

## **GRIDS 2 and Municipal Comprehensive Review Process Submission Hamilton Chamber of Commerce**

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The Hamilton Chamber of Commerce has consistently supported and promoted long term municipal land use planning in the City of Hamilton ("City"). Having a clear sense of purpose and direction is critically important for a community to prosper and grow in an orderly and predictable fashion.

### **1. Principles of Long-Range Planning**

#### **1.1 Guiding Investment**

An Official Plan policy document, by definition, is meant to direct and guide public and private investment throughout the municipality to provide residents, existing and potential investors and decision-makers with a clear sense of direction to minimize conflict and inefficiencies and to implement the best plan possible. This investment strategy must be clear, understandable and predictable in order to attract and guide investment from those in the development community, those in the agricultural community, our broader community, and those who are yet to invest in our City.

From a development perspective, this involves establishment of a clear and firm urban boundary so that development interests have a sense of certainty as to where they should place their investment. Conversely, a firm urban boundary assists investment decisions for those in the agricultural community who need to understand that their lands and their investments will be protected in the long term.

What is to be avoided is a situation where uncertainty is introduced through a review of urban boundaries undertaken every five years and a piecemeal expansion of the urban boundary on a regular basis.

#### **1.2 Infrastructure Investment**

Long term planning is required to ensure that land use planning is coordinated with the provision of basic road and service infrastructure to allow for the proper implementation of the plan. If this work is not coordinated, it is possible to generate a mismatch whereby urban services are in place however the planning process lags years behind. Alternatively, it can also result in situations where planning approvals are in place but servicing is not available, thus delaying and frustrating the intent of the planning documents.

### **1.3 Time Resources and Local Control**

By engaging in long range planning, less time, energy and resources are spent in litigation, battling decisions with respect to how and where to proceed. What is not desirable is having to engage in ongoing and expensive discussions, reports and hearings that only serve to delay and drive up the cost of outcomes that are predictable and will not change, regardless of the number of studies that are undertaken.

In addition, this adversarial approach leads to a final outcome which is determined by an outside decision maker in the form of LPAT, (formerly the OMB). This has led to many of the long-range planning decisions which have contributed to the development pattern the City over the years being established by an external authority.

### **1.4 Staging**

By undertaking long term planning, proper staging of development can take place within an overall predictable, understandable and comprehensive structure that is defined more by reasonable expectations than artificial, pre-set timing parameters. This will allow for a stable and controlled unfolding of the plan that ensures planning and infrastructure investment is properly coordinated.

What is to be avoided is an uncontrolled free for all that allows development at any cost. Rather, carefully designed staging mechanisms must be put in place to ensure orderly growth takes place and proper planning principles are followed, including the protection of significant environmental features, proper plans for roads, transit, community facilities, open spaces and employment needs.

In this fashion, each stage of development will need to meet intensification objectives and can undergo a thorough secondary planning process to design complete communities within the broader context of the entire city.

### **1.5 Maximization of employment investment**

By undertaking long range planning of employment lands, opportunities to attract new investment into the community are maximized. By offering more choices to potential investors, the opportunity for employment growth is maximized. What is to be avoided is the restriction of the supply of employment land, which can lead to the loss of investment and employment growth to other surrounding communities.

## **2.0 Chamber Position**

Based on the above principles, the Chamber of Commerce has consistently taken the position that the City should engage in long term urban planning and not be restricted by 20 or even 30 year time horizons and ongoing 5 year reviews of potential urban boundary expansions. The Chamber has taken the position that the long-term investment opportunities for new growth within the City are properly defined by all of those lands inside the Greenbelt Plan.

The Province has established a clear and long-term boundary for urban growth through the establishment of the Greenbelt Plan. In doing so, this plan provides certainty and clear expectations for both developers and the farming community that these lands are intended to remain as agricultural lands for a period well beyond 20-30 years. The Chamber has always supported the Greenbelt Plan and believes it is an effective defining limit of urban growth.

From a review of urban growth patterns in the city together with an expectation of future growth requirements, it is clear that urban growth will continue to expand from the current urban boundary through areas described as 'Whitebelt lands' to the limits of the Greenbelt Plan. This expectation provides us an opportunity to properly plan and implement servicing infrastructure to ensure timely provision of adequate services that do not result in any of the premature investment of unused services or of lost opportunities arising from lack of available infrastructure.

While the Chamber has not provided any specific direction with respect to timing of the development of individual blocks, it has always been recommended that a sequence of development be established through strong staging policies that will ensure that the intensification of existing urban areas occurs, and that premature development does not occur. This approach will eliminate the significant resources that are routinely spent on determining who goes next.

### **3.0 History of Evolution of Development**

Unfortunately, the City has in the past not proceeded to implement a long-term strategy and many of the pitfalls that were identified in the past have been experienced. There is no overall comprehensive plan for development in the city for the Whitebelt area and staging policies have not been put forward.

As a result, the City has seen a mismatch in terms of infrastructure and planning implementation in areas such as Elfrida where major trunk services have been provided. However, due to a lag in the planning process, the construction of homes for this new community is still a number of years away and that infrastructure has not been used.

In the case of Elfrida, the planning has led to a postponement of income from development charges and taxes to pay for those services well after the financial investment in the services has been made.

Lack of long-term planning has also resulted in a considerable amount of expenditure in terms of planning resources with disappointing results. As noted in the staff report, the GRIDS process started in 2003. The municipality and City now finds itself in a position 17 years later, after 3 versions of the GRIDS report still not being a position to implement the initial GRIDS recommendation to establish Elfrida as the next development community. The continuation of this process will simply delay the inevitable development of each successive community in the Whitebelt area that will ultimately be needed for Hamilton to evolve as a complete community.

#### **4.0 AEGD**

In a similar but reverse pattern found in the Elfrida situation, a plan for half of the AEGD has been in place for a number of years and yet servicing has not been able to be provided. In this case, the city has continued to lose investment opportunities to other communities as the half-approved business park remains underdeveloped because of lack of services.

The initial planning process for the AEGD identified ultimate development that would proceed as far west as Fiddlers Green Road. With respect to the AEGD, the Chamber has always taken the position that the ultimate development limits of the AEGD to Fiddlers Green Road should be established and that staging of servicing policies be put in place to ensure orderly development of a comprehensive industrial community. However, only the first phase of development was brought into the Urban Area. This has resulted in another second planning process that is now underway before the first phase of the AEGD can be serviced.

This inefficiency has created duplication in terms of resources required for planning. It has also created uncertainty through a Rural designation of Phase 2 lands that are designated Rural and intended for agricultural and other rural uses. Notwithstanding this somewhat misleading designation, it would be unreasonable to assume that these lands will attract investment from those with long term agricultural possibilities in mind.

In addition, delay of bringing these additional lands into the Official Plan, simply delays the opportunity for these lands to begin to develop returns in terms of employment opportunities.

The Phase 1 lands are now subject to a review process to allocate services throughout the Employment Growth District. The report can only consider half of the ultimate AEGD lands. The questions arise: Is this allocation program at all compromised by only

including half of the future AEGD lands. Will there be decisions made in the short term that could limit long term options?

Is the servicing infrastructure for the Phase 2 lands being put in place at the outset? If not, this could result in an inefficient use of infrastructure, which may have to be upgraded later.

If, in fact, the current infrastructure improvements being brought to the airport are indeed intended to accommodate Phase 2 lands, it will be important to ensure that planning policies are consistent with future infrastructure expectations. In any event, this exercise represents a significant illustration of why it is important to integrate long range land use planning with infrastructure planning.

## **5.0 Agricultural Community**

The pattern of short-term planning has not been helpful to the agricultural community in terms of Whitebelt lands. Planning policies point to the use of these Whitebelt lands for agricultural purposes. However, other than farming these areas to minimize assessment and tax generation, these lands are not conducive to long term investment in agriculture. It is recommended that policies for the Whitebelt areas recognize this reality and not purport to accommodate long term agricultural activity. This will reinforce the use of the Greenbelt policy and establish greater certainty with respect to the agricultural community.

## **6.0 Summary**

The Chamber has great expectations for the ultimate development of our community. There is significant diversity in terms of living environments. The City, unlike other municipalities within the GTA, has opportunities for future community building beyond the limits of the existing urban boundary. The City has an opportunity to be visionary in how our community will evolve and more fully control that process and its important outcomes.

There are no Whitebelt lands in Burlington or Oakville, so in terms of accommodating future growth in the West GTHA, Hamilton is it.

As land supply becomes limited and housing prices escalate, pressures have been moving from Toronto to here. By not allowing Whitebelt areas to develop, supply is restricted further and pressure on land values increases even more. This is part of the reason we are currently facing such extraordinary housing prices.

Moreover, if there is no room to accommodate future growth within the Whitebelt, it will simply go elsewhere. If people want to pursue reasonable housing options and have

affordability constraints, they will keep looking outside of the urban area, on the other side of the Greenbelt. This is the urban sprawl that the Greenbelt was intended to prevent. But, by not allowing development within the existing Whitebelt areas, areas outside the Greenbelt lands become the alternative.

The Chamber believes there are very positive outcomes associated with long range planning and many of the deficiencies that have been experienced over the last two decades can be avoided by providing greater certainty to development interests, the agricultural community, and the broader community at large.

The Chamber also feels that through a better coordination of the provision of infrastructure with long range planning, situations are avoided where infrastructure is provided without an immediate ability to generate revenue to pay for that investment. Similarly, by ensuring infrastructure improvements keep pace with planning policy, particularly in terms of employment lands, there is greater opportunity to enhance employment investment and prevent the potential loss of new opportunities to other jurisdictions.

This long-range planning strategy can be properly staged and phased to allow the City to meet intensification targets within the existing built-up area and to ensure that future development within the Whitebelt takes place in an orderly and pre-determined fashion. By undertaking proper land use planning, greater effort can be spent on designing complete communities rather than time and energy being spent on determining who is next. We can also then ensure that decisions about our future are not made by an outside arbitrator but are truly a 'made in Hamilton' solution.

The Chamber of Commerce strongly supports the establishment of a long-term plan for urban growth in the City of Hamilton that will produce a clear, staged approach to the development of all lands within the Whitebelt area and the full extent of the Airport Employment Growth District.

We thank you for the opportunity to provide this submission.