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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."<sup>1</sup>
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

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<sup>1</sup> 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 14<sup>th</sup> 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.

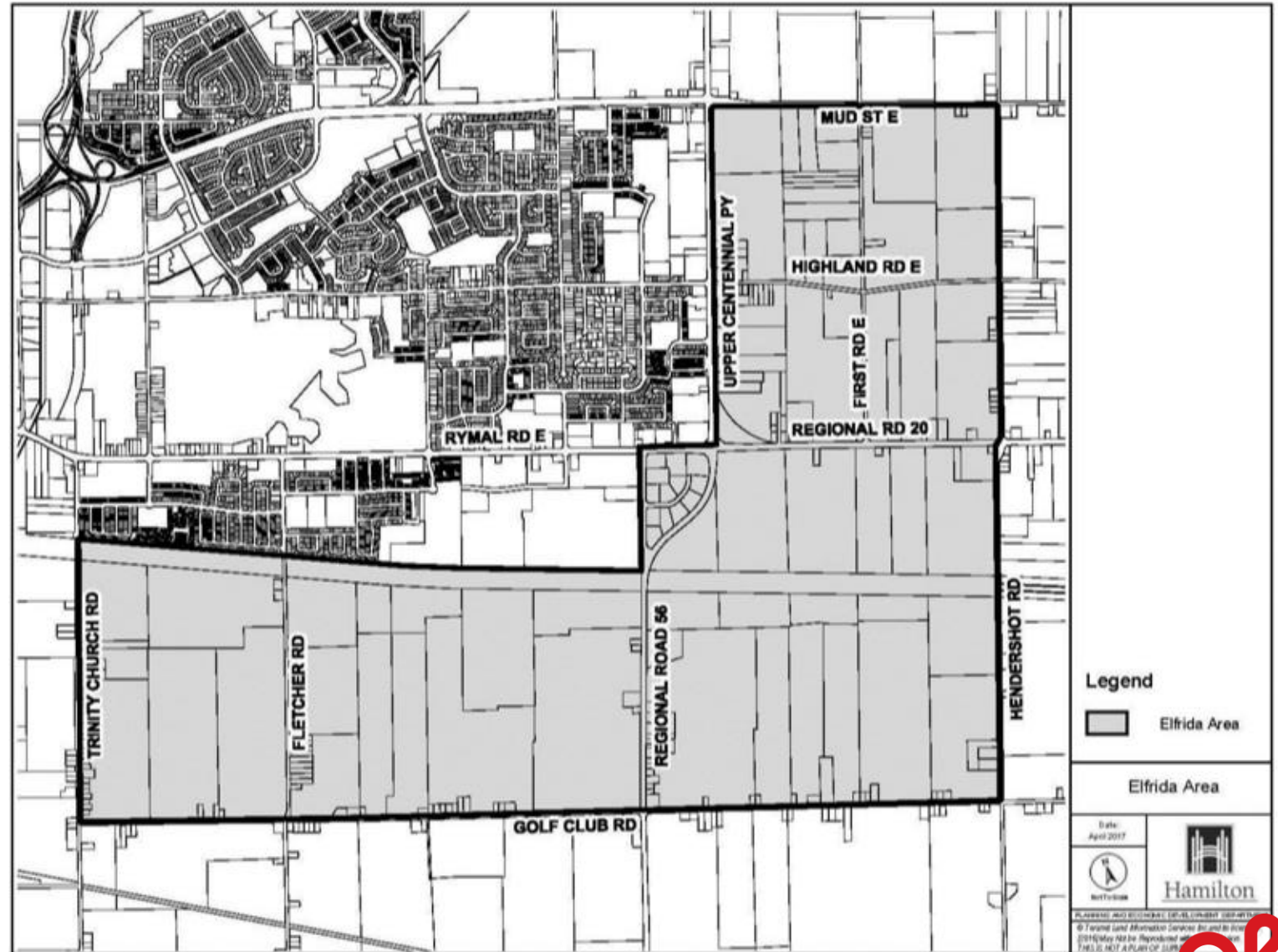
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# General Issues Committee

**Item 8.1 – GRIDS 2 & MCR**  
City of Hamilton

# Overview

Elfrida Landowners  
Elfrida's History  
Existing Conditions  
Hamilton Growth



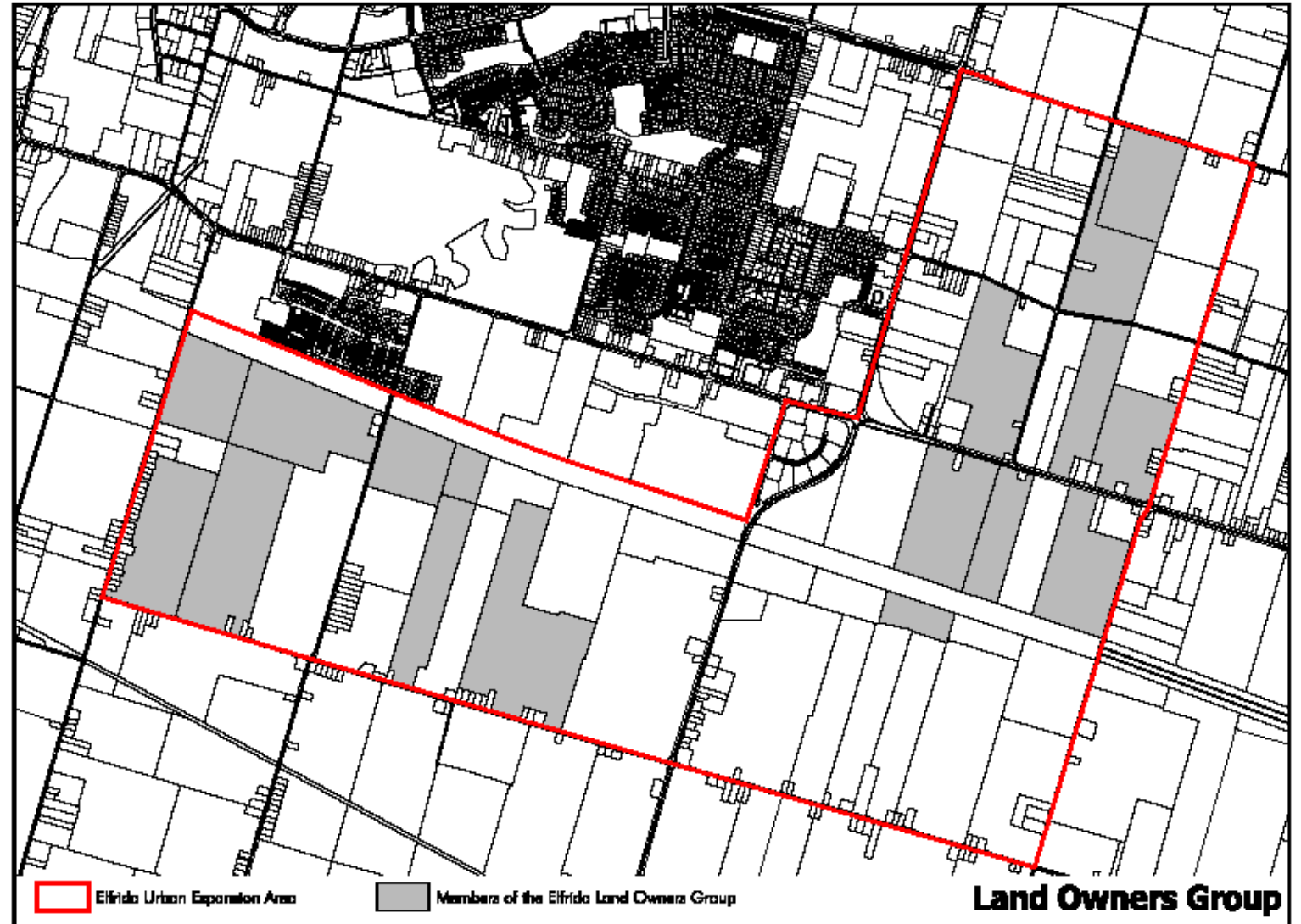
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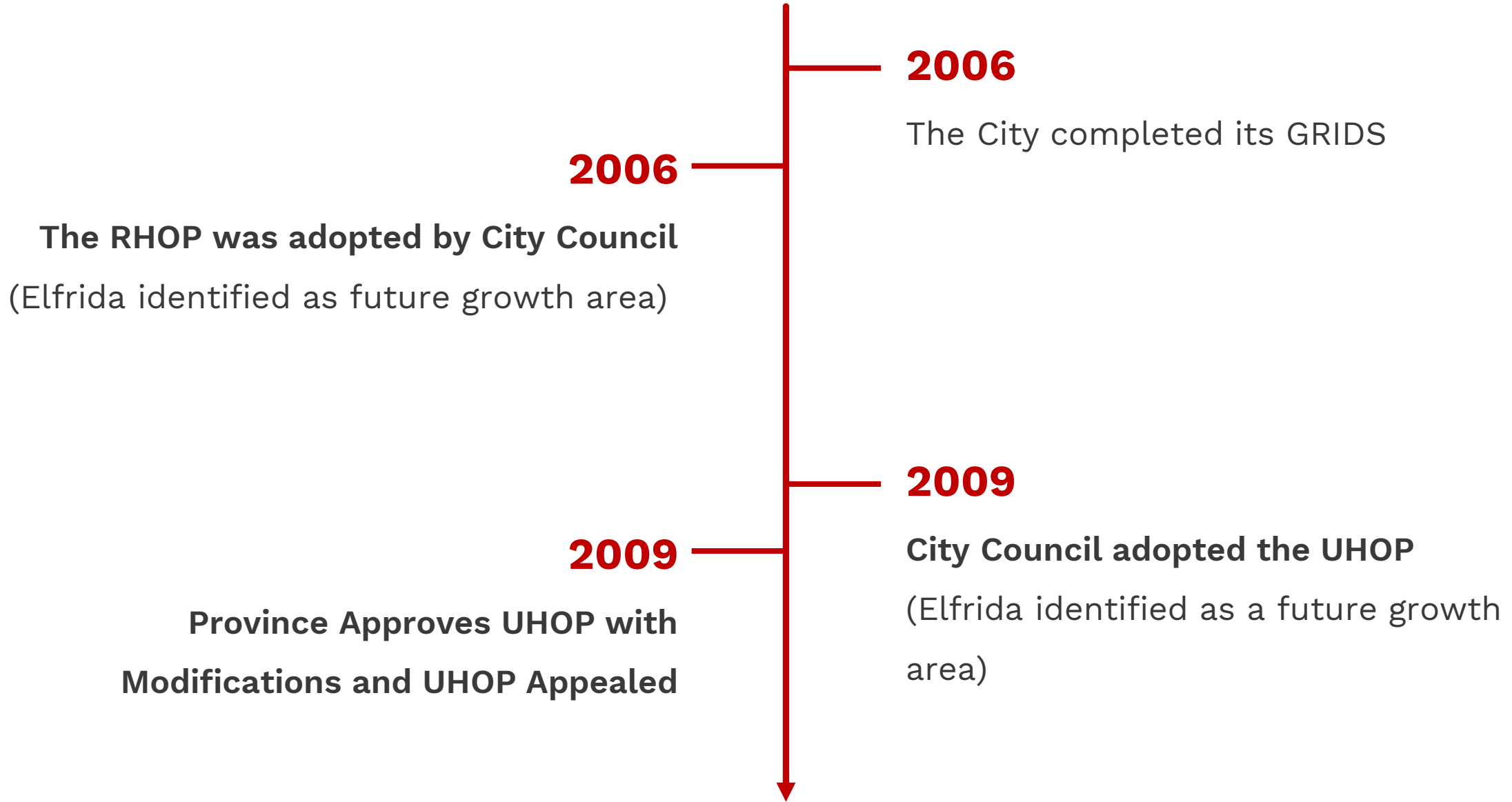


# Elfrida Landowners





# 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

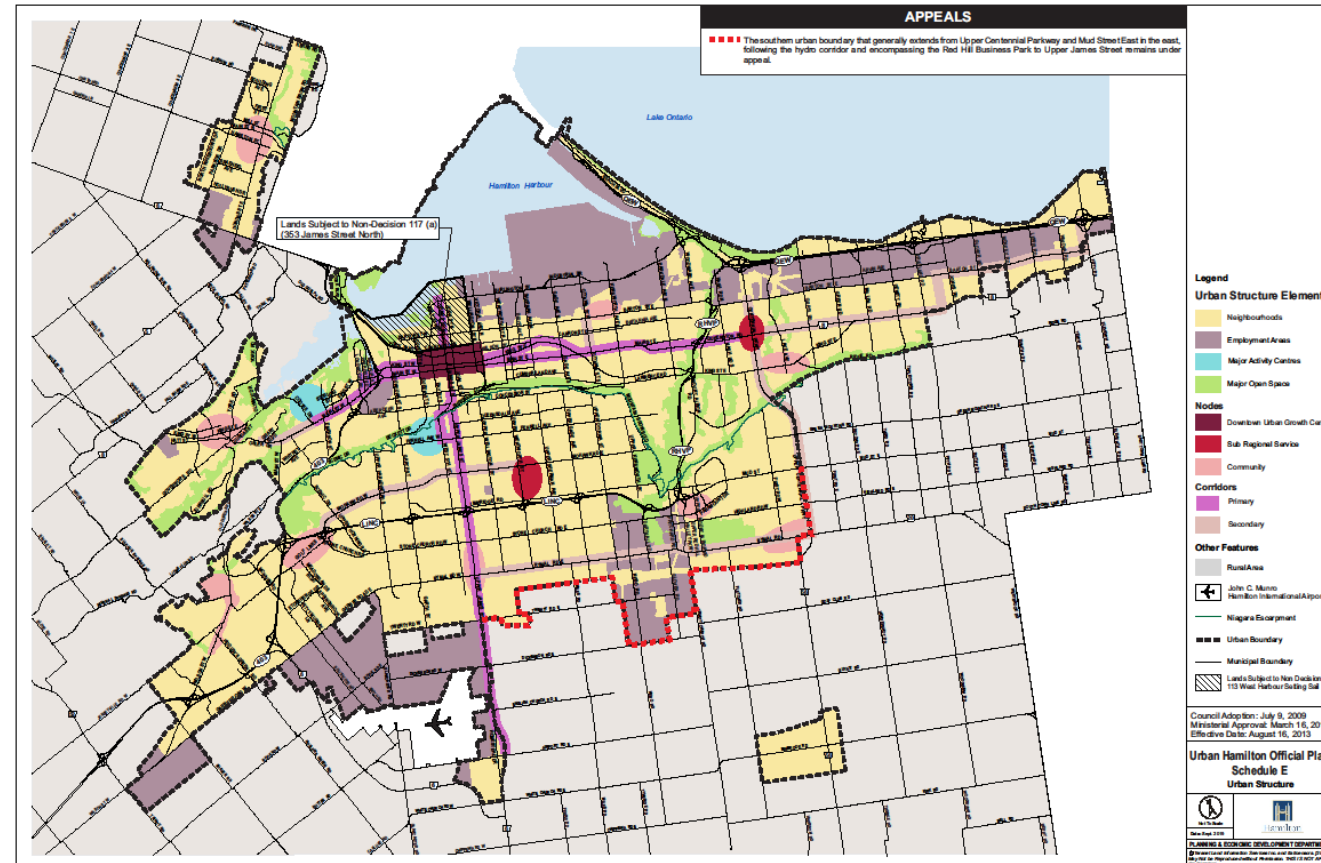
**We are Here**



# 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



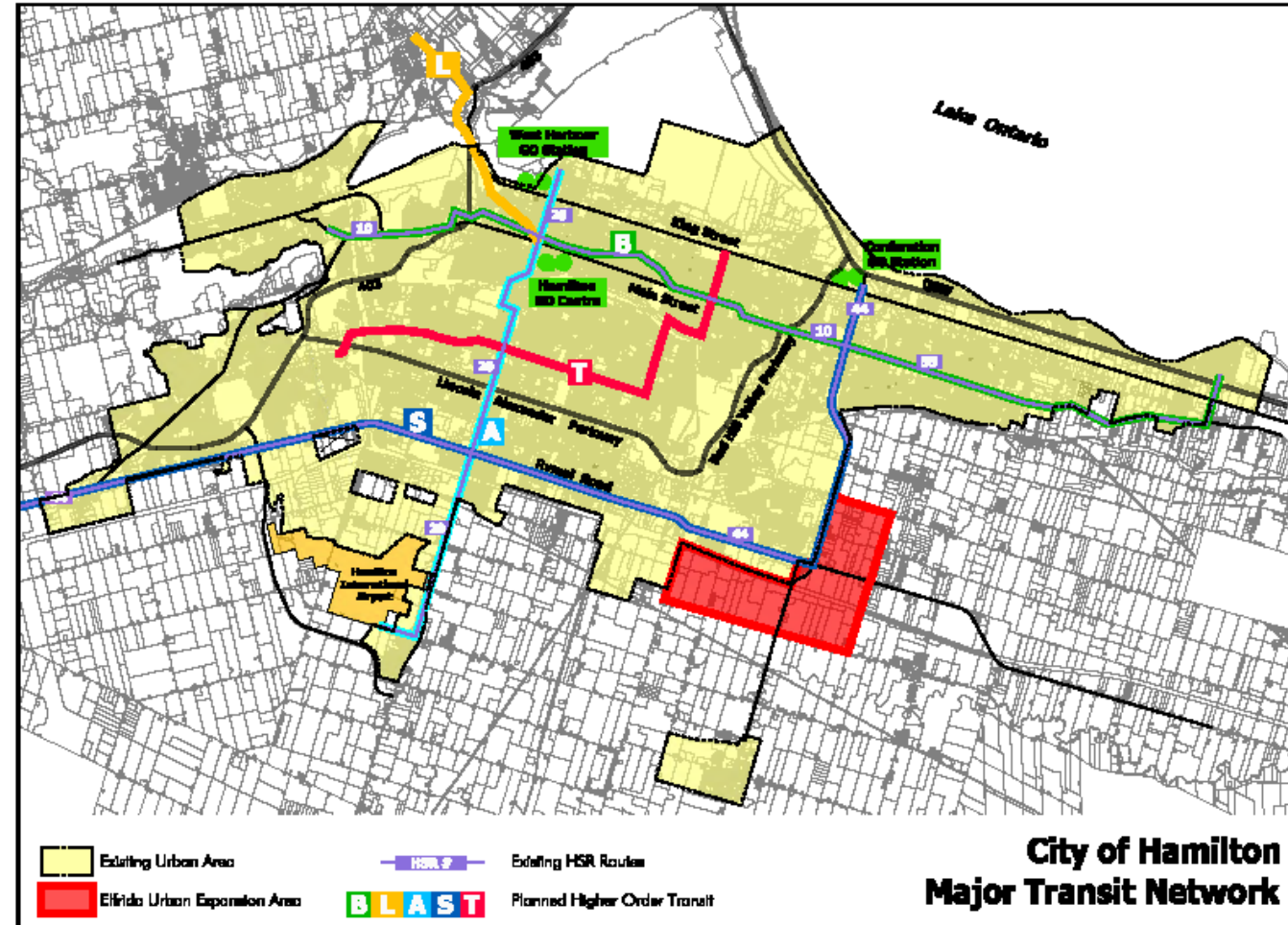
Source: City of Hamilton



# 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

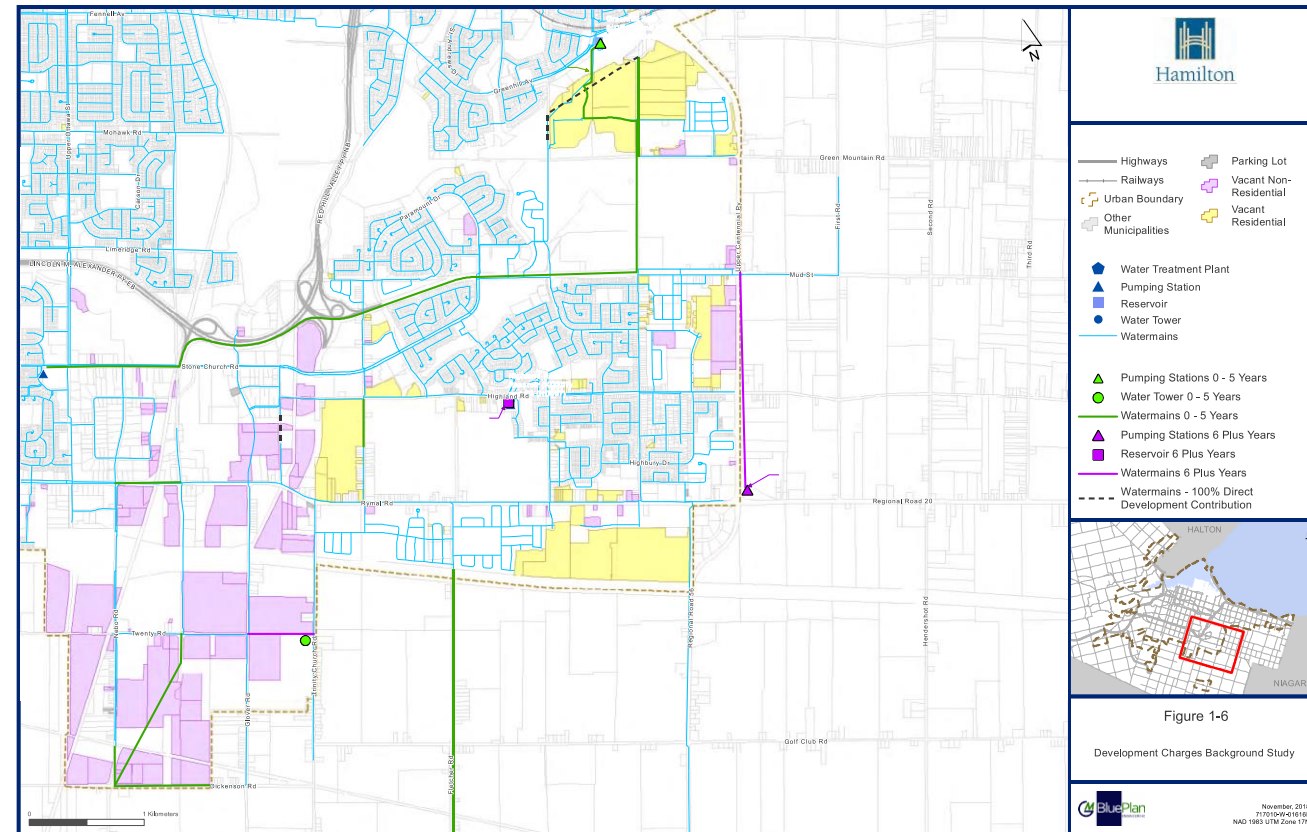


# Existing Conditions

## 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

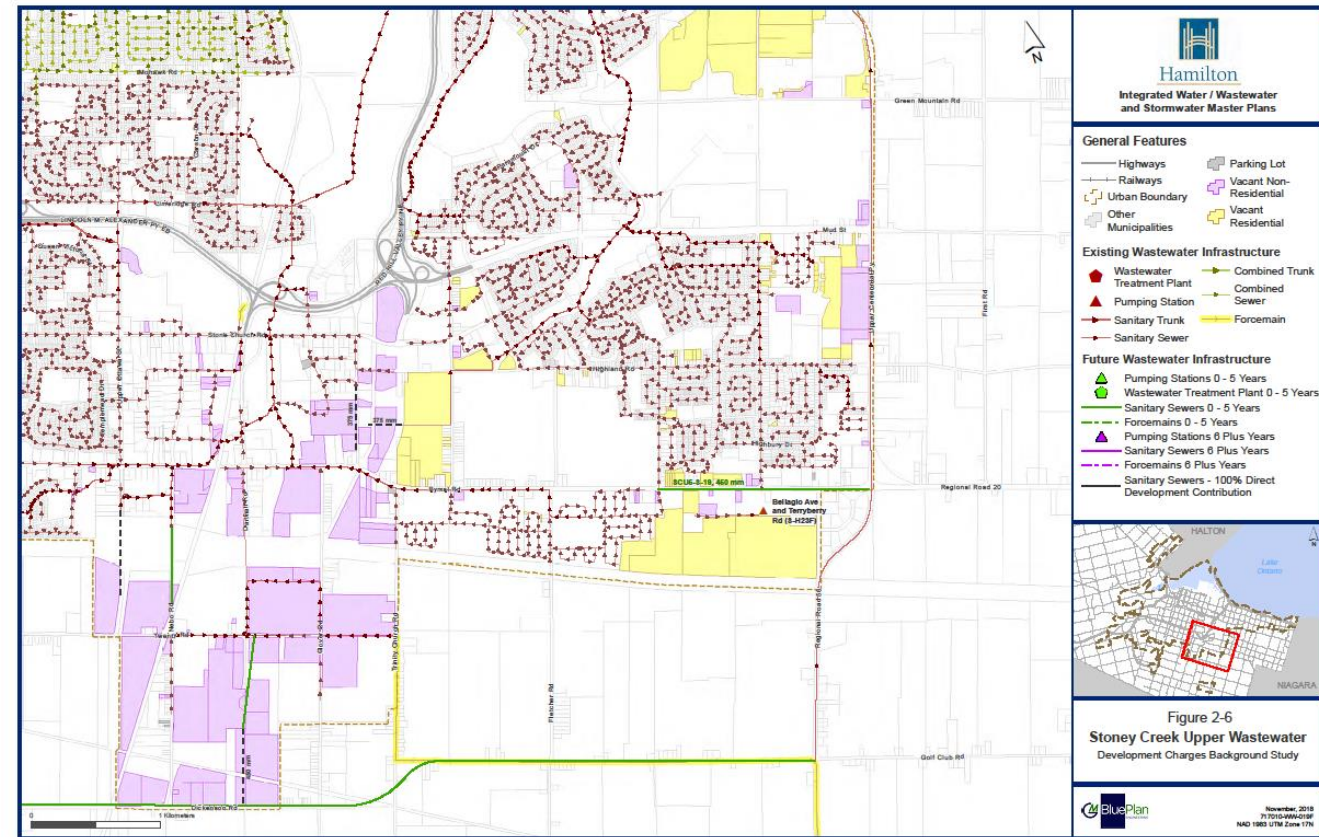


# Existing Conditions

## 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

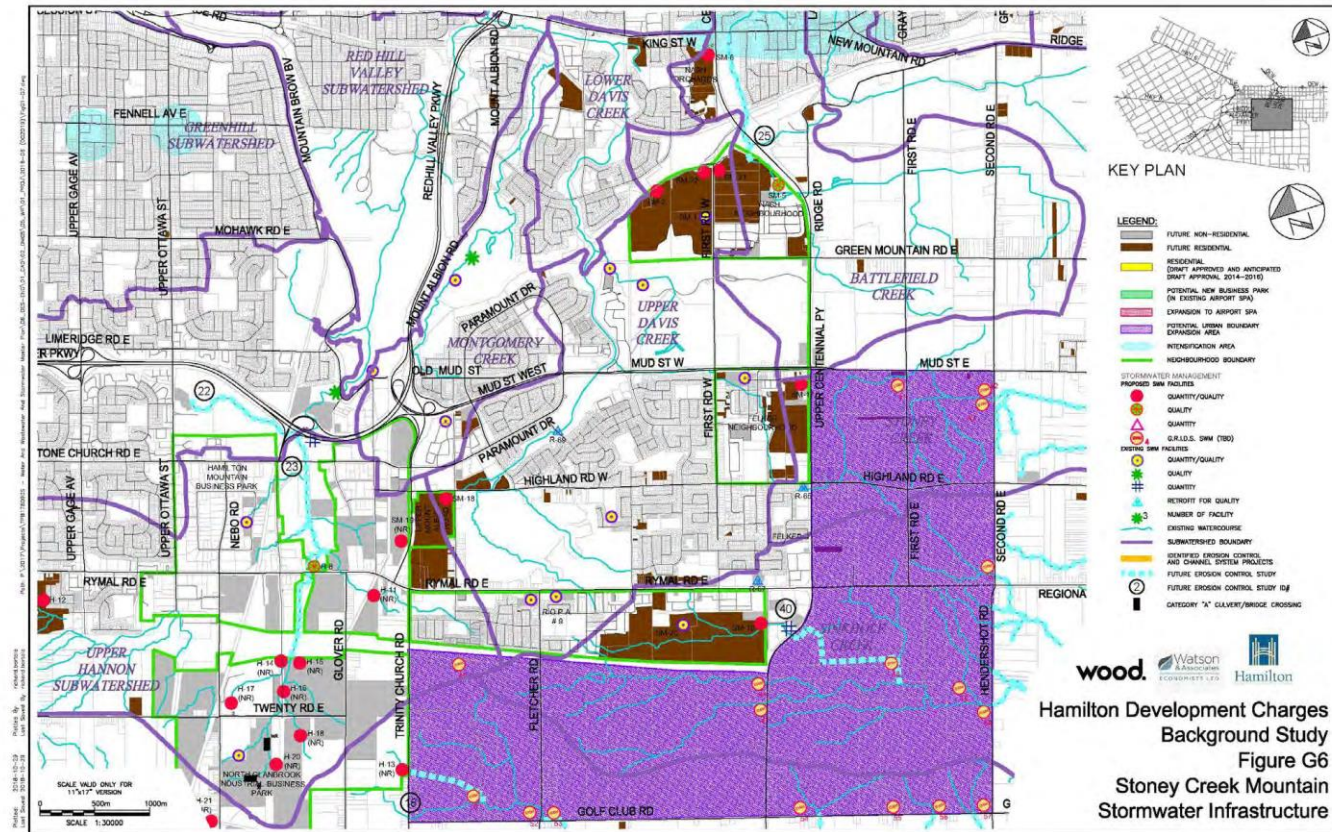




# Existing Conditions

## Stormwater

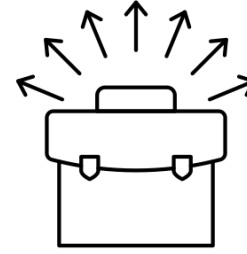
- ✔ Elfrida takes advantage of existing and planned stormwater management facilities and infrastructure
- ✔ The new stormwater management facilities in Elfrida will be in accordance with the completed and approved Subwatershed Study



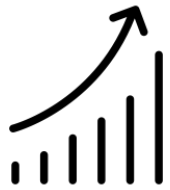
source: CITY OF HAMILTON



Choice and Affordability



Jobs

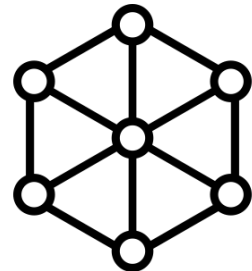


Balanced Growth

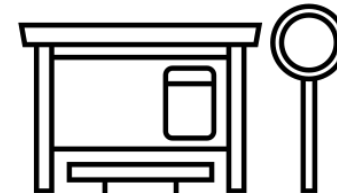
# Hamilton Growth **ELFRIDA**



Keep Taxes Down



Optimize Infrastructure



Transit Supportive

**Thank you!**