BOUSFIELDS INC.

Project No. 2556

April 23, 2025

Josh Warkentin, Senior Planner
Town of Lincoln
4800 South Service Road
Beamsville, ON L3J 1L3

Dear Josh,

Re: Response to Niagara Region Affordable Housing Strategy
5205 King Street, Beamsville (Town of Lincoln)

Bousfields is the agent for UrbanLink Developments (Beamsville) Ltd. and UrbanLink Developments (5205 King) Ltd., the owners of lands municipally known as 5205 King Street (the "**subject site**" or "**site**").

On behalf of our client, we filed applications for Official Plan and Zoning By-law Amendment on December 20, 2024 to develop the subject site for two (2) residential mixed-use buildings of 6 and 8-storeys, as well as a standalone 2-storey amenity building. On January 30, 2025, the application was deemed incomplete.

The Notice of Incomplete Application ("**Notice**") identified that the Planning Justification Report did not discuss the tenure for the proposed housing, identifying how it conforms to the applicable planning policies particularly with regard to the Region's targets for affordable and attainable housing.

The purpose of this letter is to demonstrate how the proposed development implements the applicable policies of the Niagara Region Official Plan, and Niagara Region's Housing and Homelessness Action Plan including the Affordable Housing Strategy, particularly the estimate sale price and whether the estimate sale price is above or below the threshold for affordable as defined by Niagara Region.

Niagara Region and the Town of Lincoln emphasize the importance of increasing the number of affordable housing units and the provision of a mix of housing that is appropriate for the various sizes and incomes of households and that meets the needs of current and future residents. In our opinion, the Proposed Development contributes to the achievement of a complete communities by providing a diversity of unit types and contributes to the range and mix of housing options in the Town of Lincoln, particularly within the vicinity of the subject site, the supply of which is largely dominated by ground-related dwellings.

Condominium apartment units are provided as part of the Proposed Development. The Proposed Development includes 246 apartment units, including 90 one-bedroom units (37%), 123 two-bedroom units (50%), 7 two-bedroom plus den units (3%) and 25 three-bedroom units (10%).

The Niagara Region Official Plan establishes minimum targets for affordable housing through the horizon of the Plan, being:

- 20% of all new rental housing is to be affordable; and
- 10% of all new ownership housing is to be affordable.

According to the Niagara Region Official Plan, affordable is defined as:

"*In the case of ownership housing, the least expensive of:*

a. *Housing for which the purchase price results in annual accommodation costs which do not exceed 30 per cent of gross annual household income for low and moderate income households; or*
b. *Housing for which the purchase price is at least 10 per cent below the average purchase price of a resale unit in the regional market area.*

In the case of rental housing, the least expensive of:

a. *A unit for which the rent does not exceed 30 per cent of gross annual household income for low and moderate income households; or*
b. *A unit for which rent is at or below the average market rent of a unit in the regional market area."*

Niagara Region's Housing and Homelessness Action Plan defines a 'Low Income Household' as one in the 1st, 2nd or 3rd income decile and as one with total annual earnings of less than $39,800, and a 'Moderate Income Household' as one in the 4th, 5th or 6th income decile and one with total annual earnings of $39,800 to $84,300.

With respect to the affordability threshold, we understand that Niagara Region relies on the Province's bulletin on affordable residential units for the purposes of the Development Charges Act to determine the affordable threshold in each of its local municipalities. The affordable purchase price of a condominium apartment in Lincoln is $423,000, as of June 1, 2024. Given the 2024 data, the cost to purchase each unit would need to account for inflation based on data obtained at the time of construction.

In this regard, our client has confirmed that they are exploring the opportunity to seek CMHC funding for this project, which would advance the achievement of the above noted Official Plan policies. The number of units achieving the relevant thresholds, and ultimately the cost of each unit, can be revisited later and closer to occupancy when there is clarity regarding CMHC funding and the true household income rates and cost per apartment unit based on the Region's affordable threshold is better known.

Should you have any questions or require any further clarification, please do not hesitate to contact the undersigned or Sara Gregory or Dan Watchorn of our office.

Respectfully submitted,
Bousfields Inc.



David Falletta, MCIP, RPP
Partner

Cc. Andrew Bear, Ryan Bering, Jesse Zylstra, UrbanLink Developments (Beamsville) Ltd.