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Our File No.: 063930

Sent Via Email:

City of Hamilton
Planning Committee
Hamilton City Hall
71 Main St. West, 4th Floor
Hamilton, ON L8P 4Y5

Attention: Lisa Kelsey, Legislative Coordinator, Planning Committee

**Re: Letter of Objection
Application by Corbett Land Strategies for a City-wide Amendment to the Urban
Hamilton Official Plan Respecting Urban Boundary Expansion Policies and an
Area-Specific Amendment for Lands Located in the Twenty Road West Area of
Glanbrook
City of Hamilton File No. UHOPA-20-11**

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”.

On behalf of the Elfrida Landowners, we are writing to express objections to the Official Plan Amendment Application (the “**TRW OP Application**”) submitted by landowners in the Twenty Road West Area of Glanbrook (the “**Twenty Road West Landowners**”). As is expanded upon below, the TRW OP Application should be refused, as it inappropriately seeks to establish policies that would allow the Twenty Road West Landowners to process piecemeal and *ad hoc* urban boundary expansions for their lands in advance of and outside of the completion and implementation of the City’s long-standing and comprehensive GRIDS 1 process and the City’s in-progress and comprehensive GRIDS 2 / MCR process. The TRW OP Application is also inconsistent with the spirit and intent of Minutes of Settlement that the Twenty Road West Landowners entered into with the City in 2015, as part of the Airport Employment Growth District (“**AEGD**”) Phase 3 OMB (now LPAT) hearing.

The TRW OP Application seeks to add policies to the Urban Hamilton Official Plan to permit a settlement area boundary expansion up to 40 hectares in size, in advance of a municipal comprehensive review, pursuant to the Growth Plan 2020. The TRW OP Application also seeks to identify lands within the Twenty Road West area of Glanbrook (south side of Twenty Road

West, bounded by Glancaster Road, Upper James Street and Dickson Road, hereinafter referred to as the “**TRW Lands**”) as a ‘candidate area’ for future urban boundary expansions and seeks to introduce a policy framework for the inclusion of these lands into the City’s urban boundary. On this note, we understand that the Twenty Road West Landowners have recently submitted three separate applications to expand the City’s urban boundary by up to 40 hectares to bring their lands into the City’s urban boundary now.

The GRIDS 1 process, dating back to 2006, 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. City growth management decisions since 2006 have built upon this work and the City has spent significant resources to implement its growth strategy, including work on a subwatershed study and secondary plan for the Elfrida Area, and the extension of services to the area. In 2018, the City commenced work on GRIDS 2. The purpose of GRIDS 2 is to update GRIDS 1, to approve a long term growth strategy allocating forecasted population and employment growth to the year 2041 (likely now to be extended to 2051 as a result of Amendment 1 to the Growth Plan 2020). GRIDS 2 is being undertaken in conjunction with the City’s municipal comprehensive review (“**MCR**”), as many of the studies that are required as part of the MCR are also required for GRIDS 2.

The GRIDS 2 / MCR process has now been underway for a number of years, and it is anticipated that the City will be in a position to bring forward its GRIDS 2 / MCR staff report and supporting studies, including the Land Needs Assessment and Residential Intensification Market Demand Study, planning to accommodate growth in Hamilton to 2051, before the end of the calendar year. The Elfrida landowners anticipate that the GRIDS 2 / MCR process will result in continued City support for a balanced approach of accommodating growth through both intensification and responsible, controlled urban boundary expansions, building on over a decade of studies.

In contrast to the comprehensive studies undertaken by the City to strategically plan for growth through GRIDS 1 and GRIDS 2 / MCR, the TRW OP Application attempts to prioritize the TRW Lands to be brought into the City’s urban boundary now over other lands, particularly the Elfrida Area, which since 2006 has consistently been identified as the City’s preferred residential growth area. The TRW OP Application, and the three separate urban boundary expansion applications made by The Twenty Road West Landowners, ignore the City’s long-standing comprehensive growth plans and instead propose to leapfrog the TRW Lands into the City’s urban boundary. The City should not undermine years of study and work by approving policies intended to pave the way for piecemeal and *ad hoc* urban boundary expansion for the TRW Lands. Any policies to introduce a framework for up to 40 hectare urban boundary expansions should be considered by the City as part of its Growth Plan conformity exercise, rather than by a single landowner group proposing policies specific to their lands.

Finally, in evaluating the TRW OP Application, the City should be mindful of the 2015 AEGD Phase 3 Minutes of Settlement entered into by the City, the Twenty Road West Landowners and others. In those Minutes, (i) the Twenty Road West Landowners agreed not to object to the

recognition of Elfrida as the City's area for future urban boundary expansion to accommodate growth to 2031; (ii) the City agreed to forthwith commence work on a City-wide MCR to accommodate growth from 2031 to 2041 and to include the Silvestri (Twenty Road East) and Twenty Road West lands in such MCR; and (iii) the Parties agreed that it was the City's intent to look to the AEGD area as its first priority for employment lands, Elfrida as its first priority for non-employment lands, and the Twenty Road East lands as the next priority for non-employment lands. The attempt by the Twenty Road West Landowners to now advance their lands as candidate areas for urban boundary expansion, before the completion of GRIDS1 and GRIDS2 / MCR, is inconsistent with the spirit and intent of these Minutes of Settlement.

The Elfrida Landowners urge the City to refuse the TRW OP Application.

Yours truly,

Goodmans LLP



Mark Noskiewicz

MRN/JBH

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.