 2020 PPS and the 2019 Growth Plan, no longer requires employment conversions to be undertaken during an MCR process and can happen at any time. Notwithstanding, the City is in the process of an MCR process, and even if the new 2024 PPS had not changed this requirement, the proposed employment conversion would be appropriate at this time.

In addition, the OP makes a clear distinction between *General Industrial* areas, which are intended for a broad range of heavier and more impactful industrial uses, and *Light Industrial* areas, which are limited to uses with no adverse impacts and are often located near sensitive uses like housing. While *General Industrial* areas are the City's core employment lands, *Light Industrial* areas serve more transitional or interface functions, with stricter design controls and limited outdoor storage. The subject site at 111 Victoria Street, designated *Light Industrial* and adjacent to residential uses, reflects this transitional role. Its long-term vacancy since 2008 further demonstrates low market demand for industrial uses at this location. As such, we believe *Light Industrial* lands at the residential-industrial interface are among the most appropriate locations for employment land conversion, particularly when the proposed development is a well-designed, compact residential use that supports intensification and land use compatibility.

Section 4.3.3 of the City of Welland Official Plan states that employment land conversion to non-employment uses may only be permitted through a municipal comprehensive review and must demonstrate: (i) a defined need (per Policy 4.3.3.2), (ii) continued achievement of the City's employment targets, (iii) no adverse impact on the viability of Employment Areas or intensification and density targets, (iv) availability of infrastructure, (v) the land is not required long-term for employment, and (vi) cross-jurisdictional issues are addressed. Major retail uses are not permitted in Employment Areas. Policy 4.3.3.2 clarifies that the City defines "need" in the context of the broader public interest and the Plan's Community Strategic Directions. The Plan also encourages infilling and intensification in built-up Employment Areas, prioritizing brownfield redevelopment (Policy 4.3.3.3), and requires a balance between supply and demand, with new employment lands designated only through a comprehensive review (Policy 4.3.3.4).

Accordingly, we have reviewed the Proposal against the City's employment conversion criteria and offer the following responses:

***Table 3 - Responses to City Criteria for Employment Conversions***

OP Policy Criterion (4.3.3.1)	Responses
i. There is a need for the conversion (as defined by the City in Policy 4.3.3.2);	There is a demonstrable need for additional housing in Welland, supported by both the City of Welland Growth Management Background Review (2021) and the Niagara Region 2051

	<p>Land Needs Assessment (2022). These documents confirm that Welland must accommodate 13,930 new units by 2051, with 75% directed to the Built-Up Area. The Proposal contributes directly to this need. The site has remained vacant for over 16 years since the former Vaughan Seed Company building was lost in 2008 and even prior to that as the former building was vacant at the time it burnt down. The proposed conversion meets a pressing community need for housing while revitalizing underutilized serviced land within a <i>Urban, Built-Up Area</i>.</p>
<p>ii. The municipality will meet the employment targets allocated to the City pursuant to this Plan;</p>	<p>The site is a small parcel (0.2157 ha) that has been non-contributing to employment targets since before 2008. Its long-term vacancy demonstrates a lack of market demand for employment uses. Employment targets are still achievable given the City's broader supply of viable employment lands, particularly within <i>General Industrial</i> or other <i>Regional Employment Areas</i>. The site is not identified as regionally or provincially significant for employment in any regional or provincial schedules.</p>
<p>iii. The municipality will meet the employment targets allocated to the City pursuant to this Plan;</p>	<p>The site is not embedded in a cohesive or delineated <i>Employment Area</i> and is instead situated at a transitional interface between industrial and residential uses. Its conversion will not fragment a functioning industrial district or disrupt land use compatibility. The proposed development supports intensification targets, brownfield redevelopment, and improves the urban streetscape along Victoria Street, contributing to a more complete and resilient neighbourhood. In addition, there are currently zero jobs on-site. The proposal replaces an underutilized parcel with housing for 47–59 people, 4–5 of whom may work from home (based on an 8% work-from-home rate). The site will also support indirect economic activity through construction, building operations, and increased support for nearby businesses. Accordingly, some degree of employment will remain on site even with the conversion and the added population will support local commerce and provide an increased job force.</p>

iv. There is existing, or planned, infrastructure in place to accommodate the proposed use;	The site is fully serviced with water, wastewater, and storm infrastructure. Capacity has been confirmed by UCC, and stormwater is directed to Victoria Street using CB Shields. The site is also within walking distance of schools, transit routes (e.g., NRT Routes 505 and 506), parks, and neighbourhood amenities, confirming full infrastructure integration.
v. The lands are not required, over the long term, for employment purposes for which they are designated; and,	The designation as <i>Light Industrial</i> , paired with more than 16 years of vacancy, lack of industrial reinvestment interest, and its location adjacent to sensitive residential uses, all indicate the site is not needed for long-term employment. Unlike <i>General Industrial</i> lands, the <i>Light Industrial</i> designation is typically transitional and not considered high-priority for strategic employment functions. The site is also not delineated as regionally or provincially significant and lacks access to goods movement corridors.
vi. Cross jurisdictional issues have been considered.	No cross-jurisdictional or inter-municipal issues have been identified during pre-application consultation with City, Regional, or other agency staff. The Proposal aligns with the growth management framework of the Niagara Official Plan, supports intensification in an appropriate location, and complies with the PPS by promoting housing within a serviced settlement area.

## Transportation

### Roads

Section 6.4 of the Welland OP outlines the planning objectives for the transportation system within the City. The policies throughout this provide direction with the design of roadways, function of city roads, transit and active transportation. Policy 6.4.2.1.K outlines the provisions for road design, highlighting that, where appropriate, development shall consider the inclusion of pedestrian sidewalks and aesthetic considerations, such as landscaping, tree plantings and street furniture. Further, the roadways shall be designed with consideration for the ease of movement, reduction of obstacles through utilizing minimal grade changes, level entranceways and sloped curbs.

Although the proposed development does not provide a public or private road, consideration has been taken to the Victoria Street roadway. The proposal includes a pedestrian walkway across the Victoria Street frontage with landscaped areas buffering either side of the walkway. Additionally, the access to Victoria Street utilizes a sloped curb for access into the subject site. Thus, the proposed development conforms with the directions outlined within the policy.

## Transit

Furthermore, Section 6.4.2.2 outlines the policy directions the City proposes with regards to Transit. This section outlines policies to encourage transit use, promote development within close proximity to transit, and link land uses with transit. In this regard, Policy 6.4.2.2.A highlights the desire for the City to promote transit and Policy 6.4.2.2.B outlines the desire for transit to be within a reasonable walking distance of all urban land uses.

The subject site is located within an approximate 5- to 10-minute walk of several NRT Transit stops, allowing residents to be serviced and connect to the surrounding areas of the City. Therefore, the proposal is aligned with the directions outlined within the policy.

## Pedestrians

Section 6.4.2.4 provides policy direction related to consideration for pedestrian travel along roadways. The policies provide directions with regard to pedestrian safety, connections, transitions, and extensions. In that regard, Policy 6.4.2.4.B outlines policy direction towards Pedestrian-Friendly Streets, encourage the development of safe, convenient and attractive streetscapes for pedestrians.

As outlined previously, the proposal provides a pedestrian walkway along the frontage of Victoria Street, with landscaped areas on either side of the walkway. The walkway will provide the south side of Victoria Street a pedestrian walkway, similar to that of the northern side, contributing to a fulsome streetscape along Victoria Street. Additionally, the landscaped areas adjacent to the pedestrian walkway provide separation for the pedestrians from the roadway and subject site.

## **Infrastructure & Utilities**

Section 6.5 of the OP provides policies for the servicing of development and the management of stormwater across the City of Welland. It is the intent of these policies to ensure the safety and health of the community through well-managed municipal servicing and stormwater infrastructure and promote the efficient and sustainable use of water resources, including practices to conserve water and protect, or enhance, water quality.

Policy 6.5.1.4 provides that the City of Welland is to Ensure that there is a Sufficient Planned Supply of Municipal Water and Sanitary Sewage Services. Further, Policy 6.5.1.6 provides that all development within the City of Welland is appropriately serviced by municipal water and sanitary services. Developers must provide engineered systems for water, sanitary, and storm sewers, with potential connections to city mains. Partial services are allowed for failed systems or infill, but future developments must connect to full municipal services once available.

The proposed servicing solution by Upper Canada Consultants for the Proposal adheres to the applicable policies outlined within Section 6.5 of the Official Plan. The Proposal ensures that the subject site will be fully serviced by the existing municipal water, sanitary, and stormwater infrastructure, that currently services the adjacent residential neighbourhood to the west of the subject site.

## **Conclusions**

In our opinion, the proposed Official Plan Amendment and Zoning By-law Amendment applications will facilitate the redevelopment and repair of a long-vacant, underutilized, and fully serviced

brownfield site within the City of Welland's *Urban Boundary* and *Built-Up Area*. The proposed mid-rise, purpose-built rental apartment building conforms with the strategic directions and growth management policies of the City's Official Plan by contributing to housing intensification targets, supporting a compact and efficient development pattern, and promoting walkable, transit-supportive infill on existing infrastructure.

Where the proposal does not conform to current policies—specifically related to the existing *Light Industrial* designation and prescribed density permissions for the proposed *Medium Density Residential* land use—both the OPA and ZBA are being pursued to introduce site-specific exceptions. These amendments are justified by the site's transitional context, longstanding vacancy, adjacency to residential uses, and lack of strategic value for long-term employment, making it a strong candidate for employment conversion. The proposed residential use is appropriate given its compatibility with surrounding land uses, contribution to housing supply, and support for complete community objectives. The employment conversion is similarly appropriate, as the site has been non-contributing for over 16 years, is not required to meet municipal employment targets, and is better suited for residential development given its interface location and supportive policy context.

Overall, the proposed land use and site-specific development represent a responsible, context-sensitive, and operationally sound reuse of land in alignment with the City's vision for sustainable and inclusive urban growth. A draft Official Plan Amendment By-law and related Schedules have been provided as part of the complete application package.

## 4.7 City of Welland Draft Official Plan

The City of Welland is updating its Official Plan to guide growth to 2051, ensuring policies reflect the City's evolving needs, character, and public input. The update focuses on promoting complete, vibrant, and climate-resilient communities; supporting economic vitality, especially downtown and in employment areas; protecting natural and heritage assets; aligning with provincial and regional policies; and ensuring municipal services meet the needs of a growing population. The latest iteration of the Draft New Official Plan for the City of Welland ("Draft New OP") is dated May 2024.

The subject site is proposed to be designated *Light Industrial* on Schedule B (Land Use) of the Draft New Official Plan and is situated adjacent to lands designated *Low Density Residential* and *Medium Density Residential* to the west and south, and *Light Industrial* and *General Industrial* to the north and east (see **Figure 20** below). This locates the site at the interface between residential and industrial uses. As shown on Schedule B2 (Site Specific Employment Area), the site is not located within any designated Site-Specific Employment Area (see **Figure 21** below). According to Schedule E (Road Hierarchy), the site fronts onto Victoria Street and Hester Lane, both of which are classified as local roads in the Draft New Official Plan (see **Figure 22** below). Additionally, Appendix 4 (Trail Network) identifies two proposed active transportation routes near the site—one along Lincoln Street to the south and another along the Trillium Railway corridor to the east—suggesting that future improvements will enhance the site's walkability and connectivity beyond existing conditions (see **Figure 23** below).



Figure 26 - Draft New OP Schedule B (Land Use)

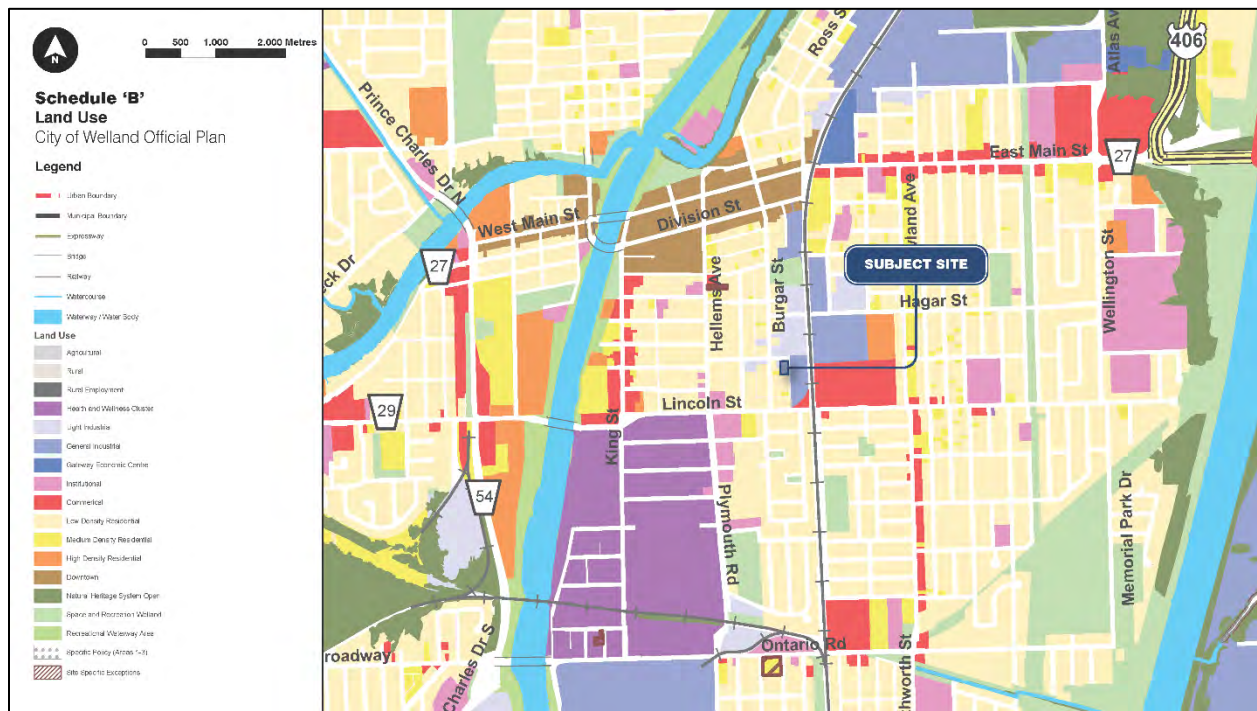


Figure 27 - Draft New OP Schedule B2 (Site Specific Employment Area)

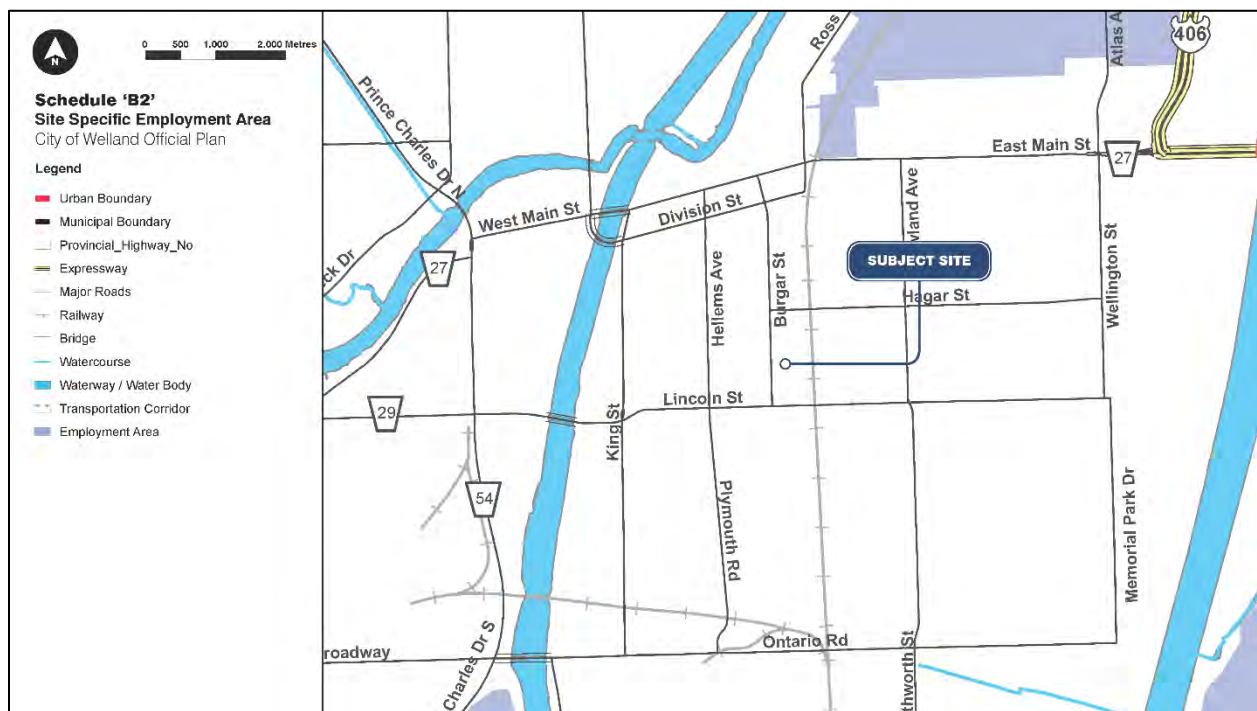


Figure 28 - Draft New OP Schedule E (Road Hierarchy)

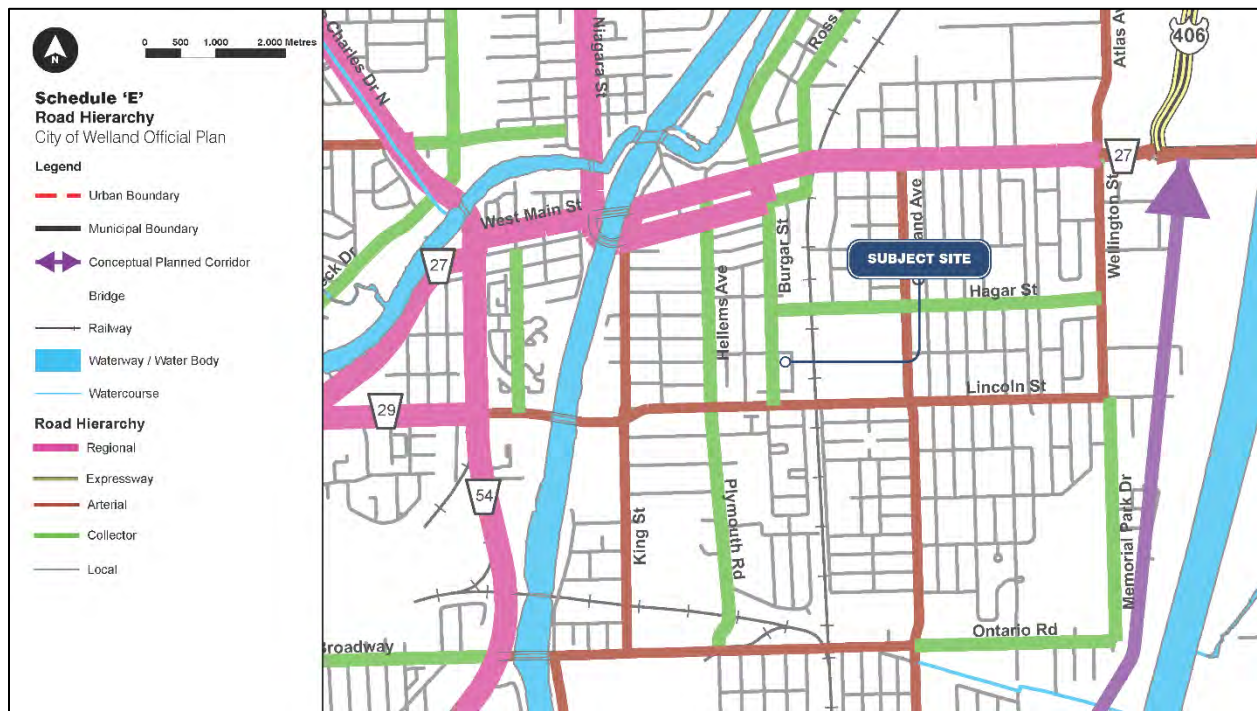
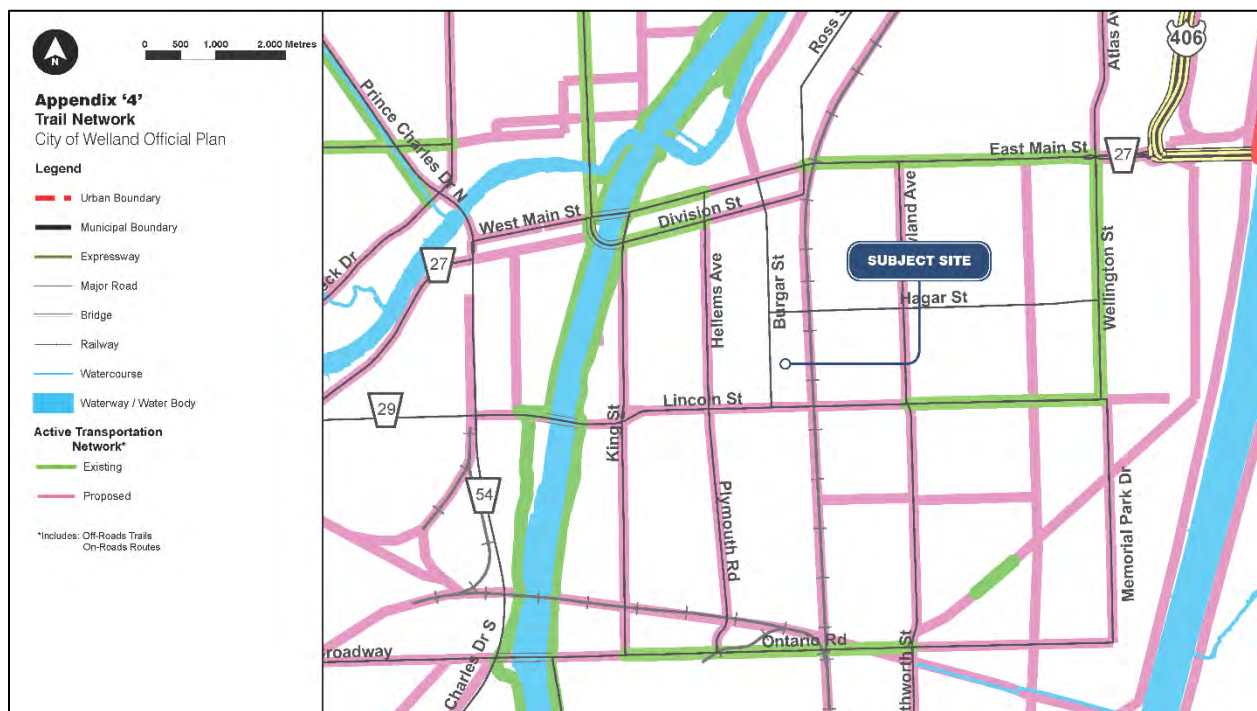


Figure 29 - Draft New OP Appendix 4 (Trail Network)



Based on the Draft New OP (May 2024), the subject site's designation and locational attributes present a compelling case for employment conversion. The site is proposed to be designated *Light Industrial* on Schedule B and is located at the interface between residential and industrial

designations, abutting lands designated *Low Density Residential* and *Medium Density Residential* to the west and south, and *Light Industrial* and *General Industrial* to the north and east. This transitional context continues to reinforce the site's role as a buffer rather than a core employment area, which aligns with the planned function of *Light Industrial* lands that are intended to accommodate industrial activities without adverse off-site impacts (Draft Policy 4.3.2.3.1, p. 62).

Under the Draft New OP, employment conversions may now be considered outside of a Municipal Comprehensive Review (MCR) where several criteria are met (Draft Policy 4.3.3.1, p. 64), including demonstrating a need for conversion, maintaining employment targets, ensuring infrastructure is available, and confirming that lands are not required long-term for employment purposes. The subject site, which has remained vacant for over 16 years and lacks regional employment significance, satisfies these criteria (discussed in greater detail below).

Furthermore, Draft Policy 4.3.3.2 (p. 65) defines "need" in terms of broader public interest and alignment with strategic directions—such as creating complete, compact, and sustainable communities. The site supports residential intensification objectives, is fully serviced, and is not located within a provincially significant employment zone, fulfilling the requirements of Draft Policy 4.3.3.1(v).

Importantly, the Draft New OP supports active transportation and pedestrian-friendly infrastructure, which strengthens the site's suitability for residential conversion. Appendix 4 identifies future active transportation routes nearby (Draft Policy 10.3.1.3, p. 172), and Victoria Street and Hester Lane are both classified as local roads intended primarily for land access and low volumes of traffic (Draft Policy 10.2.2.2.vi, p. 161). These characteristics support medium-density residential development more than goods movement or heavy industrial use.

In sum, the site's marginal viability for employment, adjacency to residential uses, and alignment with the Draft New OP's updated policy framework—including the relaxation of the MCR requirement for conversions—make it an ideal candidate for redesignation. The proposed conversion conforms with the draft policies and helps implement Welland's vision for compact, complete, and walkable neighbourhoods.

## **Community Strategic Directions**

Section 2 of the Draft New OP provides strategic directions to assist in supporting the needs of future residents with Welland. Draft Policy 2.3 outlines directions toward the establishment of complete communities throughout the City of Welland. Per Draft Policy 2.3.2, the City of Welland aims to promote: growth within the built-up area, social inclusion, improved access to housing, job opportunities and social services; creating healthy, safe, vibrant, transit supportive and mixed neighbourhoods; and ensure there's an adequate supply of diverse housing types. The development supports the creation of complete communities within the urban built-up area by providing a compact residential use in a diverse housing type, within an existing residential neighbourhood, supported by transit, and therefore conforms to the directions provided by the policy.

## **Growth Management Policies**

Section 3.1 of the Draft New OP provides overarching policy direction for the management of population growth up to the year 2051. It is outlined that the City will promote the development of

lands within the Urban Boundary that support the achievement of complete communities. This section also outlines the Draft New OP's encouraging of infill and intensification development within the built-up boundary, as well as the support of compact and transit supportive development. The projected population growth for the City of Welland is estimated to be 27,250 new residents between 2021 and 2051, totalling 83,000 new residents with Welland. Additionally, the projected housing growth for the City from 2021 to 2051 is an increase of 13,880 units, totalling 37,450 new homes in 2051 throughout Welland. Furthermore, the Draft New OP outlines the housing growth target by unit type; estimating that by 2031, 29% of housing type will be mid-rise development.

The proposed development conforms with the above policy directions as it intends to provide a four-storey compact and diverse built form that adds to the available housing stock within the built-up boundary of Welland. The additional housing stock will assist in meeting the needs of the growing population and contribute to diversifying and increasing the mid-rise housing type,

Draft Policy 3.4.2.1 outlines the planned function of Welland's Urban Boundary, identifying that majority of growth and development will be directed to within this area. Further, Policy 3.4.2.2 states that the lands within Welland's Urban Boundary are the focus for all urban development and that lands within this area are already serviced, or are intended to be serviced, and include access to major roads, transit and piped sewer and water services; and shall be used to accommodate population growth to 2051.

Draft Policy 3.4.4 outlines the intensification and brownfield remediation policies that aim to guide growth to vacant and underutilized lands; and recognizes intensification as an important appropriate and efficient means for accommodating growth on existing serviced land. The increase in housing units and employment created by intensification is identified as contributing factor to creating a vibrant community with a diverse mix of housing options.

The Proposal is located within the Urban Boundary and Built-up area of the City of Welland, thus, the subject site is an appropriate location for the gentle intensification of a currently underutilized site. Further, it provides a compact built form within an existing residential neighbourhood that is predominantly low-rise semi-detached dwellings.

Draft Policy 3.4.4.1.3 encourages the intensification of employment and residential as it offers significant opportunities for economic development, takes advantage of already serviced but underutilized land and helps to improve the vibrancy and aesthetics of Welland's existing areas. Policy 3.4.4.1.4 identifies an intensification target of 75% as recommended by Niagara Region. This means that 75% of all annual housing development should occur within the City's Built-Up Area. To achieve the 75% intensification target, Draft Policy 3.4.4.1.5 identifies strategies the City will encourage intensification within the Built-Up Area. Draft Policy 3.4.4.1.5.i states that lands with intensification potential shall be designated as Medium or High Rise Residential.

The proposed OPA and ZBA will facilitate a development that conforms with the policies outlined above as the subject site is a currently vacant and underutilized site that is an appropriate location for intensification and infill, as it continues to be located within the Built-Up area. The development of the subject site as proposed will contribute to meeting the 75% intensification target.

Draft Policy 3.4.4.2 outlines policies associated with Brownfield Redevelopment. Draft Policy 3.4.4.2.1 defines brownfields as undeveloped or previously developed properties that may be



contaminated and are usually former industrial or commercial properties that may be underutilized, derelict or vacant. Draft Policy 3.4.4.2.2 identifies brownfields as important from an economic development planning perspective as they are underutilized serviced land within the urban area and have potential for redevelopment. Draft Policy 3.4.4.2.3 states that the City will actively support brownfield redevelopment and Draft Policy 3.4.4.2.5 outlines the incentive programs through the Brownfield Community Improvement Plan ("CIP").

The subject site qualifies as a brownfield under Policies 3.4.4.2 of the Draft New OP, having been vacant since the former Vaughan Seed Company building was lost to fire in 2008. In alignment with Draft Policies 3.4.4.2.3 to 3.4.4.2.6, the Owner / Applicant has applied for and been accepted into the City's Brownfield Community Improvement Plan incentive programs to support remediation and redevelopment for residential use. This supports the City's goals of revitalizing underutilized serviced land, advancing intensification, and demonstrating public-private leadership in brownfield renewal.

## Urban Area Land Use Policies

### Housing & Residential

Section 4.2 of the Draft New OP outlines the Housing and residential land use policies, that govern the establishment and development of residential uses within the Built-Up Area. Accordingly, Draft Policy 4.2.1.1, 4.2.1.2, and 4.2.1.3 provide direction for how residential development shall occur within the Built-Up Area, stating that: residential growth shall occur in an orderly manner, residential development shall occur in a compact, efficient and logical pattern, as well as residential development shall support a range of housing types. Further, Draft Policy 4.2.1.7 and 4.2.1.8 outline policy that promotes residential intensification and redevelopment of vacant and underutilized within existing residential neighbourhoods. The proposed development is aligned with the objectives outlined within this section, as it is the development of an uncommon building typology on an underutilized and vacant site, adjacent to an existing residential neighbourhood within the Built-up Area. Thus, the proposal conforms to the listed policy.

Draft Policy 4.2.2.1 classifies residential land uses into three land use categories including *Low-Density Residential*, *Medium-Density Residential* and *High-Density Residential*. The proposed development seeks to redesignate the subject site from *Light Industrial* to *Medium Density Residential*. This redesignation will facilitate the development a four storey, purpose built rental apartment building with 35 units, some of which are intended to be affordable pending CMHC funding.

Draft Policy 4.2.2.3 outlines the permitted uses within the *Medium-Density Residential* designation which includes low-rise and mid-rise apartment buildings. Draft Policy 4.2.2.3.3 provides the scale that can be accommodated within the *Medium-Density Residential* designation, which includes low-rise (three-storeys) or mid-rise (four to eight-storeys) developments. Draft Policies 4.2.2.3.1 and 4.2.2.3.3 provide that uses within the *Medium-Density Residential* designation can now be built to densities of up to 125 dwelling units per net hectare of land, and at heights of between 4 to 8 storeys for mid-rise uses.

Accordingly, the Proposal conforms with Draft Policy 4.2.2.3.3 in terms of height and does not conform with the density maximum set out in Draft Policy 4.2.2.3.1, requiring an amendment.



Further, Draft Policy 4.2.2.3.4 provides considerations for the design of medium-density residential developments, including landscaping in all yards as a buffer between adjacent sites, parking being located in the side or rear yard and designed to provide for the collection and storage of waste on site.

The Proposal conforms with the draft policies in Section 4.2.2.3 of the Draft New OP, which govern the Medium Density Residential designation, with the exception of Draft Policy 4.2.2.3.1 (Planned Function), which requires a site-specific exception due to a proposed density of approximately 162.2 units per net hectare—exceeding the planned maximum of 125 units per net hectare.

Draft Policy 4.2.2.3.3 explicitly permits mid-rise development ranging from 4 to 8 storeys within the Medium Density Residential designation. At four storeys, the Proposal is consistent with this permitted height range. The proposed built form—compact, walkable, and appropriately massed and sited—supports the City’s intensification and housing objectives. It conforms with Draft Policy 4.2.2.3.2 (Permitted Uses), which allows apartment dwellings, and is compatible with the adjacent low-rise context through its compliance with a 45-degree angular plane, thoughtful setbacks, and contextual landscaping, fulfilling the urban design intent of Draft Policy 4.2.2.3.4 (Design Criteria).

While the Proposal exceeds the planned density in Draft Policy 4.2.2.3.1, this reflects site-specific efficiency and appropriateness rather than land use incompatibility. Density caps are often arbitrary planning thresholds that do not always reflect actual site dimensions and configuration, proximity to transit routes and amenities, availability of infrastructure and servicing, built form and massing design measures, and other policy goals for intensification, rental housing, and brownfield redevelopment.

In this case, the site continues to be within the Urban and Built-Up Area, fully serviced, within walking distance to multiple transit stops and community amenities and has remained underutilized for over 16 years. The Proposal’s density enables efficient land use and supports Welland’s housing supply, intensification targets, and brownfield revitalization goals. A site-specific exception to Draft Policy 4.2.2.3.1 is therefore justified, ensuring that the overall intent of the Medium Density Residential designation and the Draft New Official Plan is met.

### Employment Areas

Currently, the subject site is designated *Light Industrial Area*, a designation that is planned to provide areas for industrial activities which are intended to have no adverse impacts associated with their operation, as per Policy 4.3.2.3.1. The current designation does not support the proposed development; therefore, an Official Plan Amendment is required to convert the site from industrial to residential in the Draft New OP to facilitate the proposed development.

Policy 4.3.3.1 outlines the criteria needed for employment lands to undergo a conversion to permit non-employment uses. This policy is similar to the policies in the in-force OP but have been slightly enhanced. The City can now permit employment lands conversions outside of a municipal comprehensive review provided the conversion satisfies these criteria.

The following table provides our planning rationale in response to each of the Draft New Official Plan (May 2024) Policy 4.3.3.1 employment conversion criteria:

*Table 4 - Responses to Draft New OP Criteria for Employment Conversions*

Draft New OP Policy Criterion (4.3.3.1)	Responses
i. There is a need for the conversion (as defined by the City in Policy 4.3.3.2);	The Proposal responds to a clearly demonstrated local and regional housing need. The City of Welland Growth Management Background Review (2021) and the Niagara Region 2051 Land Needs Assessment (2022) both confirm the need for over 13,930 new units in Welland by 2051, with 75% to be delivered within the Built-Up Area. The subject site has remained vacant since the former Vaughan Seed Company structure was lost to fire in 2008 and has not supported employment uses in over 16 years. The conversion addresses a long-standing land use gap and repurposes a brownfield site for residential intensification in line with the City's growth and housing objectives.
ii. The conversion will maintain a significant number of jobs on those lands;	There are no jobs on site currently and there have not been any for more than 16 years. While the proposal is for residential use, it will still support some employment activity through indirect means. Based on persons-per-unit metrics and the 8% work-from-home rate (Niagara Region DC Background Study, 2022), an estimated 4–5 residents may work from home. Additionally, temporary construction jobs, ongoing property management, maintenance, and increased support for nearby businesses will sustain local economic activity. These functions, while not traditional industrial jobs, represent a modern shift toward distributed and home-based work that aligns with evolving employment trends.
iii. The proposed conversion will not adversely affect the overall viability of the City's Employment Areas and the achievement of the intensification target, density targets and other Policies of this Plan;	The subject site is isolated from larger cohesive industrial clusters and is located at the interface of residential and industrial uses. It is not functionally connected to the City's strategic employment areas and has remained vacant for over a decade. The conversion supports intensification goals, furthers brownfield revitalization objectives, and helps achieve residential density targets under Draft Policy 4.2.2.3.1. The small size of the parcel (0.2157 ha) means that its removal from the employment land supply will not compromise overall employment viability in Welland. The broader employment land base remains intact.

iv. There are existing, or planned, infrastructure in place and public service facilities to accommodate the proposed use; and	The subject site is fully serviced with municipal water, wastewater, and stormwater infrastructure. Site servicing has been reviewed and confirmed by Upper Canada Consultants. The site is also well-connected to transit (e.g, NRT Routes 505 and 506), schools, parks, and commercial amenities—all within a 5–10-minute walk—demonstrating alignment with Draft Policy 4.3.3.1(iv) for infrastructure readiness.
v. The lands are not identified as a provincially significant employment zone.	The subject site is not located within a Provincially Significant Employment Zone (PSEZ) as identified by the Ministry of Municipal Affairs and Housing or shown on any provincial or even regional mapping which does not include the site within any delineated <i>Employment Areas</i> . The lands are designated Light Industrial, which is transitional in nature and not part of the City's core General Industrial or strategic employment land base, nor are they located within any designated Site-Specific Employment Area as per Schedule B2 (Site Specific Employment Area) of the Draft New OP. Accordingly, we believe the site is not required for long-term employment preservation under the new provincial framework.

## Urban Design

Draft Section 9.3 of the Draft New OP outlines urban design policies that promote pedestrian-friendly streetscapes and vibrant, attractive neighbourhoods. The City supports consistency with both local and regional urban design guidelines (9.3.1) and prioritizes public realm improvements, including streetscapes that respect local character and enhance views with landscaping, public art, and other placemaking elements (9.3.2.1). A safe, comfortable pedestrian environment is emphasized through clear building access, lighting, and orientation toward public streets (9.3.2.2), while Crime Prevention Through Environmental Design (CPTED) principles like natural surveillance and access control are encouraged (9.3.2.3). Roads and laneways should be enhanced through features such as wide sidewalks, plantings, furnishings, and lighting (9.3.2.4). Built form should be compatible with surrounding development in scale and massing, avoiding privacy and shadow impacts (9.3.2.5). The City also promotes placemaking through visual enhancements like public art, banners, and street vendors (9.3.3) and supports temporary and interactive public art installations that may become permanent (9.3.4).

The Proposal conforms well with the draft urban design policies in Section 9.3 of the Draft New OP by prioritizing high-quality, pedestrian-oriented development and context-sensitive built form. The building is thoughtfully sited to frame the street, includes landscaped buffers, and introduces a new

sidewalk and planting strip along Victoria Street, thereby contributing to a more cohesive and attractive streetscape in accordance with Policies 9.3.2.1 and 9.3.2.2. Large ground-level windows and prominent entrances support natural surveillance and “eyes on the street,” while CPTED principles such as lighting, access control, and territorial reinforcement are reflected in the layout and interface with the public realm (Policy 9.3.2.3).

The Proposal also enhances the laneway interface (Hester Lane) with improved landscaping and screening, aligning with Policy 9.3.2.4. The building height and massing are compatible with the surrounding context and have been tested against a 45-degree angular plane from the rear and side property lines, ensuring privacy and shadow impacts are minimized per Policy 9.3.2.5. While the Proposal does not explicitly include public art or placemaking features, its contextual design, attention to the pedestrian experience, and historical reference to the Vaughan Seed Company contribute to place-making goals (Policies 9.3.3 and 9.3.4). Overall, the Proposal exemplifies good urban design and supports the City’s broader vision for attractive, inclusive, and safe neighbourhoods.

## Conclusions

In our opinion, the proposed Official Plan Amendment and Zoning By-law Amendment will facilitate a compact, mid-rise residential development on a long-vacant brownfield site in a manner that broadly conforms with the Draft New Official Plan (May 2024), with the sole exception of requiring a site-specific density increase beyond the planned maximum of 125 units per net hectare. This modest exceedance is appropriate given the site’s efficient configuration, adjacency to transit and amenities, full municipal servicing, and compatibility with surrounding residential uses—demonstrating that the proposed density reflects good planning, not incompatibility. Density caps are often arbitrary and do not account for site-specific characteristics such as massing, angular plane compliance, walkability, brownfield remediation, or the need to intensify in built-up areas to meet regional housing targets.

The Proposal conforms with all relevant growth management, intensification, urban design, and housing policies in the Draft New OP, and is consistent with the evolving policy framework that allows employment conversions outside of a municipal comprehensive review, even though an MCR is currently ongoing. As the site is designated *Light Industrial* and located at the edge of a residential neighbourhood, not within a provincially significant employment zone or designated strategic employment area, its conversion to residential is both appropriate and compatible. The proposed development aligns with the City’s vision for complete, walkable communities and supports housing supply, brownfield revitalization, and smart growth objectives to 2051. A draft Official Plan Amendment By-law and related Schedules have been provided as part of the complete application package.

## 4.8 City of Welland Zoning By-law 2017-117

The City of Welland’s Comprehensive Zoning By-law No. 2017-117, as amended (“ZBL”) applies to the subject site. The ZBL regulates land use in the City, defining permitted uses, building sizes, heights, locations, parking, and landscaping. Welland’s ZBL implements the Official Plan’s policies. It can prohibit non-permitted uses, control building construction, and set requirements for lot sizes, parking, and environmental constraints. Any amendments to the Zoning By-law must conform to the

Official Plan and are subject to review under the Ontario Planning Act. The ZBL consists of 15 sections covering standards for all lots in the municipality.

The subject site is currently zoned Light Industrial “L1”, on Schedule A of the ZBL (see **Figure 24** below). The *Light Industrial* zone permits a wide range of uses related to commercial and industrial land use. Presently residential use is not permitted in this zone, and as such the site is proposed to be rezoned from *Light Industrial* to *Residential Medium Density* “RM”.

**Figure 30 - Zoning of Subject Site**



In addition to the rezoning of the site to the RM zone, various site-specific exceptions for the RM zone are also requested to facilitate the Proposal resulting in an “RM-XX” zone for the site.

The subject site fronts Victoria Street, a standard public street, and Hester Lane, a narrow gravel laneway functioning more like a private driveway. Hester Lane lacks sidewalks, shoulders, and boulevard space, and is not identified for improvement in either the current or Draft New Official Plan. Under Zoning By-law 2017-117, Hester Lane meets the definition of a laneway, not a public street. As such, the lot line abutting it is being treated as an interior side yard, not an exterior lot line.

All site-specific exceptions for the RM-XX requested are set out below.

**Table 5 - Proposed Site-Specific Performance Standards (Purple Indicates Variance or Exception)**

Section	Regulation	Proposed / Provided	Complies (Yes / No)
Permitted Uses in Residential Zones (7.1 / Table 7.2.1)			



Permitted Uses	Accessory Dwelling Unit Accessory Uses, Buildings and Structures Apartment Dwelling Boarding and Lodging House Day Care Group Home Home Occupation Multiple Dwelling Retirement Home Short-Term Rental Street Townhouse Dwelling Townhouse Dwelling (Block)	Apartment	Yes
<b>Regulations for Residential Zones (7.3 / Table 7.3.1)</b>			
Min. Lot Area	780.0 sq.m	2,157.5 sq.m	Yes
Min. Lot Frontage	45.0 m	35.5 m	No (Legal Non-Complying)
Min. Front Yard Setback	0.0 m	2.75 m	Yes
Min. Interior Side Yard Setback	3.0 m	2.0 m	No
Min. Exterior Side Yard Setback	4.0 m	N/A	Yes
Min. Rear Yard Setback	7.5 m	18.23 m	Yes
Max. Building Height	20.0 m 6 Storeys	16.15 m 4 storeys	Yes
Max. Lot Coverage	55%	30.8%	Yes
Min. Landscaped Area	20%	27.1%	Yes
<b>General Provisions (5.0)</b>			
Access (5.1)	a) A building or structure can only be erected or used if the lot fronts on a street. b) Additionally, the street must be paved, have installed and tested water and sewer services to the property line, and include necessary signage.	Proposal is on a lot with existing street frontage along Victoria Street, which is paved, has existing services, and is signed.	Yes
Encroachments (5.10)	5.10 Encroachments – Permitted yard, setback, and height encroachments.	N/A	Yes
	5.10.1 Accessibility Ramps and Lifts – Permitted in any yard but not in a visibility triangle.	N/A	Yes

	5.10.2 Awnings and Balconies – May encroach up to 1.5m in front/exterior side yards; max height 4.0m.	N/A (Hester Ln not considered to be exterior side yard)	Yes
	5.10.3 Bay Windows – Max 3.0m width, may project up to 1.0m into front, rear, or exterior side yard.	N/A	Yes
	5.10.4 Building in Built-up Area (Residential Zones) – Setback may match adjacent buildings within 20m.	N/A	Yes
	5.10.5 Decks, Porches, Steps – Porches/stairs: 1.5m projection in front/exterior side yard, 3.0m in rear yard (max 1.5m high). Steps: Interior side yard setbacks apply; steps ≤0.5m above-grade permitted. Below-grade stairs: Max 1.5m projection, up to 4.0m high. Decks: 1.5m projection in front/exterior side yard (max 4.0m high); 3.75m in rear yard (max 1.5m high).	N/A	Yes
	5.10.6 Driveways, Parking and Walkways – Permitted to traverse required yards.	N/A	Yes
	5.10.7 Heat Pumps, A/C, Ventilation Equipment – Allowed in interior side/rear yards (min 0.5m from lot line). Prohibited in front yards. Allowed in exterior side yards (min 3.0m from street line).	N/A	Yes
	5.10.8 Height Exceptions – Roof structures (e.g., stair towers, vents) allowed up to 6.0m above roofline if not habitable and screened. Includes spires, flag poles, antennas, and industrial pollution abatement structures.	N/A	Yes

	5.10.9 Ornamental Structures – Max 0.5m projection into any required yard.	N/A	Yes
	5.10.10 Structures – Items like fences, pergolas, and flag poles allowed in required yards except in visibility triangles.	N/A	Yes
Fences and Privacy Screens (5.12)	Fences and walls are permitted in all Zones subject to the following provisions:	Noted	Yes
	<b>5.12.1 Provision Applicable to All Zones</b> Fences shall be subject to the provisions of Fence By-law, as amended.	Noted	Yes
	<b>5.12.2 Privacy Screens:</b> Privacy Screens (Apartment & Multiple Dwelling Units) Max Height: 2.0m <b>Setback from Street:</b> As per minimum front yard in Residential Zone <b>Setback from Side Lot Line:</b> 0.0m <b>Setback from Rear Lot Line:</b> 0.0m	Will Comply (SPA Stage)	Yes
Frontage on a Public Street (5.13)	<b>General Requirement:</b> Lots must front on an improved public street. <b>Existing Lots Exception:</b> Development allowed if lot is registered and has municipal or compliant private services. <b>Setbacks for Private Roads:</b> Private roads or rights-of-way are considered the front lot line.	Proposal is on a lot with existing street frontage along Victoria Street, which is paved, has existing services, and is signed.	Yes
Garbage and Refuse Storage and Enclosures (5.14)	Garbage must be stored indoors or in an enclosed accessory structure or waste container. <b>Enclosure Requirements:</b> Must have masonry, concrete, or wooden walls screening the waste container. <b>Pickup Area:</b> Minimum 9.0m x 3.0m for garbage collection. <b>Setback:</b> Minimum 6.0m from	Garage on site is located to rear of building in deep-well containers (earth bins) screened by a 1.8-m-high privacy fence and on a concrete covered area with correct sizes and setbacks	Yes

	Residential or Institutional Zones.		
Water Services (5.22.1)	<b>General Requirement:</b> All development must connect to municipal water services.	Proposal is for apartment to connect to existing municipal water and sanitary services.	Yes
Sanitary Services (5.22.2)	<b>General Requirement:</b> All development must connect to municipal sanitary services.	Proposal is for apartment to connect to existing municipal water and sanitary services.	Yes
Patios (5.26)	<b>General Requirement:</b> Allowed as an accessory to places of assembly or restaurants, subject to zone setbacks. <b>Restrictions:</b> Not permitted in yards abutting Residential or Institutional Zones. Not allowed on balconies of lots abutting Residential or Institutional Zones. Not included in gross floor area calculations. Not allowed in Industrial Zones abutting Residential or Institutional Zones.	N/A	Yes
Pergolas (5.27)	<b>Attached Pergolas:</b> Must comply with yard provisions of the applicable zone. <b>Detached Pergolas:</b> Allowed in rear or interior side yards, minimum 0.9m from lot lines, max height 3.0m. <b>Size Limit:</b> Max 5% of lot area.	N/A	Yes

Planting Strips (5.28)	<p><b>Requirement:</b> Required along lot lines abutting Residential Zones in certain cases: Apartment dwellings (<math>\geq 4</math> storeys) abutting RL1 or RL2 zones (excluding pre-existing buildings).</p> <p><b>Minimum Width:</b> 1.5m, except at ingress/egress points.</p> <p><b>Landscaping:</b> May count toward required landscaped open space.</p> <p><b>Restrictions:</b> No accessory uses, structures, or buildings allowed in planting strips.</p>	1.2 m	No
Sight Triangles (5.38)	<p><b>Restrictions:</b> Within a sight triangle, the following are prohibited: Buildings, structures, opaque fences, trees, hedges, or shrubs exceeding 1.0m in height. Parking or storage of vehicles. Driveways, access lanes, stacking lanes, parking areas, or outdoor storage.</p> <p><b>Requirement:</b> A 5.0m x 5.0m sight triangle is required at intersections of streets or a street and rail line.</p>	Will comply (SPA Stage)	Yes
Snow Storage Area (5.39)	<p><b>Requirement:</b> 2% of parking areas, loading spaces, private streets, and driveways must be designated for snow storage for commercial, industrial, institutional, and residential uses with 4+ parking spaces.</p>	The 2% of the parking area can be used for snow storage and there is a dedicated 20 sq.m snow storage area in the southwest corner of the site.	Yes
Corner Lots (5.41.2)	<p><b>Front Lot Line:</b> The shorter street frontage is the front lot line; others are exterior side yards.</p> <p><b>Equal Frontages:</b> The City may designate any street-facing lot line as the front lot line.</p>	Victoria St is considered the front lot line and Hester Ln the exterior side yard of this corner property.	Yes



Visual Barriers (5.43)	If required, it must provide a screen between uses, minimum height 1.8m. <b>Fences/Walls:</b> Max height 2.5m, not permitted within 3.0m of a street line.	Not Required	Yes
<b>Parking and Loading Regulations (6.0)</b>			
Location of Required Parking (6.1.3)	<b>Residential Zones:</b> Parking must be on the same lot as the use, not in the front yard except on a driveway or parking area. <b>Barrier-Free/Bicycle/Loading Spaces:</b> Must be on the same lot as the use. <b>Setback:</b> Parking spaces and aisles must be 3.0m from a street line with a maintained 3.0m planting strip.	All parking and loading on site and setback more than 3.0 m and includes planting strips.	Yes
Calculation and Rounding (6.1.4)	If a parking, barrier-free, or bicycle space calculation results in a fraction $\geq 0.5$ , round up to the next whole number.	Noted	N/A
Cash-in-Lieu of Parking (6.1.5)	Required parking spaces may be waived if the City and landowner enter a cash-in-lieu agreement per Section 40 of the Planning Act.	Noted	Noted
Parking Space Dimensions (6.1.6)	<b>Angle-Based Widths:</b> Parking space width varies by angle; largest required aisle applies when mixed angles are used. <b>Standard Dimensions:</b> 90°: 2.75m x 5.5m, aisle 6.0m 60°: 2.6m x 5.5m, aisle 5.5m 45°: 2.6m x 5.5m, aisle 4.5m 30°: 2.6m x 5.5m, aisle 4.5m <b>Parallel:</b> 6.0m x 2.75m, aisle 4.5m <b>Obstructions:</b> Width increases by 0.3m per obstructed side. <b>Clearance:</b> Covered spaces require a 2.0m height clearance.	2.75m x 5.50 m	Yes

Surface Treatment (6.1.7)	Parking spaces must have a stable surface (e.g., asphalt, concrete, interlocking brick) to prevent erosion and ensure year-round usability.	Parking area proposed to be paved with asphalt.	Yes
Aisle Width and Access Driveways (6.1.8)	<b>Ingress/Egress:</b> Parking must have proper access without disrupting public street/laneway use. <b>Aisle Widths:</b> Standard parking access aisle: 6.0m <b>Parallel parking aisle:</b> 3.6m (one-way), 6.0m (two-way)	6.7-m-wide access aisle.	Yes
Applicability (6.2)	<b>New/Expanded Developments:</b> Must provide and maintain off-street parking and loading within the Zone. <b>Compliance:</b> Parking/loading must follow Sections 6.1, 6.3, 6.4, and 6.6 of the By-law. <b>Additional Spaces Required:</b> When a new building is constructed or floor area is added to an existing legal/non-conforming building. When a change in use increases parking requirements per Section 6.2(b).	Will provide and maintain off-street parking and loading within the Zone.	Yes
Required Parking and Queuing Spaces (6.4 / Table 6.4.1)	Apartment/Multiple Dwelling Parking Requirements <b>Standard Units:</b> 1 space per unit. <b>Small Units (<math>\leq 50.0\text{m}^2</math> GFA):</b> 0.3 spaces per unit, no visitor parking required.  20 spaces required overall (13 for standard units and 7 for small units).	23 spaces. Of these, six are EV charging spaces and two are barrier-free.	Yes
Barrier-Free Parking (6.5.1)	Lots with 10+ required parking spaces must include barrier-free spaces per Table 6.5.1, unless specified otherwise in the Zone regulations.	Noted	Noted

Table 6.5.1	<b>10-50 spaces:</b> 1 barrier-free space required.	2	Yes
General Provisions for Barrier-Free Parking (6.5.2)	<b>Dimensions:</b> Minimum 4.5m width and 5.5m length per space. <b>Rounding Rule:</b> Fractions are rounded up to the next whole number.	4.5 m wide x 5.5 m long x 2	Yes
Loading Spaces (6.6)	<b>Requirement:</b> At least one off-street loading space required for all principal buildings (except residential < 4 storeys). <b>Dimensions:</b> Minimum 3.5m width, 12.0m length, 4.2m vertical clearance. <b>Placement:</b> Must abut the building it serves. <b>Setback:</b> Minimum 7.5m from any Residential Zone unless fully enclosed. <b>Restrictions:</b> Not allowed in minimum/front yards unless screened. Not permitted between the main wall and flankage lot line. Prohibited in yards abutting Residential/Institutional Zones unless screened.	<b>1 temporary off-street loading space has been provided between building's west wall and the neighbouring residential zone at required dimensions and will be signed as "temporary".</b>	No
Bicycle Parking (6.7)	Number of Required Bicycle Parking Spaces must be provided for lots in Residential, Mixed-Use, Commercial, Industrial, or Institutional Zones as per Table 6.7.1.	Bicycle parking will be provided on site.	Yes
Min. # of Bicycle Parking Spaces (Table 6.7.1)	0.25 spaces per dwelling unit = 9 spaces	22	Yes

General Provisions for Bicycle Parking (6.7.2)	<p><b>Rounding Rule:</b> Fractions round up to the next whole number.</p> <p><b>Location:</b> Must be on the same lot as the associated use/building.</p> <p><b>Placement:</b> Allowed in any yard but not in a visibility triangle.</p> <p><b>Landscaped Area:</b> Max 50% of spaces may be in a required landscaped area.</p> <p><b>Dimensions:</b> Spaces must be 0.6m x 1.8m, with 1.5m aisle width for access.</p> <p><b>Accessibility:</b> Must be directly accessible from a driveway or parking aisle.</p> <p><b>Surface:</b> Bicycle racks must be on crushed stone, brick, asphalt, or concrete.</p> <p><b>Applicability:</b> Applies to new buildings, lot redevelopments, or changes in use.</p>	Will Comply (SPA Stage)	Yes
Residential Parking Requirements (6.9.3)	<p>Multiple Dwellings and Apartments</p> <p><b>Resident Parking:</b> Not allowed between the façade and front lot line.</p> <p><b>Setback:</b> No parking within 3.0m of a street line.</p> <p><b>Visitor Parking:</b> Allowed in front yard, but max 50% of front yard can be used for parking and access.</p>	Will comply.	Yes

Landscaping Provisions for Parking Lots (6.17)	<p><b>Requirement:</b> Minimum 10% of a parking lot (except in Industrial Zones) must be landscaped.</p> <p><b>Landscaped Buffer:</b> Required along the parking lot perimeter per Table 6.17.1 (driveways may cross buffer).</p> <p><b>Interior Landscaping:</b> May include landscaped islands, medians, pedestrian pathways, or public plazas to meet the 10% requirement.</p> <p><b>Outdoor Loading &amp; Refuse Areas:</b></p> <p><u>Setback:</u> Min 3.0m from a public street lot line.</p> <p><u>Setback:</u> Min 1.0m from any other lot line.</p> <p><u>Screening:</u> Opaque screen min 2.0m high unless using a specialized semi-underground waste container system.</p>	<p>10% of a parking lot landscaped.</p> <p><b>Landscape buffer is 1.2 m at narrowest point.</b></p> <p>Interior landscaping provided.</p> <p><b>Outdoor Loading &amp; Refuse Areas are setback 0.5 metres from eastern interior side lot line.</b></p>	No, partial compliance.
Minimum Required Width of a Landscaped Buffer of a Parking Lot (Table 6.17.1)	<p><b>Abutting a Street:</b></p> <p>≤10 spaces: 1.5m</p> <p>11-99 spaces: 2.0m</p> <p>≥100 spaces: 3.0m</p> <p><b>Not Abutting a Street:</b></p> <p>≤10 spaces: No buffer required</p> <p>11+ spaces: 1.5m</p> <p><b>Abutting Residential/Institutional Zone:</b></p> <p>All parking lots: 1.5m buffer required</p>	<p><b>1.2 m abutting residential zone.</b></p>	No

A draft Zoning By-law Amendment By-law and related Schedules have been provided as part of the complete application package.

## 4.9 City of Welland Urban Design Guidelines

The City of Welland's Urban Design Guidelines ("City UDGs") are based on 7 main principles:

- Provide a Multi-Functional & Multi-Modal Streetscape Network;
- Promote a Convenient & Connected Open Space Network;
- Protect and Enhance Natural Heritage;
- Preserve and Embrace Cultural Heritage;
- Establish Appropriate Built Form & Architecture;



- Cultivate Identity & Sense of Place; and,
- Incorporate Measures of Healthy Communities and Sustainability through Urban Design.

The main principles are summarized below, and a high-level review has been provided indicating how the proposed development conforms to these principles. In our opinion, the proposed development demonstrates appropriate regard for the City of Welland's Urban Design Guidelines.

#### **4.10.1 Multi-Functional and Multi-Modal Streetscape Network**

The Guidelines state that walkability represents a vital measure of assessing how successful a community will function now and into the future. The Guidelines also state that along with ease of access and advancing walkability, there should also be considerations made for the encouragement of a variety of modes of transportation which are sustainable and will reduce the impacts of the automobile, with particular focus on cycling and public transit. The proposal includes a sidewalk along the frontage of the development to allow for safe pedestrian movement away from vehicular traffic, providing for safe and enjoyable use for all types of users. Additionally, the medium-density residential form increases the pedestrian scale of the overall area in the long-term by providing the density necessary to support existing and future neighbourhood services within walking distance.

Further, intensification is encouraged within vicinity of established transit routes and require that new development provide convenient and direct access to public transportation facilities (Policy 6.4.2.2D).

The Proposal introduces a new sidewalk connection along Victoria Street, enhancing pedestrian safety and walkability in line with the Guidelines' emphasis on a multi-modal streetscape network. The development's compact, medium-density form fosters a more pedestrian-scaled environment and supports the viability of nearby services and public transit. Located within a short walking distance of existing NRT transit stops, the Proposal ensures convenient and direct access to public transportation, further advancing the City's goals of reducing automobile dependency and promoting sustainable mobility options.

#### **4.10.2 Appropriate Built Form and Architecture**

The Guidelines state that it is important for the City of Welland, with a rich history and culture, to ensure that any development, redevelopment and intensification is responsive to the existing conditions. New built form should be context sensitive to ensure that the City of Welland retains its unique sense of place. The Guidelines state that establishing appropriate built form and architecture can be achieved in many ways. Building heights should have a smooth transition to adjacent existing built form, in turn protecting the existing stable neighbourhood. Development, redevelopment and intensification through the provision of a mix of densities, and encouraging higher density close to major street intersections, can be achieved through moderately scaled buildings varying in height. This built form scale promotes liveability through pedestrian scaled development. The Guidelines state that compact built form, sustainable development and moderately scaled buildings are all means of establishing a built form appropriate for the City of Welland. Tools such as building articulation, massing and streetscaping should be utilized.

The proposed four-storey apartment building reflects the Guidelines' call for context-sensitive, moderately scaled built form. The design carefully responds to the existing low-rise residential

context by applying a 45-degree angular plane from the south and west property lines, ensuring a smooth height transition and protecting neighbourhood character. The building includes features such as defined entrances, extensive landscaping, and varied massing, which contribute to a well-articulated, human-scaled streetscape. The overall design balances intensification objectives with architectural sensitivity, reinforcing the Guidelines' focus on compact, livable, and sustainable development.

#### **4.10.3 Identity and Sense of Place**

The Guidelines state that urban design presents a formal strategy to promote an identity and a distinctive sense of place for a community. This could include gateway elements and signage, public art, unique landscape treatments, and more.

While the development does not include explicit gateway features or public art installations, it contributes to local identity through its high-quality design and historical sensitivity. The reuse and revitalization of a long-vacant brownfield site formerly occupied by the Vaughan Seed Company re-establishes a meaningful presence on the street, creating a new chapter in the site's story while enhancing the sense of place for the broader neighbourhood. The landscaping, active frontage, and pedestrian-oriented design also contribute positively to the local streetscape character.

#### **4.10.4 Healthy Communities and Sustainability through Urban Design**

The Guidelines state that the idea of building and designing cities is intrinsically tied to the idea of creating healthy and sustainable communities. Urban design measures should take into account ways to reduce adverse impacts of cities and promote a healthier way of life. In Welland, this can include promoting mixed-use and compact form or building upon the regional cycling network.

The Proposal supports the Guidelines' healthy communities principle by introducing a compact residential form that promotes walkability, transit use, and a more active lifestyle. The project's brownfield redevelopment aligns with sustainability goals by repurposing previously developed, fully serviced land within the Built-Up Area. Moreover, the inclusion of landscaping, reduced surface parking, and integration with future active transportation routes all contribute to creating a healthier, more resilient urban environment.

#### **Conclusions**

In our opinion, the proposed development has appropriately incorporated the City's Urban Design Guidelines into its site design, building form, and streetscape interface, contributing to a walkable, well-scaled, and sustainable neighbourhood while reinforcing Welland's long-term planning vision.

### **4.10 City of Welland Community Improvement Plans**

To assist in the revitalization, intensification and general development throughout Welland, the City offers many Community Improvement Plans ("CIP") to private developers. A CIP is a formal planning tool authorized under the Ontario Planning Act. A CIP allows the City of Welland and municipalities throughout Ontario to offer programs, grants, and incentives to revitalize areas of a city or community. As of right, Welland is undertaking a significant update to the CIP's currently being offered for development. The City of Welland currently offers four CIP's. The offered CIP's are:

- Affordable Rental Housing CIP;
- City of Welland Niagara Gateway Economic Zone and Centre CIP (Gateway CIP);
- Brownfield CIP; and
- Downtown and Health and Wellness Cluster CIP.

Similarly to the Draft Official Plan updates, the Engage Welland Program is undertaking a review of the Brownfield CIP and the Downtown and Surrounding Area CIP.

## **Brownfield CIP**

The subject site is located within the City of Welland's Brownfield Community Improvement Plan (CIP) area and, as a vacant and underutilized property within the Built-Up Area, represents a clear opportunity for brownfield revitalization. The Brownfield CIP, originally adopted in May 2007 and updated in June 2018, provides a financial incentive framework to support the remediation and redevelopment of eligible properties within the City's urban boundary and lands identified in the Northwest Planning and Servicing Study. As such, the Proposal is well-suited to benefit from this program. The CIP offers four key incentives: the Environmental Study Grant (ESG), Brownfields Tax Assistance (BTA), Brownfields Tax Increment Grant (BTIG), and Brownfields Fees Grant (BFG). The CIP acknowledges the critical role of brownfield remediation in supporting job creation, tax base growth, neighbourhood renewal, and intensification goals set out in Provincial, Regional, and City planning policies. These incentives assist private sector developers with the costs of environmental assessment, remediation, adaptive reuse, and redevelopment of brownfield lands.

The owner/applicant has proactively engaged with the City of Welland's Brownfield CIP team to facilitate the remediation and redevelopment of the subject site for residential use. Recognizing the site's classification as a brownfield—previously developed land complicated by potential environmental contamination—the applicant applied for and was accepted into several of the CIP's incentive programs designed to offset the costs associated with site preparation and environmental remediation. Specifically, the applicant secured funding through the Environmental Study Grant, which provides up to 50% of the cost for eligible environmental studies, capped at \$35,000 per project. Additionally, they are anticipated to be approved for the Brownfield Tax Assistance Program, allowing for the cancellation of municipal property taxes for up to three years during the remediation period. The applicant also anticipated to be qualified for the Brownfield Tax Increment Grant (TIG), offering a rebate of up to 100% of the municipal property tax increase resulting from the redevelopment for a period of 10 to 15 years. The Brownfield Tax Assistance Program and Brownfield TIG will be applied for at a later date, further into the projects development. Furthermore, the project benefited from the Brownfield Fees Grant, which will cover 100% of city planning, building, and demolition permit fees, and a Brownfield Development Charge Reduction, which includes a 75% automatic reduction and the potential for an additional 25% reduction upon meeting specific criteria.

By leveraging these programs, the applicant not only mitigates financial barriers but also aligns with the City's strategic objectives to revitalize underutilized lands, promote sustainable development, and enhance community livability through the transformation of brownfield sites into productive residential spaces. In our opinion, acceptance into the City of Welland's Brownfield CIP program represents the first formal acknowledgment that the subject site—previously designated for industrial use—may be suitable for alternative land uses, including residential development. The program is specifically designed to facilitate the remediation and adaptive reuse of contaminated or

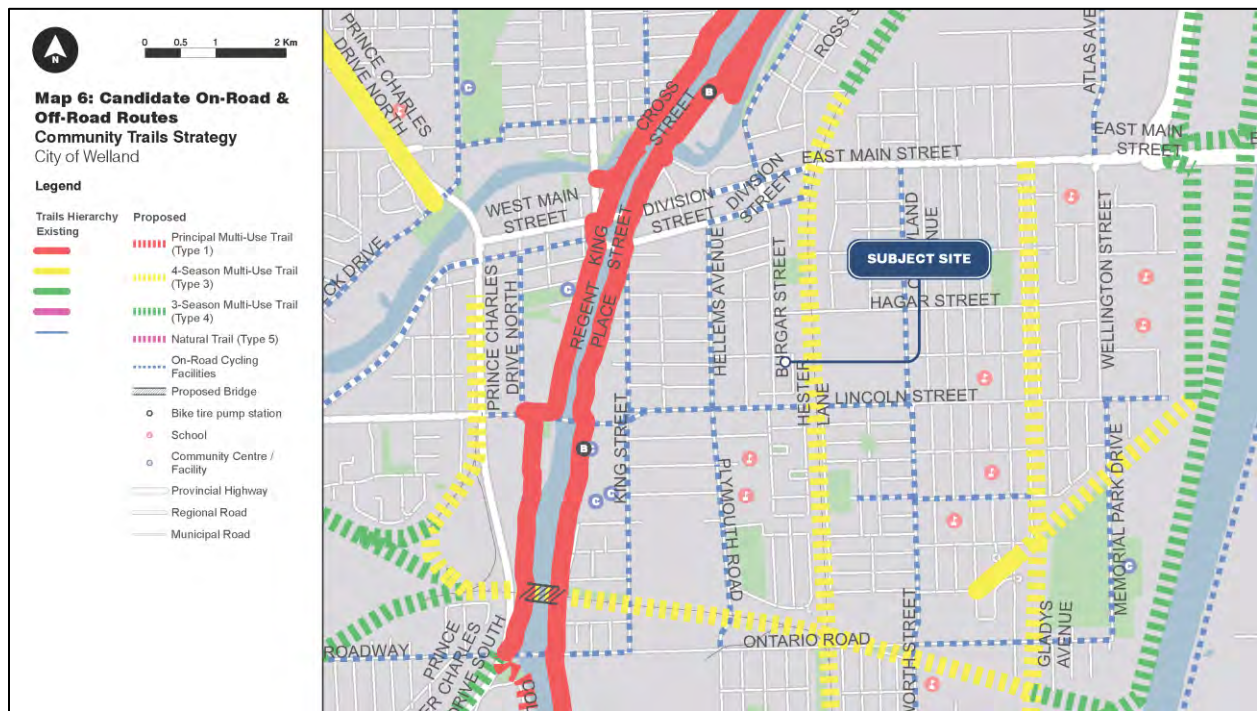
underutilized lands, and its application process involves a review of the site's redevelopment potential in alignment with broader municipal objectives, including intensification, housing supply, and neighbourhood renewal. By accepting the site into the Brownfield CIP, the City effectively recognizes that industrial redevelopment is no longer the highest and best use of the land, and that repurposing the site—subject to appropriate planning approvals—is consistent with the City's policy goals for urban revitalization, sustainability, and complete communities. This acknowledgment lays the groundwork for the proposed Official Plan Amendment and Zoning By-law Amendment, to redesignate the site for residential use.

## 4.11 City of Welland Community Trails Strategy

The City of Welland Community Trails Strategy ("CTS") was adopted by council on February 15, 2022 and outlines an approach to expanding its cycling, walking, and recreational trails network over the next 20 years. The CTS acts as a guiding document for the Welland to improve, create and enhance active transportation and the trail network throughout the City. The CTS is not a prescriptive document and does not create or enforce policies for development within Welland.

The proposed development is located in a residential neighbourhood that is supported by transit and active transportation opportunities. Adjacent to the subject site is the sidewalk on the northern side of Victoria Street, which leads to pedestrian sidewalks aligning all sides of Burgar Street and connects pedestrians to the active transportation network in the surrounding area. In addition, Map 6 (Candidate On-Road & Off-Road Routes) of the CTS identifies proposed on—road cycling facilities along Lincoln Street to the south of the site and along Hellems Avenue West of the site, as well as a proposed four-season multi-use trail (Type 3) along the rail corridor east of the site (see Figure 25 below). This indicates that the site is planned to see enhancements to the active transportation network in the future which will enhance the multi-modal options for the site.

Figure 31 – CTS Map 6 (Candidate On-Road & Off-Road Routes)



In addition, the proposed development provides a pedestrian walkway along the southern side of Victoria Street, along the property's frontage, that will assist in providing residents further connections to pedestrian walkways and transit within the adjacent residential neighbourhood, as well as providing access to the subject site.

## 4.12 City of Welland Parks, Recreation & Culture Master Plan

The City of Welland Parks, Recreation and Culture Master Plan ("PRCMP") was completed July 31, 2019, and outlines a framework of recommendations to guide the City of Welland for the next 10 years. The PRCMP outlines priorities for the City including: Coordinating planning and service delivery within the Welland Recreational Corridor, Creating an arts and cultural resource centre in the downtown, strengthening departmental promotion and marketing efforts, positioning parks and trails for the future, and lastly, preparing a comprehensive festivals and events strategy. The intent of the PRCMP is to guide the City of Welland to enhance and maintain parks, recreation, community resources and cultural resources. The PRCMP is an actionable document that assists the City in making strategic investments to ensure a healthy community, improve the quality of life of residents, and encourage a strong economy and sustainable environment. The PRCMP is not a policy document and does not create or enforce policies for development within Welland. The subject site is well serviced by existing parkland in the City according to Figure 4 (Geographic Distribution of Parkland in Welland) of the PRCMP (see **Figure 26** below).



Figure 32 – PRCMP Figure 4 (Geographic Distribution of Parkland in Welland)



For the subject site and future residents of the Proposal, the PRCMP affirms that the area is already well-served by parkland, meaning residents will have convenient access to outdoor recreation and green spaces. This supports the City's goals for complete and healthy communities and reinforces the suitability of the site for intensification and residential use.

## 5.0 PLANNING & URBAN DESIGN ANALYSIS

### 5.1 Intensification

The Proposal supports the intensification objectives of the City of Welland, the Niagara Region, and the Province of Ontario by facilitating compact residential growth within the Urban Boundary and *Built-Up Area* of Welland. The subject site is fully serviced with municipal water, sanitary, and storm infrastructure, with available capacity confirmed by Upper Canada Consultants. Redeveloping this long-vacant and underutilized brownfield site directly aligns with the intensification and growth management policies of the Niagara Region Official Plan (NROP), the City of Welland Official Plan (OP), and the Draft New Official Plan (May 2024), which prioritize infill development on serviced urban land and encourage the conversion of brownfields to meet housing demand.

Vacant since the loss of the Vaughan Seed Company building in 2008, the site has contributed neither to employment nor to housing needs for over 16 years. Its redevelopment presents a strategic opportunity to reintroduce productive land use in the form of a mid-rise, purpose-built rental apartment building containing 35 units. By introducing a housing typology not commonly found in the surrounding low-density neighbourhood, the Proposal enhances housing diversity and helps address the City's intensification target of delivering most of its new housing within the *Built-Up Area*.

The development further advances Smart Growth principles by promoting a transit-supportive, walkable built form. The site is within a 5–10-minute walk of several Niagara Region Transit stops and is well-served by nearby parks, schools, and other amenities. On-site bicycle parking and a pedestrian-oriented frontage enhance access to active transportation options, reducing reliance on private vehicles and contributing to broader climate and sustainability goals.

Importantly, the Proposal supports the region-wide housing forecast, which anticipates approximately 13,880 new housing units in Welland by 2051, the majority of which are expected to be delivered through intensification. It also fulfills the City's brownfield remediation objectives by bringing a long-dormant parcel back into productive use in a manner compatible with the surrounding residential context. Overall, the Proposal represents an efficient, sustainable, and well-integrated form of development that operationalizes multiple objectives of the City and Region's policy frameworks.

In summary, the Proposal represents a context-sensitive and strategic form of residential intensification. It facilitates the redevelopment of a long-vacant brownfield site within the Urban Boundary and *Built-Up Area*, in alignment with the growth management strategies of the NROP, OP, and Draft New OP. Fully serviced and within walking distance of transit, parks, and amenities, the site is well-suited for compact, efficient development. By introducing a medium-density, purpose-built rental building, the Proposal supports housing diversity, makes efficient use of infrastructure, and contributes to the City's population, housing, and intensification targets—making it a well-planned and appropriate location for intensification and land use conversion.

## 5.2 Land Use & Employment Conversion

In our opinion, the proposed conversion and resulting land use are highly appropriate for the subject site and reflect strong conformity with the City of Welland's planning framework including, the Niagara Region Official Plan (NROP), the in-force Official Plan (OP), and the Draft New Official Plan (May 2024). The Proposal facilitates the redevelopment of a long-vacant brownfield site at the interface of industrial and residential uses, bringing forward a purpose-built rental apartment building within the Urban Boundary and Built-Up Area. This location is already fully serviced, supports existing transit, and lies adjacent to low- and medium-density residential lands, making it well-suited for proposed use.

While the site is currently designated and zoned for *Light Industrial* uses, its long-standing vacancy, small size (0.2157 ha), and proximity to sensitive land uses make it increasingly unsuitable for employment investment. The subject site is not within a designated Site-Specific Employment Area or Provincially Significant Employment Zone and is not functionally connected to any contiguous or delineated Employment Area. As such, its conversion to a *Medium Density Residential* use is not only justifiable—it is aligned with evolving land use priorities, which emphasize the efficient use of serviced urban land and the remediation of underutilized sites.

The proposed use also aligns with the *Medium Density Residential* designation in both the current and Draft Official Plans subject only to density increase requiring site-specific relief. It introduces a compact, mid-rise form that is appropriate in height, scale, and character relative to surrounding uses. The building massing has been carefully positioned toward the rear of the site, with generous setbacks and landscaping that create a respectful transition to neighbouring low-rise dwellings and a buffer from adjacent light industrial operations. Importantly, the Proposal enhances walkability and transit use in the area, as it is located within 400–800 metres of multiple Niagara Region Transit stops and key amenities, which reduces reliance on automobiles and supports the creation of a complete community. This aligns directly with goal of creating transit-supportive, walkable complete communities and the intensification targets established in both the OP and NROP, including Welland's target for the majority of new housing to be located within the Built-Up Area.

From a zoning standpoint, the site's current *Light Industrial* zone no longer reflects the best or highest use of the land. The proposed Zoning By-law Amendment to rezone the site to *Residential Medium Density* (RM-XX) is appropriate given its location at the periphery of the industrial zone and immediate adjacency to residential neighbourhoods. The proposed residential land use is consistent with the permissions and built form envisioned by the RM zone, subject only minor site-specific exceptions to facilitate the Proposal. The massing, scale, and design features demonstrate sensitivity to the surrounding context while operationalizing broader City goals for complete, livable, and well-integrated neighbourhoods.

The *Medium Density Residential* designation and the corresponding *Residential Medium Density* (RM) zone are particularly well suited to the subject site due to its transitional location at the interface between industrial and residential uses, existing servicing, and proximity to both low-rise residential and light industrial uses. The proposed 4-storey apartment building represents a moderate and context-sensitive built form that bridges the scale between adjacent single-detached homes and larger industrial properties. It respects neighbourhood character by remaining below mid-rise thresholds established in the Draft New Official Plan, and it complies with a 45-degree angular plane from adjacent residential lots to minimize shadowing and overlook. The building's placement, with side and rear yard setbacks and perimeter landscaping, further enhances compatibility. A 4-storey form is also an efficient typology for delivering a compact, walkable development that supports intensification targets without overwhelming existing infrastructure or surrounding properties. It provides the critical mass needed to support transit and local amenities, while still maintaining a pedestrian-oriented, human-scaled streetscape—key objectives of both the City's urban design guidelines and broader planning vision.

Moreover, the Proposal contributes to housing diversity and addresses a critical local need. As confirmed by both the Niagara Region Land Needs Assessment and the City's Growth Management Background Review, Welland must accommodate nearly 14,000 new housing units by 2051, with most of that supply targeted for the *Built-Up Area*. The proposed 35-unit, purpose-built rental apartment helps fulfill this mandate by delivering much-needed, higher-density housing within a typology that is currently underrepresented in the neighbourhood. It also offers future affordability potential and work-from-home capacity—both increasingly important elements of modern housing need.

Finally, acceptance into the City's Brownfield Community Improvement Plan (CIP) reinforces the appropriateness of the conversion. The CIP is intended to facilitate remediation and redevelopment

of underutilized, often industrially zoned sites into higher and better uses such as residential or mixed-use development. The owner/applicant has already been approved for CIP incentives, which represents the City's early acknowledgement that the site's industrial designation is outdated and its future lies in contributing to residential intensification and brownfield renewal objectives. Accordingly, the proposed OPA and ZBA will result in a development that will transform a non-contributing parcel into a productive and vibrant component of the neighbourhood—supporting intensification, infrastructure efficiency, housing supply, and employment transition in a way that is both defensible and forward-looking.

### 5.3 Built Form

In our opinion, the proposed development demonstrates strong alignment with all applicable urban design policies and the City of Welland's Urban Design Guidelines (2014) and the Niagara Region's Model Urban Design Guidelines, incorporating built form, streetscape, and public realm strategies that promote compatibility, walkability, and context-sensitive intensification.

The Proposal introduces a thoughtfully designed four-storey apartment building that responds to the site's transitional context—located at the edge of a residential neighbourhood and adjacent to light and general industrial uses. This placement supports the OP and Draft New OP's vision for well-integrated growth within the *Urban and Built-Up Area*.

The built form is compatible with the surrounding context. The building height of four storeys complies with the Draft New OP Policy for mid-rise development and introduces a housing typology not presently available in the immediate neighbourhood. Although the proposed density exceeds both the OP and the Draft New OP's units per hectare threshold, the entire building fits within a voluntarily applied 45-degree angular plane from adjacent low-rise residential properties. This not only minimizes shadow and privacy impacts but provides a gradual and visually appropriate transition in scale between single-detached dwellings and the proposed apartment form. The design approach promotes compatibility, preserves residential character, and supports intensification without disruption.

In terms of urban interface and public realm, the building is oriented to frame Victoria Street, supported by new landscaping, a defined pedestrian connection, and low-impact massing. This reinforces the street edge and enhances the pedestrian experience, aligning with the Urban Design Guidelines' emphasis on walkable, attractive streetscapes. A sidewalk along the site's frontage improves local connectivity and strengthens the relationship between the site and nearby parks, schools, and transit infrastructure.

The proposal also incorporates multi-modal design features, including 13 long-term and nine short-term bicycle parking spaces, further encouraging active transportation. Its location—within a 5–10-minute walk of planned active transportation corridors along Lincoln Street and the Trillium Railway—makes it well-positioned to support the Region's and City's transit-oriented development goals.

From a placemaking and identity perspective, the proposal references the site's industrial history—once home to the Vaughan Seed Company—while reimagining it as a compact, residential infill project. This respectful reuse enhances the visual identity of Victoria Street and contributes positively to the urban fabric of a long-underutilized site.

Safety and surveillance have also been addressed through ground-floor windows, prominent building entrances, and adequate site lighting (to be specifically addressed at the site plan stage)—all designed to maximize visibility and support CPTED principles. These measures help foster a sense of safety and activity along the site edges.

The site's location at the interface between residential and employment lands makes it an ideal candidate for a mid-rise typology that both buffers and bridges these uses. By situating a four-storey form at the edge rather than the interior of the site, the development maintains neighbourhood stability while facilitating a compact, transit-supportive growth pattern. Its built form and siting contribute to a strong sense of place and reinforce the City's urban design objectives for healthy, complete communities.

In sum, we believe the Proposal delivers context-sensitive intensification through thoughtful architecture and urban design. It leverages the site's transitional context, enhances pedestrian connectivity, respects adjacent residential uses through massing controls, and contributes to the revitalization of underutilized land—all while advancing the City's broader planning and design goals for a livable, walkable, and resilient urban environment.

## 5.4 Air Quality, Odour, and Noise

A Land Use Compatibility Study was completed by Sonair Environmental (dated December 31, 2024) to ensure compliance with MECP guidelines.

The purpose of the Land Use Compatibility Study was to assess whether the proposed sensitive land use would be compatible with surrounding industrial and commercial uses, in accordance with the MECP Guidelines D-1, D-6, and NPC-300. The study reviewed facilities within a 1,000-metre radius of the site. While several industrial and commercial operations were identified within the potential influence areas, including Class I and Class II facilities, none were found to pose significant concerns related to air quality or noise. Facilities such as Next Generation Volkswagen Dismantlers, 11 Motors, Canada Forgings Inc., Ward Industrial Equipment Inc., and Silver Creek Cabinetry were assessed in detail and were either located beyond the minimum required separation distances or found to have valid Environmental Compliance Approvals. Site visits conducted in November 2024 and reviews of MECP databases revealed no significant dust, odour, noise, or vibration concerns from these operations.

A transportation noise assessment was also undertaken and determined that noise levels from nearby roadways and the adjacent railway would exceed MECP NPC-300 criteria at certain planes of window (POW) on the east, south, and west façades of the proposed development. As a result, Sonair Environmental recommended that these units be designed with provisions for central air conditioning to ensure windows can remain closed and that appropriate warning clauses (Type "C" and Type "E") be registered on title and included in lease and purchase agreements. Sonair Environmental confirmed that these measures will address potential exceedances and inform future occupants of the existing conditions.

A stationary noise impact assessment was also conducted for two nearby facilities—the Plaza at 300 Lincoln Street and Ward Industrial Equipment Inc.—which were identified as having notable rooftop mechanical units and operations. Noise modelling concluded that stationary noise impacts



at the proposed development would fall within MECP NPC-300 Class 1 area limits during daytime, evening, and nighttime conditions. No additional mitigation was recommended for these sources.

The study concluded that with the implementation of recommended mitigation measures and warning clauses, the proposed development is not expected to be adversely impacted by surrounding industrial and commercial uses and will not impose operational constraints on existing facilities. It further recommended that a reassessment of mechanical equipment associated with the proposed development be undertaken by an acoustical consultant at the site plan approval stage to ensure ongoing compliance with noise guidelines. Overall, Sonair Environmental concluded that the proposed development is compatible with its surroundings and appropriate from a land use compatibility perspective.

## 5.5 Servicing

Upper Canada Consultants (UCC) was engaged to evaluate the servicing and stormwater management for the Proposal, focusing on efficient use and conservation of energy and water. As a result of their evaluation, a Functional Servicing Report has been completed. Based on the evaluation, the report has conclude that the existing 150 millimetre diameter watermain and the 300 millimetre diameter sanitary sewer will have adequate capacity for the proposed residential development. Further, the report outlines that the proposed stormwater quantity controls on site will allow conditions up to an including the 100-year design storm event. Stormwater quality protection will be provided to Normal Protection levels. Additionally, communication agencies will coordinate the provision of communication services to the subdivision. Thus, existing municipal services and infrastructure can adequately service the proposed development, without requiring the creation of any additional services.

## 5.6 Environmental Site Assessment

Phase 1 and Phase 2 Environmental Site Assessments (ESA) were prepared by Soil-Mat Engineers and Consultants Ltd. (Soil-Mat). The Phase 1 ESA was conducted in order to satisfy the requirements of Ontario Regulation 153/04 to support the future filing of an RSC for the Phase One Property. As previously mentioned, the future SPA will address the RSC The Phase 1 ESA revealed three potentially contaminating activities (PCA's) and two historical PCAs on lands in the Phase One Study Area that are considered a PCAs likely to cause an area of potential environmental concern (APEC) on the property. As such, based on these findings, Soil-Mat finds the potential of site contamination to be considered Medium and recommend that additional investigations are required, to reduce their degree of uncertainty associated with the PCA's and associated APEC's.

Thus, a Phase 2 ESA has been prepared, in support of the proposed development. A preliminary Phase 2 ESA was completed by Soil-Mat prior to the purchasing of the property. A supplementary Phase 2 ESA was completed by Soil-Mat following the purchase of the property. The preliminary and supplementary ESA amount to a full understanding of the environmental conditions of the site. The Phase 2 ESA was also conducted in accordance with Ontario Regulation 153/04 in order to support the future filing of an RSC for the property. The analysis included the digging of test pits, establishment of three groundwater wells and collection and analysis of soil samples. As a result of the field observations and laboratory testing for the purpose of the Phase 2 ESA, the samples collected revealed elevated levels of Cobalt, Copper, Molybdenum, Nickel and Zinc. Further,

elevated levels of Organochlorine Pesticide parameter were revealed. However, the remaining soil samples did not reveal any issues and meet the applicable site condition standards. Soil-Mat suggests that the samples secured for testing are believed to be representative of the conditions at the sample locations only and not the entire subject site. As a result, the Phase 2 ESA revealed isolated samples, and it is concluded that contamination is minor in nature and no further Phase 2 ESA research or sampling is required.

## 6.0 PUBLIC CONSULTATION STRATEGY

As part of the public consultation process for this project, we will ensure full compliance with the statutory requirements outlined in the Planning Act. This includes working closely with City staff to guarantee that all circulations, notifications, and public consultation activities are carried out in accordance with the Act. Upon submission of the application, we will collaborate with City staff to help prepare and issue statutory notices to prescribed agencies, stakeholders, and members of the public (as needed). This will include ensuring that all notice signs are installed on the property and making ourselves available to neighbours within the circulation area, should they have any questions.

### **Enhanced Consultation Components**

Recognizing the importance of fostering meaningful public engagement, the proponent has committed to an enhanced consultation process that goes beyond statutory requirements. These additional efforts aim to ensure transparency, facilitate dialogue, and provide ample opportunity for feedback. Key elements of the enhanced consultation strategy include:

- 1. Individual Councillor Outreach:**

Direct outreach will be conducted with Councillors to keep them informed and engaged as representatives of their constituents. This ensures that Councillors are equipped to act as conduits for public opinion and can address inquiries or concerns from residents effectively. This outreach has begun and has occurred with the mayor as well as Ward 3 and 5 Councillors.

- 2. Applicant-Led Public Open House:**

A virtual Public Open House (“POH”) will be scheduled within 30 days following the submission of the OPA and ZBA Applications. This session will offer the public an opportunity to review the project, ask questions, and provide input in an accessible and interactive setting. City staff, the proponent, and their consulting team, including our office, are invited to attend and contribute to the discussion if schedules permit. The POH will occur in addition to the Statutory Public Meeting.

### 3. **Door-to-Door Notice Delivery:**

To ensure immediate neighbours are informed of the future POH, the proponent will manually deliver notices door-to-door in the surrounding streets. This targeted outreach will occur in two weeks following the application submission. This approach is designed to build awareness among those most directly affected and encourage their participation in the consultation process.

## **Goals of the Public Consultation Strategy**

The objectives of the consultation strategy are to:

- Ensure compliance with statutory requirements under the Planning Act.
- Provide accessible and transparent channels for public input.
- Foster open communication between the proponent, City staff, Councillors, and the public.
- Address concerns early in the process to refine the proposal and support informed decision-making.

By adhering to these principles and combining statutory compliance with proactive community engagement, the consultation strategy seeks to balance statutory obligations with meaningful public involvement, creating a collaborative foundation for the project’s advancement.

# 7.0 CONCLUSIONS

In our professional opinion, the proposed Official Plan Amendment (“OPA”) and Zoning By-law Amendment (“ZBA”) for 111 Victoria Street represent a well-considered and context-sensitive development that aligns with all relevant planning frameworks at the provincial, regional, and municipal levels. The Proposal facilitates the infill and intensification of a long-vacant brownfield site within the *Urban, Built-Up Area* of the City of Welland. It directly supports growth management, housing diversification, and brownfield remediation objectives set out in the Niagara Region Official Plan, the City of Welland Official Plan, and the Draft New Official Plan (May 2024).

The Proposal introduces 35 purpose-built rental housing units in a four-storey mid-rise apartment building, designed to be compatible with adjacent land uses through angular plane compliance, landscaping buffers, and a sensitive site layout. The project exemplifies good urban design by enhancing the pedestrian realm along Victoria Street, supporting active transportation through new walkways and bicycle parking, and incorporating references to the site's historical legacy. It also meets intensification targets and contributes to a range and mix of housing options, consistent with the Provincial Planning Statement (2024).

Importantly, the subject site is located at the interface of industrial and residential uses, is not part of a strategic or protected employment area and has remained underutilized for over 16 years. Its inclusion in the City's Brownfield Community Improvement Plan and acceptance into its incentive programs further reinforce the appropriateness of converting the site from industrial to residential use.

The proposed OPA and ZBA will facilitate compact, transit-supportive, and sustainable development on an underutilized parcel of land, while advancing the City's goals for complete communities, efficient infrastructure use, and affordable housing delivery.

Accordingly, it is our recommendation that the City of Welland approve the proposed Official Plan Amendment and Zoning By-law Amendment applications.

Your truly,

The Biglieri Group Ltd.



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