



City of Hamilton
GENERAL ISSUES COMMITTEE
ADDENDUM

Meeting #: 20-024
Date: December 14, 2020
Time: 9:30 a.m.
Location: Due to the COVID-19 and the Closure of City Hall

All electronic meetings can be viewed at:

City's Website:

<https://www.hamilton.ca/council-committee/council-committee-meetings/meetings-and-agendas>

City's YouTube Channel:

<https://www.youtube.com/user/InsideCityofHamilton> or Cable 14

Stephanie Paparella, Legislative Coordinator (905) 546-2424 ext. 3993

4. COMMUNICATIONS

4.1. Written Submissions respecting Item 8.1 - Report PED17010(h) - GRIDS 2 and Municipal Comprehensive Review - Land Needs Assessment and Technical Background Reports

*4.1.c. Maurice Stevens, Castangrey 5 Corp. and Castangrey 7 Corp.

*4.1.d. John S. Doherty, Gowling WLG (Canada) LLP, on behalf of 1507565 Ontario Limited, otherwise known as the Frisina Group

*4.1.e. Denise Baker, WeirFoulds LLP, on behalf of the Twenty Road East Landowners' Group (the "TRE Group")

5. DELEGATION REQUESTS

- *5.1. Requests to speak respecting Item 6.1 - Report PED17010(g), GRIDS 2 and Municipal Comprehensive Review - Public Consultation Round 2 and Work Plan Update
 - *5.1.a. Maria Gatzios, Gatzios Planning, on behalf of the Twenty Road East Landowners Group

- *5.2. Requests to speak respecting Item 8.1 - Report PED17010 - GRIDS 2 and Municipal Comprehensive Review - Land Needs Assessment and Technical Background Reports
 - *5.2.a. John Corbett, Corbett Land Strategies Inc., on behalf of the Upper West Side Landowners Group
 - *5.2.b. Drew Spoelstra, Ontario Federation of Agriculture
 - *5.2.c. Lynda Lukasik, Environment Hamilton
 - *5.2.d. Don McLean
 - *5.2.e. Maria Gatzios, Gatzios Planning, on behalf of the Twenty Road East Landowners Group
 - *5.2.f. Mark Noskiewicz and David Falletta, Goodmans LLP and Bousfields Inc., on behalf of the Elfrida Landowners Group
 - *5.2.g. Sergio Manchia and Matt Johnston, Urban Solutions Planning and Land Development Consultants Inc., on behalf of Effort Trust
 - *5.2.h. Paul Lowes, SGL Planning and Design Inc.
 - *5.2.i. Jonathan Minnes, Gowling WLG (Canada) LLP

Castangrey 5 Corp. & Castangrey 7 Corp.

107110 Bathurst Street

Vaughan, ON

L6A 4B6

December 9, 2020

By email

Chairman and Members of the Special Issues Committee
City of Hamilton
71 Main Street East,
Hamilton, ON
L8P 4Y5

Re: Report on GRIDS 2 / MCR for General Issues Committee meeting of December 14th.

Dear Members of the Committee:

We are the owners of lands on Fletcher Road in Elfrida.

Upon reading your report, we have the following comments:-

- 1) The report identifies a number of scenarios, all of which show a higher intensification level than has been achieved in the past several years. In the report, the City's consultant acknowledges that the targeted levels will be difficult to implement. This puts into question whether such higher levels of intensification will occur. We do not believe that this will be accomplished.

- 2) Given the changes occurring brought about by the Covid crisis, which place more emphasis on home based work, we believe that there will be a growing demand for ground related housing that provides more living space than apartments which will continue long after the COVID pandemic is under control. There is clearly a change in the way many people will be working. While this is good from a climate change perspective, it also changes the housing mix needs to require less apartments and more low-rise type homes

- 3) I note that on Page 15 of the report there is a reference to balanced growth that states that greenfield development may be tied to achieving certain thresholds of intensification. This could be counter productive, recognizing that market demands for low-rise housing will continue to increase due to the change in workplace preferences mentioned above. Therefore, limiting the amount of greenfield development would drive up the price of homes if there is limited supply.

We ask that the Committee consider a reduction of the intensification targets to a more achievable level and also that they delete the suggested requirement for the intensification thresholds related to greenfield development.

Thank you.

Castangrey 5 Corp. and Castangrey 7 Corp.

A handwritten signature in blue ink, appearing to read "MS", followed by a horizontal line extending to the right.

Per Maurice Stevens

c.c. Heather Travis



December 11, 2020

Via E-mail (stephanie.paparella@hamilton.ca)

Stephanie Paparella
 Legislative Coordinator
 Office of the City Clerk
 71 Main Street West, 1st Floor
 Hamilton, ON L8P 4Y5

John S. Doherty
 Direct +1 519 575 7518
 Direct Fax +1 519 571 5018
john.doherty@gowlingwlg.com
 File no. T968115

Dear Ms. Paparella:

**Re: GRIDS 2 and the Municipal Comprehensive Review – Land Needs Assessment and Technical Background Reports (PED17010(h)) (City Wide)
 Our Client: 1507565 Ontario Limited**

We are counsel to 1507565 Ontario Limited, otherwise known as the Frisina Group (“**Client**”), the owners of approximately 106 acres of land located within the Elfrida Community (“**Elfrida**”).

We write to provide our Client’s written submissions in response to the GRIDS 2 / Municipal Comprehensive Review (“**MCR**”) staff report, which contains a number of recommendations to be considered by City Council at their December 14, 2020 Special General Issues Committee (the “**Staff Report**”). The Lorus and Associates City of Hamilton Land Needs Assessment to 2051 (“**LNA**”) generally presents a balanced approach, both strongly supporting intensification and providing for urban expansions in a responsible and controlled way.

Prior Decisions Endorsed Elfrida as the City’s Preferred Location for Future Growth

Elfrida has long been the City’s preferred location to accommodate future residential growth. This status flows from the City’s long-standing comprehensive Growth Related Integrated Development Strategy (“**GRIDS**”) process dealing with growth to 2031. The GRIDS 2006 study selected Elfrida for very good reasons. The identification was the culmination of a robust 3-year municipal comprehensive review, involving significant public engagement and stakeholder consultation. In the end analysis, of the 5 geographically-based growth options considered, Option 5 being the three-pronged “Nodes and Corridors” option was selected as the best growth strategy for implementing the Provincial Growth Plan. This Option provided for proportionate growth being targeted to a combination of vacant lands within the urban boundary, residential intensification within the built-up area, and two future urban boundary expansion areas for employment and non-employment, being the AEGD and Elfrida respectively.

Appendix 1 to Mr. Thorne’s GRIDS and Elfrida Information Update Report to Council dated April 30, 2019 provides an exhaustive account of the evaluation, consultation, adoption and implementation process underpinning the selection of Option 5 and Elfrida which now forms the basis of the City’s urban structure in the Urban Hamilton Official Plan. As Mr. Thorne’s Report correctly points out, the employment and non-employment boundary expansions could have been formalized at the time, but a strategic decision was made to delay formal adoption of the two expansions thereby allowing for the



completion of the implementation of the secondary planning to ensure that the land use planning framework would be in place to guide development within the expansion areas.

In summary, as a preferred candidate area for future residential growth, the Elfrida lands have already been proven by:

- the secondary planning for Elfrida, which is effectively completed, including sub-watershed planning and environmental impact analysis;
- the financial planning underpinning the servicing infrastructure, supporting the Elfrida growth area which has been completed and fully entrenched in the City's 10-year capital budget and DC Bylaw;
- referencing Appendix "A" attached, the constructed water and wastewater services supporting the Elfrida growth area which are in the ground on Elfrida's doorstep; and,
- Given its location, there are no noise exposure issues.

Infrastructure Investments Implemented the GRIDS 1 Decisions

The City adopted policies within both its Urban Official Plan and Rural Official Plans identify Elfrida as the preferred location to accommodate future non-employment growth. Although these provisions have been under appeal for more than a decade (OMB Case Nos. PL110331 and PL090114) (the "**Expansion Appeals**"), in the intervening period, the City has notably continued to invest very substantial public funding in the future development of Elfrida.

The City has also invested many millions of dollars in public infrastructure relating to the future development of Elfrida, including the Upper Centennial Parkway Trunk Sewer and Dickenson Road Trunk Sewer. We have enclosed a list of the infrastructure projects relating to Elfrida for your reference at Appendix A to this letter.

AEGD

The City again reinforced Elfrida as its first priority for non-employment lands in its settlement of the Airport Employment Growth District ("**AEGD**") Secondary Plan hearing by way of Minutes of Settlement dated February 3, 2015 ("**AEGD Minutes**"). Within the AEGD Minutes the Parties agreed that it is the intent of the City of Hamilton that "The Elfrida lands are its first priority for non-employment lands" (See paragraph 14(b)). Paragraph 12 of the AEGD Minutes also bars the Parties from objecting "directly or indirectly to the recognition of the Elfrida area as identified in section B.2.2.1 of the Urban Hamilton Official Plan" as a future urban growth district. We specifically note that the members of the Upper West Side Landowners ("**UWS**") entered into those minutes and they are bound by those provisions.

Recommendation (b) – Do Not Pre-Judge the Process

The parties to the Expansion Appeals have already committed to participating in a mediation to explore if a resolution is possible to avoid a lengthy and expensive LPAT hearing process. Tentative dates are being worked out for such a mediation in late January or early February of 2021. In addition, the City process following the December 14 meeting contemplates a public consultation process in the first



quarter of 2021. Our client is of the view that to avoid any appearance that the City is prejudging the outcome of either process that it would be prudent for the City to defer the consideration of recommendation (b) for fear that some may misconstrue this recommendation. Should the mediation process not avoid a contested hearing of the Expansion Appeals, it is our position that Elfrida remains the preferred 2031 residential expansion area.

Upper West Side Proposed Amendment Contrary to the GRIDS Public Process

We would like to address the correspondence provided by Joel Farber on behalf of UWS and their proposed change to the language at number 4 of GRIDS 10 Directions (Appendix A to the Report) as follows,

4. Protect rural areas for a viable rural economy, agricultural resources, environmentally sensitive recreation and the enjoyment of the rural landscape *and avoid urbanization of prime agricultural areas.*

The Staff Report at page 9 summarizes the lengthy consultation process for the adoption of the Nine (now Ten) Directions to Guide Development. It is unfair and too late in the day to now unilaterally circumvent the public consultation process by the proposed amendment. As staff noted:

Through staff review and consultation with stakeholders and members of the public, it was determined the Directions are generally still relevant to guide future development decisions and align with the City's Our Future Hamilton vision. Comments from the public and stakeholders on the GRIDS Directions were summarized in the Round One and Two Public Consultation Summary Reports.

Moreover, the LNA clearly indicates that an expansion of the urban boundary, including onto prime agricultural lands, is required in order to address the 2051 growth requirement. Through GRIDS 1, the loss of prime agricultural lands was directly addressed, and was a key study consideration in leading to the choice of Option 5 (Nodes and Corridors) over Option 2 (Distributed Development). GRIDS 1 ensured the conversion of prime agricultural lands to accommodate 2031 forecasted growth will be kept to a minimum. Accordingly, Item 4 of the GRIDS 10 Directions as currently framed, accurately reflects the outcome of the 2031 growth structure exercise on this point and in our view appropriately protects for agricultural resources. It is important to emphasize that expansion onto prime agricultural lands to accommodate provincially directed growth is sanctioned by both the Provincial Policy Statement and the Growth Plan provided it can be justified. In our view, such justification was made plainly evident through GRIDS 1 and equally is made clear through the LNA which demonstrates that avoidance of prime agricultural lands is not possible without employing a totally unfeasible intensification target.

As a result of the foregoing, we urge the City not to amend the language at number 4 of GRIDS 10 Directions as requested by UWS.



We appreciate your careful consideration of this submission and our Client's delegation to the Committee.

Yours very truly,

Gowling WLG (Canada) LLP

A handwritten signature in blue ink, appearing to read "John S. Doherty", written in a cursive style.

John S. Doherty

JSD:hp

Encl.

cc: Patrick MacDonald - City of Hamilton
Paul Lowes – SGL Planning & Design Inc.
Jonathan Minnes – Gowling WLG (Canada) LLP
Client

ACTIVE_CA\ 42517805\12

Appendix A

Major Capital Project Directly Related to the Elfrida Area

- 1) Upper Centennial Parkway Trunk Sewer - Phase I (Lower Centennial) \$14.5 M Total Cost - conservatively 20% is attributable to Elfrida = \$2.9 M. Phase II (Upper Centennial) \$51 M Total Cost - conservatively 50% is attributable to Elfrida = \$25.5 M for a Total of \$28.4 M
- 2) Dickenson Road Trunk Sewer (Miles Road to Golf Club to Highway #56) - \$44.2 M Total Cost - conservatively 60% is attributable to Elfrida = \$26.52 M

Sub-total = \$54.92.

Projects Approved by City Council and implemented through the current DC By-law

- 1) Wastewater Capital Program - \$30.1 M
- 2) Water Projects - \$51.4 M
- 3) Stormwater Management Projects - \$114.835 M
- 4) Road Projects - \$130.495 M
- 5) Portions of City-Wide Capital Programs Related to Elfrida
 - Woodward WTP - \$35.8 M (10% of total attributable to Elfrida)
 - Transit BLAST Network and new Transit Center - \$5 M (10% of total attributable to Elfrida)
 - Other Soft Service Costs including parks, indoor recreation, library, administrative studies, paramedics, fire, police, waste diversion, LPAT tribunals, Secondary Plan, Watershed Plan and Staff time - Estimated \$30 M

Sub-total = \$397.63 M

GRAND TOTAL = \$452.55 M

December 11, 2020

Denise Baker
Partner
t. 416-947-5090
dbaker@weirfoulds.com

**Via Email to stephanie.paparella@hamilton.ca,
clerk@hamilton.ca and GRIDS2-MCR@hamilton.ca**

File

Ms. Stephanie Paparella
Legislative Coordinator
General Issues Committee
City of Hamilton
71 Main Street West, 1st Floor
Hamilton, ON L8P 4Y5

Dear Chair and General Issues Committee Members:

**Re: GRIDS 2 and Municipal Comprehensive Review
Land Needs Assessment and Technical Background Reports
Report No. PED17010(H) (City Wide)**

We, together with Ms. Susan Rosenthal of Davies Howe LLP, are counsel to the group of landowners known as the Twenty Road East Landowners' Group (the "**TRE Group**"). The TRE Group has been actively engaged on the Rural and Urban Hamilton Official Plan matters and welcomes this opportunity to comment on the City's current growth management exercise, GRIDS 2.

We would first like to recognize and thank staff for the work that they have done on the Land Needs Assessment ("**LNA**"). We recognize the LNA as a positive starting point for what we expect to be several on-going discussions, with the overall goal of including the TRE Group lands in the City of Hamilton urban boundary.

To that end, we are providing this submission outlining our initial areas of concern following our preliminary review of the LNA and associated staff report. In addition, we have included some clarifying information as part of this submission, all of which is intended to form the basis of a road map for further discussion between ourselves and staff. Further, it is noted that this submission is made in consideration of the inputs of our consulting team including land use planners, servicing engineers and a land economist.

Getting the Intensification Target Right

The selection of an Intensification Target for the existing built-up area has significant implications to how the City will grow. As the Intensification Target increases, so does the number of households required to live in smaller and more intensive units, while at the same time, the land needed to accommodate future growth is reduced.

The report provides important context informing the selection of the Intensification Target by setting out a scale to help ground the discussion. At the low end of the scale is the “current trends” rate of 40%. While we are advised that this is the rate of intensification that is more recently experienced by the City, we understand the rate over the last ten years to be closer to 35%.

The 50% minimum requirement of the Growth Plan, which the LNA identifies as being at the high end of the range of market demand is, in our submission, a suitable aspirational goal. The staff report further identifies “increased” and “ambitious” targets, which average out to 55% and 60% over the growth period, respectively, which in our opinion would result in a significant departure, not only from what the City has experienced over the last ten years, but is also a considerable departure from forecasted market demand.

The staff report translates the Intensification Targets into more readily understandable terms by correlating them to land needed to accommodate new Community Area. The Growth Plan target of 50% results in the need for about 2,200 ha of land. The averages of 55% and 60% give rise to a need of approximately 1,640 ha and 1,340 ha, respectively. These numbers are understandably preliminary, but nevertheless start to form the picture. We note that we would like a better understanding of whether or not the aforementioned numbers are gross ha or net ha, and we would fur

Going forward, it is our submission that rather than restricting Intensification Target options under consideration to the “increased” or “ambitious” targets, the full range of Intensification Targets from the Growth Plan’s 50% target to the higher averages should be given consideration to ensure that a sufficient amount of land is added to the urban boundary to accommodate the full range and mix of housing contemplated by the Growth Plan, and to ensure that objectives of the provision of affordable housing for young families can be met.

This approach would also be consistent with provincial policy direction to plan for growth on a market basis while not precluding other considerations. This approach also allows for a weighing of the consequences of too high of an Intensification Target, such as development “leap-frogging” Hamilton as a whole, leading to financial negative consequences for the City. Therefore getting the Intensification right is an important input into the LNA to ensure that the appropriate amount of lands is added to the urban boundary and should include full consideration including the minimum target as permitted by the Growth Plan.

Correctly Assessing Lands in the Whitebelt

Properly identifying the area of land available to accommodate new growth is critical to successful implementation of any growth management exercise. Making the right choices about what lands to avoid, for example, prime agricultural lands, is critical to long term prosperity. The whitebelt lands are the lands available to accommodate future growth subject to certain development constraints, though on a finer scale. In terms of constraints on Hamilton’s whitebelt, the Staff Report notes that a large portion of the whitebelt is constrained by the airport Noise Exposure Forecast (NEF) contours and natural heritage features. In applying these constraints, along with the proposed intensification target, Staff have identified approximately 1,600 ha of land available for residential urban boundary expansion.

What was not evident in the Staff Report was the clear need to avoid prime agricultural lands, some of which are located within the whitebelt, when determining the most appropriate location for any proposed expansion. Discussion about the role of prime agricultural areas may have a significant impact on the amount and location of unconstrained whitebelt lands available to accommodate Community Area lands needs.

The Staff Report very helpfully provides a map of the potential whitebelt lands in Appendix “H”. We understand that the assessment is preliminary in nature and that the City intends to complete further “ground-truthing” to better identify the lands; however, we note based on our review of all factors that the amount of land that is available in the Twenty Road East area is larger than the 275 net hectares as shown in Appendix “H”, as they are designated rural and not constrained by way of a prime agricultural lands designation in the same way as some of the other lands in the whilebelt. We look forward to discussing that in greater detail with Staff.

Understanding the Numbers

The staff report states that “[T]he results of the scenarios, together with the City’s constrained whitebelt land supply, identifies that an urban expansion area ranging in size from 1,340 ha to 1,640 ha will be required to accommodate residential (Community Area) growth to the year 2051. We would appreciate clarity in these numbers to understand whether these are gross hectares or net hectares, and what if any, “take outs” were considered in arriving at this number.

Timing and Ordering of Future Development

We understand that once the LNA is finalized, the City will explore phasing of development within the whitebelt. While we recognize that this topic will be covered in much greater detail, we wanted to correct any misunderstanding or uncertainty in the Staff Report regarding the execution of Minutes of Settlement as part of the AEGD Secondary Plan proceeding. The TRE Group was not a signatory to the Minutes of Settlement and as such, the priority of development, including the relative position of various whitebelt areas, remains an outstanding matter which is still before the LPAT.

Concluding Remarks

We encourage the ongoing consideration of three Intensification Targets, including the Growth Plan density target of 50%. We caution that more intense density scenarios may result in a land needs outcome which is not in the City’s long-term best interest.

Further, we urge the City to ensure that it meets the provincial policy mandate to avoid prime agricultural areas in considering lands for urban expansion.

Finally, it is imperative that the City treats all potential whitebelt lands equally as this process unfolds, subject to the applicable prime agricultural constraints as noted above, to ensure the integrity of the Municipal Comprehensive Review process is not otherwise compromised by

favouring one area over any other. Appropriately considering all lands equally will ultimately lead to the best alignment between the market-based need for housing and its availability.

As always please do not hesitate to reach out to me should you have any questions or concerns. We remain available to meet with staff at their convenience to discuss the foregoing.

Yours truly,

WeirFoulds LLP



Per: Denise Baker
Partner

DB
cc. Mr. Steve Robichaud, Director of Planning and Chief Planner
Ms. Heather Travis, Senior Project Manager, Growth Management Strategy
Ms. Susan Rosenthal, Davies Howe LLP
Ms. Maria Gatzios, Gatzios Planning
Client

Request to Speak to Committee of Council

Submitted on Thursday, December 10, 2020 - 2:31 pm

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: Maria Gatzios

Name of Organization: Gatzios Planning

Contact Number: 416-716-5506

Email Address: maria@gatziosplanning.com

Mailing Address:

701 Mount Pleasant Road, 3rd floor

Toronto, Ontario

M4S 2N4

Reason(s) for delegation request: Planning consultant speaking on behalf of the 'TWENTY ROAD EAST LANDOWNERS GROUP' to address the staff reports at items 6.1 and 8.1.

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? Yes

Request to Speak to Committee of Council

Submitted on Tuesday, December 8, 2020 - 1:10 pm

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: John Corbett

Name of Organization: Corbett Land Strategies Inc.

Contact Number: 416-806-5164

Email Address: john@corbettlandstrategies.ca

Mailing Address:

483 Dundas Street West, Unit 212

Oakville ON L6M 1L9

Reason(s) for delegation request: As the acting agent and applicant for the active planning applications submitted on behalf of the Upper West Side Landowners Group, the Upper West Side lands are considered a candidate growth area and are currently part of the on-going MCR process. Further, the Upper West Side lands are included within the recently released Land Needs Assessment report by the City which is the basis of the GIC meeting on December 14th. Therefore, we respectfully deem it necessary for the Committee and Council to consider and approve our request to speak to the matters within the staff report.

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? Yes



Friday, December 11, 2020

City of Hamilton,
 General Issues Committee
 Hamilton City Hall
 71 Main Street West, 4th Floor
 Hamilton ON L8R 2K3

**RE: GRIDS 2 AND BACKGROUND COMPREHENSIVE REVIEW – LAND NEEDS
 ASSESSMENT AND TECHNICAL BACKGROUND REPORTS
 (PED1701(h))(CITY-WIDE)
 UPPER WEST SIDE LANDOWNERS GROUP**

Dear Chair and Members,

On behalf of the Upper West Side Landowners Group (UWSLG) (formerly Twenty Road West Landowners Group), Corbett Land Strategies Inc. (CLS) is pleased to submit the following comments in response to the staff report PED17010(h). The UWSLG is committed to delivering an infill and complete community for lands located within Twenty Road West, Upper James Street, Dickenson Road and Glancaster Road (see Appendix A for additional deliverables)

As part of the on-going Municipal Comprehensive Review (MCR), City staff are presenting an update on the MCR and the results of the recently completed Land Needs Assessment (LNA) at the December 14th General Issues Committee (GIC). Amongst other items, staff are asking that Council endorse the consolidation of the MCR to identify growth between the 2021 and 2051 planning horizons into one process, that the LNA be received and that Council authorize staff to commence the public and stakeholder consultation process prior to final approval of the LNA. Please see Appendix B for a complete list of comments on the December 14th Staff Report. These comments are supplementary to those submitted by our legal counsel, Mr. Joel Farber, dated December 4th, 2020.

The UWSLG is in agreement with the results of the LNA and have no issue with the methodology, which was completed in accordance with the Land Needs Assessment Methodology for the Greater Golden Horseshoe (August 2020). The LNA determined that an urban expansion is required to accommodate projected growth to 2051. The area required for community lands ranges between 1,340 ha to 1,640 ha in area and is dependent on several intensification targets. The LNA also determined that the supply and demand for employment area lands are in balance and that no additional lands are required for future employment growth.



The UWSLG are in agreement that no further employment lands are required to accommodate the future growth of the City. On this basis, the UWSLG requests Council and Staff proceed with the processing of the submitting Official Plan Amendment applications File No. UHOPA-20-018/019/020 & RHOPA-20-022/023/024) given the results of the LNA as well as due to the fact that the UWSLG lands remain one of the only growth area considerations which remain unencumbered by prime agricultural designated lands.

Given the large area to be considered for future growth, it would benefit the City greatly to allow the UWSLG lands to be advanced first. In accordance with PPS (2020) Sec. 1.1.3.8 and Growth Plan (2020) Sec. 2.2.8.3, all lands to be considered as part of an expansion of a settlement boundary area can only do so if it has been demonstrated that *no other reasonable alternatives which avoid prime agricultural areas exist*. By allowing the UWSLG lands to be brought into the urban boundary on an immediate basis, it would ensure that the other candidate growth areas can be considered for inclusion within the settlement boundary in accordance with planning policy.

To assist Council in reinforcing this direction, the UWSLG suggests the approval of the following motion at the upcoming GIC meeting, which would effectively revise the motion put forth by Planning Committee on October 6, 2020 (and adopted by Council on October 14, 2020) :

“That all eligible lands including the Twenty Road West lands be considered of future growth options (for residential purposes) as part of GRIDS 2 / MCR and that staff be directed to expedite the approval processes for the Urban Boundary Expansion applications (UHOPA-20-018/019/020 & RHOPA-20-022/023/024) for the Upper West Side Community”;

Thank you for considering this submission.
Sincerely,

John Corbett

John B. Corbett, MCIP, RPP
President
Corbett Land Strategies Inc.
john@corbettlandstrategies.ca
416-806-5164

Cc: Jason Thorne, General Manager of Planning and Economic Development
Steve Robichaud, Director of Planning and Chief Planning Officer
Heather Travis, Senior Project Manager

483 Dundas Street West, Suite 212
Oakville, Ontario L6M 1L9



APPENDIX A

UWSLG Deliverables

UWS Deliverables

-  Represents infill development/not urban sprawl
-  Requires only 172 Ha of 1,210 Ha for the 2051 Lands Needs Forecast
-  Will be a Complete Community
-  Will deliver Infrastructure (i.e. Garth Street extension)
-  Avoids developing on prime agricultural land
-  Will deliver and support employment activities
-  Will deliver infrastructure and financing through landowner cost sharing agreement
-  Will deliver on provincial planning priorities for housing and land supply
-  Provides \$17.5 million in development charges
-  \$55.7 million in annual revenue (e.g. taxes/ water/ wastewater and non-tax)
-  Will incorporate extensive sustainable development features
-  Will provide affordable housing land grant opportunities
-  Will act as a COVID-19 economic stimulus project
-  Offers an ease of implementation through a phased MCR official plan amendment
-  Will buffer light and truck traffic noise from planned industrial area and airport.



APPENDIX B

UWSLG Comments on Staff Report PED17010(H)



UWSLG Comments on Staff Report PED17010(H)		
No.	Item	Comment
1.	2.0 GRIDS 2 / MCR Revised Planning Period (p.11, last paragraph)	<p>The UWSLG are in agreement that it would be beneficial for the City to include the planning horizon of 2021 to 2031 within the current MCR review. At the same time, it may be prudent for the city to reconsider the “preferred growth option” for the Elfrida lands. Particularly as the City may no longer consider these lands as the best option for growth, in light of the climate change lens for this MCR and the availability of other whitebelt lands which are fully contained by the urban boundary and/or are not designated as prime agriculture.</p>
2.	6.3 Key Decision #3 - Community Area Land Need Area (p.34, last paragraph)	<p>The staff report comments that a large portion of the City’s whitebelt lands are constrained by the airport Noise Exposure Forecast (NEF) contours and thus limits the lands available to accommodate future Community Area (i.e., residential) growth. While this is true for some lands, the applied NEF contours do not represent the latest mapping available to the City.</p> <p>In May 2011 the Hamilton International Airport completed the Airport Master Plan, which was accompanied by a Noise Impact and Evaluation Study, prepared by the City of Hamilton (dated December 2006). This report resulted in revised Noise Exposure Projections (NEP) for 2010, 2015 and 2025. This updated mapping saw the NEF/NEP contours shrink to accommodate planned airport runway improvements and technological improvements to aircraft. It is noted that the City has yet to implement the latest 2025 mapping into its UHOP and RHOP documents. If implemented, it would alter the quantum of lands considered to be not available to accommodate future Community Area (i.e., residential) growth.”</p> <p>In addition, some of the lands deemed unavailable for community area are within the NEF 28, which the UHOP/RHOP applies to regulate sensitive and residential uses in proximity to the airport. The UWSLG</p>



CORBETT LAND STRATEGIES INC.

VISION • EXPERTISE

		<p>notes that the PPS (Sec. 1.6.9.1) prohibits new residential development and other sensitive land uses in areas near airports above the 30 NEF/NEP. As such, the standard is more prohibitive than provincial policy and not reflective of other GTA airport restrictions (i.e., Pearson).</p> <p>As the City is currently completing the MCR, which is a review of all polices to ensure conformance with provincial policy, we suggest that this is an appropriate time for the City to apply the NEF/NEP contours identified in the 2025 forecasts (Airport Master Plan) to Appendix D of the UHOP and RHOP to ensure it is representative of the latest airport conditions and to ensure the city is working in accordance with the correct quantum of “unavailable” lands for community area.</p>
3.	Community Area whitebelt land areas - Relationship of Community Area whitebelt land areas (p.36) -	<p>We are in agreement with the statement that the Phase 2 area of the AEGD secondary plan is the appropriate location for the next location of employment growth. Through technical assessment completed by UWSLG, the lands to the immediate east and west of the Hwy 6 corridor have been identified to be the most appropriate locations for the expansion of the AEGD. This location is more appropriate than to the south of Twenty Road West as it would be located immediately adjacent to existing critical transportation infrastructure such as Hwy 6 and Hwy 403 and will facilitate connections of the current AEGD to a transportation network which is better suited for industrial and employment traffic.</p>
4.	Relationship of Community Area whitebelt land areas - Servicing and Transportation Costs (p.38)	<p>The UWSLG has gone to great lengths to demonstrate the servicing and transportation costs associated with the expansion of the urban boundary and the realization of the Upper West Side community for residential uses. Included within this are some of the revenues the City can expect to gain, if the UWS community was to be advanced. These include:</p> <ul style="list-style-type: none"> • \$175.5 million (2020 dollars) in DC revenues; • \$10.3 million DC revenues for school boards and GO transit;



CORBETT LAND STRATEGIES INC.

VISION • EXPERTISE

		<ul style="list-style-type: none"> • \$15.4 million (2020 dollars) in building permit revenues; • \$33.5 million in property tax revenues; • \$17.7 million in water and wastewater/storm revenues; • \$4.5 million in non-tax revenues; • \$17.7 million to the annual operating expenditures (\$1,911 per person/\$859 per employee); • Annual lifecycle costs: <ul style="list-style-type: none"> ○ \$260,000 for roads; ○ \$330,000 for stormwater services; ○ \$1.1 million for sanitary services; ○ \$1.4 million for water services; • \$55.7 million in on going revenues which exceed City expenditures by \$20.7 million; and, • \$35 million in annual positive net fiscal impact.
5.	<p>Relationship of Community Area whitebelt land areas – Complete community considerations (p.39)</p>	<p>The UWSLG is in agreement in the need to ensure the future expansion area functions as a complete community. This would ensure that the future expansion area offers a mix of uses, housing options and amenities for residents and employees which support walkability and the ability to live, work and play in close proximity. As well, a complete community would ensure that the future expansion area is compatible and enhances existing areas.</p> <p>Through the completion of the UWSLG urban boundary expansion applications, the determination of an appropriate mixture of employment and residential uses has been determined which utilizes the planned residential uses and enhanced natural heritage system to buffer the planned employment uses of the AEGD from the existing residential community on the north side of Twenty Road West.</p>

GIC December 14th Meeting – Proposed Motion

“That all eligible lands including the Twenty Road West lands be considered of future growth options (for residential purposes) as part of GRIDS 2 / MCR and that staff be directed to expedite the approval processes for the Urban Boundary Expansion applications (UHOPA-20-018/019/020 & RHOPA-20-022/023/024) for the Upper West Side Community”;

GIC December 14th Meeting - UWS Deliverables

- | | | | |
|---|--|---|---|
|  | Represents infill development/ <u>not</u> urban sprawl |  | Provides \$175 million in development charges |
|  | Requires only 172 Ha of 1,210 Ha for the 2051 Lands Needs Forecast |  | \$55.7 million in annual revenue (e.g. taxes/ water/ wastewater and non-tax) |
|  | Will be a Complete Community |  | Will incorporate extensive sustainable development features |
|  | Will deliver Infrastructure (i.e. Garth Street extension) |  | Will provide affordable housing land grant opportunities |
|  | Avoids developing on prime agricultural land |  | Will act as a COVID-19 economic stimulus project |
|  | Will deliver and support employment activities |  | Offers an ease of implementation through a phased MCR official plan amendment |
|  | Will deliver infrastructure and financing through landowner cost sharing agreement |  | Will buffer light and truck traffic noise from planned industrial area and airport. |
|  | Will deliver on provincial planning priorities for housing and land supply | | |

Request to Speak to Committee of Council

Submitted on Tuesday, December 8, 2020 - 2:17 pm

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: Drew Spoelstra

Name of Organization: Ontario Federation of Agriculture

Contact Number: 905-379-5751

Email Address: drew.spoelstra@ofa.on.ca

Mailing Address:

531 Guyatt Rd

Binbrook, On

L0R 1C0

Reason(s) for delegation request: Speak to the issues of Grids 2, land needs assessment, farmland protection and the urban boundary

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? No

Request to Speak to Committee of Council

Submitted on Wednesday, December 9, 2020 - 8:22 am

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: Lynda Lukasik

Name of Organization: Environment Hamilton

Contact Number: 905-549-0900

Email Address: llukasik@environmenthamilton.org

Mailing Address:

Environment Hamilton
22 Wilson Street, Suite 4
Hamilton, ON L8R 1C5

Reason(s) for delegation request: I am requesting to speak to Item 8.1 on the December 14th GIC agenda - GRIDS 2 & Municipal Comprehensive Review - Land Needs Assessment & Technical Background Reports.

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? No

Request to Speak to Committee of Council

Submitted on Wednesday, December 9, 2020 - 6:12 pm

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: Don McLean

Name of Organization:

Contact Number:

Email Address:

Mailing Address:

Reason(s) for delegation request: To speak on Monday, December 14 re item 8.1 - GRIDS2 and Municipal Comprehensive Review

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? No

Request to Speak to Committee of Council

Submitted on Thursday, December 10, 2020 - 2:31 pm

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: Maria Gatzios

Name of Organization: Gatzios Planning

Contact Number: 416-716-5506

Email Address: maria@gatziosplanning.com

Mailing Address:

701 Mount Pleasant Road, 3rd floor

Toronto, Ontario

M4S 2N4

Reason(s) for delegation request: Planning consultant speaking on behalf of the 'TWENTY ROAD EAST LANDOWNERS GROUP' to address the staff reports at items 6.1 and 8.1.

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? Yes

Request to Speak to Committee of Council

Submitted on Friday, December 11, 2020 - 8:53 am

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: Mark Noskiewicz and/or David Falletta (on behalf of the Elfrida Landowners Group)

Name of Organization: Goodmans LLP / Bousfields Inc.

Contact Number: 416.597.4136 / 416.418.5422

Email Address: mnoskiewicz@goodmans.ca

Mailing Address:

333 Bay Street, Suite 3000

Toronto, ON M5H 2S7

(Goodmans LLP)

1 Main Street East, Suite 200

Hamilton, ON L8N 1E7 (Bousfields Inc.)

Reason(s) for delegation request: To make a deputation in respect of GRIDS 2 and Municipal Comprehensive Review - Land Needs Assessment and Technical Background Reports (PED1701(h)) (City Wide)

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? Yes



Barristers & Solicitors

Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, Ontario M5H 2S7Telephone: 416.979.2211
Facsimile: 416.979.1234
goodmans.caDirect Line: (416) 597-4136
mnoskiewicz@goodmans.ca

December 11, 2020

Via Email (stephanie.paparella@hamilton.ca)City of Hamilton
General Issues Committee
Hamilton City Hall
71 Main Street West
Hamilton, ON L8P 4Y5**Attention: Stephanie Paparella, Legislative Coordinator**

Dear Chair and Members:

Re: GRIDS 2 and Municipal Comprehensive Review – Land Needs Assessment and Technical Background Reports (PED1701(h)) (City Wide) (“Land Needs Assessment Report”)

We are solicitors for a group of landowners (the “Elfrida Landowners”) in the Elfrida area of the City of Hamilton. The list of Elfrida Landowners we represent is attached to this letter as Schedule “A”. Our clients’ landholdings in the Elfrida area are shown in the attached slides prepared by our client’s planning consultants, Bousfields Inc. (the “Bousfields Slides”).

Our clients have reviewed the above-noted Lands Needs Assessment Report, which is to be considered at the General Issues Committee meeting scheduled for December 14, 2020.

On behalf of our clients, we are providing the following comments for the Committee’s consideration:

1. The Land Needs Assessment Report confirms that the City needs to support both intensification of its downtown and built-up areas and responsible urban boundary expansion to meet its prescribed growth needs to 2051.
2. The Elfrida area remains a logical, appropriate and needed expansion to the City’s urban boundary.
3. The Elfrida Landowners will constructively participate in the pending mediation with the City and other parties with respect to the outstanding Urban Hamilton Official Plan (“UHOP”) and the Rural Hamilton Official Plan (“RHOP”) appeals.

We have elaborated below on each of these comments.

City Requires Both Intensification and Urban Boundary Expansions

The updated provincial Growth Plan requires the City to plan to achieve minimum provincial forecasts of 820,000 persons and 360,000 jobs by 2051. As noted in the Land Needs Assessment Report, the City is required to plan for growth to 2051, and lower forecasts than those set forth in the Growth Plan are not permitted.

The Land Needs Assessment Report concludes that even if the most Ambitious Intensification Targets are adopted by the City (which the Report cautions will be challenging to achieve), almost all of the City's Community Area Whitebelt lands (including the Elfrida, Twenty Road East and Twenty Road West lands, but excluding the Whitechurch lands) will be required to accommodate the City's forecasted growth to 2051. If Increased Intensification Targets are adopted by the City (less than the most Ambitious Intensification Targets but above the Growth Plan minimum intensification targets, and described in the Land Needs Assessment Report as above the high-end of market demand), then all of the City's Community Area Whitebelt lands will be required to meet the City's forecasted growth to 2051. Under both scenarios, the number of intensification units required to meet the target is significantly greater than the City's past intensification rates.

The analysis set forth in the Land Needs Assessment Report makes it clear that the City is not facing a choice of supporting intensification or urban boundary expansions. The City needs both increased levels of intensification and responsible urban boundary expansions that included most, if not all, of its Community Area Whitebelt lands.

It is important to note that approving urban boundary expansions to accommodate growth to 2051, as is required by the Growth Plan, will not translate into immediate development of the lands brought into the urban boundary. All of the lands will be subject to extensive Secondary Plan processes, subwatershed planning, and the need to address other matters such as phasing considerations, before development can proceed.

When developed, these new urban areas will accommodate a growing population that cannot be accommodated within the City's existing boundary, at higher densities than current City trends. These new communities will be designed as complete communities, with a mix of land uses and housing options, with active transportation, pedestrian and cycling infrastructure and open space options, serving as a place for people to live and work within the City. All of which will achieve numerous policy objectives and result in significant public benefits, including:

- Balanced growth through intensification and new growth areas;
- The ability to achieve growth forecasts and provide much needed housing stock;
- Housing choice that includes a full range and mix of housing options for existing and new Hamiltonians;

- Affordability flowing from a full range and healthy supply of housing;
- The opportunity for job growth in complete and mixed use growth areas;
- Development that is transit supportive, which adds transit ridership and improves HSR's fiscal position;
- Capitalizing on already paid for infrastructure that is sized to accommodate growth; and
- Keeping taxes down and contributing to the City's fiscal position.

Elfrida Remains a Logical, Appropriate and Needed Expansion to the City's Urban Boundary

The City's GRIDS 1 process, dating back to 2006 and earlier, identified the Elfrida area as Hamilton's next urban expansion area to accommodate growth to 2031, in conjunction with planned intensification of Hamilton's downtown and other built-up areas.

Elfrida remains a logical, appropriate and needed expansion to the City's urban boundary for the following reasons:

1. Elfrida was selected as the City's next growth area as part of a municipal comprehensive review. [Note: As stated in the Lands Needs Assessment Report, and contrary to what is suggested in the December 4, 2020 letter that has been submitted to the Committee by Fogler Rubinoff LLP on behalf of the Twenty Road West (or UWS landowners), GRIDS 1 was a municipal comprehensive review.]
2. GRIDS 1 resulted in the City endorsing a Nodes and Corridors land-use structure, which was described as follows: "This [Elfrida] option concentrates growth in essentially one new growth area to facilitate mixed use, higher density, transit friendly development that optimizes existing infrastructure. Some prime agricultural land is lost by this option. Although agriculture is highly valued in the City, it was found that it was impossible to identify a concentrated new growth area without impacting prime agricultural land because of the extent of such land in the City."¹
3. The selection of Elfrida as the City's preferred next growth area was confirmed by City Council through its adoption of the RHOP in 2006, and its adoption of the UHOP in 2009.
4. As shown on the Bousfields slides, City growth management decisions since 2009 have built upon the GRIDS 1 process, and the City has spent significant resources to implement

¹ Growth Related Integrated Development Strategy: Growth Report (May 2006), pages 43 and 44.

its growth management strategy, including work on a subwatershed study and Secondary Plan for the Elfrida area, and the extension of services to the area.

5. City Council reaffirmed Elfrida as its first priority for residential growth in 2015, as part of the AEGD settlement.

Pending LPAT Mediation

The UHOP and RHOP appeals relating to the City's identification of Elfrida as its next residential growth area has not yet been resolved.

At a recent Case Management Conference ("CMC") convened by the Local Planning Appeal Tribunal ("LPAT"), the City and other parties to the appeals indicated a willingness to attempt to resolve the appeals through mediation. It appears that this mediation will be occurring in late January. The Elfrida Landowners will participate constructively in the mediation.

Now that the City's Land Needs Assessment Report, dealing with growth to 2051, has identified a need for urban boundary expansions including most, if not all, of the City's Community Area Whitebelt lands, it is possible that the parties to the UHOP and RHOP appeals can reach agreement at the mediation on how to avoid a contested hearing over those appeals, dealing with growth to 2031. We note that Recommendation (b) of the Land Needs Assessment Report, suggesting that the MCR process to direct growth for the 2021 to 2051 period be collapsed into one process, appears premised on such a result being achieved. If a contested hearing over the UHOP and RHOP appeals cannot be avoided, the GRIDS 1 process and subsequent growth management actions taken by the City reinforce that Elfrida would remain the appropriate and preferred choice to accommodate residential growth to 2031.

The undersigned, and David Falletta of Bousfields, have registered as deputants for the December 14th General Issues Committee meeting, and will be available to address this letter and the attached Bousfields Slides.

Yours very truly,

Goodmans LLP



Mark Noskiewicz
MN/nb

cc: Heather Travis, Planning & Economic Development Department, Hamilton
Steve Robichaud, Manager of Development Planning, Hamilton



City Clerk, City of Hamilton
Elfrida Landowners
David Falletta, Bousfields Inc.

SCHEDULE A

Multi-Area Developments Inc.

Mud & First Inc.

Marz Homes Brofrida Inc.

Marz Homes (Elfrida) Inc.

Palleta International Corporation

1356715 Ontario Inc.

2188410 Ontario Inc.

2084696 Ontario Inc.

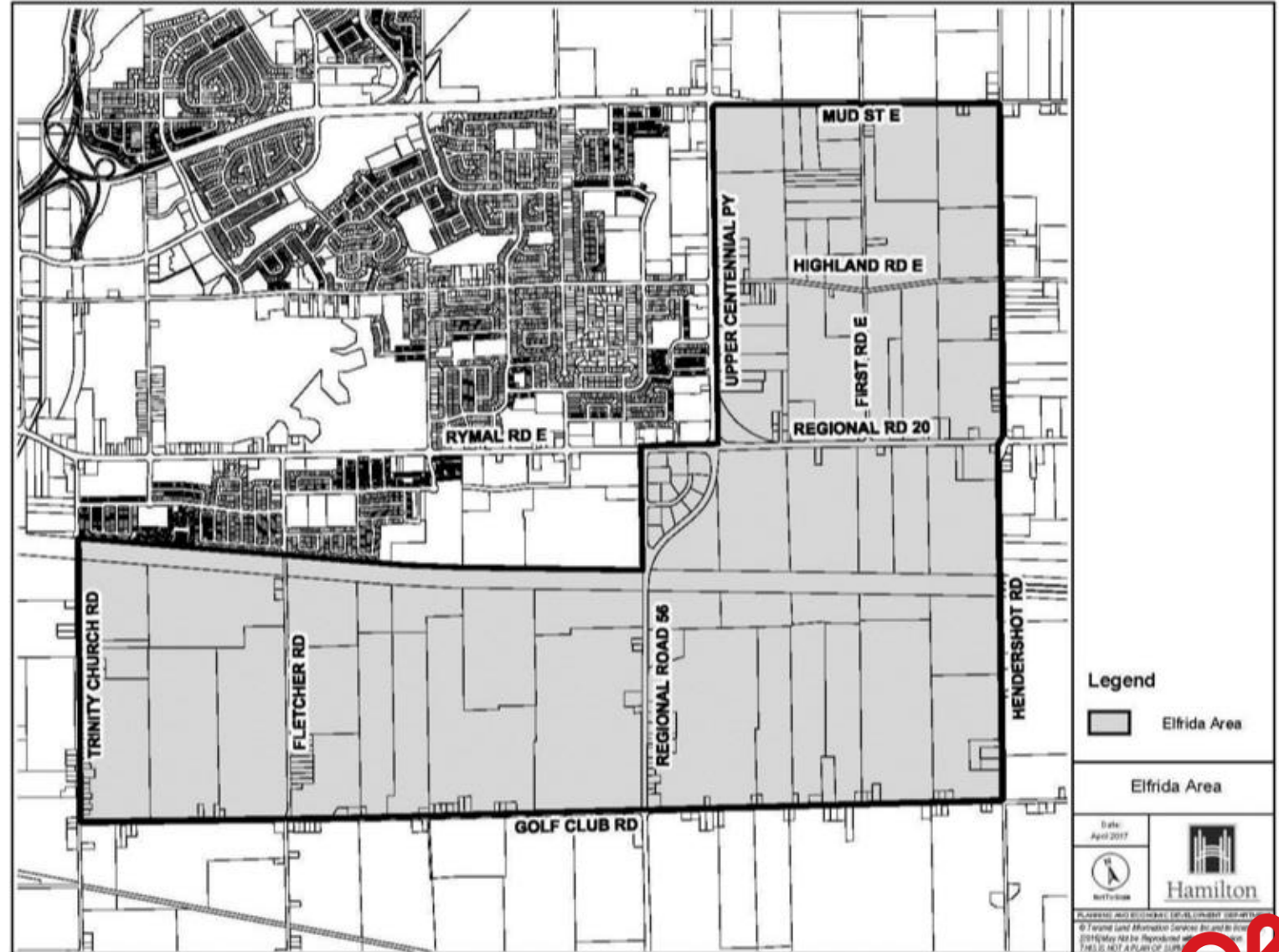
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General Issues Committee

Item 8.1 – GRIDS 2 & MCR
City of Hamilton

Overview

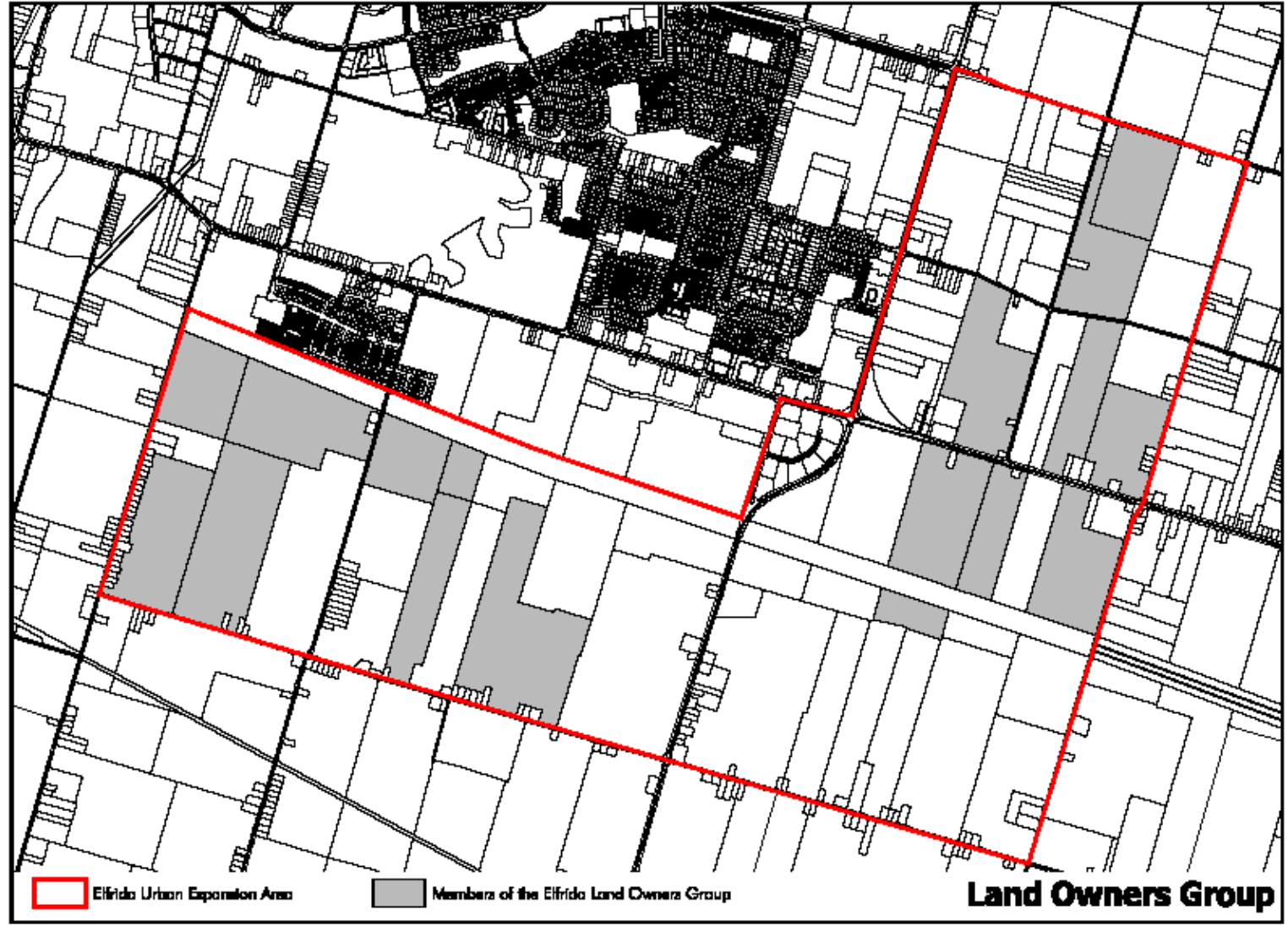
- Elfrida Landowners
- Elfrida's History
- Existing Conditions
- Hamilton Growth



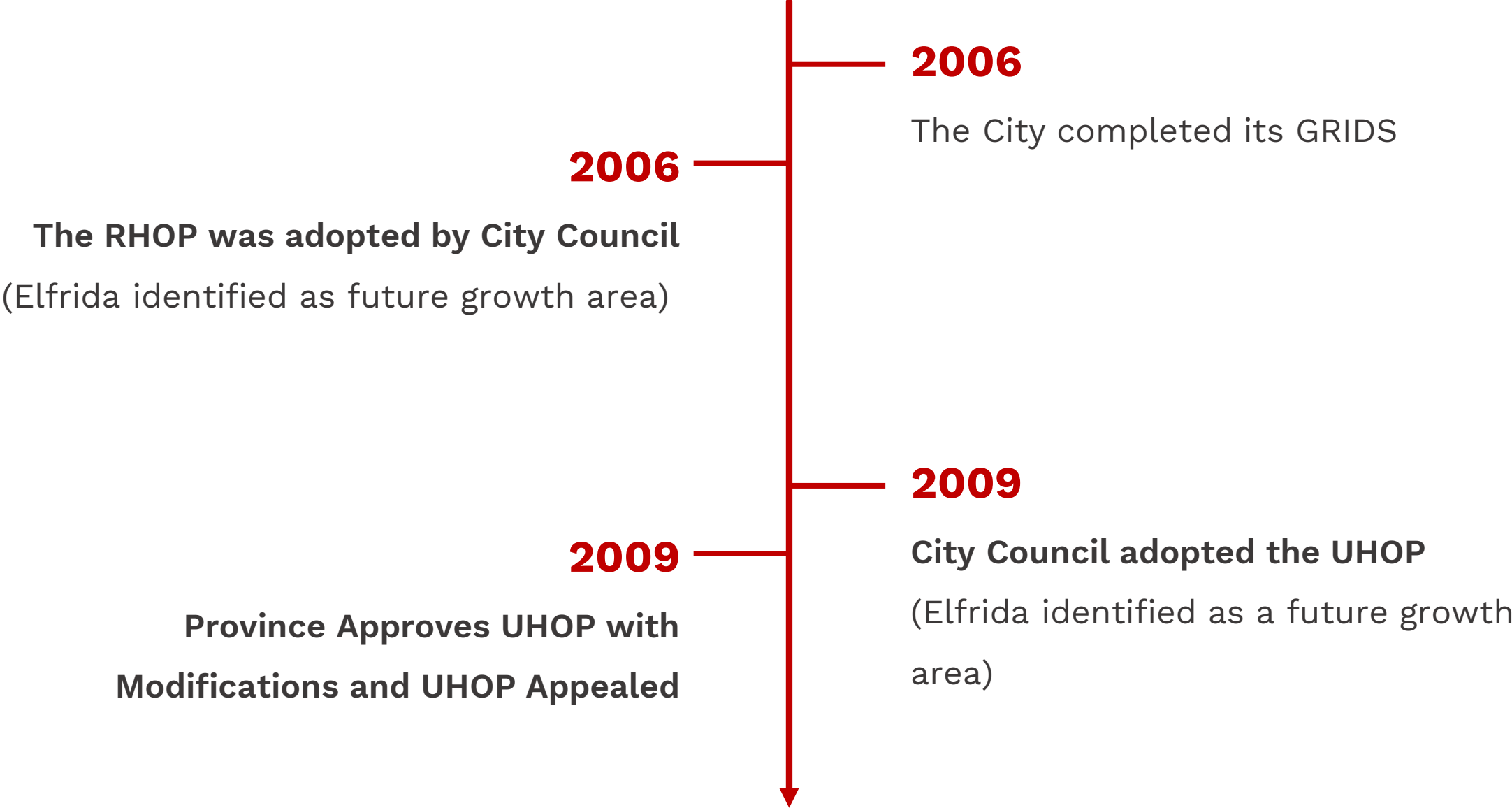
Source: City of Hamilton



Elfrida Landowners



Elfrida's History





2013

City Council Approves \$1 Million
for studies related to Elfrida

2015

**City Council confirms Elfrida as first
priority for residential growth**
(with Twenty Road East to follow as
second priority)

2016

**The City initiated the Elfrida Growth Area
Study** – Phases 1 and 2 of the Study are
complete and Phase 3 has been initiated



2018

GRIDS 2 Initiated by the City including a workplan and consultation update

2020

GRIDS 2 LNA to accommodate growth to 2051 reconfirming the need for Elfrida

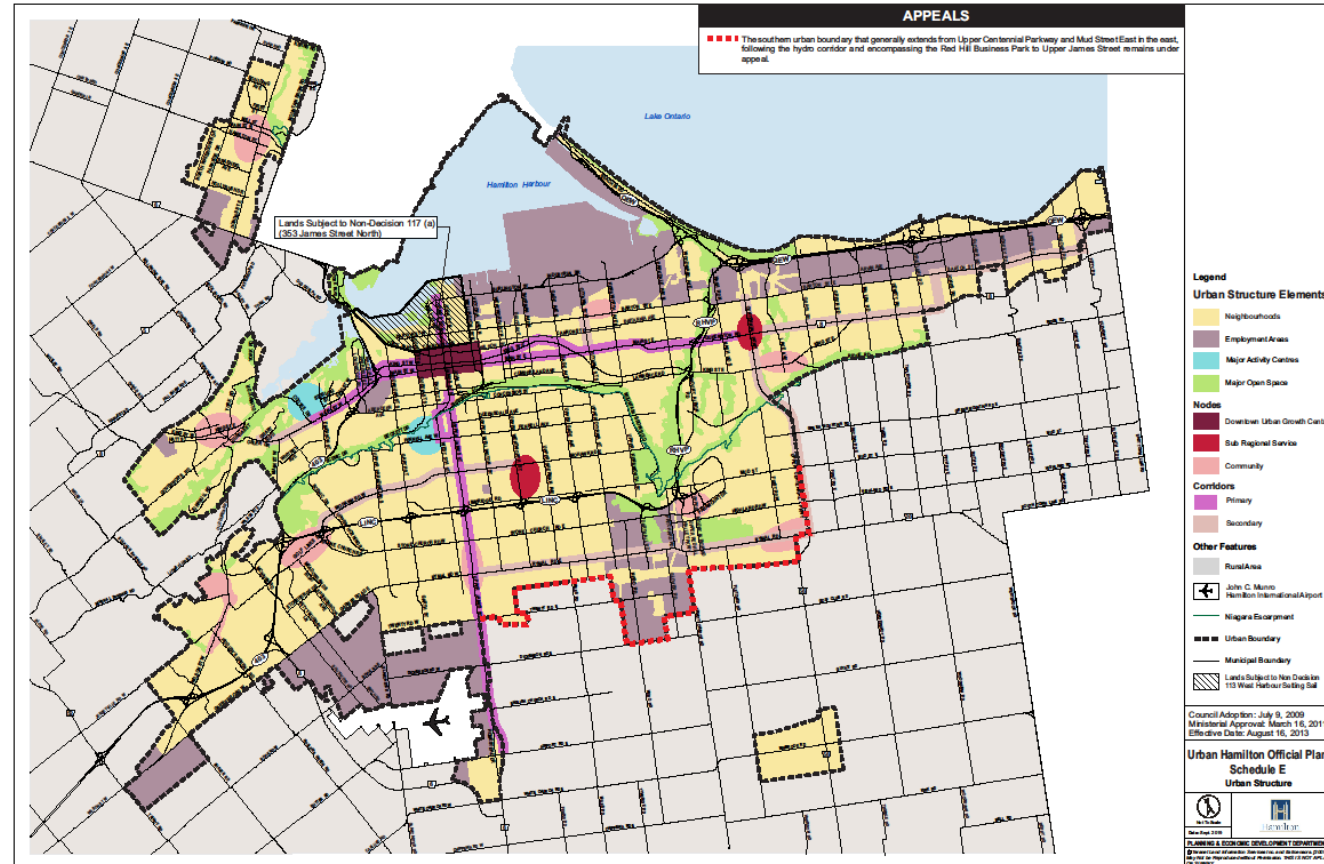
We are Here



Existing Conditions

Urban Structure

- ✓ Elfrida represents a logical extension of the **urban boundary**
- ✓ An opportunity to complete the **Community Node** at Rymal/ Highway 56
- ✓ The realization of a complete community



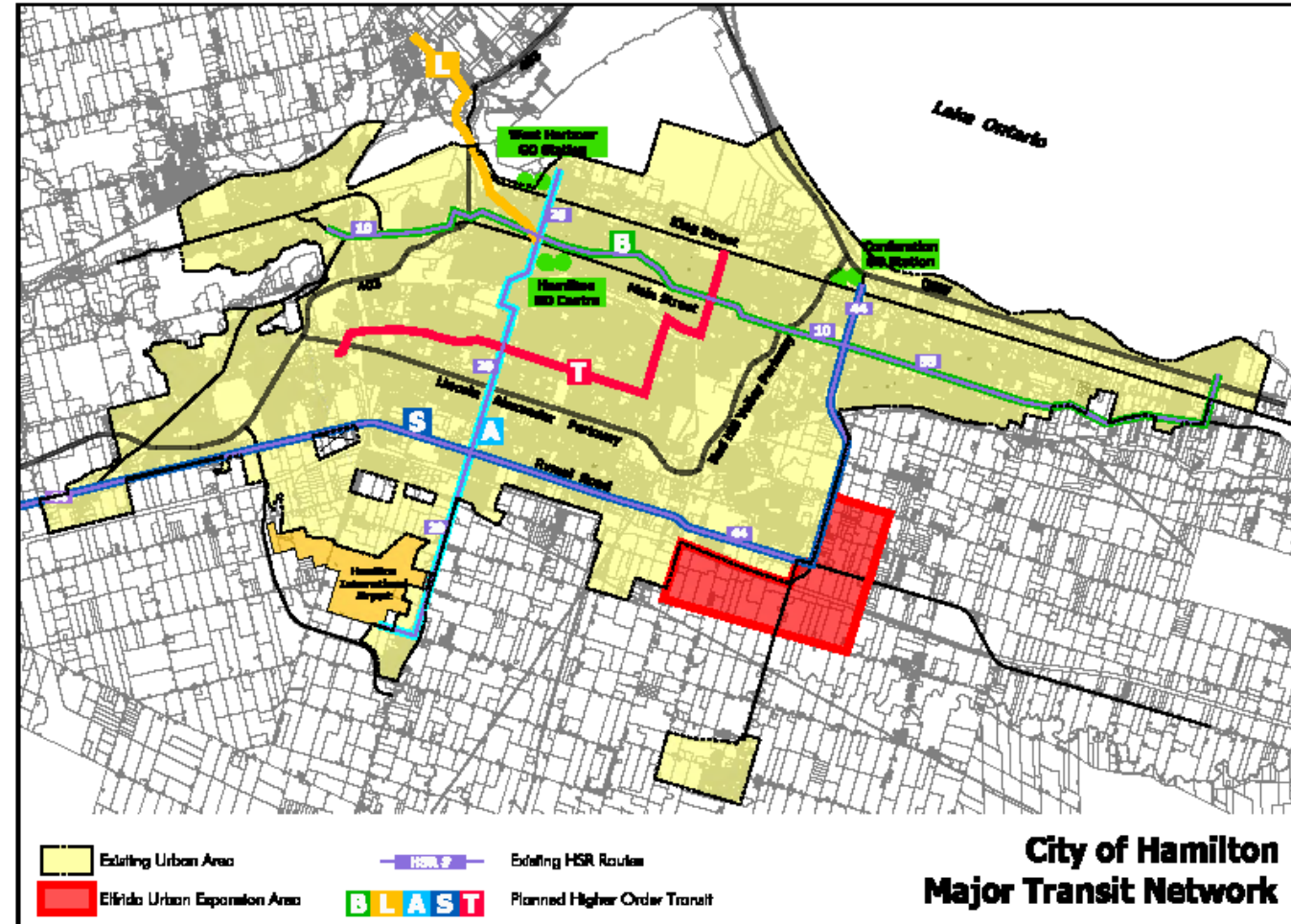
Source: City of Hamilton



Existing Conditions

Transportation

- ✓ Elfrida represents an opportunity to capitalize on the planned S-Line Rapid Transit Corridor
- ✓ Providing a direct connection to the Confederation GO Station
- ✓ The realization of the Secondary Corridor along Upper Centennial
- ✓ Supports HSR Transit ridership at transit supportive densities



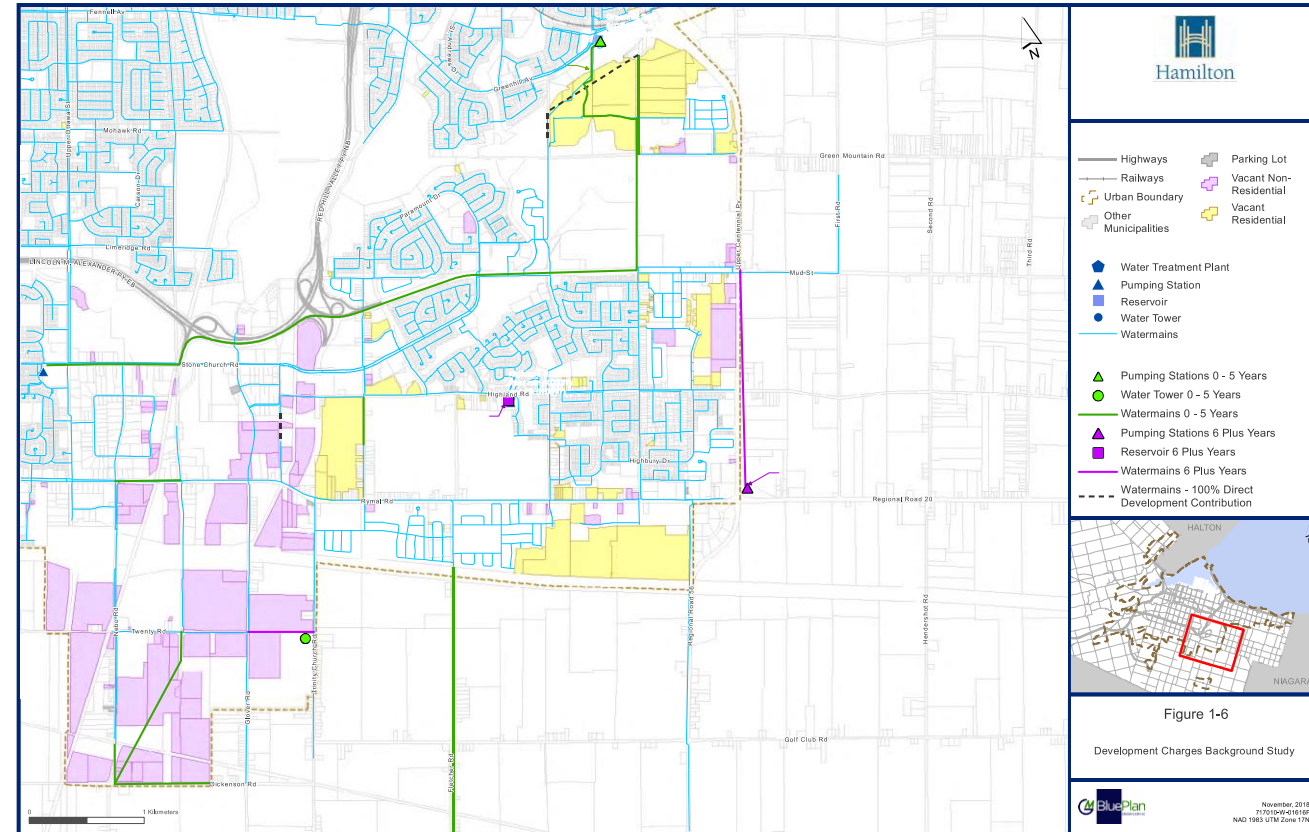
Source: City of Hamilton

Existing Conditions

Water

Elfrida can utilize:

- ✓ An existing large watermain on Rymal Road
- ✓ A funded large watermain on Upper Centennial
- ✓ Municipal Class EA approved by Council for water pressure improvements to Elfrida



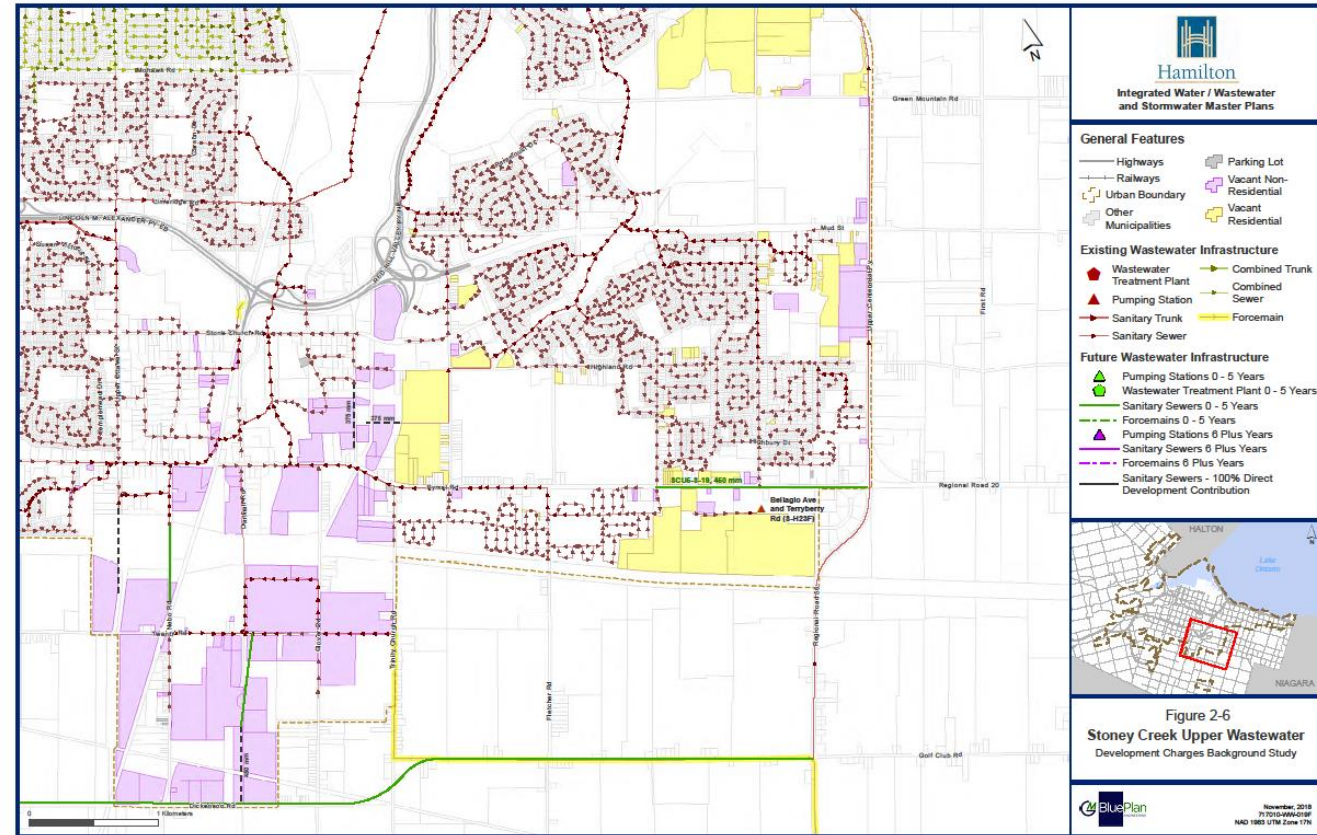
Source: City of Hamilton

Existing Conditions

Wastewater

Elfrida can utilize:

- ✓ An existing large sanitary trunk on Upper Centennial
- ✓ A funded large sanitary sewer along Golf Club Road

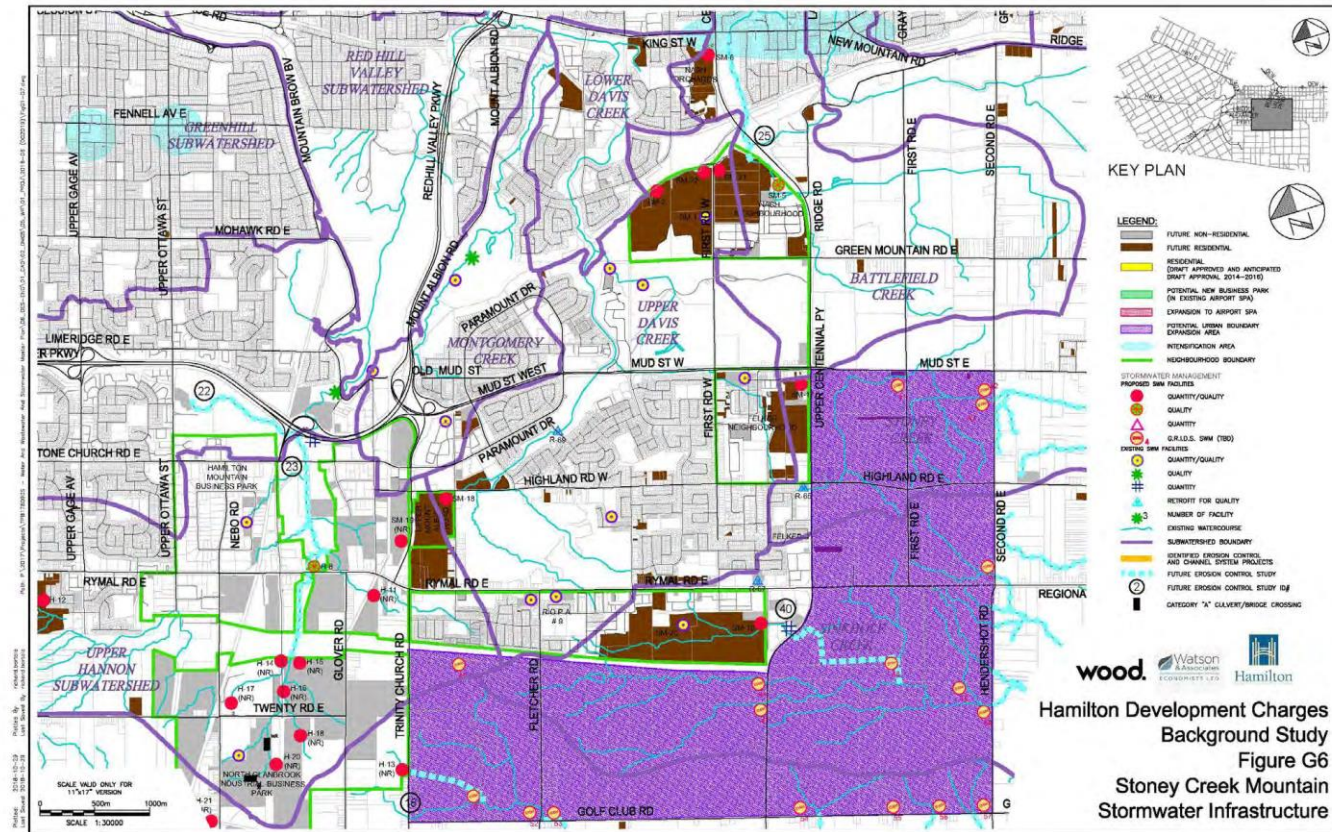


Source: City of Hamilton

Existing Conditions

Stormwater

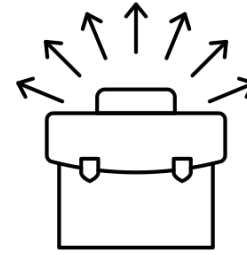
- ✓ Elfrida takes advantage of existing and planned stormwater management facilities and infrastructure
- ✓ The new stormwater management facilities in Elfrida will be in accordance with the completed and approved Subwatershed Study



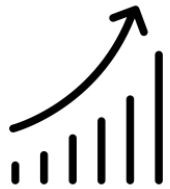
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Choice and Affordability

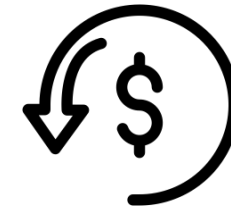


Jobs

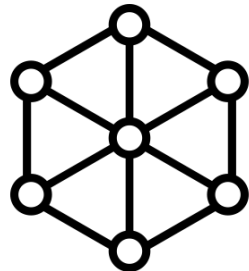


Balanced Growth

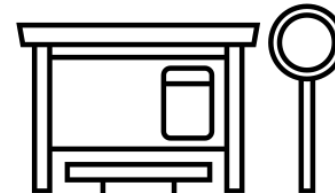
Hamilton Growth **ELFRIDA**



Keep Taxes Down



Optimize Infrastructure



Transit Supportive

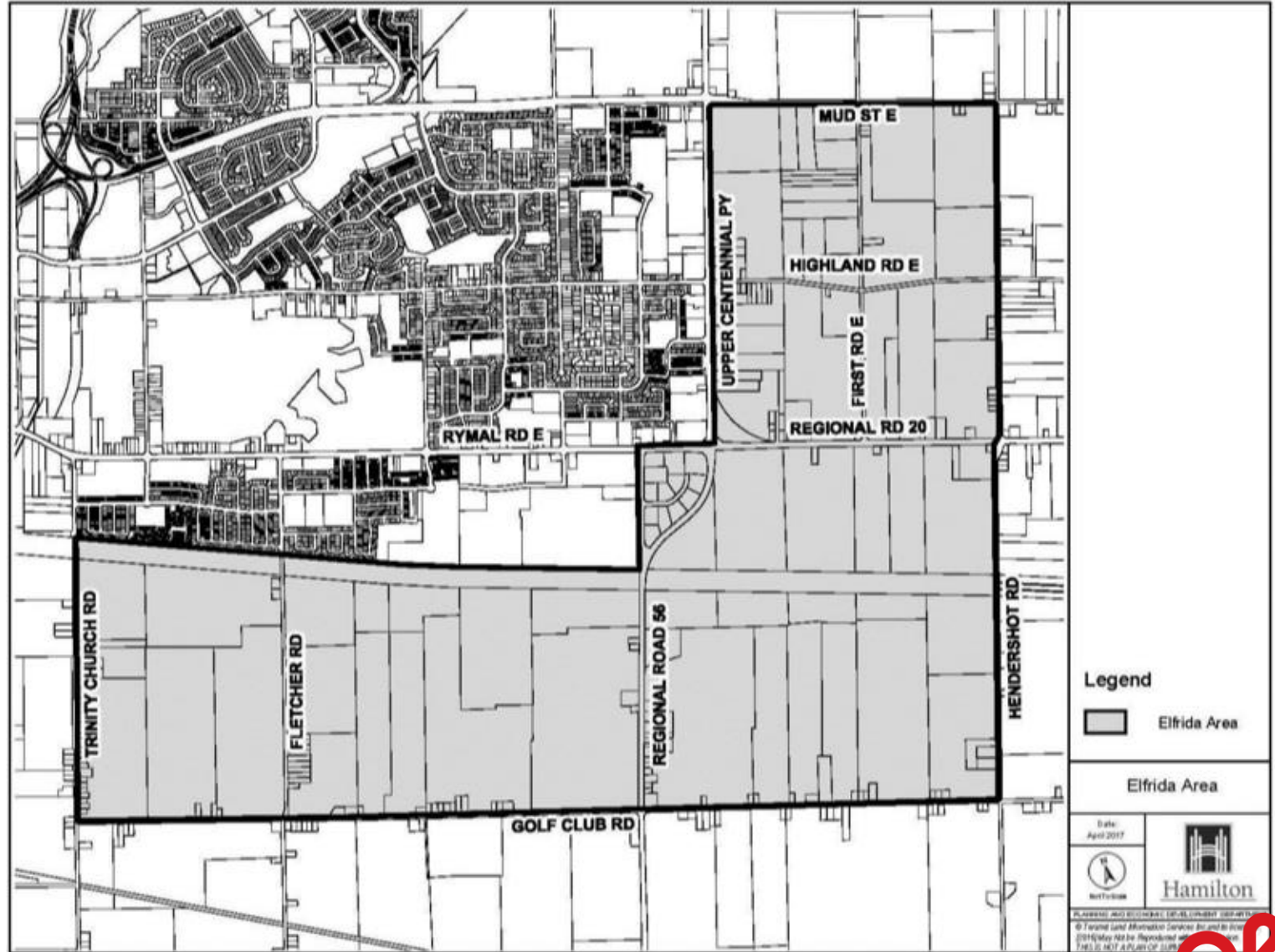
Thank you!

General Issues Committee

Item 8.1 – GRIDS 2 & MCR
City of Hamilton

Overview

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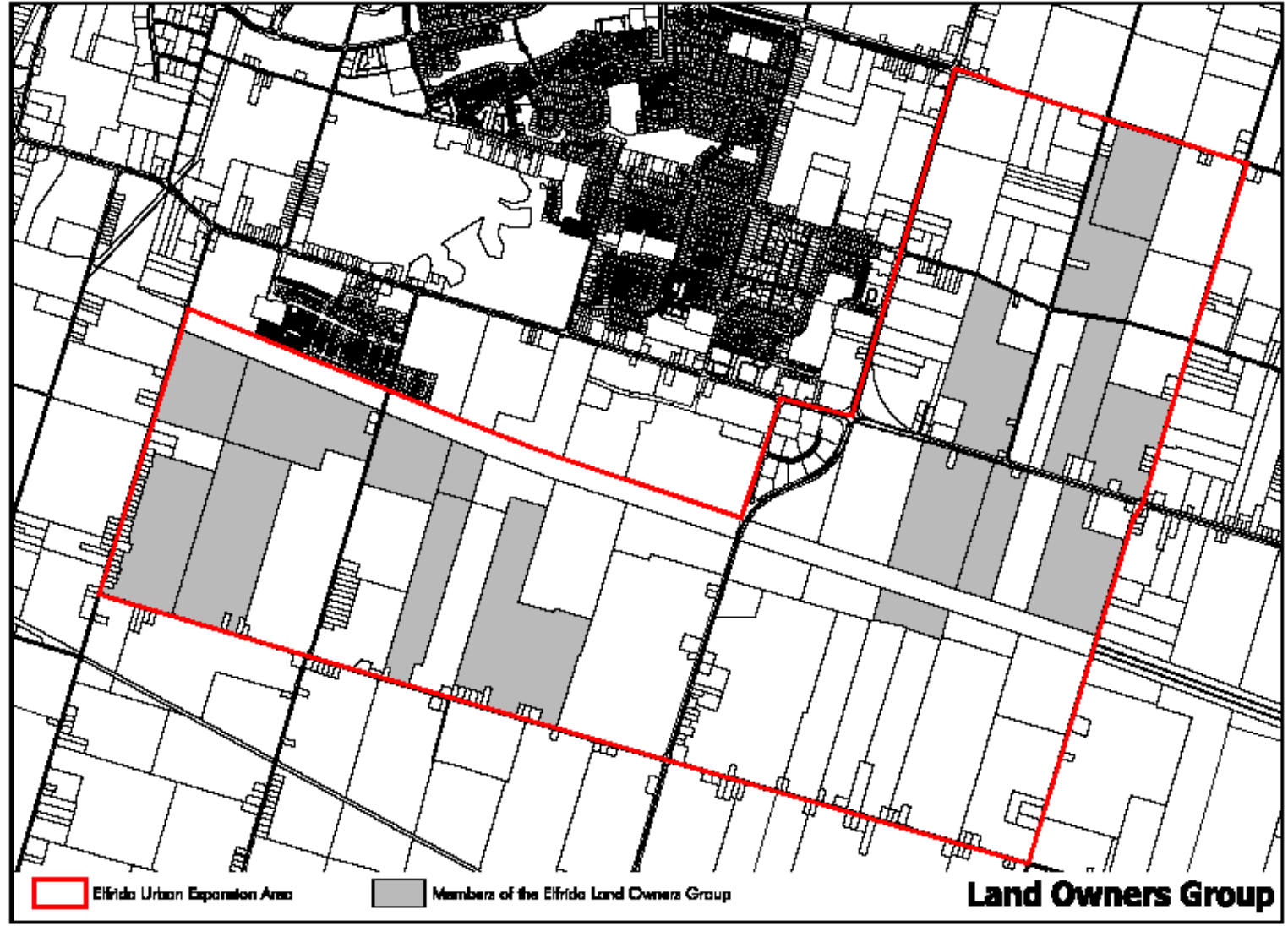


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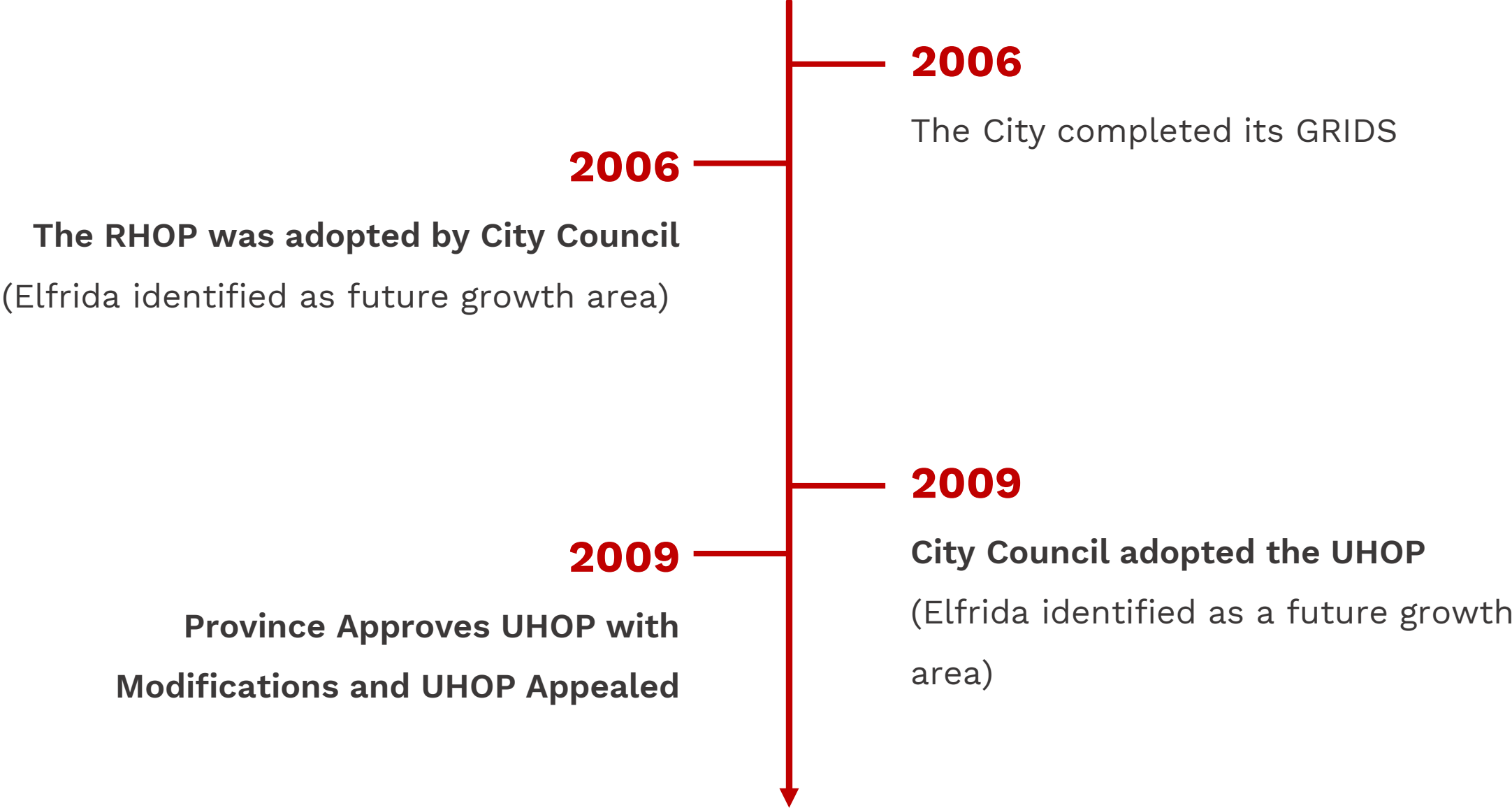




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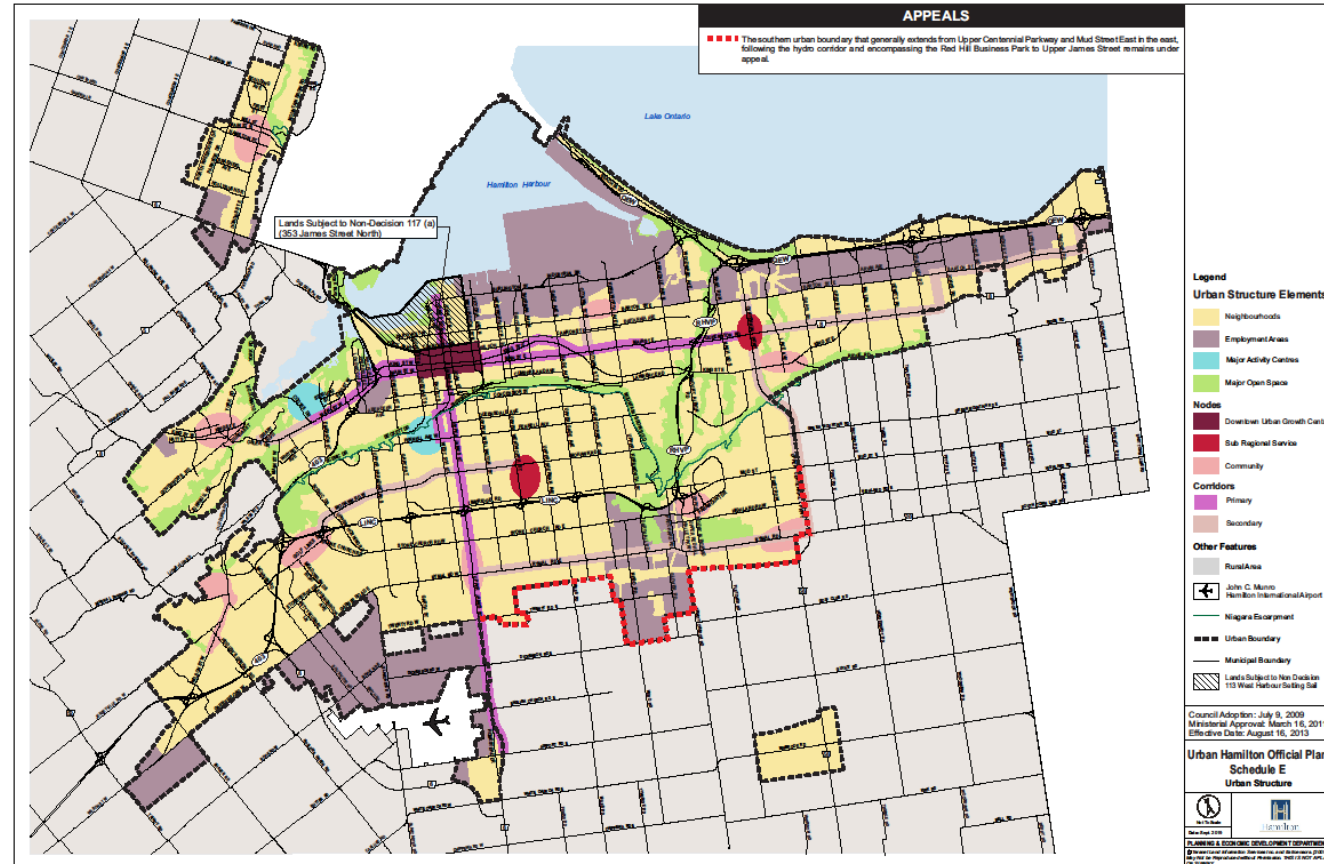
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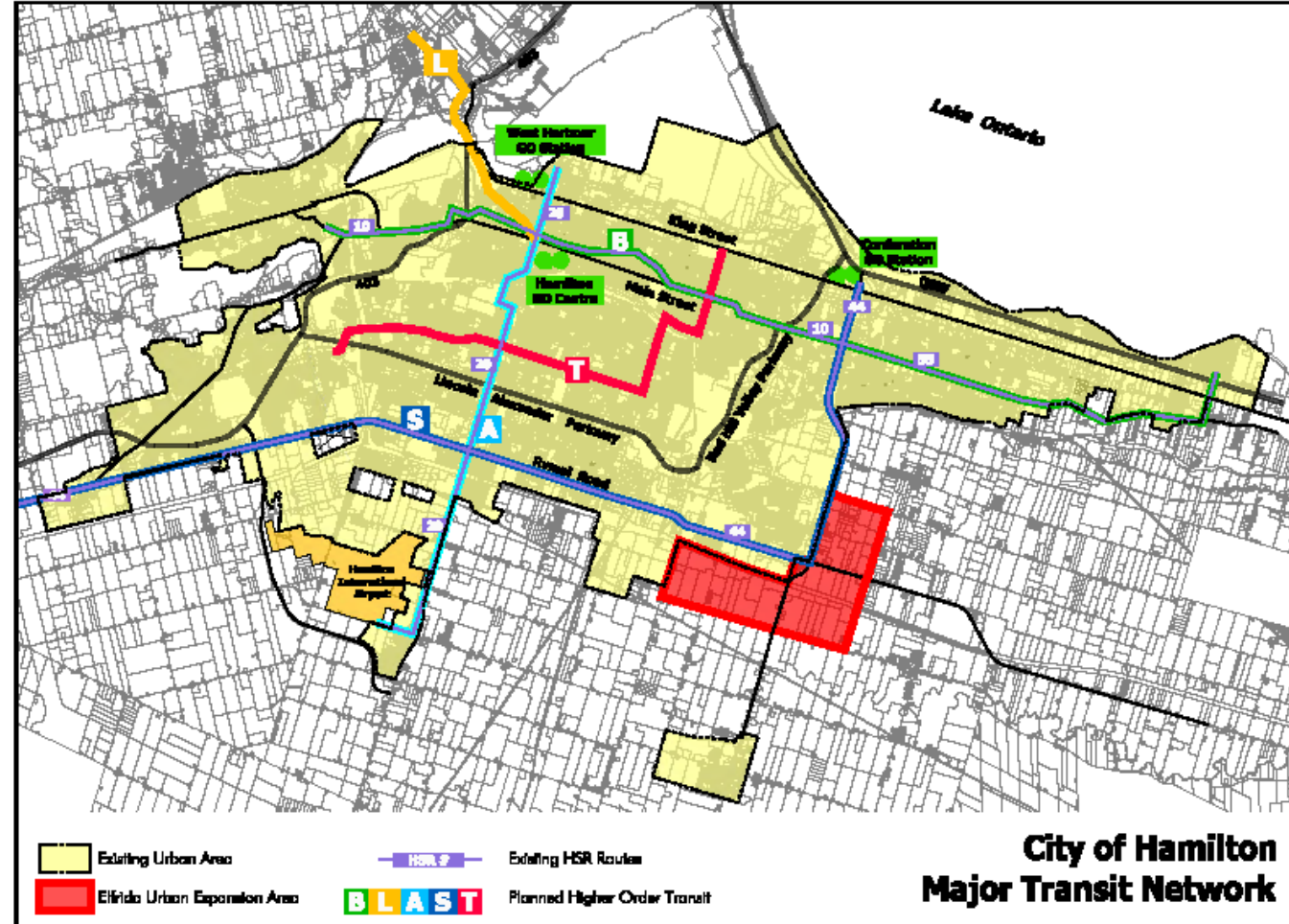


Source: City of Hamilton



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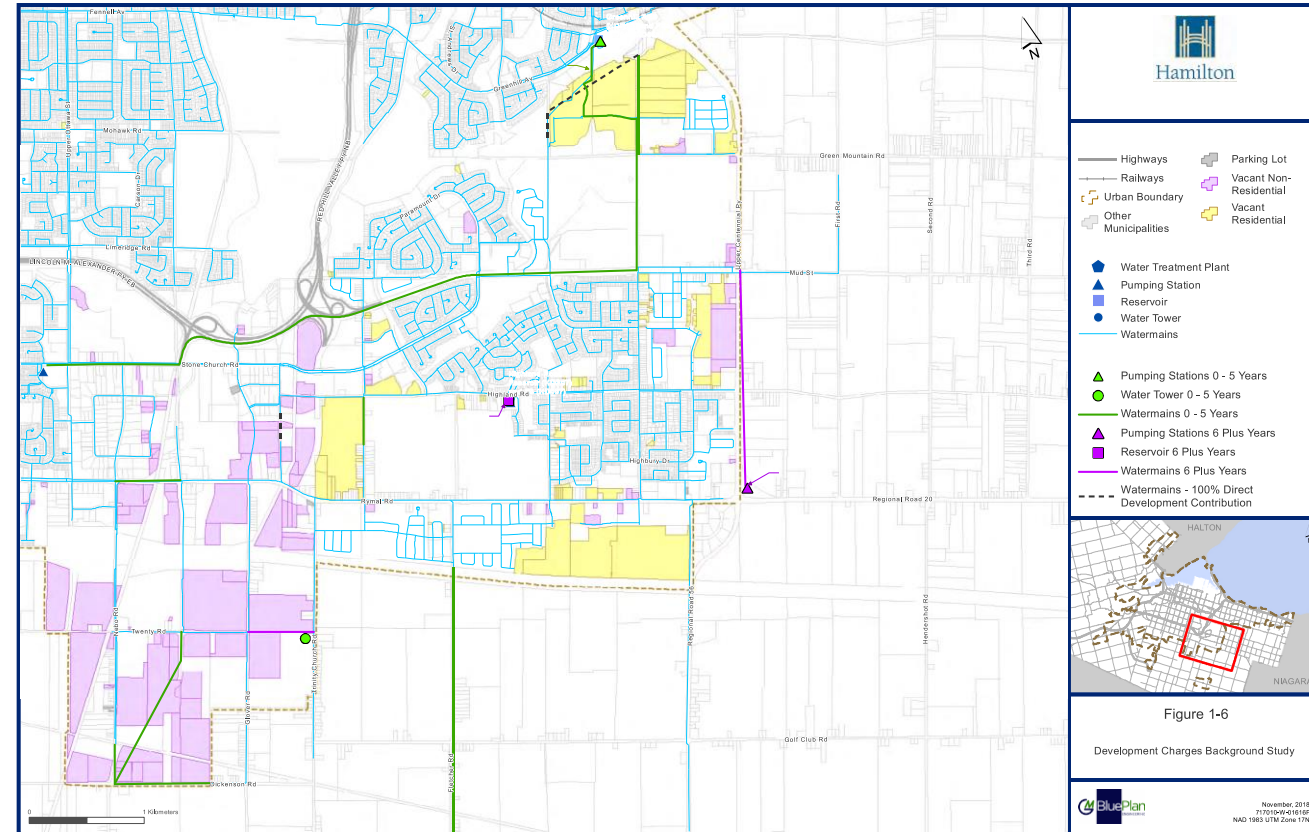
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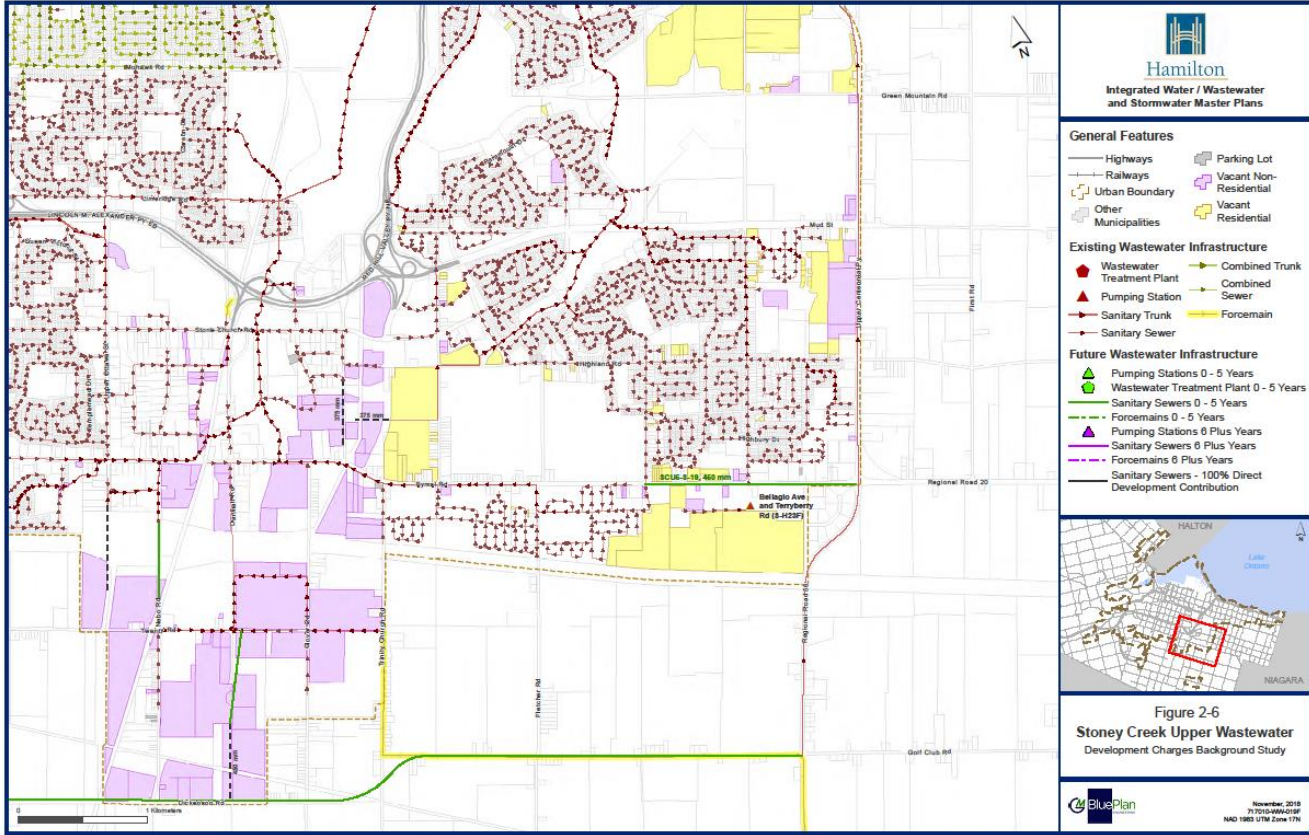
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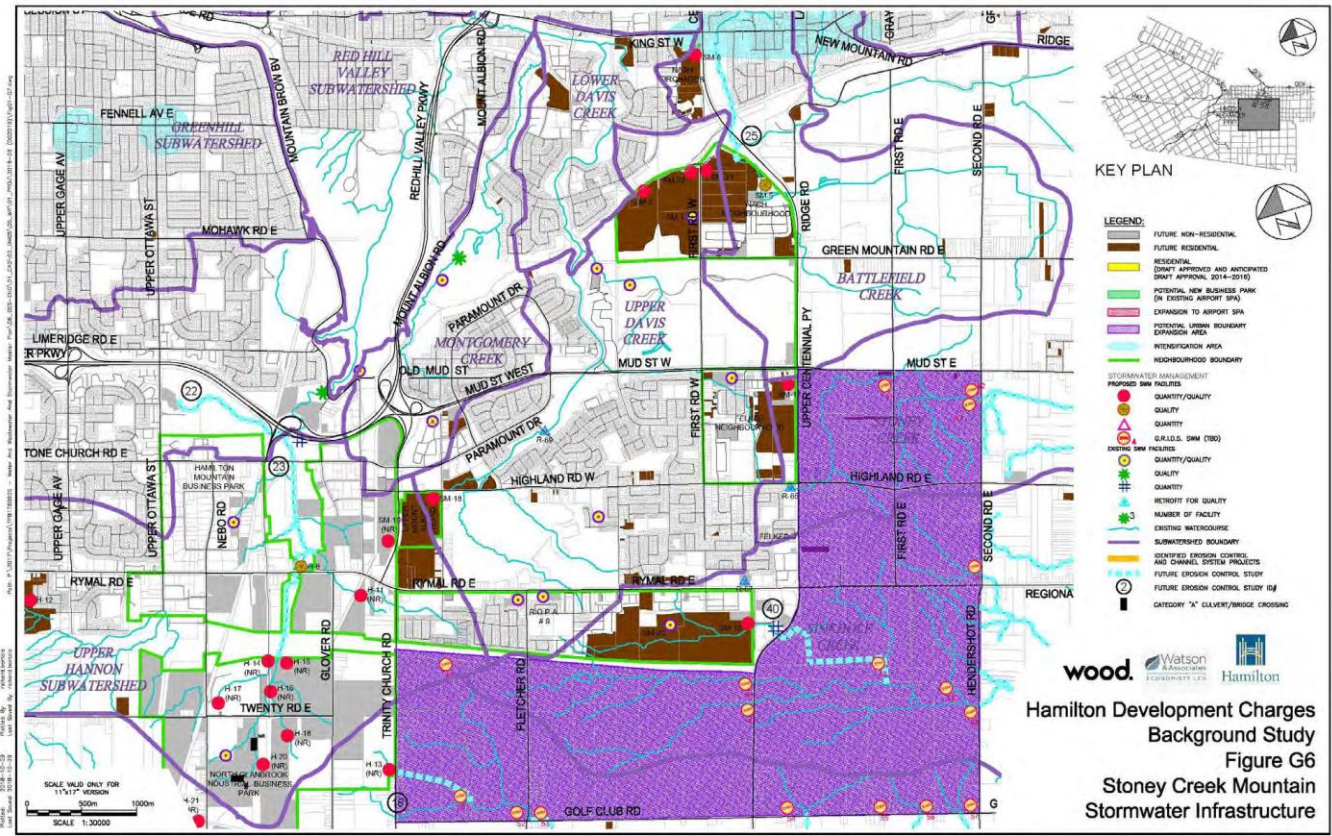


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Existing Conditions

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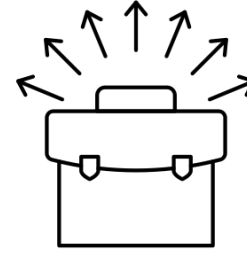
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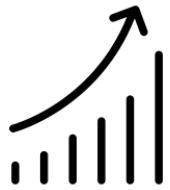
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Choice and Affordability

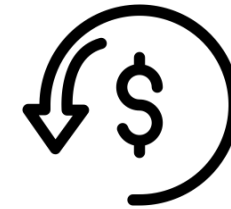


Jobs

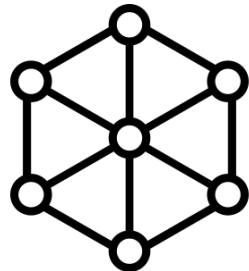


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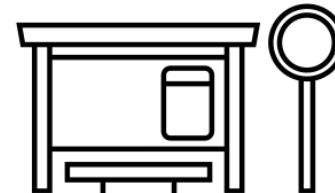
Hamilton Growth **ELFRIDA**



Keep Taxes Down



Optimize Infrastructure



Transit Supportive

Thank you!

Request to Speak to Committee of Council

Submitted on Friday, December 11, 2020 - 10:05 am

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: Sergio Manchia, MCIP, RPP & Matt Johnston, MCIP, RPP on behalf of Effort Trust

Name of Organization: UrbanSolutions Planning & Land Development Consultants Inc.

Contact Number: 905-546-1087

Email Address: mjohnston@urbansolutions.info

Mailing Address:

3 Studebaker Place, Unit 1
Hamilton ON, L8L 0C8

Reason(s) for delegation request: To address Committee regarding Item 8.1 on the December 14, 2020 General Issues Committee agenda.

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? No

Request to Speak to Committee of Council

Submitted on Friday, December 11, 2020 - 11:19 am

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

Name of Individual: Paul Lowes

Name of Organization: SGL Planning & Design Inc.

Contact Number: 416-923-6630 ext. 23

Email Address: plowes@sqlplanning.ca

Mailing Address:

SGL Planning & Design Inc.

1547 Bloor Street West

Toronto, ON M6P 1A5

Reason(s) for delegation request: Please refer to the December 11, 2020 Letter from John Doherty at Gowling WLG (Canada) LLP.

While we will not be making a formal presentation, we do wish to monitor the meeting, and speak only in reply should City staff or the Committee want to direct a question or require clarification pertaining to our letter.

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? No

Request to Speak to Committee of Council

Submitted on Friday, December 11, 2020 - 11:20 am

==Committee Requested==

Committee: General Issues Committee

==Requestor Information==

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Reason(s) for delegation request: Please refer to the December 11, 2020 Letter from John Doherty at Gowling WLG (Canada) LLP.

While we will not be making a formal presentation, we do wish to monitor the meeting, and speak only in reply should City staff or the Committee want to direct a question or require clarification pertaining to our letter.

Will you be requesting funds from the City? No

Will you be submitting a formal presentation? No