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March 25, 2021

**Chair and Members**  
**General Issues Committee**  
**City of Hamilton**

**Re: GRIDS 2 and Municipal Comprehensive Review – Planning for Growth to 2051: Draft Evaluation and Planning Criteria ( PED 17010(j)) ( City Wide)**

We are the Land Economics Consultants for Upper West Side Land Owners Group Inc., Spallaci & Sons Limited, 2112443 Ontario Ltd., Twenty Roads Developments Inc., Sullstar Twenty Limited, Lynmount Developments Inc., 909940 Ontario Ltd., and Liv Developments Ltd. (collectively, the "**UWS Landowners**").

We have reviewed the "GRIDS 2 and Municipal Comprehensive Review – Planning for Growth to 2051 (PED17010(j)) (City Wide)" (the "**Report**"), which we understand is to be considered by the General Issues Committee (the "**Committee**"), at the meeting scheduled for March 29, 2021.

We are pleased to be in a position to offer our conditional support of the recommended land need for an additional 1340 developable ha of Community Area lands and 0 ha of employment lands to the year 2051. Our support is subject to the resolution of the following matters:

- Finalization and agreement on the net development area quantities for the white belt areas;
- Confirmation of the existing inventory of residential land supply within the built boundary of the City of Hamilton; and,
- That Council adopt full urban boundary expansion needs to the year 2051 given the relatively modest amount of additional land to satisfy community land requirements between 2041 and 2051 and the benefits of taking this opportunity to conclude a definitive mature state urban boundary for the City;
- That allocation priority should be given to locations that are infill in nature, are substantially non-prime agricultural lands and which abut and are contiguous to the current urban boundary; and,

- That the Municipal Comprehensive Review process conclude with the adoption of a 2051 urban boundary with staging of development to proceed based specific growth management criteria rather than area specific allocation.

It is understood that the definition of “development land” excludes restrictions from Airport Noise Exposure Forecast contours, and non- developable features such as natural heritage features, cemeteries, and rights of way. This is defined on page 8 of 18 of the Report which notes that “the developable white belt area for Community Area Uses is approximately 1600 ha” subject to refinement through the planning process.

The City’s adoption of the “Aggressive Intensification’ Scenario as the basis for the land needs assessment must be viewed in context of:

- The accuracy and true capacity of the existing inventory of available development potential within the built boundary to achieve the level of intensification to achieve the aggressive rates of up to 70 percent over the planning period;
- The significant impact this level of intensification will have on the stability and character of existing neighbourhoods across the City. The adoption of the aggressive intensification scenario means that neighbourhoods will have to accommodate and manage the impact of introducing higher density unit forms including apartments with significant vertical definition. This will have specific impacts on community facilities, infrastructure and traffic capacity in host neighbourhoods across the City.
- City Council should understand the financial impact of intensification particularly in existing communities with aging infrastructure and insufficient public amenities. The level of aggressive intensification will place significant demands on capital and operating budgets to meet the demands of increased populations in older areas of the City. This municipal financial impact of aggressive intensification must be compared to the cost of carefully managed development in the white belt areas.

We request that MCR not focus on 2031 but rather provide for the additional land requirement to 2051 with a process to determine phasing to 2051.

There are a number of reasons for this request. The first is that 2031 will be upon us in less than 10 years after the approvals for the MCR. Clearly, the vast majority of the land needs projected for the 2031 horizon will not be developed until after the time horizon has passed. The second reason is that the “Ambitious Density” targets for the lands within the Built Boundary represent a major shift in development trajectory and it may take time to realize the densities required to accommodate the expected population growth in Hamilton.

Finally, we are of the view that the City should not exclude any post 2041 land need from inclusion in the urban boundary. The MCR is being applied holistically to the 2051 horizon with a view to balancing the need for an urban expansion to allow for compact new complete communities and the promotion of intensification beyond the minimum standards in the Growth Plan. By establishing firm and final urban boundaries for the planning horizon, the City achieves a number of important

objectives as follows:

- Promoting and finally resolving fixed long term mature urban boundaries;
- Resolving all uncertainties for existing communities and stakeholders as to where the built limits of the City will be fixed and protecting the agricultural and rural base;
- Allowing for much higher certainty in capital budgeting, transportation and infrastructure planning as to where growth will be accommodated over the long term; and
- Enabling and accommodating growth on a dynamic basis for the planning horizon depending on where infrastructure and complete communities can be provided to integrate with the existing urban boundary.

Thank you for your consideration of this submission.

Yours truly,

MGP CITY PLAN LTD



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Cc

Clients

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