

December 23, 2025

John Federici
Senior Planner
Town of Niagara-on-the-Lake
1593 Four Mile Creek Road
P.O. Box 100, Virgil, ON L0S 1T0

Dear John Federici,

**Re: 524 York Road, Niagara-on-the-Lake
Town File Nos. OPA-01-2025 and ZBA-01-2025
Planning and Urban Design Rationale Addendum Letter**

Bousfields Inc. is the planning consultant for Niagara York Road Inc., the registered Owner of the lands located north of York Road and east of Glendale Avenue, municipally known as 524 York Road (the “subject site”). On behalf of the owner, we are pleased to provide revised materials in support of the Official Plan Amendment and Zoning By-law Amendment applications (together, the “**Applications**”) for the subject site.

The subject site is a large triangular shaped site, approximately 2.83-hectares in size and divided by a central private road. The north portion of the subject site is developed with two 6-storey hotels (Staybridge Suites and Holiday Inn Express) and associated surface parking, and the south portion of the subject site is currently vacant. The Applications are for the redevelopment of the southern portion of the site, south of the central private road (the “**development site**”). The development site is proposed to be developed with a 7-storey hotel building, one single-storey commercial building containing a restaurant, and associated surface parking (the “**Proposal**”).

1.0 BACKGROUND

On February 27, 2025, applications were submitted by Bousfields Inc. on behalf of the Owner for an Official Plan amendment and Zoning By-law Amendment (OPA-01-2025 and ZBA-01-2025) to permit the proposed development of the subject site with a 10-storey hotel building (30.58 metres, plus rooftop parapets and mechanical equipment) containing 207 hotel rooms, and 556 square metres of commercial gross floor area at the edges of the development site, divided between two stand-alone restaurants, with a large surface parking area located central to the development site.

Bousfields Inc. prepared a Planning and Urban Design Rationale report (the “February 2025 Rationale”) in support of those applications. The Applications were deemed

complete on March 28, 2025, and have since been reviewed by Town departments and commenting agencies. Comments were received on May 2, 2025, and June 9, 2025.

The Proposal has since been revised in response to comments from Town departments and commenting agencies, and the revised design is reflected in the materials submitted in support of this resubmission (the “Revised Proposal”). Key changes to the design include the following:

- The height of the hotel building has been reduced from 10-storeys to 7-storeys to ensure the top of the proposed building is lower than the Airport Zoning Regulation (“AZR”) height limit of 140 metre ASL;
- One of the two stand-alone restaurants has been removed, and the remaining restaurant has been reconfigured with a tiered patio to the west;
- The hotel has been re-oriented from a north-south configuration along the Counsell Street frontage to an east-west configuration along the York Road frontage;
- One level of below-grade parking has been added to the hotel, and the total number of vehicle parking and bicycle parking spaces has been increased;
- The surface parking lot has been reconfigured to include dedicated pedestrian walkway connections and enhanced landscaped bays to improve pedestrian circulation and safety.

This Planning Addendum concludes that the Revised Proposal is consistent with the planning framework established in the Provincial Planning Statement (“the PPS”), conforms to policies of the Region of Niagara Official Plan, the Town of Niagara-on-the-Lake Official Plan, and the Glendale Secondary Plan, subject to the proposed amendment, and respects the applicable urban design guidelines and represents good planning.

Detailed responses to comments received from Town departments and commenting agencies are provided in the enclosed Comment Response Matrix submitted with this application.

2.0 THE REVISED PROPOSAL

The Revised Proposal contemplates a 7-storey (23.47 metres plus rooftop parapets and mechanical equipment) hotel with 227 units and a gross floor area (“GFA”) of 11,859 square metres, and one stand-alone restaurant with a ground floor GFA of 372 square metres and a basement area of 372 square metres. The restaurant is located to the west of the hotel and contains a two-tiered patio to the west. The large surface parking lot to the north of the proposed buildings has been slightly modified to provide enhanced landscaping bays and improved pedestrian circulation, and additional landscape

screening has been added throughout the development site. Vehicular access continues to be proposed via a private road to the north of the development site.

The hotel has been re-oriented from a north-south configuration along Counsell Street to an east-west configuration along the York Road frontage in order to create a consistent street wall along York Road, as requested through Planning Staff comments.

One level of below-grade parking has been added below the hotel to provide additional vehicular parking, and 273 spaces are now provided. Additional bicycle parking has also been provided for a total of 26 bicycle parking spaces. The entrance to the below grade parking is proposed to the west of the hotel.

The table below provides a breakdown of the revised project statistics:

Statistic	February 2025 Proposal	December 2025 Proposal
Total Gross Floor Area	11,373 square metres	12,231 square metres
Hotel Building	10,817 square metres	11,859 square metres
Restaurant A	220 square metres	372 square metres above-grade & 372 square metres below-grade
Restaurant B	336 square metres	-
Density	0.77 FSI	0.84 FSI
Height		
Hotel Building	10-storeys (30.58 metres)	7-storeys (23.47 metres)
Restaurant	1-storey (5 metres)	1-storey (5 metres)
Total Hotel Rooms	207 rooms	227 rooms
Total Vehicular Parking	254 parking spaces	273 parking spaces
Total Bicycle Parking	11 bicycle spaces	26 bicycle spaces
Loading Spaces	(2) 3.6 metre by 9 metre loading spaces	(2) 3.6 metre by 9 metre loading spaces

3.0 PLANNING ANALYSIS

In our opinion, the Revised Proposal is in keeping with the planning and urban design framework established by the applicable planning documents, specifically the PPS, the Niagara Region Official Plan, the Town of Niagara-on-the-Lake Official Plan, and the Glendale Secondary Plan. The Revised Proposal will help to implement the vision of Glendale as a complete urban community with an array of opportunities to live, work, and play by providing a mixed-use commercial development on an underutilized site.

The proposal has been adjusted to address comments from staff, specifically with the re-orientation of the hotel building to create a street frontage along York Road and contribute to a vibrant public realm.

Accordingly, our analysis and conclusions provided in the February 2025 Rationale remain relevant and applicable to the revised proposal. In terms of the key issues that were raised through the comments received, the following provides a response to those key issues:

Natural Heritage Boundary

Following extensive coordination with the Town and Region, including a site visit on July 31, 2025, the natural heritage boundary has been further rationalized in the updated Environmental Impact Study (“EIS”) Addendum prepared by Colville Consulting Inc., dated December 2025. The EIS has been revised to address the following comments, and recommendations from the Town and Region, including specific policies in the Niagara Region Official Plan (“NOP”):

- Evaluate Supporting Features and Areas (Policy 3.1.15, NOP) and Enhancement Areas (Policy 3.1.16, NOP);
- Include all field survey data sheets as appendices, consistent with TOR requirements;
- Include an assessment of how the applicant proposes to address the Phase 1 off-site restoration requirement;
- Include a proposal identifying an alternative location for the restoration works originally intended to be off-site; and
- Provide an explanation of how the revised restoration plan will enhance the Natural Environment System.

As noted above, Colville has coordinated with the Town and Region to determine appropriate locations for the proposed off-site restoration requirements. The EIS further provides a number of mitigation measures to reduce any impacts associated with the proposal and concludes that the proposed development satisfies the intent of natural heritage policies of the Niagara Region Official Plan and the Niagara-on-the-Lake Official Plan. The proposed development also satisfies the intent of NPCA regulatory policies. In addition, a Woodland Enhancement Plan is recommended as a condition of approval to offset the proposed woodland removal. Colville will work closely with the Town and Region to prepare the Woodland Enhancement Plan to their satisfaction as part of the Site Plan stage.

Building Height

The proposed building height has been reduced from 10-storeys to 7-storeys to address Niagara District Airport concerns related to the Airport Zoning Regulations (“AZR”). The proposed height of 7-storeys ensures that the top of the proposed building is lower than the AZR height limit of 140 metres ASL. As such, the draft zoning by-law amendment has been updated to remove the proposed Holding provision related to the AZR.

Urban Design

The consultant Team met with Town Planning Staff and the Region’s Urban Design Team on September 25, 2025, to discuss the revisions to the proposal based on comments received. Through those discussions, a re-organization of the built form, walkways and overall site design occurred. Some of the key revisions made to the plans based on these conversations include:

- The re-orientation of the built form elements to the York Road frontage to create a continuous streetwall and frame York Road, while contributing to the pedestrian environment and the animation of the public realm;
- Inclusion of a comprehensive walkway system with safe pedestrian connections throughout the site;
- Enhanced landscaping, including increased screening around loading and utility areas, the hotel frontage, and around outdoor amenity areas and patios; as well as enhanced landscaped bays within the surface parking lot and pedestrian walkways.

In our opinion, the re-configuration of the site effectively addresses Staff’s comments with regards to the York Road street-wall and contributes to the site’s location as a gateway to Glendale by framing and enhancing York Road and limiting the visibility of surface parking and loading areas from the public realm.

Transportation

The Ministry of Transportation (“MTO”) provided comments on the Transportation Impact Study (“TIS”) prepared by Paradigm Transportation Solutions, dated February 18, 2025, as submitted with the initial Applications. These comments expressed the need to provide a Terms of Reference for the revised TIS, which was provided by Paradigm via email on October 27, 2025. MTO requested that Microsimulation modelling would be required using Vissim or Aimsun.

The revised TIS uses the requested PTV Vissim model to assess existing traffic conditions along the Glendale Avenue Corridor in proximity to the site. The Vissim model was calibrated in accordance with the MTO Traffic Modelling Guidelines.

The TIS concludes that the proposed development is expected to generate increased vehicular trips in the AM and PM peak hours and contribute to additional critical movements at key intersection. It is noted that, based on site-generated traffic, traffic signals are not warranted at any of the study area interactions, but left turning lanes are warranted at the south site driveway and north site driveway on Townline Road under future conditions. A number of intersection improvements are also identified.

Based on these findings, the TIS provides the following recommendations:

- The Town of Niagara-on-the-Lake implement the active transportation and transit facilities identified within the Glendale Secondary Plan;
- Changes in real-world traffic volumes should be monitored, and
- The noted intersection improvements should be implemented to facilitate the developments.

Stormwater Management

Town Staff and the MTO provided comments on the Functional Servicing and Stormwater Management Reports prepared by Quartek Group Inc., both dated February 19, 2025, as submitted with the initial Applications. In response to these comments, the consultant Team met with Town Staff and MTO reviewers on October 30, 2025, to discuss the requirements for the revised stormwater management strategy. As a result of this meeting, a revised Functional Servicing and Stormwater Management Report has been provided by C.F. Crozier & Associates Inc., dated December 18, 2025, as part of this resubmission.

The revised report demonstrates that onsite quantity controls are provided to restrict the 100-year post-development flow rate to the pre-development 5-year level in order to address Town comments. Further, no drainage from the Phase 2 development will impact the adjacent MTO controlled highways or their drainage systems. An explanation of how the site would function if rooftop storage was not considered is also included in the revised report in order to address MTO comments.

Bicycle Parking

The revised proposal includes a reduction in bicycle parking. In this regard The Town of Niagara-on-the-Lake Zoning By-law 4136-09 requires 1 bicycle parking space per 200 square metres of gross floor area (“GFA”) for commercial uses, which a hotel use falls under, and 2 bicycle parking spaces per 100 square meters of GFA for restaurant use.

Based on these provisions, the current proposal for 524 York Road would require a total of 66 bicycle parking spaces (based on a hotel GFA of 11,859 square metres and restaurant GFA of 372 square metres). The revised proposal proposes **26 bicycle parking spaces total**, which represents a reduction of approximately 66% from the current by-law requirement.

The Owner of the subject site owns and operates a number of hotels across the Greater Toronto Area, and in their experience, there is little-to-no demand for bicycle parking for hotel uses. The majority of people using the hotels come from further away and therefore use cars or transit to access them.

In addition, we have reviewed zoning by-laws in other surrounding municipalities to compare their bicycle parking rates, and found that other municipalities have lower rates as follows:

Municipality	Bicycle Parking Rate	Total required based on GFA of 11,859 sq m/227 suites
Hamilton By-law 05-200 <i>(Non-residential uses)</i>	Short term – 0.15 spaces for each 100 square metres of GFA Long term – 0.1 spaces for each 100 square metres of GFA	Short term = 18 Long term = 12
Burlington By-law 2020 <i>(Hotel considered a Commercial use)</i>	2 spaces plus one space for every 1000 square metres of GFA	25
Grimsby By-law 14-45 <i>(Hotel/Motel)</i>	7% of motor vehicle space requirements for non-residential uses Motor vehicle spaces required for hotel use = 1 space per suite	16
Niagara Falls By-law 79-200 <i>(Non-residential uses)</i>	1 space for each 500 square metres of floor area for non-residential uses	24

Based on this review, it is our opinion that the proposal for 26 bicycle parking spaces is appropriate and sufficient for the proposed uses of the site and is more comparable to bicycle parking rates in other municipalities. The draft zoning by-law amendment has been revised to include this reduction in bicycle parking.

Vehicular Parking for Restaurant

The proposed restaurant building has a ground floor area of 372 square metres and a basement area of 372 square metres. Given the surrounding grades, it is anticipated that approximately half of the basement area will be utilized as additional restaurant space. In this regard, the vehicular parking requirement in the Zoning By-law is 1 parking space per 9 square metres of gross floor area. The ground floor space (372 sq. m.) would generate a vehicular parking requirement of 41.3 spaces, and the basement floor area (approximately 186 sq. m.) would generate a vehicular parking requirement of 20.66 spaces. The site plan attributes 41.3 vehicular parking spaces for the restaurant building.

The Draft Zoning By-law proposes to reduce the vehicular parking for the restaurant use from 1 space per 9 square metres to 1 space per 14 square metres. In our opinion, this reduction is minor in nature and can be supported, since it is anticipated that the great majority of the patrons of the restaurant will be visitors of the proposed and surrounding hotels. In this regard, the subject site is generally isolated and surrounded by three (3) existing hotel buildings and the proposed dual brand hotel. In our opinion, these hotels represent the primary customers for the proposed restaurant use who will park at the hotel and walk to the restaurant. In our experience, where there is a mix of uses on a site, there is an overlap of uses where patrons visit multiple uses on one site. Furthermore, the Zoning By-law regulations apply to the entire municipality and do not recognize these site-specific scenarios where multiple complementary uses exist on one site and will have a reduced vehicular parking requirement. Accordingly, it is our opinion that the proposed vehicular parking reduction is minor and should be supported.

4.0 CONCLUSIONS

Based on the above, it is our opinion that the proposed Official Plan Amendment and Zoning By-law Amendment are appropriate and support a desirable use of the subject site and should be approved. In addition to the foregoing, a comprehensive comment matrix has been provided to respond to all the comments received.

5.0 ENCLOSURES

In support of the revised applications, please find enclosed the following revised materials in response to staff and agency comments. The following materials have been provided digitally:

1. Response to Comments Matrix dated December 2025;
2. Planning Addendum Letter prepared by Bousfields Inc., dated December 23, 2025;

3. Architectural Package, including Site Plan, Site Stats and Details, Floor Plans, Roof Plan, Elevations, and Renderings prepared by Mataj Architects Inc., dated December 8, 2025;
4. Draft Official Plan Amendment prepared by Bousfields Inc., dated December 2025;
5. Draft Zoning By-law Amendment prepared by Bousfields Inc., dated December 2025;
6. Landscape Concept prepared by Adesso Design Inc., dated December 18, 2025;
7. (a) Tree Inventory and Preservation Report prepared by Kuntz Forestry Consulting Inc., dated December 18, 2025;
7. (b) Tree Inventory and Preservation Plan prepared by Kuntz Forestry Consulting Inc., dated December 18, 2025;
8. Functional Servicing and Stormwater Management Report prepared by Crozier Consulting Engineers, dated December 18, 2025;
9. Environmental Impact Study prepared by Colville Consulting Inc., dated December 23, 2025;
10. (a) Stage 1 and 2 Archaeological Assessment prepared by Archaeological Consultants Canada, dated September 13, 2024;
10. (b) Entry into Ontario Public Register for Archaeological Assessment dated November 19, 2024;
11. (a) Groundwater Comments Letter prepared by Soil-Mat Engineers & Consulting Ltd., dated December 16, 2025;
11. (b) Letter of Reliance and Seismic Design Comments prepared by Soil-Mat Engineers & Consulting Ltd., dated December 23, 2025;
12. (a) Transportation Impact Study prepared by Paradigm Transportation Solutions Limited, dated December 22, 2025;
12. (b) Transportation Synchro Modelling Files prepared by Paradigm Transportation Solutions Limited, dated December 2025.
12. (c) Vissim Transportation Modelling Files prepared by Paradigm Transportation Solutions Limited, dated December 2025.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Respectfully submitted,
Bousfields Inc.



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