

June 15, 2015

City of Hamilton – Planning Committee  
Attn.: Ida Bedioui, Legislative Co-ordinator  
71 Main Street West  
Hamilton, ON L8P 4Y5

**Re: Co-ordinated Land Use Planning Review – Reponse to City submission/comments  
June 16, 2015 Planning Committee Agenda Item 8.1, PED15078**

Thank you for affording the Hamilton-Halton Home Builders' Association the opportunity to provide feedback on the above reference agenda item, being the City's recommended report to be submitted to the Ministry of Municipal Affairs and Housing regarding the Co-ordinated Land Use Planning Review.

We are supportive of the ten key messages determined as a result of the City's public review. Additionally we are supportive of many of the thirty-two staff recommendations within the report, especially those that relate to

- de-linking of the population and employment targets
- allowing for consistency between the various Plans looked at in the review
- exclusion of lands from the greenbelt when calculating density targets
- long term protection for strategic employment areas
- providing municipalities with a prescribed land budget methodology for both employment and non-employment lands
- flexibility for determining where intensification is best accommodated within the built boundary
- identification of regional transit corridors within the Big Move
- allow for future thinking beyond the 20 year horizon to maximize efficiencies between land use and infrastructure planning
- expanding land uses in the agricultural designation and rural areas in general
- providing flexibility to the municipality to modify boundaries that reflect the more detailed local knowledge of areas to be protected or not protected
- Better define streams and provide updated mapping for same to avoid implementation issues
- Long term sustainable funding for infrastructure and transportation to support the Growth Plan
- Providing a mechanism to allow municipalities to make boundary change requests to the province.

However, the staff report goes beyond the request for comments on the Coordinated Planning Review, and incorporates comments related to Bill 73 which is a different document altogether. It is our position that it is not appropriate to address issues such as OMB operations and practises as part of the Growth Plan or Plan Review when a second and parallel process is currently underway by the Province to gather comments on these issues, a process which commenced in 2013.

Further, we are concerned that the timing of reviewing of potential changes to the boundaries may come too late. We applaud the City for requesting a mechanism for boundary adjustments that reflect the science and needs specific to any given municipality. We further appreciate that inclusion of Appendix E to the staff report that provides a number of areas for general review. Our concern is that the blobs on the mapping are insufficient to understand the details of the requests and the impacts on the landowners affected. Further, the staff report indicates that it is staff's recommendation to retain Dillon Consulting to begin to look at potential changes to the Greenbelt boundaries.

It is our understanding that these such issues were requested to be submitted as part of a current submission – at the Provincial "Town Hall" meetings our staff and members attended, attendees were urged to submit any such boundary reviews as part of their May 28<sup>th</sup> submissions. Our written requests to City staff on January 28, 2015 requested that we meet to review just that. Further, we are aware that some municipalities have made these specific requests for boundary adjustments to better take advantage of existing infrastructure, or to preserve protect natural heritage features as part of their current submission.

Our final concern relates to lack of openness and transparency to date: as early as January of this year our Association made formal requests to meet with City staff to review the greenbelt issues in general and to allow consultation prior to staff making such a report. Copies of these written requests are attached for your reference. It was our understanding that we would be afforded the opportunity for real discussion with staff on these issues which directly affect how our members and industry operate. While members attended one of the City's PICs on the matter, the intent of these PICs was high level and cursory in nature, and did not address the items we wished to discuss. However, after again requesting a meeting to discuss the matter, I was advised that City staff could discuss this as part of the Development Industry Liaison meetings. Further, and as indicated by the email chains, the timing of these liaison meetings did not allow for any meaningful detailed discussion as staff comments were not made public until after the meeting. To be clear, the total discussion with our industry on this topic lasted less than five minutes at the last Liaison meeting.

To contrast this, HHHBA was afforded an opportunity to meet with and discuss the Coordinated Plan review with the David Crombie panel, representing the Province on the issue. We believe that speaks volumes to how other government agencies consider the opinions of Associations such as ours.

The reality is that our industry is directly affected by this legislation, and it is our belief that as a stakeholder, working together with City staff we can bolster respective positions when they are aligned, to approach the province with a stronger position. Further it is always appropriate to understand the position of the other, as one may have knowledge that is of benefit to the other. An offer to work with the municipality was made again in our submission to the Province, which was copied to staff and council on May 28, 2015. (copy attached for reference.) We are disappointed that Senior Management has elected to leave us out of the process, when we specifically requested consultation.

We believe that we have taken great strides to relay to staff and council alike that we are open to working with the City on such issues, so that there is mutual understanding and to pool resources as may be appropriate or beneficial. We truly hope that staff can be directed to do just that and work with us as a partner in shaping our city in the future.

Yours truly,

**HAMILTON-HALTON HOME BUILDERS' ASSOCIATION**



Suzanne Mammel, MBA, CET  
Executive Officer

- Copy - City of Hamilton, Council  
- City of Hamilton, Mr. Jason Thorne  
- City of Hamilton, Mr. Steve Robichaud