

**From:** Warren Caldwell

**Sent:** October 2, 2020 11:01 AM

**To:** [clerk@hamilton.ca](mailto:clerk@hamilton.ca)

**Subject:** Corbett Land Strategies Application for Official Plan Amendment, City Planning Committee meeting, 6 October 2020

Dear Madame Clerk,

Please pass these comments to the City Planning Committee in time for its 6 October meeting.

I am a retired homeowner resident of Hamilton. I have no interest, direct or indirect, in the Twenty Road West group of lands nor in any lands abutting or close to them.

**I urge the Planning Committee to deny the Corbett Land Strategies' application** for three sets of reasons. The first have to do with how the amendment if passed would affect the City's future position in any change of municipal boundaries and/ or urban/rural boundaries. The second set concerns the effect of the amendment if passed on the intensification required in Hamilton by the Province of Ontario's proposed plan for population and employment growth. The third is about who controls land use planning in Ontario.

First, boundaries. The Corbett application would change the rural/ urban boundary inside the City by moving the Twenty Road West group of lands from the Rural Hamilton Official Plan (RHOP) to the Urban Hamilton Official Plan (UHOP). It would do so soon, certainly before the City can complete the provincially required municipal comprehensive review (MCR) that is underway and must be finished by July 2022. In planning terms this would be completely backwards. The MCR must and should come first. If it justifies and prepares for a change in the rural/ urban plan boundary, then the City would be in a position to make an informed decision one way or the other. But consider what will happen if the Corbett application is approved and two years later the City's finished MCR concludes the Twenty Road West lands should not be in the UHOP. By that time the landowners may well be far into their development which would force the City to provide costly urban services despite the manifest mistake. In other words, and putting it gently, allowing the Twenty Road West lands into the UHOP now is doing it too soon, undermining essential City work and precluding a Planning Committee decision that should be taken after the MCR.

Second, intensification. The Province requires residential intensification. But its real value is in the maintenance of agricultural and other rural uses plus wetlands and other natural habitat that we need more and more for resilience in the face of climate change. So any loss of rural land is serious indeed. Intensification inside already urbanized areas is the only practical way to go.

The Corbett application claims the Twenty Road West lands are needed for residential housing for all the extra people expected to move to Hamilton. That is simply not the case. Please consult the staff report on this matter, at page 34. Paragraph ii details what is available in the City's Vacant Residential Land Inventory. These lands are all inside the UHOP boundary. They are enough for 31,900 housing units identified in 2019 plus an estimated further 30-50,000 units, the variance depending on how different properties are rebuilt. This range total of 61,900 to 81,900 housing units

within urban Hamilton satisfies the provincial housing planning requirement right to the end of the 15 year planning period the province uses. The Twenty Road West lands are simply not needed for housing.

Third: the control of land use planning. This peculiar business of letting private landowners demand municipal boundary changes in this way comes from a very recent amendment to the Province's growth plan. It allows a landowner to demand a change in municipal boundaries, bypassing most planning studies and procedures a municipality must pass through, and, by appeal to the LPAT, have a real chance of getting away with it even if the City is opposed for the best planning reasons. Of course the Province must set standards and procedures for every town and city. But letting individual property owners act outside the planning procedures the same province forces on municipalities is folly. It gives individual developers the initiative that belongs to Councils. It completely undermines all the work done by municipal staffs everywhere. What an insult to elected councillors. What an insult to voters. Hamilton's Planning Committee should deny every application that tries this just to preserve its own position in the planning process for our City.

For all these reasons, please deny the Corbett application.

Yours truly,

Warren Caldwell  
Hamilton