



PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE

November 11, 2025

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1593 Four Mile Creek Road
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**RE: 263 CONCESSION ROAD 6, TOWN OF NIAGARA-ON-THE-LAKES
ZONING BY-LAW AMENDMENT THIRD RESUBMISSION
OUR FILE: 09144U**

On behalf of our client, Parth Patel & Sejal Patel (the "Owner"), we are pleased to re-submit the following materials for a Zoning By-law Amendment ("ZBA") Application for the lands municipally known as 263 Concession Road 6 in the Town of Niagara-on-the-Lake (the "Subject Lands") to facilitate the development of the proposed lands for agricultural-related uses (in addition to agricultural uses already permitted).

In support of the application resubmission, please find enclosed revised PDF copies of the following:

- Concept Plan, dated October 14th, 2025, prepared by Ace Architecture;
- Draft Zoning By-law Amendment

Summary of Revisions to Proposed Draft Zoning By-law Amendment

- Prohibition of single detached dwelling within the "Rural (A) – Site Specific Zone – XXX."
- New definition for Farm Produce Storage Building which is inclusive of temperature-controlled storage.
- Removal of the request for increased lot coverage, as the Owner will be deferring the consent to sever application (deferral under separate cover to the Secretary Treasurer).
- Including provisions for a maximum Gross Floor Area for the proposed agricultural-related use.

Supporting Agricultural Operations

Further, to the revisions summarized above, it was requested through discussion with Town staff, that additional information regarding the supporting agricultural operations initially intended to support the proposed agricultural-related uses, would be beneficial in the evaluation of the applicable provincial and municipal policies and guidelines for agricultural-related uses.

The Owner has advised that they have received interest to utilize the proposed farm produce storage building if permitted from a total of twenty-three existing agricultural operations, with a diversified agricultural portfolio, as illustrated in **Appendix 1 - Supporting Agricultural Operations**.

In summary, the identified supporting agricultural operations have an average land area of 24.51 ha (60.57 ac) and are located an average of 29 km away from the Subject Lands. **Figure 1 – Identified Supporting Agricultural Operations** illustrates the radial distribution of the supporting agricultural operations, relative to the location of the Subject Lands. These agricultural operators expressed that they currently travel an average of 44 km for alternate facilities to meet their storage demands. Therefore, the proposed development of the Subject Lands reduces the need for them to travel for supporting agricultural operations by an average of 15 km.

Furthermore, when the development becomes operational, it is expected that the business will attract more agricultural operations within the identified 10 km and 25 km radius due to the location of the Subject Lands.

The Subject Lands are located along a regional arterial road (York Road/Highway 81) and within proximity to a 400 series highway (QEW and 405), making it easily accessible to the identified surrounding agricultural operations. As opined by Colville Consulting, the proposed storage facility in the proposed location will result in reduced transportation costs for agricultural businesses, reduced risk of spoilage, and additional marketing opportunities.

Appendix 1 further illustrates that the identified supporting agricultural operations have an average demand of 2,012 sq. feet of storage space, with a total demand of 46,280 sq. feet. The proposed 41,000 sq. feet of agricultural equipment storage and temperature-controlled farm produce storage building will provide a supply area that sufficiently accommodates the demand for storage of these initial supporting agricultural operations. The operational plan to provide rental agricultural equipment to the supporting agricultural operations will decrease their individual demands for storage, as the agricultural equipment will be provided and stored in a single location, rather than having each operation erecting buildings for their own storage needs, thereby preserving agricultural lands on their own farmland, throughout Niagara Region.

SUMMARY

In summary, as expressed within our Planning Justification Report dated August 2025, it remains our opinion that the proposed Zoning By-law Amendment (ZBA) application for the Subject Lands is appropriate, for the reasons as follows:

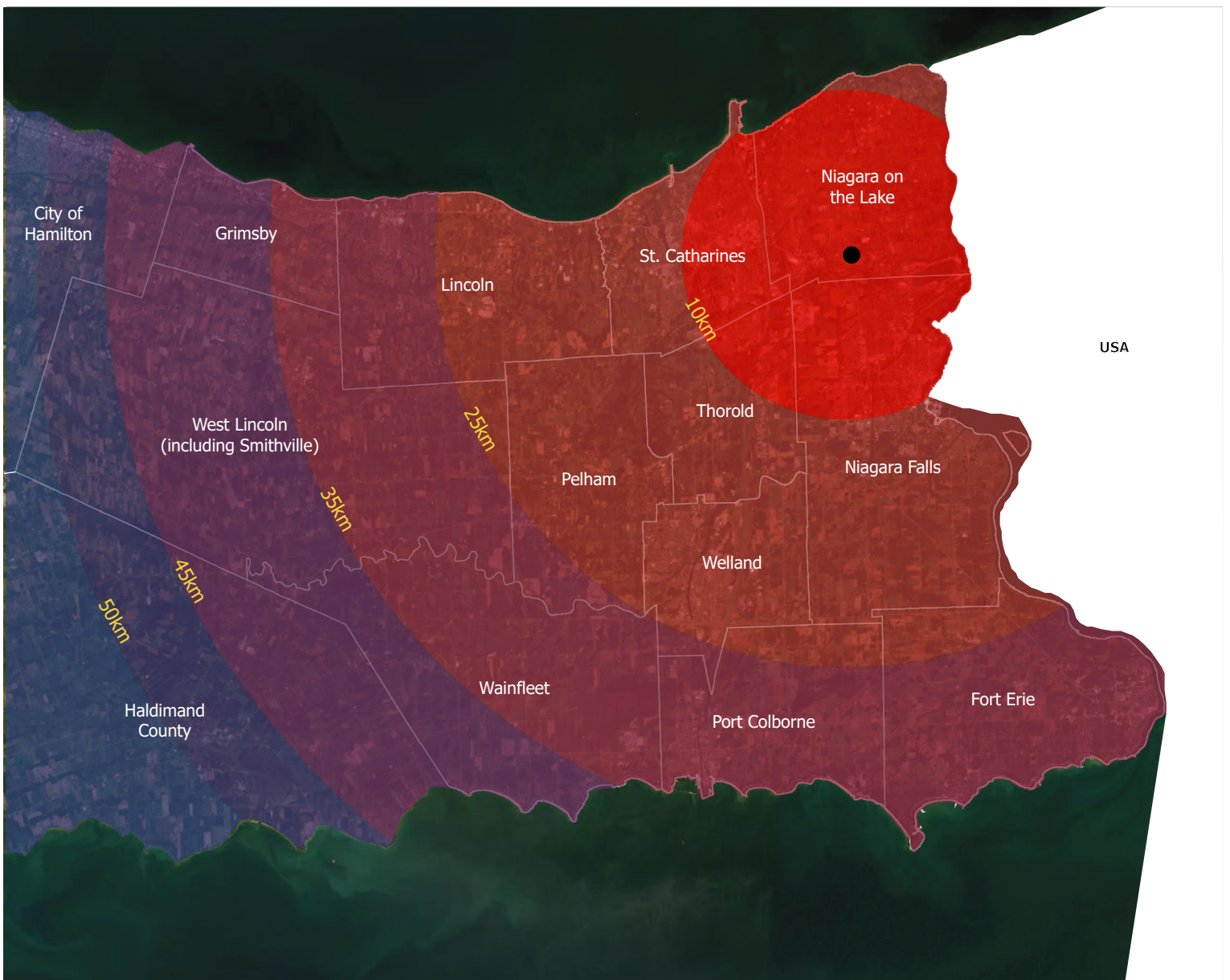


Figure 1 - Identified Supporting Agricultural Operations

- Subject Lands
- 4 identified agricultural operations within 0-10 km
- 4 identified agricultural operations within 11-25 km
- 5 identified agricultural operations within 26-35 km
- 5 identified agricultural operations within 36-45 km
- 4 identified agricultural operations within 46-50 km
- 1 identified agricultural operation beyond 50 km
- USA area not being serviced



1. The Proposal has had appropriate regard to matters of provincial Interest (Section 2 of the Planning Act).
2. The Proposal is consistent with the policies of the PPS, 2024.
3. The Proposal conforms to the policies of the Greenbelt Plan.
4. The Proposal conforms to the applicable policies of the Regional Official Plan.
5. The Proposal conforms to the NOTL Official Plan.
6. The Proposal contains uses that are consistent with the agricultural-related uses, as guided by the OMAFRA Guidelines.
7. The Proposal provides diversification to the agricultural sector of the Town, which benefits the agricultural land base and the agricultural economy.
8. The Proposal is compatible with the surrounding agricultural area and will be more appropriate on the Subject Lands instead of being relocated to Settlement Areas.
9. The Proposal will be adequately serviced and will adhere to Regional By-law No. 2017-30.
10. Access to and from the Proposal will be planned and designed to be efficient and support optimized circulation throughout the southern portion of the Subject Lands.
11. The Proposal conserves the existing natural heritage resource, which is the woodlot located on the Subject Lands, as development will be located entirely on the southern portion of the Subject Lands.
12. The Proposal will permit development that will not cause any environmental or public health and safety concerns.
13. The proposed area of development does not contain any archaeological resources within the development area.

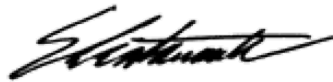
If you have questions or require any further information to assist with your review, please do not hesitate to call or email.

Thank you,

MHBC



Debra Walker, BES, MBA, MCIP, RPP
Partner



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Senior Planner

*Cc: Client
Aimee Alderman, Manager of Planning, Niagara-on-the-Lakes*

Appendix 1 - Supporting Agricultural Operations

CITY	FARM LAND (Acres)	FARM LAND (Ha)	PRODUCTION	STORAGE SIZE DEMANDS (Sq.Ft.)	DISTANCE TO SUBJECT LANDS (KM)	DISTANCE TO ALTERNATE STORAGE FACILITY (GRIMSBY/SMITHVILLE/FROTHILL/PORT COLBORNE) (KM)	AGRI EQUIPMENT STORAGE NEEDED	AGRI TEMP CONTROL FACILITY NEEDED
Fort Erie	30	12.14	Cash Crop and Fruit Orchard	2,000	34	59	yes	yes
Grimsby	98	39.66	Cash Crop and Vegetables Farm	2,000	47	50	yes	yes
Grimsby	100	40.47	Cash Crop, Livestock and Fruit Farm	2,200	46	53	yes	yes
Lincoln	34	13.76	Fruits Orchard & Vegetables Farm	1,600	26	44	yes	yes
Lincoln	47	19.02	Cash Crop and Vegetables Farm	2,000	37	42	yes	yes
Lincoln	86	34.8	Cash Crop, Livestock and Fruit Orchard	6,988	38	50		yes
Lincoln	65	26.3	Cash Crop and Vegetables Farm	4,380	48	56	yes	yes
Lincoln	21	8.5	Livestock	2,134	28	30		yes
Lincoln	112	45.32	Cash Crop and Groginseng Farm	1,500	28	35	yes	yes
Lincoln	30	12.14	Fruits Orchard & Vegetables Farm	1,100	48	50	yes	yes
NOTL	56	22.66	Fruits Orchard & Vegetables Farm	700	4	47	yes	yes
NOTL	17	6.88	Vineyard	1,500	8	26		yes
NOTL	157	63.54	Cash Crops and Nursery	6,000	11	41		yes
NOTL	12	4.89	Plums & Grapes	450	11	48		yes
Niagara Falls	54	21.85	Cash Crops and Medicinal Plants Farm	500	5.5	46	yes	yes
Niagara Falls	38	15.38	Cash Crop and Vegetables Farm	500	6.5	49	yes	yes
Pelham	64	25.9	Fruits Orchard & Vegetables Farm	1,528	54	41	yes	yes
Pelham	23	9.31	Fruits Orchard & Vegetables Farm	1,800	31	37		yes
Smithville	88	35.61	Fruits Orchard & Vegetables Farm	900	39	50	yes	yes
Smithville	103	41.68	Cash Crop, Fruits and Vineyard Farm	1,870	41	47	yes	yes
Smithville	50	20.23	Vineyard and Fruit Orchard	1,180	41	48	yes	yes
St. Catherines	20	8.09	Vineyard	1,150	17	42		yes
St. Catherines	88	35.61	Cash Crop, Fruits and Vineyard Farm	2,300	17	31	yes	yes
Average Supporting Agricultural Operation	60.57	24.51	N/A	2,012	29	44	N/A	N/A