

GRIDS 2 / MCR – Email Comment Summary (May 2021)

Evaluation Framework and Phasing Criteria

Email/Mail Comments

#	Date:	Name:	Comment:	Staff Response / Action Required
1.	May 2, 2021	Rose Janson	<p>We are glad that you are reaching out for feedback from citizens of Hamilton. We witnessed the meeting on March 29th.</p> <p>However, even after trying, we do not understand this mailing. The language seems to be for specialists; it is not intelligible to us. We do not understand the questions you are asking.</p> <p>If you are interested in gathering feedback about Hamilton's growth and boundaries, perhaps you could provide a 'translation' of this document?</p>	Noted. Follow up email with additional information sent on May 3, 2021.
2.	May 4, 2021	Lyn Folks	<p>Any growth in Hamilton outside of the present urban boundary cannot be called either efficient or sustainable, as you say it would be. The city should be growing 'up' rather than 'sprawling outwards'.</p> <p>Your letter is very disappointing as far as the environmental health of our City is concerned.</p>	Comments noted.
3	May 26, 2021	Rose Janson	<p>Thank you for allowing me to comment without registering on the web-page. Appreciated!</p> <p>My family used to have an orchard in Flamborough, but now we live in Ward One. L8P 1P5</p> <p>We are firmly opposed to any expansion of Hamilton's Urban Boundary, because precious farmland, trees and green space must be protected, for our kids.</p> <p>It is premature to ask citizens about where new subdivisions should go, as people just don't want that kind of expansion.</p>	Comments noted.

			<p>So much unused and empty space exists in the city, that could become beautiful family housing, with green public spaces. This is the way of progressive cities; Montreal is an excellent example.</p> <p>Thank you for making our comments count.</p>	
4	May 26, 2021	Margot Olivieri	<p>I am writing in response to the City of Hamilton’s proposed “Evaluation Framework & Planning Criteria for Urban Expansion Into Hamilton’s Whitebelt and Greenbelt Areas”.</p> <p>I would like to begin by stating that I am strongly OPPOSED to ANY expansion into our Whitebelt and Greenbelt areas for several reasons.</p> <p>First, the Whitebelt area which is being proposed for pave-over is prime agricultural land. If we continue to expropriate these farming hectares for development, we will eventually be forced to rely on imported foodstuffs, which in turn will increase usage of transportation methods that contribute to our environmental crisis.</p> <p>Clearly, the Greenbelt area slated for destruction is an area rich in flora and fauna resources that are rapidly disappearing. It seems redundant to have to justify its protection.</p> <p>The City planning staff claims to want input on an evaluation framework that already assumes expansion needs to and will take place; they are hoping to “evaluate different areas of the Whitebelt using a series of provincial and locally determined criteria to determine their feasibility for expansion”. It is more than a little puzzling to me that the public consultation (survey) slated for June should even offer a ‘no boundary’ option, if the City has already decided that expansion will occur. It is inappropriate for the City planners to move forward with a framework which has not been approved by the community they profess to represent.</p> <p>This is a ‘cart before the horse’ scenario: is the planning committee satisfied to just go through the motions of public input, or is it truly interested in what Hamiltonians have to say about this critical issue?</p> <p>As a taxpayer and life-long Hamiltonian, I demand that a rigorous Evaluation Framework and Planning Criteria be applied FROM THE START--to assess the implications of Urban Sprawl on the climate emergency, municipal finances, local agricultural systems, natural</p>	<p>Comments noted.</p> <p>A ‘no urban boundary expansion’ option will be evaluated as part of GRIDS 2 / MCR.</p> <p>Staff concur that there is opportunity to more broadly address food security. In addition, the definition of Agri-food Network includes agricultural distributors and farmers markets. Staff concur that food security should be more explicitly referenced within the evaluation framework.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option as an evaluation scenario.</i></p> <p><i>Action: Evaluation Framework and Phasing Criteria (Whitebelt) Part 1 Evaluation Criteria and Part 2 Phasing Criteria related to the Agricultural System theme amended to include food security.</i></p>

			<p>heritage and water resources. A rigorous process will be beneficial even if that process ends up being applied to expansion areas.</p> <p>Bleeding into the Whitebelt and Greenbelt is unnecessary and, indeed, detrimental to our city in many ways. There are, at the committee's disposal, various creative solutions to address the projected population increase. We do not need to contemplate expansion into the Whitebelt or Greenbelt areas that are now being considered and threatened.</p>	
5.	May 27, 2021	Colin Chung (GSAI – Elfrida)	<p>Glen Schnarr & Associates Inc. (GSAI) represents Hamilton Country Properties Ltd. (c/o Country Homes), who own lands within the northwest corner of the Elfrida Whitebelt area which are municipally known as 420 and 646 Henderson Road. Our office has been actively monitoring the City of Hamilton's GRIDS 2 and Municipal Comprehensive Review. On behalf of our client, we would like to continue to provide our professional planning opinion that the Elfrida area remains a logical and viable option to expand the City's urban boundary to accommodate growth and development.</p> <p>It is understood the City's preferred growth option is the "Ambitious Density" scenario, which identified a "Community Area" land need of 1,340 gross developable hectares to 2051. The land need of 1,340 gross developable hectares is based on a planned intensification target which increases, over time, from 50% between 2021 and 2031, to 60% between 2031 and 2041 and to 70% between 2041 and 2051, and a density of 77 persons and jobs per hectare (pjh) in new growth areas.</p> <p>It is also understood that, through the City's GRIDS and Land Needs Assessment, four Community Areas have been identified for a possible urban expansion (Twenty Road West, Twenty Road East, Elfrida and Whitechurch). As part of the next phase of determining where to grow, the City will evaluate growth scenarios through the evaluation framework and phasing criteria themes. As part of the City's ongoing consultation for the 'Whitebelt Land Evaluation Framework and Phasing Criteria', we are pleased to provide these comments. Please note that our commentary is provided to supplement staff's evaluation of the Elfrida Whitebelt area.</p> <p><i>Climate Change</i> – Adapting to climate change through urban development requires cooperation across all levels of government and the development community. Planning and development practices continue to evolve to minimize the impacts of climate change on our communities. In the context of Elfrida, a greenfield community, the City of Hamilton has an opportunity to implement policies and collaboratively work with the</p>	Comments noted.

development industry to implement a community wide district energy strategy/green energy standards that relies on solar and/or geothermal infrastructure. Developers including Country Homes actively participate in discussions with Municipal Staff to implement innovative energy conservation practices within their projects. A community-wide climate change strategy and program could become a successful footprint for the City to exemplify to other municipalities how greenfield community planning could effectively implemented partnering with the development industry.

Municipal Finance – Elfrida represents a gross developable area of approximately 1,200 hectares. The redevelopment of Elfrida as a complete community that is walkable and accessible allows the City of Hamilton to collect Development Charges, which are instrumental in financing and implementing public infrastructure such as transit and community services for other areas of the City. Regional and local governments have implemented unique financing and growth management tools to ensure that the development industry contributes its share of the costs required to support growth and development.

Servicing Infrastructure – Through the City’s GRIDS 1 process, the Elfrida area was identified as Hamilton’s next urban expansion area, planned to accommodate growth to 2031, in conjunction with the planned intensification of Hamilton’s downtown and other built-up areas. It is understood that the City of Hamilton has already invested in the oversizing of infrastructure along Highway 56 to accommodate this growth and development. Recognizing Elfrida as a preferred growth option will utilize existing and invested infrastructure to accommodate growth. Furthermore, building on the principles of complete communities and the key considerations for the ‘*Servicing Infrastructure*’ theme, Elfrida represents an opportunity to plan for and develop a comprehensively integrated water and wastewater infrastructure strategy.

Transportation – B-L-A-S-T is a rapid transit network and forms part of the \$17.5 Billion MoveOntario capital investment program. The ‘S-Line’ connects Centennial and the Ancaster Business Park. The route is planned along Upper Centennial Parkway and Rymal Road E. Elfrida offers an opportunity to extend the B-L-A-S-T network and to provide an active transit network to service a broader community. The extension of the B-L-A-S-T network builds on the 2006 endorsement of the “Nodes and Corridors” growth scenario provided through the GRIDS 1 process.

Natural Heritage and Water Resources – As part of the Elfrida Growth Area Study, the City initiated a Subwatershed Study (SWS). The Study is well advanced and provides

a detailed analysis of the natural heritage and water resources in the Elfrida area. The SWS establishes a hierarchy of natural heritage features, each requiring different levels of conservation. The SWS also provides further direction as to the extent of the Natural Heritage System (NHS) to be conserved. It is our opinion that the City should leverage the work undertaken to-date and rely upon the information presented through the SWS, which demonstrates that Elfrida can continue to be planned as a complete community while preserving significant Natural Heritage and Water Resources.

Complete Communities – The Elfrida Growth Area Study identified a ‘Nodes and Corridors’ growth and land use scenario that builds on the principles of complete communities. Elfrida offers a unique opportunity to plan for a new community that builds on these principles and provides convenient access to an appropriate mix of jobs, local services, affordable housing, a full range of other housing options, public services and recreational and educational facilities. Through the Elfrida Growth Area Study, the City acknowledged that the preferred Community Structure will provide for a mix and diversity of housing types that includes low-rise, mid-rise, and high-rise development. The high-rise development will be concentrated within the Mixed-Use Centres and Corridors, with density filtering out into the low-rise residential neighbourhoods.

Agricultural System – It is recognized that, through a future Secondary Plan process, an Agricultural Impact Assessment will be required. GRIDS 1 resulted in a ‘Nodes and Corridors’ land use structure, which was described as follows in the Growth Related Integrated Development Strategy: Growth Report (May 2006): “this option concentrates growth in essentially on 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.” Furthermore, in the Staff Report (PED17010(j), dated March 29, 2021, it notes that “...the City’s options for expanding the urban boundary to accommodate population growth are limited. The majority of Rural Hamilton (94%) is within the Greenbelt Plan area.”

Natural Resource – As previously noted, through the Elfrida Growth Area Study, the City initiated a Subwatershed Study (SWS). The Study is well advanced and provides a detailed analysis of the natural heritage and water resources in the Elfrida area.

Cultural Heritage – It is recognized that cultural heritage and archaeological resources will be studied as part of a Stage 1 evaluation that will consider the presences of significant cultural heritage resources. Based on our review of Schedule F (Rural Cultural

			Heritage Resource) and F- 1 (Rural Area Specific Cultural Heritage Resources), no cultural resources have been identified within the Elfrida area.	
6.	May 27, 2021	Maurice Stevens	<p>1) <u>Evaluation Criteria for determining the Whitebelt Expansion areas:</u></p> <p>I note that Agricultural System is a component of this evaluation. While, in some circumstances this would be appropriate, the previous reports clearly show that at least 1,340 ha of Whitebelt lands are need to meet the Growth Plan populations to 2051. This inherently requires that lands in the Prime Agricultural designation be included in the urban boundary expansion. As such, the use of the Agricultural System evaluation would not be relevant. I also note that most of the Whitebelt lands are not owned by farmers and are operated as rentals and there do not appear to be any significant dairy, poultry or greenhouse operations.</p> <p>In terms of the other criteria listed, the only one that appears to have some impact would be the Complete Communities evaluation. In particular, the Whitechurch area is remote for the remainder of the Whitebelt lands and therefore could be ranked much lower in this category.</p> <p>In general, I would like to see how the various criteria are weighted relative to one another and how the scoring will work.</p> <p>2) <u>Phasing Criteria, Whitebelt Lands</u></p> <p><u>Climate Change</u> is the first noted criteria. The City, through Secondary Planning, should use this tool to minimize negative impacts on Climate Change. As this relates to Phasing, it could be useful in determining where community-wide infrastructure, such as district energy etc. would make the most sense.</p> <p>Considering the various criteria listed, the City should strongly weight issues related to <u>Municipal Finance and Servicing Infrastructure</u>. These would have a direct impact on the taxpayers. The need to construct major infrastructure projects would also involve significant timeframes, which could delay the availability of homes when they are needed to meet the anticipated demands. Such delays would result in driving up home prices and reducing affordability.</p> <p>The <u>Transportation System</u> criteria is also an important tool, as the City moves toward more public transit opportunities. In new growth areas this is always a challenge and</p>	<p>Staff provide the following comments in the order of the email:</p> <p>1. Evaluation Criteria for Whitebelt Expansion Areas comments:</p> <p>Regarding the Agricultural System comment, it is staff's opinion that the wording of the evaluation and phasing criteria with respect to the Agricultural System is consistent with the direction of the PPS and the Growth Plan. The Growth Plan policy 2.2.8.3 requires that settlement area expansions avoid prime agricultural areas where possible. Alternative locations are to be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the agricultural system. Staff note that this is one criteria that will be considered comprehensively with the other criteria.</p> <p>Staff acknowledge the comment regarding weighting of criteria. The framework is intended to be used as a method for documenting the wide range of information considered in the development of staff's planning</p>

		<p>careful evaluation of potential new transit routes can guide phasing decisions, along with the need to create these routes in a continuous form at the earliest stages of development. There should be a process that would require such routes to be established regardless of independent developer ownerships.</p> <p><u>Complete Communities</u> should be a determinant in the phasing to avoid piecemeal development.</p> <p>In looking at the <u>Agricultural System</u> criteria, it is readily evident that Prime Agricultural land is required in the Urban Expansion It is also noted that there is a relatively small percentage of non-Prime Agricultural land within the Whitebelt areas. Therefore, the concept of prioritizing non-prime agricultural areas is not feasible, given the need to meet projected demands to 2031 will require more than just the non-prime agricultural area.. The more important tool in evaluating the phasing would be to minimize fragmentation within the agricultural areas.</p> <p>Since the Provincial mandate is to plan for growth to 2051, I anticipate that the Official Plan would include all of the required area for that target. The significance of the Phasing will be in how it gets implemented. Will this be done through phasing of Secondary Plans? What will determine the triggers to move from one phase to the next? I would like to see this addressed in the report that goes forward to Council.</p>	<p>recommendation. The information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given dataset. The phasing component will include the results of more detailed technical analysis related to agriculture, municipal finance, transportation, water, wastewater and stormwater management. Revisions to the framework document will include a more detailed explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario and how this approach is consistent with the Provincial policy framework for growth planning, which requires the City to consider the Growth Plan and PPS's policies in their entirety when making a decision.</p> <p>2. Phasing Criteria comments:</p> <p>Climate change – comments noted.</p> <p>Municipal Finance and Servicing Infrastructure – see comments above on weighting of criteria</p> <p>Transportation system – comments noted.</p>
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7.	May 28, 2021	Dave Carson	<p>This is an elaboration of my input via the Engage Hamilton website.; it is not clear on the online input form that only a single question is being asked, or that additional input is not possible, until the “Submit” button is pressed. Therefore, I am making a second submission directly.</p> <p>I have two main areas of concern.</p> <p><i>Major Concern 1. The whole document assumes that the white belt lands must be used - See Part 2 Phasing Criteria statement - "It is anticipated that the City will require all or a portion of its white belt lands to accommodate forecast community growth to 2051".</i></p> <p>The land needs assessment for GRIDS 2 attempts to provide an overall justification for additional greenfield lands from a land needs perspective. It is only through blind acceptance of this justification, without fully considering the alternative of no expansion, that the evaluation framework and phasing criteria, as they stand, are appropriate. If these criteria and framework are to be comprehensive and valid then they must be applicable to urban growth through greater densification & intensification within the urban boundary. There are overarching needs driven by our needs for clean air, clean water, food and protection from extreme weather, that should trump economic growth drivers.</p>	<p>A ‘no urban boundary expansion’ option will be evaluated as part of GRIDS 2 / MCR.</p> <p>Modelling of GHG emissions will be incorporated into the evaluation, including both the whitebelt growth scenarios and the no urban boundary expansion option.</p> <p>Regarding comments on impacts on prime agricultural land and infrastructure costs, these matters are being addressed in the Agricultural System and Municipal Finance sections of the framework.</p>

	<p>These are compounded by the City and community goal for greenhouse gas (GHG) reduction needs.</p> <p>Recent inventory of Hamilton’s GHG emissions (https://taf.ca/qtha-carbon-emissions/) show that buildings are the largest non-industrial source, with transport emissions close behind. If Hamilton is to meet its’ stated reduction goals, and even more to meet goals demanded by national and international reduction needs, then land use and growth planning must start with a carbon budget.</p> <p>Transport emissions are driven in large part by the location and distribution of buildings, where we live, work and play. They thus become secondary to our urban / sub-urban form. If the white belt lands are built on for housing sub-divisions with weak or no transit infrastructure – similar to past expansions, we will see more commuting distances and more greenhouse gas emissions.</p> <p>If the white belt lands are built upon, it will destroy for all foreseeable generations, the prime farmland that exists in the white belt.</p> <p>If the white belt lands are built upon, it will maximize the infrastructure costs that the City will bear. Instead of making better use of existing infrastructure, it will require new infrastructure that development charges will not pay for, leading to a further accumulation of the infrastructure deficit.</p> <p>Major concern 2. The examples above on transport emissions, farmland destruction and infrastructure deficit all give rise to this; there is no way to understand the relative importance of the Phasing Criteria themes. Will you apply some form of weighting to assess? Will some areas override others?</p> <p>Past growth – much of it driven by developer profits rather than community needs – shows how a decision to expand the urban boundary pulls the trigger on sprawl and less than ideal complete communities. The City quickly loses control over the type and mix of housing.</p> <p>The Report suggests that an “evaluation theme summary” will show how well Candidate Expansion Areas address the nine evaluation themes. It suggests that an evaluation of the themes, using a graphic that shows how well the Candidate Area address some or all considerations, is a useful decision-making tool. I am already suspicious that this cannot be done in a reasonably objective fashion. This suspicion is raised by the omission of the “no expansion” alternatives in this whole process. What weight will be given to the</p>	<p>Regarding the comments on weighting, the information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given dataset. The phasing component will include the results of more detailed technical analysis related to agriculture, municipal finance, transportation, water, wastewater and stormwater management.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option as an evaluation scenario.</i></p> <p><i>Action: Part 2 Phasing Criteria related to the Climate Change theme amended to include GHG emissions analysis. Included GHG emissions modelling in the evaluation of the ‘no urban boundary expansion option’.</i></p> <p><i>Action: Revised the framework document to include a more detailed explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario.</i></p>
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			<p>different themes? How will “consideration” be judged? By whom? Is it just a comparative “better or worse” between Area A and Area B?</p> <p>Summary of concerns: If you are to have an open and transparent decision-making process on the urban boundary then</p> <ol style="list-style-type: none"> 1. The “no expansion” alternative should be included with a review of the multiple possible candidate areas <i>within the existing urban boundary</i> 2. All the Theme Key Considerations and Measurements must be quantified and published before starting to evaluate individual candidate areas. It will then be evident if proportionate weightings are being given, based on the relative importance of the considerations. Indeed, the proportions must be open for public discussion, to avoid having corporate profits override the need for long term care of our community climate, environment and sustainability. 	
8.	May 28, 2021	Darlene Quilty – MHBC	<p>We are the planning consultants for TransCanada PipeLines Limited (TCPL), an affiliate of TC Energy Corporation (TC Energy). This letter is in response to notification of the GRIDS public consultation – Draft Evaluation Framework and Phasing Criteria. TCPL has high-pressure natural gas pipelines within the Hydro Corridor adjacent to and within the City’s whitebelt lands.</p> <p>TCPL’s pipelines and related facilities are subject to the jurisdiction of the Canada Energy Regulator (CER) – formerly the National Energy Board (NEB). As such, certain activities must comply with the Canadian Energy Regulator Act (Act) and the National Energy Board Damage Prevention Regulations (Regulations). The Act and the Regulations noted can be accessed from the CER’s website at www.rec-cer.gc.ca.</p> <p>TCPL’s pipelines are defined as Infrastructure in the Provincial Policy Statement (PPS). Section 1.6.8.1 of the PPS states that ‘<i>planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit and electricity generation facilities and transmission systems to meet current and projected needs.</i>’ The Growth Plan (2020) also references the importance of protecting and maintaining planned infrastructure to support growth in Ontario.</p> <p>The Hydro Corridor crosses and in some areas forms the current urban boundary where additional whitebelt lands are located. While By-law 05-200 currently provides setback requirements, TCPL has additional requirements for new development and increased</p>	<p>Comments are noted.</p> <p>Future secondary planning will consider the hydro corridor and appropriate land uses.</p> <p>TransCanada Pipelines will be included in all future planning processes within the vicinity of the Corridor.</p>

			<p>density that may result in TCPL being required to replace its pipelines to comply with CSA Code Z662 as well as crossings, which will need to be addressed with any future lands considered to be brought into the urban boundary for development.</p> <p>While there are no specific criteria related to the protection of existing and planned infrastructure, we trust the City will consider this in terms of any lands adjacent to the Hydro Corridor.</p> <p>Thank you for the opportunity to comment. please keep us informed of the next steps in the process. If you have any questions, please do not hesitate to contact our office.</p>	
9.	May 28, 2021	Carmen Chiaravalle	<p>I've got a few comments and insights and as you suggested it might be easier to draft an email instead of the online survey for you and the other planners to look at. The other important thing is that the Phasing of development Criteria of the Whitebelt lands be a fair process. Heather I'm not a planner but I'll try to list some of the important advantages of the Twenty Road East area for city planning and city council to consider. The two most important considerations for any Phasing of Development as was made evident by the March 29 GIC Meeting should be the preservation of Prime Agricultural areas and the application of a Climate Change Planning Lens to any Phasing of development decisions.</p> <p><u>Climate Change</u> Transportation is one of the major causes of the increase of greenhouse gas emissions. The closer we are to our jobs will reduce commute times reducing greenhouse gas emissions. The Twenty Road East area is located between Hamilton's employment areas the AEGD and Redhill north and south Business Centres. The TRE area is also located in close proximity to the city's major activity centres, community infrastructures and contiguous to the central mountain development to the north.</p> <p><u>Servicing Infrastructure and Municipal Finance Impacts</u> The new Dickenson Road Trunk Sewer line has been Designed and approved to accommodate future growth of the Twenty Road East area (Motion in Council 7.8 of September 13, 2006). There is an existing unused sewer line(250 mm) and water line on Upper Ottawa adjacent to the TRE area that could be extended to service approximately 250 acres. The city has already completed the Upper Hannon Creek Master Drainage and Servicing Study for these 250 acres and this area is development ready. There are also many existing sewer and water infrastructure (Twenty Road East, Upper Gage, Miles Road, Upper Sherman, and Upper Wentworth. All of Miles Road from the city limits to Dickenson is serviced by city water and all the Twenty Road East area east of Miles Road is serviced by city water.</p>	Comments noted.

Transportation System and Municipal Finance TRE is directly connected to the Upper James Primary Corridor which connects to the Lincoln Alexander Expressway . TRE is connected to Dartnall Road connecting directly to the Lincoln Alexander Expressway. The extension of the major Arterial Roads of Upper Wentworth and Upper Gage will connect the TRE lands to the Linc. The major Arterial Roads of Upper Ottawa and Upper Sherman could also be extended to integrate the TRE area to the existing urban boundary. Miles Road connects to Rymal Road which has been approved to be widened to five lanes from Upper James to Dartnall Road. The Transportation infrastructure already exists or can easily and cost effectively be extended to the TRE area.

Natural Heritage and Water Resources This is a prime example of how the process has again been tilted to favour the Elfrida area. City planning staff repeatedly stated in their planning reports that the reason that they did the Background Studies and the Municipally Initiated Comprehensive Review Process only for the Elfrida Area was that: “When the UHOP was approved the Province again removed the reference to Elfrida as a growth area, however, the general policies addressing urban boundary expansion were left in the plan”.

The problem with this statement by city planning staff is that the Province specifically deleted Elfrida from both the RHOP and the UHOP as Hamilton’s future growth area. The Province didn’t delete the “general policies addressing urban boundary expansions”. The question is why did the city only include the Elfrida area the area that the Province specifically deleted twice and exclude all other areas for consideration as part of the Background and MCR process? The general urban boundary expansion policies are specifically that “general policies” not only Elfrida urban boundary expansion policies. The other question is why exclude the Twenty Road East lands that are designated non-prime agriculture and only include the Elfrida area that is designated Prime Agriculture? The other question for the city is why they didn’t include the TRE area as part of the MCR process when Motion in Council 7.8 of September 13, 2006 specifically stated: “Therefore it is resolved that staff be directed to Incorporate the lands along Twenty Road in the required five-year review of the Official Plan and Master Plans”.

The only comparison that we have for the impact of development on the Natural Heritage and Water Resources (Ecology) between the Elfrida area and the TRE area are the Grids 1TBL Ecological Well Being Assessments. The Elfrida Growth Option 5 had the “Largest Potential Impact” on the Ecology (See Grids 1 Table 20 Ecological TBL). Evaluation). The Twenty Road East Growth Options 3 and 4 had only “Moderate Potential Impact” on the Ecology See (Grids 1Table 18 and 19 Ecological TBL)

			<p><u>Complete Communities</u> “Complete Communities are places where homes, jobs, schools, community services, parks and recreational facilities are easily accessible” The TRE lands are centred between Hamilton’s two Employment areas. TRE lands are adjacent to Turner Park Sports Complex, Les Chater YMCA, Skate Park, Splash Pad, Turner Park Public Library and Mountain Police Station. Corner of Twenty Road east The Chippewa Trail crosses and can be accessed at the corner of Twenty Road East at Nebo Road. The Twenty road East area is closer to Hamilton’s Downtown area than many areas that are already in the urban boundary.</p> <p><u>Protection of Prime Agricultural Areas</u> 100 % of the Twenty Road East Community Lands are designated rural non-prime agricultural (SRG LEAR Study). Approximately 85 % Of the Elfrida area is designated “Prime Agricultural” (SRG LEAR Study).</p> <p><u>Natural Resources</u> Neither area has any Natural Resources.</p> <p><u>Cultural Heritage</u> ASI Cultural Heritage Resource Assessment of the Elfrida area (20 active cultural heritage resources) the city did not do a Cultural Heritage assessment of the TRE area.</p> <p><u>The city’s Cultural Heritage Resources Interactive mapping</u> identifies (one cultural heritage property, one place of worship (Hindu Temple) and two inventoried properties within the TRE Community land area.</p> <p>Heather I’ve tried to summarize some of the TRE area’s advantages for the Phasing of Development Evaluation Process. Thanks again for your prompt reply.</p>	
10.	May 28, 2021	Ashley Paton, Bousfields (309-311 Parkside)	<p>We are writing on behalf of Mr. Consoli regarding his lands at 309/311 Parkside Drive (the “subject site”), Waterdown in response to your circulation of the Draft Screening Criteria and Evaluation Tool (Waterdown and Binbrook) released by the City of Hamilton through Staff Report PED17010(j) – Planning for Growth to 2051: Draft Evaluation Framework and Phasing Criteria, which includes Appendices A and B (the “Draft Criteria”).</p> <p>In general, we are supportive of the Draft Criteria as it relates to Waterdown. As you are aware, a Planning Rationale Report, prepared by The Biglieri Group Ltd. and dated January 2019, was submitted in support of the consideration of adding the subject site to the urban area and addresses the Draft Criteria.</p>	Comments are noted.

			Thank you for the opportunity to comment on the Draft Criteria. We look forward to working with you as you consider the subject site to be added to the urban area and to assist the City to grow as a complete community.	
11.	May 28, 2021	Dave Pitblado (Paletta)	<p>We submit the following comments for consideration as part of the ongoing GRIDS 2 / MCR public consultation process.</p> <p>We are in full support of the proposed urban boundary expansion for the entire Elfrida Future Growth Area. Not only is it needed from a provincial policy perspective to accommodate growth in Hamilton to 2051, it is also needed to provide relief to the challenging housing market where demand far exceeds supply, resulting in skyrocketing housing prices. As affordability is a growing concern, additional residential supply is urgently needed.</p> <p>In the event that additional land beyond Elfrida is needed in order to meet provincial growth targets, an urban boundary expansion surrounding Binbrook and along Regional Road 56 would be the next logical location. Binbrook today is an urban island surrounded by rural land, completely disconnected from the Hamilton urban area. It is time to address this long outstanding amalgamation issue. An urban boundary expansion along Regional Road 56 and surrounding Binbrook would not only provide greater connectivity and traffic movement, but also enhanced opportunities for housing, retail, and jobs, all of which Hamilton needs.</p> <p>Please keep us informed as the City continues its work on the MCR and GRIDS 2 projects.</p>	Comments are noted.
12	May 28, 2021	Dave Falletta (Bousfields) - Elfrida	<p>We are writing on behalf of a group of landowners in the Elfrida area of the City of Hamilton (listed in Schedule "A" to this letter) in response to the Draft Evaluation Framework and Phasing Criteria released by the City of Hamilton through Staff Report PED17010(j) – Planning for Growth to 2051: Draft Evaluation Framework and Phasing Criteria, which includes Appendices A and B (the "Draft Criteria").</p> <p>Under the proposed Evaluation Criteria and Phasing Criteria Themes of "Agricultural System", the key considerations go beyond the policies of the Growth Plan for the Greater Golden Horseshoe ("Growth Plan") and the policies of the Provincial Policy Statement, 2020 ("PPS"). With respect to settlement area boundary expansions, both the Growth Plan and the PPS permit the expansion of the urban boundary into prime agricultural areas where there are no reasonable alternatives which avoid prime agricultural areas (Policy 2.2.8.3 f) of the Growth Plan and Policy 1.1.3.8 c) of the</p>	It is staff's opinion that the wording of the evaluation and phasing criteria with respect to the Agricultural System is consistent with the direction of the PPS and the Growth Plan. The Growth Plan policy 2.2.8.3 requires that settlement area expansions avoid prime agricultural areas where possible. Alternative locations are to be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the

		<p>PPS). However, once lands are added to the urban boundary, neither the Growth Plan nor the PPS speak to phasing development within designated greenfield areas based on the prioritization of non-prime agricultural areas.</p> <p>In order to accommodate the minimum urban boundary expansion area of 1,340 ha (under the staff-recommended “Ambitious Density Scenario”), there is no scenario that avoids Prime Agricultural Lands. The Final Land Needs Assessment staff report (PED17010(i) dated March 29, 2021, makes it clear that the City will need to expand its urban boundary to include all or a majority of its remaining Whitebelt lands, including prime agricultural areas. However, the report notes, on page 19, that “the recommended expansion land need, at approximately 1,340 ha, equates to 1.5% of the City’s total rural land area. The remaining 98.5% of the City’s rural lands will remain outside of the urban boundary as part of the Rural Hamilton...even after expansion occurs, at least 98% of the City’s existing prime agricultural lands will remain and will be protected.” It then states: “Based on the above it is apparent that an expansion of approximately 1,340 ha to accommodate the next 30 years of the City’s growth is not resulting in urban sprawl, and to the contrary, the overwhelming majority of the City’s rural land, including prime agricultural lands, will remain protected.”</p> <p>When the City selected Elfrida as the preferred community growth area as part of GRIDS1, it concluded that that there was no reasonable urban boundary expansion that avoided prime agricultural areas. It is clear that the same conclusion will apply to the staff-recommended Ambitious Density Scenario as part of GRIDS2.</p> <p>While it is acknowledged that there are policies that state prime agricultural lands are to be avoided in the determination of the extent and location of the urban boundary expansion, once lands have been added to the urban boundary, there is no policy direction in either the Growth Plan or PPS that directs the phasing of development within designated greenfield areas to occur based on the prioritization of non-prime agricultural areas or prioritizing areas that have fewer existing agricultural operations or active livestock operations to accommodate development first as recommended on page 22 of Appendix “A” of Report PED17010(j).</p> <p>Rather than the prioritization of non-prime agricultural lands over prime agricultural lands once the urban boundary has already been established, the phasing of development of lands within the urban boundary should be determined primarily on the basis of the orderly, efficient, and cost-effective extension and sequencing of development in conjunction with the delivery of infrastructure and community services.</p>	<p>impact on the agricultural system. This is one criteria that will be considered comprehensively with the other criteria.</p> <p>The City has retained Dillon Consulting to complete an Agricultural Impact Assessment that will assist with evaluation of whitebelt areas against the criteria above.</p>
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			<p>Based on the foregoing, we respectfully request that the “Agricultural System” Draft Criteria be revised as follows:</p> <p><u>Part 1: Evaluation Approach for Whitebelt Lands</u> What are the key considerations? o After “Does the Candidate Expansion Area avoid prime agricultural areas?” add “If not, are there reasonable alternatives that avoid prime agricultural areas?”</p> <p><u>Part 2: Phasing Criteria, Whitebelt Lands</u> Agricultural System – Delete the following two criteria: o Does the phasing scenario prioritize development of areas that are non- prime agricultural? o Does the phasing prioritize development of areas that have fewer existing agricultural operations or active livestock operations?</p> <p>Thank you for the opportunity to comment on the Draft Criteria. We look forward to working with you to address the comments that have been put forward in this letter in order to finalize the criteria to assist the City to meet its growth needs and grow as a complete community.</p>	
13	May 28, 2021	Steve Spicer	<p>I have read through staff Report PED17010(j) Planning for Growth to 2051: Draft Evaluation Framework and Phasing Criteria.</p> <p>I believe that there is too much emphasis put on Prime Agricultural vs Non- Prime Agricultural lands. My main point would be that an UBE will be required to accommodate growth to 2051 and that 1340 ha will be required for the Ambitious Density Scenario to succeed. There is no other option that avoids Prime Agricultural other than that what is proposed in the white belt candidate areas. Once the lands have been designated Urban, I don't believe that the Prime Agricultural vs Non- Prime Agricultural issue any longer applies. If a “No UBE” scenario is adopted then the Prime Agricultural vs Non- Prime Agricultural issue is redundant.</p> <p>I think that the criteria for development phasing within an approved UBE should be determined by other factors, mainly on the basis of the orderly, efficient, and cost-effective extension of existing built or approved development and sequencing of development in conjunction with the efficient delivery of infrastructure and community services. Priority should also be given to lands that are most likely to be ready for development in the short term. By this I mean lands that are owned by proponents that are ready and able to invest in their lands to actually accommodate the families looking to buy new homes. There is no</p>	<p>Regarding the comments on the phasing criteria related to prime agricultural lands, it is staff's opinion that the wording is consistent with the direction of the PPS and the Growth Plan. The Growth Plan policy 2.2.8.3 requires that settlement area expansions avoid prime agricultural areas where possible. Alternative locations are to be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the agricultural system. This is one criteria that will be considered comprehensively with the other criteria.</p>

			<p>point in phasing lands that won't be developed in a timely manner because the land owner has other plans for his property; continuation farming for instance.</p> <p>Thank you for this opportunity to comment.</p>	<p>Regarding phasing, staff concur that this issue should be addressed as one phasing consideration.</p> <p><i>Action: Part 2 Phasing Criteria amended to add a criteria related to implementation and readiness of lands for development.</i></p>
14	May 28, 2021	Gerry Tschiler (MHBC)	<p>As you may know, MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") is retained by 456941 Ontario Ltd., 1263339 Ontario Ltd. and Lea Silvestri (hereinafter referred to as "the Owner" or "Silvestri Investments") in relation to Silvestri Investment's lands, legally described as "Part of Lots 8 & 9, Concession 1, Glanford, Part 1 on 62R-1261, T/W AB332743, Glanbrook, City of Hamilton" (Twenty Road Lands) and "Part of Lot 50, Concession 4, Ancaster, as in CD209927 & Firstly in HL269410, except AB199470, S/T AB215016 & S/T HL19853, S/T AN26836, VM196953, Hamilton" (832 Garner Road East). As part of the early stages of the Growth Related Integrated Development Strategy 2 and Municipal Comprehensive Review (GRIDS 2 / MCR) process, MHBC has submitted requests on behalf of Silvestri for the inclusion of both of these properties within the urban boundary, including detailed technical reports and justification for the Twenty Road Lands.</p> <p>We have reviewed the Draft Evaluation Framework and Phasing Criteria released by the City for comment. The document is comprehensive and well organized and we agree with many of the criteria. However, we do have concerns with several of the criteria and thus we are providing the following comments for your consideration. The comments below are related to themes and specific criteria in both Parts 1 and 2 of the evaluation framework.</p> <p><i>District Energy</i></p> <p>Our understanding is that district energy systems are highly context-specific and require detailed planning and financial commitments early on in any planning process in order to actually be implemented on the ground. Although we are not opposed to the principle of district energy as a method of energy generation, we do not believe that this is a relevant criterion to assess urban boundary expansion which is a high level land use planning exercise where the details of a district energy system would not normally be assessed and confirmed.</p> <p><i>Infrastructure Resiliency</i></p>	<p>Responses are provided in the topic order referenced in the email:</p> <p>District energy – District energy systems have been included as an opportunity to consider aspects of energy efficiency/conservation through community planning. The Growth Plan directs municipalities to consider aspects of infrastructure and energy conservation when applying the policies of the Plan. The analysis being undertaken to assess the potential for district energy is relatively high level, and if there are differences between the candidate expansion areas, then the results will surface any reasonable differences. Similarly, if there is insufficient information to identify the potential for district energy (based on the need for more detailed study), the results will also be documented.</p> <p>Infrastructure Resiliency – The infrastructure resiliency analysis</p>

	<p>There are references to “proposed stormwater management” in this criterion. Since this criterion is being used to assess whitebelt lands for inclusion within the urban boundary, it is not clear what stormwater infrastructure would have been proposed for these areas since they are currently outside of the urban boundary. Clarification is required on what exactly is being assessed for this criterion since the “How will we measure this?” column only talks about existing infrastructure and input from staff.</p> <p><i>Servicing Infrastructure</i></p> <p>We do not disagree with the principles of the criteria in this section. However, we would like to note that there were a number of outstanding appeals related to the existing urban boundary identified in the UHOP through the previous GRIDS / MCR process. While several land areas were appealed for not being included within the urban area, including Elfrida, the Elfrida lands have had the benefit of additional study by the City since then, regardless of not being within the urban area. We are thus concerned about the inequity in how these criteria may be applied relative to the other Candidate Expansion Areas given the additional work completed by the City for the Elfrida lands.</p> <p><i>Prioritizing Public Transit</i></p> <p>Supporting existing and planned public transit is a key community building goal. We note that this section contains two similar criterion assessing whether a Candidate Expansion Area <u>contains</u> a public transit route or stop and whether it is <u>adjacent</u> to a public transit route or stop. Based on current HSR mapping, we do not believe that any of the Candidate Expansions Areas contain existing transit routes or stops so we are assuming that “contains” in the context of this criterion means “directly adjacent to”. However, we would like clarification of this assumption. If this assumption is correct, we do not believe that the distinction between “contains” and “adjacent” is helpful as two separate elements of an assessment. No matter which Candidate Expansion Area is introduced into the urban boundary, it is likely that not all of its future parcels will be directly adjacent to the specific transit route or stop in question. Therefore, it is much more helpful to assess this criterion from the perspective of proximity to existing routes or stops as opposed to direct adjacency.</p> <p><i>Complete Community</i></p> <p>This criterion appears to suggest that each Candidate Expansion Area will be evaluated on its ability to function as a standalone complete community. We understand that the Provincial policy supports the creation of complete communities but this should not be narrowly interpreted so that any proposed Candidate Expansion Area must itself function</p>	<p>will consider availability of existing and planned stormwater infrastructure within and in proximity to the Candidate Area. It is acknowledged that most of the Candidate Areas do not have stormwater management plans Policy 2.2.8.3 directs municipalities to consider existing and planned infrastructure when making decisions related to settlement area expansion. It is understood that more detailed planning will be required to address infrastructure resiliency through subwatershed studies, stormwater management and secondary planning. Accordingly, use of words in the framework such as “proposed” will be reviewed and modified as needed. As noted above, some of the Candidate Expansion Areas will require additional studies prior to development.</p> <p>Servicing Infrastructure: comment noted. The best available information for each candidate area will be utilized in the evaluation.</p> <p>Prioritizing Public Transit: Criteria will be simplified to refer to transit routes/stops that are adjacent to a Candidate Expansion Area.</p> <p>Complete Communities: staff note that the complete communities</p>
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			<p>as a standalone complete community. This approach does not recognize the complex and interdependent nature of a diverse city like Hamilton or even the broader region. We recommend removing the criteria that each Candidate Expansion Area be a standalone complete community and replacing it with criteria which considers how the Candidate Expansion Areas would function within the broader city structure.</p> <p>An important component of the complete community concept is the ability to provide a range of housing types. As such it is important to assess areas not only on their ability to function as new standalone complete communities but more importantly to look for opportunities where existing communities can be enhanced with the introduction of a broader range of house forms in Candidate Expansion Areas. This should be prioritized over the creation of new standalone complete communities.</p> <p><i>Additional Criteria</i></p> <p>Apart from the issues identified herein, we generally take no issue with the criteria that have been proposed thus far. We do recommend that additional criteria be included that consider the contiguity and the adjacency of the Candidate Expansion Areas with the existing urban boundary and prioritize inclusion of those areas that round out the existing urban boundary, as highlighted in our comments on complete communities.</p> <p>We would like to thank staff for the opportunity to provide comments on the draft framework. We look forward to staff's review of our request for a settlement boundary expansion for 832 Garner Road East and the Twenty Road Lands as part of the next phase of GRIDS 2.</p>	<p>criteria is intended to evaluate the ability of a candidate area to both function as a complete community and contribute to a surrounding area's completeness, in addition to its ability to provide a range of housing types.</p> <p>Additional criteria: Staff concur that contiguity is an important factor to consider and should be reflected in the complete communities consideration and phasing growth scenarios.</p> <p><i>Action: amended framework to address Energy Efficient Community Design including best practices consideration.</i></p> <p><i>Action: framework amended to remove reference to proposed stormwater management.</i></p> <p><i>Action: amended evaluation criteria to refer only to adjacency of public transit stops.</i></p> <p><i>Action: Part 2 Phasing Criteria amended to add criteria regarding logical expansion of the urban boundary.</i></p>
15	May 29, 2021	Daniel Rocchi	<p>To Whom It May Concern,</p> <p>I request the committee read and consider the following letter opposing urban expansion into Whitebelt and Greenbelt areas.</p>	<p>Comments noted that no urban boundary expansion is respondent's preference.</p>

		<p>I have met the May 31 deadline for comments. It is time for this city's government to do the right thing and consider the long-term consequences of its shortsighted greed.</p> <p>Daniel Rocchi</p> <p><<Attached Letter>></p> <p>I am writing in response to the City of Hamilton's proposed "Evaluation Framework & Planning Criteria for Urban Expansion Into Hamilton's Whitebelt and Greenbelt Areas."</p> <p>I would like to begin by stating that I am STRONGLY OPPOSED to ANY AND ALL expansion into our Whitebelt and Greenbelt areas for several reasons.</p> <p>The Whitebelt area which is being proposed for pave-over is prime agricultural land. If this government continues to expropriate these farming hectares for development, we will eventually be forced to rely on imported foodstuffs, which in turn will increase usage of transportation methods that contribute to our environmental crisis.</p> <p>Clearly, the Greenbelt area slated for destruction is an area rich in flora and fauna resources that are rapidly disappearing. It seems redundant to have to justify its protection.</p> <p>The City planning staff claims to want input on an evaluation framework that already assumes expansion needs to and will take place; they are hoping to "evaluate different areas of the Whitebelt using a series of provincial and locally determined criteria to determine their feasibility for expansion." It is extremely puzzling that the public consultation (survey) slated for June should even offer a 'no boundary' option if the City has already decided that expansion will occur. It is inappropriate for the City planners to move forward with a framework which has not been approved by the community they profess to represent.</p> <p>Is the planning committee satisfied to just go through the motions of public input, or is it truly interested in what Hamiltonians have to say about this critical issue?</p> <p>As a taxpayer and lifelong Hamiltonian, I demand that a rigorous Evaluation Framework and Planning Criteria be applied FROM THE START to assess the implications of Urban Sprawl on the climate emergency, municipal finances, local agricultural systems, natural heritage and water resources.</p>	<p>Framework will be modified to address and evaluate the no urban boundary expansion option.</p> <p><i>Action: Addition of the "How Should Hamilton Grow?" Framework to include the No Urban Boundary Expansion option as an evaluation scenario.</i></p>
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16	May 29, 2021	Marie Covert	<p>Hello,</p> <p>I am writing to give you my comments about the proposed expansion into the Whitebelt and Greenbelt areas as mentioned on the web site: GRIDS 2 and Municipal Comprehensive Review Engage Hamilton</p> <p>I have tried multiple times, on different days, to Register on the site and despite every effort I have been unable to log in. Apologies. That is why I am reverting to the old style of communication to send you my thoughts in the hope that you are able to upload them to the site. I understand that it represents extra work for you and I am sorry.</p> <ol style="list-style-type: none"> 1. This whole process has to be guided by a rigorous evaluation framework FROM THE BEGINNING. It appears that the City has just jumped into the middle of a solution without developing a plan first. How can anyone know what the City will need by 2051? It's preposterous to think that we can see that far into the future and make accurate decisions that will condemn thousands of acres, potentially without need. These are extremely important considerations under review and they require the greatest care and analysis. We cannot possibly guess where we will be by 2051. To start to infringe on the white belt and even consider the precious green belt without due consideration is reckless. We CANNOT know that there will be 236,000 new residents and 122,000 new jobs in 30 years. These numbers are groundless and not binding. They cannot possibly be used as the guide unless there is some information as to their derivation. Reminder: In late 2019, we didn't know the world would shut down in 2020. Please take a step back to conduct the Plan in an orderly, sequential manner. Don't put the cart before the horse. 2. An Evaluation Framework would provide documented evidence that expansion beyond the existing Urban Boundary is truly required. Without that sound evidence, without unwavering proof, any surveys, citizen requests, assessments, etc. are meaningless. Please take the time necessary to do the required research and do 	<p>Staff provide the following responses to the comments in the email:</p> <ol style="list-style-type: none"> 1. The City is required to plan to the year 2051 in accordance with Provincial forecasts. The Provincial forecasts were updated in 2019. 2. The evaluation framework will be modified to address the no urban boundary expansion option. 3. Regarding underutilized spaces in the City which could be redeveloped for alternative uses, the City can put in place Official Plan and zoning designations that encourage this type of redevelopment, and offer financial incentives, but cannot force any private redevelopment to occur. The market will determine how many of these sites will redevelop and for how many units by 2051. An assumption that all of these sites will

			<p>not be bullied by the provincial government whose needs and greed are all too apparent. Please do not blindly accept the mandate that this must be done. <u>There is no demonstrated need to expand beyond the boundary.</u> Please take a major step back to determine the Planning Criteria that will be applied.</p> <ol style="list-style-type: none"> 3. A casual drive through downtown Hamilton will demonstrate to anyone that there are many, many blocks of boarded up buildings , unused factories and warehouses. These buildings or the spaces they occupy can certainly be converted into multi-purpose buildings, creating communities with parks and shopping and jobs for the residents who live nearby. Transportation does not need to be considered because everyone can walk or bike to grocery stores and recreational centres. No infrastructure work is required because it is already in place so the cost is immediately more affordable. Please consider using the huge amount of space already available within the urban boundary before asking for an evaluation of the white belt destruction. The green belt must remain untouched. 4. Similarly, there are acres of parking lots dotted all over Hamilton, both the downtown core and the Hamilton mountain. These should be considered as possibilities for multi-storey parking lots, where applicable, to be more efficient in the use of land already serviced by water, sewer, and transportation. Extra costs are incurred as soon as we expand beyond the Urban Boundary, so please consider every alternative before the few pieces of land that are still free of pavement and asphalt are invaded. This farmland is necessary to provide food for the city. The closer to the city, the less it costs in transportation and labour. 5. Citizens cannot be expected to comment on this huge assumption that expansion is necessary. The survey seems to ask for their opinions on government assumptions. This is not an organized plan. Also, citizens don't seem to have the option to say they oppose expansion. Surely that should be their right? Again, I return to the undeniable fact that a rigorous framework does not exist and therefore, this assumption is meaningless. 6. I say "NO" to expansion of any kind into the Greenbelt. The City is under no obligation to even consider it. These lands are especially precious as we are in the middle of a Climate Crisis. It is totally confounding that the City would even mention such a travesty at this point in the crisis. Again, the fact that this kind of expansion would even be considered points to lack of planning of any kind. 	<p>redevelop to provide housing is not valid.</p> <ol style="list-style-type: none"> 4. Financial costs of growth will be reviewed through the framework / phasing criteria. 5. The survey requesting citizen input on the no urban boundary expansion option will be mailed in June. 6. Comment noted.
17	May 29	Matt Johnston (Elfrida – 60 Reg. Rd 20)	UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) is the authorized planning consultant acting on behalf of Artstone Holdings Ltd., (the Owner) of the property municipally known as 60 Regional Road 20 in the City of Hamilton.	Staff provide the following responses in the order of the comments in the email:

		<p>As you'll recall, UrbanSolutions has actively participated in the various City of Hamilton growth planning exercises on behalf of the Owner and we thank you for the opportunity to participate in this stage of the Growth Related Integrated Development Strategy (GRIDS) 2 and the Municipal Comprehensive Review (MCR) process. This submission includes input from UrbanSolutions and our colleagues at IBI Group who form part of the project team collectively retained by the Owner.</p> <p>The March 29, 2021 staff Report No. PED17010(j) contains a draft evaluation framework and phasing criteria. This submission outlines our primary concerns with regards to Agricultural Systems acting as an Evaluation Criteria and Phasing Criteria Theme, followed by contains general comments on the evaluation framework and phasing criteria for potential urban boundary expansions drafted in Appendix "A" to the March 29, 2021 staff Report No. PED17010(j) and the draft screening criteria and evaluation tools for Binbrook and/or Waterdown contained in Appendix "B" of the same report. It also contains specific comments relating to the nine Evaluation Criteria Themes contained in Appendix "A".</p> <p>Agricultural Systems</p> <p>The Provincial Policy Statement (PPS) and the Growth Plan for the Greater Golden Horseshoe (Growth Plan) both permit settlement boundary expansions into prime agriculture areas when there are no reasonable alternatives. Apart from the Council initiated 'no boundary expansion' scenario, the City of Hamilton planning staff have established that a boundary expansion of 1,340 hectares is required for the 'Ambitious Density Scenario'. Further, as concluded by City planning staff in their Report No. PED17010(j), given the finite amount of 'whitebelt' lands available outside the 28dB NEF contour associated with the John C. Munro International Airport, there are no reasonable alternatives which to avoid prime agricultural areas. As there is no policy direction at any level to further preserve prime agricultural areas within designated Settlement Areas and urban areas, it is inappropriate to include or weight Agricultural Systems as an Evaluation Criteria and Phasing Criteria Theme.</p> <p>General Comments on the Evaluation Framework</p> <ul style="list-style-type: none"> • The use of "Foundational" criteria would imply that certain categories/criteria are weighted more heavily than others. Is there an intention to weight certain categories differently to determine a total score? If yes, can you please provide the weighting? • Within each of the criteria, there are key considerations. However, some criteria have only two considerations such as Municipal Finance and others have several such as Transportation System. How will the evaluation of the Candidate Areas 	<p>Agricultural systems: Regarding the comments on the phasing criteria related to prime agricultural lands, it is staff's opinion that the wording is consistent with the direction of the PPS and the Growth Plan. The Growth Plan policy 2.2.8.3 requires that settlement area expansions avoid prime agricultural areas where possible. Alternative locations are to be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the agricultural system.</p> <p>Staff note that this is one criteria that will be considered comprehensively with the other criteria.</p> <p>General Comments on framework:</p> <ul style="list-style-type: none"> • Many of the comments / question in this section are on weighting – the information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given dataset. The phasing component will include the results of more detailed technical analysis related to agriculture, municipal finance, transportation, water, wastewater and stormwater management.
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		<p>consider those who have multiple considerations and measures versus those with only a few? How will the different key considerations be weighed?</p> <ul style="list-style-type: none"> • Some of the criteria/measurements (e.g. stormwater) appear in multiple categories. Does this overemphasize some of these criteria/measurements and potentially put Candidate Areas at an unfair disadvantage due to double counting? How does this impact the weighting determined in the assessment? • In the “<i>How will we measure this?</i>” section for each of the key considerations, there is a mix of qualitative and quantitative data. How will those without numeric value be ranked against the other more subjective and qualitative options? (e.g. 1-4 Using the assessment categories?) • Some of the measurements are unclear and appear to be subject to input from staff – what documents will be used in these cases? Please provide examples. • Is it the City’s intention to assume that each Candidate Area will have to accommodate the same mix of housing and non-residential space? If not, how will this be established? (City answer: mix of land uses will be determined at future secondary planning stage) • The evaluation criteria and phasing criteria was all established with the four growth (‘current trends’, ‘growth plan minimum’, ‘increased targets’ and the ‘ambitious density’) scenarios in mind. With the Council direction to explore a ‘no boundary expansion’ scenario, specific criteria to evaluation 100% of the targeted growth within the existing urban boundary must be established for consideration. (City answer: the framework will be modified to address the no urban boundary expansion option) • It is understood that 10-hectare expansions from Binbrook and Waterdown into the Greenbelt are a consideration as it represents an option considered by the policy framework. However, given this option contains its own criteria, please advise how these findings will be compared against the separate analysis for the other four growth area options as they have their own distinct criteria. • To date, the City has invested in the completion of thorough analysis within some growth area options, evaluating 9 Evaluation Criteria Themes while other growth area options have very little, if any detailed analysis completed to date. Please advise how the growth areas can be evaluated equally when some areas have more thorough analysis than others. 	<ul style="list-style-type: none"> • Measurement examples – Input from staff may be based on available reports and other secondary source materials, such as the mapping contained in the Hamilton Urban and Rural Official Plan, existing infrastructure master plans and GIS data where available. • Details on housing mix and jobs for each candidate area will not be finalized until future planning phases, but the assumption is that all candidate areas would accommodate a mix of dwelling types and some non-residential gfa. • The framework will be modified to address the no urban boundary expansion option. • The 10 ha Greenbelt expansion options will be considered distinctly and not compared to the whitebelt options). • The best available information for each candidate area will be utilized in the evaluation. • The GRIDS 2 / MCR workplan is scheduled to be completed prior to July 2022 to meet the provincial deadline. <p>Specific comments on themes:</p> <ol style="list-style-type: none"> 1. Climate change – see above comments on weighting. Note
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		<ul style="list-style-type: none"> Based on the current work program for the GRIDS2/MCR process, will the provincial timeframes be met for complete the MCR process to allow the Urban Hamilton Official Plan be updated to implement the Growth Plan within the timeframe prescribed by the Province? (City to answer) <p>Specific Comments on the Evaluation Criteria Themes</p> <ol style="list-style-type: none"> Climate Change: This criteria overlaps with several other criteria such as transit/transportation and stormwater management. As noted above, it is not clear how weighting will be assigned to this criteria or other criteria that overlaps. Please advise how overlapping criteria will be taken into consideration. Municipal Finance: This criteria will be measured based on a high-level assessment of financial impacts for Candidate Areas and a relative assessment of infrastructure costs. Please consider the following comments, questions and concerns: <ol style="list-style-type: none"> Has the City previously completed fiscal impact assessments for other secondary plan areas? If so, do they have a terms of reference with which Watson and Associates will be using? Will the City be using the same base assumptions in relation to unit counts and types and general road patterns, parkland dedication and road patterns to assess the fiscal impact of each Candidate Area? Will the City be considering area specific development charges and front-end financing as options to off-set any additional infrastructure costs associated with the different Candidate Areas? Where is the risk assessment in these criteria? Servicing Infrastructure: ‘Significant water and waste water extensions/expansions beyond planned/budgeted trunk infrastructure required in order to service a candidate expansion area’ is identified as the key consideration measured using input from City staff and reference to a Water/Wastewater Master Plan. Please consider: <ol style="list-style-type: none"> It appears unclear the extent that infrastructure to any of the candidate areas has been planned/budgeted for. Please advise. The draft states this criteria will be measured based on input from City staff and with reference to a Water/Wastewater Master Plan. Please confirm the extent of public engagement by stakeholders, and their consulting engineers will inform this exercise. 	<p>that the information documented in the evaluation will be used to formulate a professional planning opinion. There is no specific weighting assigned to various criteria, as Provincial policy requires the City to apply the policies of the Growth Plan and PPS in their entirety (see page 8, “Read the Entire Plan” subsection of A Place to Grow for further reference).</p> <ol style="list-style-type: none"> Municipal finance – an RFP has been prepared for the FIA. Financing options will be included. Aspects of financial risk will be considered. Servicing infrastructure – Detailed analysis undertaken for phasing scenarios will identify order of magnitude costs for servicing. Public engagement on the evaluation and recommendations will be undertaken in fall 2021. Transportation System – The criteria are based on the considerations identified in a Place to Grow. When making decisions for settlement area expansions, planning authorities are to consider existing and planned systems. The phasing analysis will include more detailed assessment of transportation systems, including aspects of capacity. Key destinations are
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		<p>servicing assumptions from the previous analysis? Will they incorporate different components of the Candidate Areas? How will population and employment forecasts be incorporated?</p> <ul style="list-style-type: none"> • How will the Phasing consider the PPS requirements, in particular Section 1.4 which directs municipalities to maintain a minimum 15-year supply of lands, and at all times, a three-year supply of residential units? The time periods noted in the work suggest 10-year increments. • Once the need for expansion into a prime agriculture area has been established, it is inappropriate to use the soil conditions as a phasing tool. • The themes and descriptions in the Phase 2 assessment do not align with Phase 1, and again appears to prioritize certain components and has some themes with more phasing criteria than others. Are these to be weighted? How will non-numerical/qualitative criteria be weighted? • Will each scenario/theme/category be ranked on a scale of Most Preferred to Least Preferred? How will the totals be calculated? • Most importantly, in keeping with provincial policy direction, it is inappropriate and unnecessary to defer development of prime agricultural areas within the urban boundary for later phases. Rather, phasing should be entirely based on the implementation of the efficient, cost-effective, proper and orderly development of the City. <p>On behalf of the Owner, we look forward to a response to the above noted comments, questions and concerns. Upon receipt, we look forward to the opportunity to provide additional comments. In keeping with the <i>Planning Act</i> we request to be notified of any future meetings or decision of the City of Hamilton.</p>	<p>will include population and employment forecasts.</p> <ul style="list-style-type: none"> • PPS land supply requirements will be considered to ensure that the City meets the minimum 15 year supply requirement throughout the planning period. • As noted above, it is staff's opinion that the wording is consistent with the direction of the PPS and the Growth Plan. The Growth Plan policy 2.2.8.3 requires that settlement area expansions avoid prime agricultural areas where possible. Alternative locations are to be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the agricultural system. • See comments on weighting / rankings above <p><i>Action: Revisions to the framework document will include a more detailed explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario.</i></p> <p><i>Action: amend Phase Evaluation Criteria under Complete Communities theme to focus on</i></p>
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				<i>the Candidate Expansion Area's potential to contribute to the completeness of the surrounding communities.</i>
18	May 29, 2021	Matt Johnston (Elfrida – 467 Highway 56)	<p>UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) is the authorized planning consultant acting on behalf of Corpveil Holdings Ltd., (the Owner) of the property municipally known as 467 Highway 56 in the City of Hamilton.</p> <p>As you'll recall, UrbanSolutions has actively participated in the various City of Hamilton growth planning exercises on behalf of the Owner and we thank you for the opportunity to participate in this stage of the Growth Related Integrated Development Strategy (GRIDS) 2 and the Municipal Comprehensive Review (MCR) process. This submission includes input from UrbanSolutions and our colleagues at IBI Group who form part of the project team collectively retained by the Owner.</p> <p>The March 29, 2021 staff Report No. PED17010(j) contains a draft evaluation framework and phasing criteria. This submission outlines our primary concerns with regards to Agricultural Systems acting as an Evaluation Criteria and Phasing Criteria Theme, followed by contains general comments on the evaluation framework and phasing criteria for potential urban boundary expansions drafted in Appendix "A" to the March 29, 2021 staff Report No. PED17010(j) and the draft screening criteria and evaluation tools for Binbrook and/or Waterdown contained in Appendix "B" of the same report. It also contains specific comments relating to the nine Evaluation Criteria Themes contained in Appendix "A".</p> <p>Agricultural Systems</p> <p>The Provincial Policy Statement (PPS) and the Growth Plan for the Greater Golden Horseshoe (Growth Plan) both permit settlement boundary expansions into prime agriculture areas when there are no reasonable alternatives. Apart from the Council initiated 'no boundary expansion' scenario, the City of Hamilton planning staff have established that a boundary expansion of 1,340 hectares is required for the 'Ambitious Density Scenario'. Further, as concluded by City planning staff in their Report No. PED17010(j), given the finite amount of 'whitebelt' lands available outside the 28dB NEF contour associated with the John C. Munro International Airport, there are no reasonable alternatives which to avoid prime agricultural areas. As there is no policy direction at any level to further preserve prime agricultural areas within designated Settlement Areas and urban areas, it is inappropriate to include or weight Agricultural Systems as an Evaluation Criteria and Phasing Criteria Theme.</p> <p>General Comments on the Evaluation Framework</p>	<p>Staff provide the following responses in the order of the comments in the email:</p> <p>Agricultural systems: Regarding the comments on the phasing criteria related to prime agricultural lands, it is staff's opinion that the wording is consistent with the direction of the PPS and the Growth Plan. The Growth Plan policy 2.2.8.3 requires that settlement area expansions avoid prime agricultural areas where possible. Alternative locations are to be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the agricultural system.</p> <p>Staff note that this is one criteria that will be considered comprehensively with the other criteria.</p> <p>General Comments on framework:</p> <ul style="list-style-type: none"> • Many of the comments / question in this section are on weighting – the information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given

		<ul style="list-style-type: none"> • The use of “Foundational” criteria would imply that certain categories/criteria are weighted more heavily than others. Is there an intention to weight certain categories differently to determine a total score? If yes, can you please provide the weighting? • Within each of the criteria, there are key considerations. However, some criteria have only two considerations such as Municipal Finance and others have several such as Transportation System. How will the evaluation of the Candidate Areas consider those who have multiple considerations and measures versus those with only a few? How will the different key considerations be weighed? • Some of the criteria/measurements (e.g. stormwater) appear in multiple categories. Does this overemphasize some of these criteria/measurements and potentially put Candidate Areas at an unfair disadvantage due to double counting? How does this impact the weighting determined in the assessment? • In the “<i>How will we measure this?</i>” section for each of the key considerations, there is a mix of qualitative and quantitative data. How will those without numeric value be ranked against the other more subjective and qualitative options? (e.g. 1-4 Using the assessment categories?) • Some of the measurements are unclear and appear to be subject to input from staff – what documents will be used in these cases? Please provide examples. • Is it the City’s intention to assume that each Candidate Area will have to accommodate the same mix of housing and non-residential space? If not, how will this be established? (City answer: mix of land uses will be determined at future secondary planning stage) • The evaluation criteria and phasing criteria was all established with the four growth (‘current trends’, ‘growth plan minimum’, ‘increased targets’ and the ‘ambitious density’) scenarios in mind. With the Council direction to explore a ‘no boundary expansion’ scenario, specific criteria to evaluation 100% of the targeted growth within the existing urban boundary must be established for consideration. (City answer: the framework will be modified to address the no urban boundary expansion option) • It is understood that 10-hectare expansions from Binbrook and Waterdown into the Greenbelt are a consideration as it represents an option considered by the policy framework. However, given this option contains its own criteria, please advise how these findings will be compared against the separate analysis for the other four growth area options as they have their own distinct criteria. 	<p>dataset. The phasing component will include the results of more detailed technical analysis related to agriculture, municipal finance, transportation, water, wastewater and stormwater management.</p> <ul style="list-style-type: none"> • Measurement examples – Input from staff may be based on available reports and other secondary source materials, such as the mapping contained in the Hamilton Urban and Rural Official Plan, existing infrastructure master plans and GIS data where available. • Details on housing mix and jobs for each candidate area will not be finalized until future planning phases, but the assumption is that all candidate areas would accommodate a mix of dwelling types and some non-residential gfa. • The framework will be modified to address the no urban boundary expansion option. • The 10 ha Greenbelt expansion options will be considered distinctly and not compared to the whitebelt options). • The best available information for each candidate area will be utilized in the evaluation.
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		<ul style="list-style-type: none"> To date, the City has invested in the completion of thorough analysis within some growth area options, evaluating 9 Evaluation Criteria Themes while other growth area options have very little, if any detailed analysis completed to date. Please advise how the growth areas can be evaluated equally when some areas have more thorough analysis than others. Based on the current work program for the GRIDS2/MCR process, will the provincial timeframes be met for complete the MCR process to allow the Urban Hamilton Official Plan be updated to implement the Growth Plan within the timeframe prescribed by the Province? (City to answer) <p>Specific Comments on the Evaluation Criteria Themes</p> <ol style="list-style-type: none"> Climate Change: This criteria overlaps with several other criteria such as transit/transportation and stormwater management. As noted above, it is not clear how weighting will be assigned to this criteria or other criteria that overlaps. Please advise how overlapping criteria will be taken into consideration. Municipal Finance: This criteria will be measured based on a high-level assessment of financial impacts for Candidate Areas and a relative assessment of infrastructure costs. Please consider the following comments, questions and concerns: <ul style="list-style-type: none"> Has the City previously completed fiscal impact assessments for other secondary plan areas? If so, do they have a terms of reference with which Watson and Associates will be using? Will the City be using the same base assumptions in relation to unit counts and types and general road patterns, parkland dedication and road patterns to assess the fiscal impact of each Candidate Area? Will the City be considering area specific development charges and front-end financing as options to off-set any additional infrastructure costs associated with the different Candidate Areas? Where is the risk assessment in these criteria? Servicing Infrastructure: ‘Significant water and waste water extensions/expansions beyond planned/budgeted trunk infrastructure required in order to service a candidate expansion area’ is identified as the key consideration measured using input from City staff and reference to a Water/Wastewater Master Plan. Please consider: <ul style="list-style-type: none"> It appears unclear the extent that infrastructure to any of the candidate areas has been planned/budgeted for. Please advise. 	<ul style="list-style-type: none"> The GRIDS 2 / MCR workplan is scheduled to be completed prior to July 2022 to meet the provincial deadline. <p>Specific comments on themes:</p> <ol style="list-style-type: none"> Climate change – see above comments on weighting. Note that the information documented in the evaluation will be used to formulate a professional planning opinion. There is no specific weighting assigned to various criteria, as Provincial policy requires the City to apply the policies of the Growth Plan and PPS in their entirety (see page 8, “Read the Entire Plan” subsection of A Place to Grow for further reference). Municipal finance – an RFP has been prepared for the FIA. Financing options will be included. Aspects of financial risk will be considered. Servicing infrastructure – Detailed analysis undertaken for phasing scenarios will identify order of magnitude costs for servicing. Public engagement on the evaluation and recommendations will be undertaken in fall 2021. Transportation System – The criteria are based on the considerations identified in a Place to Grow. When making
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				<p><i>the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario.</i></p> <p><i>Action: Evaluation Criteria under Complete Communities theme amended to focus on the Candidate Expansion Area's potential to contribute to the completeness of the surrounding communities.</i></p>
19	May 29	Betty Way	<p>I am sorry to bother you this way but I had difficulty signing in to the survey you sent me. I would just like to comment that the two maps that are involved, are not very helpful. On the one there is some writing but it is not legible as it is smudged and out of focus when you try to read it. The other map does not even have the names of the towns of Binbrook or Waterdown on their location. I also wonder if the word , mitigate, should be changed to the word, manipulate. 😊.</p> <p>I live in Binbrook where there is now a plan to build a six story building in the middle of the town. We all recognize that the builder requested 10 stories so that he could mitigate to six stories, which is what we know was what he really wanted in the first place.</p> <p>Also our main Street in Binbrook is inundated by constant, large, long, infrastructure trucks passing through. Years ago there was talk of putting a ring road around Binbrook. What ever happened to that idea?</p> <p>I would also like to suggest that when we build dense residential areas, that they not be black, dark and dismal. Let's have happy towns with lighter colours that won't be so depressing to those living in them and those driving by. Thank you for your kind attention in this matter.</p>	Comments noted.
20	May 30	Denise Baker (TRE)	<p>Together with my co-counsel, Davies Howe LLP, we are writing on behalf of our client, the Twenty Road East Landowners' Group (the "TRE Group") to provide comments on the GRIDS 2 and Municipal Comprehensive Review Planning for Growth to 2051: Draft Evaluation Framework and Phasing Criteria, (the "Staff Report"). The TRE Group has been actively involved in the Urban and Rural Hamilton Official Plan matters since GRIDS 1 and appreciates this opportunity to provide input to the City on the above-noted matter.</p>	<p>Staff responses under The Evaluation Criteria (Part A):</p> <p>Regarding the Agricultural System criteria, staff note that the criteria as proposed in the Part 1 Evaluation Criteria does consider</p>

		<p>THE TRE GROUP LANDS The TRE Group consists of approximately 25 landowners collectively owning approximately 480 hectares within the City, centred around the intersection of Twenty Road East and Miles Road (the “TRE Lands”). They are non-prime agricultural area lands within the White Belt and have been colloquially described as a “hole-in-the-donut”, being immediately adjacent to the southern urban boundary of the City and located between two employment areas. They are also adjacent to and proximate to many of the City’s Community Infrastructure and Major Activity Centres like the Turner Park Sports Complex, Les Chater YMCA, Turner Park Public Library and Mountain Police Station and are one of the main access points to the Chippewa Rail Trail.</p> <p>It is without dispute that the TRE Lands can be easily integrated into the urban area through the extension of existing major arterial roads to provide a variety of housing opportunities on non- prime agricultural areas in close proximity to the City’s core, to the City’s future employment areas, to the Airport Employment Growth District and to the Redhill South Business Park, and will optimize the use of existing or planned infrastructure, including transportation infrastructure, in a cost-efficient manner.</p> <p>The TRE Lands are available and suitable for urban development, and it is appropriate to include these Lands within the next urban boundary expansion to accommodate the City’s growth to 2051. Inclusion of TRE Lands in the urban boundary has been recognized as appropriate in the City’s Land Needs Assessment analysis. With respect to the Draft Evaluation Framework and Phasing Criteria as set out in the Staff Report, our comments are as follows:</p> <p>THE EVALUATION CRITERIA (Appendix A) We generally agree that a set of evaluation criteria such as those presented in Appendix A (the “Evaluation Framework”) are necessary to determine which lands should be brought into the urban boundary to satisfy the City’s growth requirements to 2051.</p> <p>We are supportive of the Evaluation Framework themes and the general descriptions provided, with the exception of the characterization and description of the Agricultural System theme, and the comments on the availability of infrastructure.</p> <p>With respect to the theme of the Agricultural System, Growth Plan policy 2.2.8(f) with respect to Settlement Area Boundary Expansions states that:</p>	<p>the agricultural classification of the lands within the candidate areas and the avoidance of prime agricultural lands.</p> <p>Regarding the comments on weighting, the information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given dataset. The phasing component will include the results of more detailed technical analysis related to agriculture, municipal finance, transportation, water, wastewater and stormwater management.</p> <p>With regard to the comments “that policies should be included in the Official Plan which require the undertaking of more detailed work for lands added to the urban boundary, including subwatershed studies, master environmental servicing plans and secondary plans immediately following their inclusion in the urban boundary”, staff note that determination of implementation policies is still under review.</p> <p>Staff responses under the Phasing Criteria:</p> <p>See comments above re weighting of criteria.</p>
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	<p>“<i>prime agricultural areas</i> should be avoided where possible. To support the <i>Agricultural System</i>, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the <i>Agricultural System</i> and in accordance with the following.... i.... ii. Reasonable alternatives that avoid <i>prime agricultural areas</i> are evaluated; and iii. where <i>prime agricultural areas</i> cannot be avoided, lower priority agricultural lands are used (emphasis added);”</p> <p>To be in conformity with the Growth Plan, the City must treat this Provincial policy requirement as a priority criterion relative to others given the language of the Growth Plan and the significant importance of the matter of preservation of prime agricultural areas.</p> <p>We believe that the theme of the Agricultural System must be elevated within the Evaluation Framework, and that this criterion should recognize that lands which are not prime agricultural areas are to be given higher overall priority over lands which are prime agricultural areas. This direction and emphasis is evident in, and required by, the Growth Plan language.</p> <p>With respect to the theme of Servicing Infrastructure, we agree that the noted “high level assessment of new infrastructure requirements” and “assessment of capacity in existing and planned” systems are the appropriate high level of study required at this point in order to ascertain the appropriateness of including particular lands into the urban boundary.</p> <p>However, we believe that policies should be included in the Official Plan which require the undertaking of more detailed work for lands added to the urban boundary, including subwatershed studies, master environmental servicing plans and secondary plans immediately following their inclusion in the urban boundary.</p> <p>THE PHASING CRITERIA (Appendix A and E) We agree and acknowledge that phasing criteria are an important part of establishing and providing for the orderly and efficient implementation of new urban land use designations. However, we note, as per our comments on the Evaluation Criteria above, given the Province’s direction to prioritize non-prime agricultural areas, the Agricultural System criteria should be the priority consideration with respect to phasing.</p>	<p>Phasing scenarios and approaches are still under review.</p> <p>Staff comments regarding the Map of Whitebelt Growth Options:</p> <p>Staff acknowledge the comment on the difference in calculation of gross developable land area, and note that confirmation of developable land area within each candidate area will be delineated through future study.</p> <p><i>Action: Revised the framework document to include a more detailed explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario.</i></p>
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			<p>Further, according to our calculations, the Elfrida area only contains approximately 125 to 170 hectares of land which are not prime agricultural area, with the balance (approximately 760 to 805 hectares) being prime agricultural area.</p> <p>CONCLUSION In summary, the Evaluation Framework provided is generally supportable, save and except for the need to acknowledge the importance of the Agricultural System theme relative to other themes.</p> <p>While we agree that phasing criteria will be an important component of the official plan policies applicable to lands brought into the urban boundary in ensuring that the progression of development occurs in an orderly and efficient manner, it is contrary to provincial policy to apply these phasing criteria to bringing lands needed to 2051 incrementally into the urban boundary, as is recommended in the Staff Report. As confirmed by the Province in its letter, all lands needed to achieve the 2051 forecasts must be brought into the urban boundary at this time.</p> <p>Finally, we believe that the City should include policies in each land use designation for new urban areas which require the initiation of the studies necessary for the planning and development of the areas, including subwatershed studies, master environmental servicing plans and various secondary plan level studies.</p> <p>We thank the City for the opportunity to provide our comments on the Staff Report.</p>	
21	May 30, 2021	Paul Lowes (SGL)	<p>As you know, we represent 1507565 Ontario Limited, otherwise known as the Frisina Group ("Frisina"), the owners of approximately 106 acres of land located within the Elfrida Community ("Elfrida").</p> <p>The following sets out our comments on behalf of our client regarding the Draft Evaluation Approach and Phasing Criteria. Please consider the following comments and recommendations in finalizing the evaluation criteria and measures and the phasing criteria.</p> <p>Evaluation Criteria:</p> <ol style="list-style-type: none"> 1. While the evaluation criteria for choosing the Urban Boundary Expansion Areas (UBEA) is comprehensive in scope and detail, the implementation or decision-making process which will lead to the optimal choice of UBEA is uncertain, it is not well defined or traceable and raises significant questions. 	<p>The following comments are provided in response to the numbered comments:</p> <ol style="list-style-type: none"> 1. The framework is intended to be used as a method for documenting the wide range of information considered in the development of staff's planning recommendation. The information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given dataset. The phasing component will

		<ol style="list-style-type: none"> 2. The overall criteria themes are appropriate and exhaustive and many of the criteria themselves are appropriate, but the proposed means of measurement is often vague. Any proposed means of measurement should be clear, measurable and traceable. 3. Under “Climate Change”, the criterion under District Energy is appropriate but the means of measurement of input from City staff is unclear. The measurement should be measurable such as the ability to create nodes of dense development capable of supporting district energy. 4. Under the criterion “Infrastructure Resiliency” again it is unclear what input from staff is being provided. On the criteria “consider climate change adaptability”, the how-to measure should specify what aspects of adaptability the City is measuring. 5. It is unclear how the Criterion “Prioritizing Tree Canopy Protection/Enhancement” will be used. If it is to be used to assess the impact of greater intensification on built up areas with existing tree canopy, we understand the need for the criterion. However, if it is solely to evaluate the whitebelt lands, we don’t understand the value of the criterion. The whitebelt lands do not have any tree canopy other than in existing woodlands that are protected under the PPS and addressed in other criteria. 6. Under the criterion “Avoid Natural Hazardous Lands”, we question the value of this criterion. According to the PPS, all development is to avoid floodplains and other natural hazards, so although a candidate may contain a floodplain or other natural hazard, those lands are not developable and do not count towards the gross developable area of an expansion. As such, we don’t understand why natural hazards should be an evaluation criterion. 7. Under the criterion “Does the Candidate Expansion Area have an unreasonable or unanticipated financial impact on the City”, again, the how-to measure does not describe what specifically is being measured to determine the financial impact. Greater clarity and traceability are required. 8. We do not understand the use of the criterion grouping “Integrated Waste Management Planning”. Capacity of waste management facilities is dictated by additional population. All options provide for the same population. Whether the population is in the Built-up Area or in new Designated Greenfield Areas, the population will generate the same amount of waste so there should be no difference amongst any of the options on this criterion. 9. Under the criterion “Is the proposed or potential street network within the Candidate Expansion Area a logical extension of the existing street network? Does it connect the Candidate Expansion Area to surrounding areas and key destinations?”, it is unclear how a “logical extension” will be measured or even what it is. Nor is it clear what connection to surrounding area means or how it is to be measured. It is also not clear what “key destinations” are. 	<p>include the results of more detailed technical analysis related to agriculture, municipal finance, transportation, water, wastewater and stormwater management. Revisions to the framework document will include a more detailed explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario and how this approach is consistent with the Provincial policy framework for growth planning, which requires the City to consider the Growth Plan and PPS’s policies in their entirety when making a decision.</p> <p>2. Please see response to comment 1.</p> <p>3. Regarding the comment on District Energy, the evaluation is based on the potential of a Candidate Expansion Area being able to introduce District Energy, taking into consideration land size and potential future land uses. However, additional studies will be required based on land use and energy density.</p> <p>4. Please see response to comment 1.</p>
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		<p>Plan? Is it anticipated that the total land area needed for Urban Boundary Expansion to 2051 will be designated Urban Area through a concluding single implementing Official Plan Amendment to expand the Urban Area? Clarity on this point is fundamental, as it goes directly to the underpinning core of the phasing framework.</p> <p>Phasing Considerations</p> <p>16. In our view, since the Provincial Growth Plan mandates that Municipalities plan for growth to 2051, we would expect that any implementing Official Plan Amendment would include and designate as "Urban Area" <u>all</u> of the land area required to meet the required growth targets in which case the most key components of the Phasing Criteria must be specific, clear, and precise so as to provide for equitable and transparent implementation.</p> <p>17. It is unclear at this stage how the phasing process will work in terms of the timing of each phase, the quantum of each phase and the triggers moving between phases. It will be critical to establish appropriate policy guidance, controls or "triggers" for the method of progression from one phase of development to the next. We recommend that Phasing is best addressed in the context of completed Secondary Plans and Infrastructure Servicing Plans which provides the most prudent, cost effective and efficient approach to accomplishing the City's phasing objective.</p> <p>18. In accordance with the PPS, previous Staff reporting, and the LNA Report itself, all clearly demonstrate that at least 1,340 ha of Whitebelt lands are required for the settlement area boundary expansion to meet the Provincial Growth Plan population projected to 2051. Therefore, the concept of prioritizing non-prime agricultural areas is no longer relevant or feasible, given that the need to meet projected demands to 2051 will require more than just the non-prime agricultural area. Accordingly, in our view it is illogical to apply the Agricultural System phasing criteria to this exercise.</p> <p>19. However, what is relevant is to ensure that existing agricultural operations that will continue to operate on the edges of settlement area boundary expansion are properly protected and remain viable, through buffering in accordance with the PPS. It is also worthwhile to note that virtually all of the lands in the potential Urban Boundary Expansion Areas are not owned by "farmers". There are not any significant high value livestock, dairy, poultry or greenhouse operations. Almost all lands being farmed currently are rented and being temporarily used for cash crop cultivation.</p> <p>20. To reiterate, the Agricultural System criteria, and the issue of Prime Agricultural land in our view should not be a component of the Phasing of Development as it has already been considered and addressed in the Urban Boundary Expansion Evaluation criteria and process.</p>	<p>8. The criterion group for "integrated Waste Management Planning" focuses on existing capacity projects, such as the Solid Waste Management Master Plan (SWMMP) Update (2020). It is possible that there will be no difference amongst any of the options for this criteria. However, it is included as a part of the application of Growth Plan policies to test the feasibility boundary expansion for each of the Candidate Expansion Areas, as the Growth Plan requires the City to consider existing and planned infrastructure when making decisions related to settlement area expansion.</p> <p>9. The term "logical extension" is intended to address opportunities for connections to the existing adjacent street network.</p> <p>10. The Growth Plan's direction on Settlement Area Boundary Expansion requires the City to demonstrate that it has applied the policies the policies of section 2 of the PPS and the criteria on Natural Heritage Systems has been included to demonstrate consideration for natural features.</p> <p>11. The Complete communities criteria is included to demonstrate the potential for each Candidate Area to accommodate a mix</p>
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		<p>21. Under Servicing Infrastructure, the criteria should include:</p> <ul style="list-style-type: none"> a. “Does the phasing scenario maximize use of existing infrastructure before considering expansion or extension of new infrastructure?” b. “Does the phasing scenario maximize infrastructure that is already being funded through Development Charges?” <p>22. The Transportation System phasing criteria is also an important phasing tool, as the City moves toward more public efficient transit opportunities. In new growth areas, careful evaluation of potential new transit routes can guide phasing decisions. The need to create and establish transit routes in a continuous form at the earliest stages of development helps to establish good transportation habits by new residents. The process should require that such transit routes be established regardless of independent developer ownerships as early as possible in the development process.</p> <p>Finally, there is a fundamental and overriding issue with the whole evaluation process that warrants closer attention. Given that the Land Needs Assessment (LNA) has been completed and Staff have recommended a settlement area boundary expansion scenario which virtually incorporates all reasonable growth option areas contiguous to the existing Urban Boundary (i.e., Elfrida, Twenty Road West, and Twenty Road East), what then is the purpose of going through this evaluation process? In our view the only settlement area boundary expansion option that needs to be eliminated is the Whitechurch Expansion Area. This area is remote from the existing Built-Up Area and the remainder of the Whitebelt lands and accordingly, deserves to be ranked much lower or eliminated altogether at the outset. It seems to be a somewhat redundant and inefficient process to consider a candidate area such as Whitechurch, which arguably should not have been included as an Urban Expansion Area in the first instance.</p> <p>Thank you for the opportunity to offer comment on the pending evaluation and phasing framework. We trust that our comments will be carefully considered and will lead to needed clarity in the application of and weighting of the criteria and the implementation of the framework as a whole. We would recommend that all of these aspects and factors be addressed in the forthcoming Staff Report to the General Issues Committee and Council.</p>	<p>housing types, range of uses and ability to support transit.</p> <p>12. The criterion grouping has been reworded to focus on the Candidate Expansion Area’s potential to contribute to the completeness of surrounding communities.</p> <p>13. This is largely based on the size of the expansion area, although the location relative to the City’s planned urban structure is also a consideration.</p> <p>14. The evaluation approach is not based on weighting. See comment above regarding methodology (comment 1).</p> <p>15. Staff note that phasing scenarios and implementation approaches are still under review.</p> <p>Phasing Considerations</p> <p>16. Staff note that phasing scenarios and implementation approaches are still under review.</p> <p>17. Staff note that phasing scenarios and implementation approaches are still under review.</p> <p>18. It is staff’s opinion that the wording is consistent with the direction of the PPS and the Growth Plan. The Growth Plan</p>
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				<p>policy 2.2.8.3 requires that settlement area expansions avoid prime agricultural areas where possible. Alternative locations are to be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the agricultural system.</p> <p>19. Comment noted. The Agricultural system phasing criteria already prioritizes the development areas within the candidate areas that have fewer active operations and livestock facilities. This criterion could be expanded to also prioritize development of lands that maximize buffering / distance from active operations and livestock facilities on adjacent lands.</p> <p>20. Comment noted. See response to 18 above.</p> <p>21. Generally covered under the criteria “does the phasing scenario allow for efficient servicing based on existing or planned infrastructure”.</p> <p>22. Comment noted.</p> <p>Regarding the comment on the inclusion of the Whitechurch lands in the evaluation process, staff note that all available candidate areas must be examined for inclusion in the urban area and</p>
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				<p>evaluated against the comprehensive criteria in order to ensure that the City is making an informed choice on where and when to grow.</p> <p><i>Action: Revisions to the framework document included a more detailed explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario.</i></p> <p><i>Action: Evaluation Criteria under Complete Communities theme amended to focus on the Candidate Expansion Area's potential to contribute to the completeness of the surrounding communities.</i></p> <p><i>Action required: Amended Part 2 Phasing Criteria under the Agricultural System theme to address buffering to adjacent active agricultural operations and livestock facilities.</i></p>
22	May 30	Nancy Freiday (GSP)	GSP Group represents the landowners of 513, 531 and 537 Dundas Street East located on the north side of Dundas Street East immediately east of Avonsyde Blvd. (Subject Lands) (see Figure 1 below). The west property line of 513 Dundas Street East is the boundary between the Urban Area and Rural Area.	Comments are noted.

		<p>The City is entering the next phase of GRIDS 2 / MCR which is the evaluation of where and when to grow to the year 2051. Appendix B to Report PED17010(j), considered by the General Issues Committee on March 29, 2021, contains the Draft Screening and Evaluation Tool to be used to assess requests to expand the urban boundary of the communities of Binbrook and Waterdown. Both communities are classified as 'Towns' in the Greenbelt Plan. The documents state that the expansion area is limited to ten (10) hectares by A Place to Grow: Growth Plan for the Greater Golden Horseshoe ("Growth Plan").</p> <p>City staff have requested comments on the screening criteria and evaluation framework for the identified Whitebelt lands as well as lands adjacent to the urban areas of Waterdown and Binbrook.</p> <p>Agricultural Lands adjacent to the Waterdown Urban Area 513 Dundas Street East is cultivated and owned by Angelo and Sandra Notarianni who reside on the farm. The farm is approximately 12.3 hectares in size (30.5 acres). The Waterdown Poultry Farm, including livestock barns and a manure storage facility is located on approximately 4 hectares (10 acres) of land located at 531 / 537 Dundas Street East owned by the Gillyatt family. These agricultural parcels are designated Rural Area in the Hamilton Official Plan and Escarpment Rural Area in the 2017 Niagara Escarpment Plan (NEP).</p> <p>Background - 2015 Provincial Plan Review As part of the 2015 Provincial Plan Review, the public was advised that requests for Niagara Escarpment Plan (NEP) urban area expansions would be considered by the Province. On behalf of the landowners, a NEP Amendment application (NEPA) was submitted to the Niagara Escarpment Commission (NEC), including a Planning Justification Statement.</p> <p>Between 2015 and 2017, the landowners participated in the Provincial Plan Review process, at the Provincial and City levels. At a September 2016 City meeting, a recommendation was before Council "to defer any decisions on potential changes to the Greenbelt Plan boundaries in the City of Hamilton to allow the City to complete a municipal comprehensive review". On behalf of the landowners, a request was made to also defer any decisions on potential changes to the NEP boundaries. The request was not supported by City Council as it was stated Council was considering changes to the Greenbelt Plan and not the NEP.</p>	
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		<p>Unfortunately, there was quite a bit of confusion during the Provincial Plan Review regarding the Greenbelt Area (lands in both the Greenbelt Plan and the Niagara Escarpment Plan) and the individual designations in each of these Provincial Plans.</p> <p>The timing of the City’s MCR and the Provincial Plan Review were not in sync to allow either the City or the NEC to fully consider the proposed urban area amendment for the Subject Lands. Perhaps if City Council had agreed to defer NEP boundary adjustments to the current MCR, the NEC would have agreed to defer the landowners’ application. Then, if successful, the NEPA could have been processed and dealt with by the NEC. There should be a method whereby a MCR and Greenbelt Plan/NEP review can be synchronized (such as deferrals) to allow the consideration of urban area expansions.</p> <p>For example, in 2018, immediately after the Provincial Plan Review, the NEC circulated three proposed amendments to the NEP that were deferred during the Review. One proposed amendment to the NEP involves redesignating approximately 12 hectares of land in the Town of Milton, adjacent to the Urban Area, from Escarpment Rural Area to Escarpment Urban Area. This request is very similar to the request made by the landowners.</p> <p>Overall, during the 2015 Provincial Plan Review, the NEC supported some minor (technical) Urban Area amendments, refused most requests and deferred a few.</p> <p>While the Province refused the landowners’ urban area request in 2017, Provincial staff stated, in their report on the application:</p> <p>“Through its next comprehensive review, the City of Hamilton should determine if additional settlement area is needed to accommodate forecasted population growth, and if the subject lands are the most suitable to accommodate the growth. Once that is determined, then an application to amend the NEP could be submitted at the time of the next NEP review.”</p> <p>Based on the above, the Province left the door open for the City, during this current MCR to consider expanding the urban area to incorporate the Subject Lands. This provincial statement was made before the amendment to the Growth Plan to consider 10-hectare urban area expansions in the Greenbelt Area. As such, it is our opinion that the City should include the Subject Lands in the GRIDS 2 / MCR evaluation process.</p>	
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		<p>i) the settlement area to be expanded is identified in the Greenbelt Plan as a Town / Village;</p> <p><i>Map 91 to the Greenbelt Plan shows that the Waterdown Settlement Area (Urban Area) to be expanded is identified as a Town / Village in the Greenbelt Plan (see Figure 3 below).</i></p> <p>ii) the proposed expansion would be modest in size, representing no more than a 5 per cent increase in the geographic size of the settlement area based on the settlement area boundary delineated in the applicable official plan as of July 1, 2017, up to a maximum size of 10 hectares, and residential development would not be permitted on more than 50 per cent of the lands that would be added to the settlement area;</p> <p>The total area of the two (2) farms is approximately sixteen (16) hectares. In our opinion, the ten (10) hectares should be net of the Grindstone Creek and associated buffer area. The Notarianni Farm has been cleared, with some natural vegetation remaining. The Waterdown Poultry Farm contains livestock facilities and some natural features. This matter can be discussed and explored in more detail as the MCR process proceeds. Regardless of this screening criteria, as a participant in the Provincial Plan Review and given the Province’s direction to the landowners at the conclusion of the process, in our opinion their lands should be considered for an urban area expansion. Through the Land Needs Assessment, it has been determined that additional settlement area is needed to accommodate forecasted population growth. Therefore, the totality of the Subject Lands should be evaluated for inclusion in the Urban Area.</p> <p>iii) the proposed expansion would support the achievement of complete communities or the local agricultural economy;</p> <p>The Growth Plan defines complete communities as: Places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities. Complete communities are age-friendly and may take different shapes and forms appropriate to their contexts.</p> <p>The proposed expansion to the urban boundary would support the achievement of a complete community. Given the adjacent urban</p>	
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		<p>boundary to the west and south and the future widening of Dundas Street East, the ability to farm the Subject Lands is increasingly restricted, including physical access restrictions for farm vehicles and restrictions on expansion of the Waterdown Poultry Farm given Minimum Distance Separation II (MDS II).</p> <p>the proposed uses cannot be reasonably accommodated within the existing settlement area boundary;</p> <p>There are no specific proposed uses contemplated at this time. The City's Land Needs Assessment (LNA) modelled four (4) land need scenarios based on varying intensification targets and density inputs. Staff has recommended that Council adopt the "Ambitious Density" scenario which requires an urban expansion area of 1,340 hectares. The Subject Lands represent 1.1% of the 1,340 hectares.</p> <p>the proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities <i>in the existing settlement area; and</i></p> <p>There is existing infrastructure (municipal water and wastewater systems) surrounding the Subject Lands. It is understood that servicing for the Waterdown South Secondary Plan Area is "ahead in the queue" for the allocation of servicing capacity.</p> <p>vi) expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.</p> <p>The Subject Lands are not designated Greenbelt Natural Heritage System.</p> <p>In our opinion, the screening criteria are met. The landowners' participation in the Provincial Plan Review and the comments made by the Province regarding their request for an urban area designation qualifies their lands as a candidate area in this GRIDS 2 / MCR Review.</p> <p>Phase Two: Evaluation Criteria</p> <p>The second phase includes an individual evaluation of each potential expansion area. Areas will be evaluated against a series of criteria which represent local and provincial planning priorities, including the GRIDS 2 10 Directions to Guide Development. The City will rank expansion areas that best satisfy the criteria. One expansion may take place from each of Waterdown and Binbrook. As stated in the evaluation document: "If no</p>	
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		<p>expansion areas perform well against the criteria (i.e., only partially address or do not address all or most of the criteria) no areas will be identified as the preferred expansion area.”</p> <p>The following discussion provides some comments on the evaluation criteria as well as a preliminary assessment of how the criteria are met by the Subject Lands.</p> <p>Some of the criteria are rather broad and their satisfaction will depend on further land use analysis. For example, an assessment of an area’s contribution to a complete community depends upon the specific land use proposed and the number and size of similar services in the neighbourhood / community.</p> <p>The criteria are listed below, followed by a brief comment.</p> <p>1. Can the expansion area be efficiently serviced based on existing water / wastewater and stormwater infrastructure?</p> <p>Hamilton Maps (extract above) shows water and wastewater services in the vicinity of the Subject Lands. Several studies have been undertaken in the recent past addressing servicing upgrades for the Waterdown community. Recently, a Municipal Class Environmental Assessment as been initiated by the City to twin the trunk watermain to provide more reliable water services to Waterdown. Even without the benefit of a Functional Servicing Report and Stormwater Management Report, in our opinion the expansion area can be efficiently serviced based on the existing services and planned services for the area.</p> <p>2. Does the expansion area align well with existing and planned road and active transportation networks?</p> <p>The extract above from the Transportation Master Plan below shows the existing and planned roads in the immediate vicinity of the Site. The City has completed the Waterdown / Aldershot Transportation Master Plan – Transportation Network for Urban Development in the community of Waterdown. Completion of the Waterdown By-pass is underway. A portion of this by-pass (Avonsyde Blvd.) is adjacent to the Subject Lands.</p> <p>What is the impact of the expansion area on the capacity of the road network? In recent years, the capacity of the Waterdown road network has been reviewed and addressed through the Waterdown / Aldershot Transportation Master Plan. A Schedule C</p>	
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		<p>Municipal Class Environment Assessment for improvements to Parkside Drive has been completed. Additional studies are underway for road improvements in and around the Waterdown community.</p> <p>Does the expansion area contribute to the surrounding area’s completeness?</p> <p>This is a difficult criterion to assess now as the end urban use is not known. It is expected that the market and needs of the community will dictate the use and thereby contribute to achieving a complete community.</p> <p>Does the expansion area represent a logical rounding out of the urban boundary and / or recognize existing uses?</p> <p>The location of the Subject Lands, bound by urban development and Dundas Street East does represent a logical expansion of the urban boundary. In addition, there is non-farm, rural residential development to the east, along Evans Road. At some point in the future, it may be prudent to assess the urban expansion potential of the lands on both sides of Evans Road to the limit of the City of Hamilton (rounding out the urban area north and south of Dundas Street East).</p> <p>Does the expansion area present any significant opportunities or risks associated with climate change?</p> <p>While climate change is a global issue, every community must address how development provides opportunities and risks. On a local level, municipalities can assist by addressing flood defenses, plan for heatwaves and higher temperatures, install water-permeable pavements to better deal with floods and stormwater and improve water storage and use. Opportunities and risks exist for all expansions areas. The type of development proposed, and the preservation of water and natural heritage features will provide opportunities.</p> <p>Does the expansion area demonstrate avoidance and / or mitigation of potential negative impacts on watershed conditions?</p> <p>This criterion may require further clarification. All lands in the City of Hamilton are part of a watershed or sub-watershed and all development must avoid or mitigate potential negative impacts. A tributary of Grindstone Creek bisects the Subject lands. Further review would determine how redevelopment for urban purposes can avoid or mitigate potential impacts on the Grindstone Creek watershed. This review must take into consideration the current impacts, given the existing agricultural uses.</p>	
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		<p>Does the expansion area avoid key hydrologic areas?</p> <p>The expansion area does contain a stream (key hydrologic feature) as shown on Schedule B-8 to the Rural Hamilton Official Plan. Given the rural environment, key hydrologic features exist, or once existed on most lands that have become part of the Waterdown urban area. The features have been retained as stormwater outlets and as environmental features that contribute to a desirable living area.</p> <p>Does the expansion area maintain, restore or improve the functions and features of the area including diversity and connectivity of natural features?</p> <p>We assume the City may be looking for a scoped environmental assessment for those candidate expansion areas that contain natural features. Further review is required to determine how the features will be maintained, restored or improved. Retaining natural features is an important component of creating a liveable, complete community.</p> <p>10. Does the expansion area minimize / mitigate impacts on the agricultural system, including the agri-food network?</p> <p>An existing urban area and a planned expansion by its very nature creates some degree of impact on the agricultural system surrounding the City of Hamilton. In Waterdown, the potential for future impacts was established when the Urban Area, north and south of Dundas Street was expanded through past land use planning decisions. Continued tilling, cropping and the operation of livestock facilities is threatened by non-farm residents that continue to move into the area and surround the subject farms.</p> <p>In this area, the larger agricultural system itself lies north of Parkside Drive and to the northeast. The Subject Lands are now surrounded by non-farm uses, including the rural residential lots on Evans Road. The larger agricultural system is not adjacent to the Subject Lands and the loss of the Subject Lands will be isolated in nature. There is no real impact on the greater agricultural system.</p> <p>11. Does the expansion area minimize land fragmentation?</p> <p>This criterion is not completely understood. In the end, any expansion area will fragment the land. In the subject area, fragmentation is minimized given that one farm parcel is approximately 12 hectares, and one farm parcel is approximately 4 hectares. The land could be available for a large single use, or several residential community-type uses.</p>	
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		<p>Is the expansion area in compliance with MDS guidelines?</p> <p>Livestock facilities exist on the Subject Lands and if they become part of the urban area, they would eventually be phased out when phased growth occurs. There are no other livestock facilities in the immediate area.</p> <p>Does the expansion area have an unreasonable or unexpected financial impact on the City?</p> <p>We assume this criterion pertains to the cost of servicing an expansion area and providing necessary community benefits such as schools and parks. The Subject Lands are adjacent to a new expanding community, with planned community benefits. Inclusion of the Subject Lands in the urban area boundary is not expected to create an unreasonable or unexpected financial impact on the City.</p> <p>Conclusion Generally, the lands north of the Waterdown Urban Area boundary are designated Greenbelt Natural Heritage System, with a few exceptions and are therefore not eligible for consideration as an urban expansion area. The lands south of the Waterdown Urban Area are designated Escarpment Natural Area, Niagara Escarpment Parks and Open Space System and Escarpment Protection Area and are also not eligible for consideration as an urban expansion area.</p> <p>The western portion of the Waterdown Urban Area has been designated for employment uses. The Land Needs Assessment has concluded that no additional employment land is required in the City to the year 2051.</p> <p>The Subject Lands are designated Escarpment Rural Area and are part of the Greenbelt Area. Except for the Subject Lands, all Escarpment Rural Area lands in the City of Hamilton are adjacent to lands designated Escarpment Protection or Escarpment Natural Area. The Subject Lands are adjacent to an Urban Area. The Subject Lands are unique in the City for this reason and given the fact that they are still used for agricultural purposes. However, encroaching urban development has jeopardized their continued operation. Expansion of the Waterdown Poultry Farm is restricted given the MDS formula. Access to the farms, by farm equipment is increasingly restricted, given existing and proposes transportation infrastructure.</p>	
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			<p>This letter serves as the Landowners' request to consider the Subject Lands as a candidate urban expansion area to the community of Waterdown. We would be pleased to answer any questions staff may have regarding this request or clarify any statement contained within this letter.</p> <p>Thank you for the opportunity to provide input on the Draft Screening Criteria and Evaluation Tool (Waterdown and Binbrook). We look forward to continued participation in the GRID 2 / MCR process.</p>	
23	May 30	George Voros	<p>There should be no encroachment or impact on Greenbelt Plan Protected Countryside. Light pollution is a growing problem and encroachment in our communities and the lack of hindsight, understanding of the current problem or foresight on the part of the City of Hamilton is apparent. The public standards for the mitigation of light pollution are inadequate and do not cross over into private standards. Our by-laws are woefully inadequate and out of date and do not address the issue of light pollution. Light does not have any boundaries and impacts communities and the surrounding natural environment. Our lands and skies are part of our natural heritage and we should be able to look up and see the stars at night and walk the night without blinding lights in our path. I can't even open my curtains in the evening (12th floor apartment) building because of light pollution from the City of Hamilton managed parks, facilities and media signs; efforts to address this with councilors have failed. I respectfully ask that you address the problem of light pollution with any expansion into Whitebelt lands for current and future residents including our natural flora and fauna. There should be no expansion into Greenbelt lands... it will never end and should stop now.</p> <p>I would be happy to discuss this.</p> <p>Here is one of many references on the subject: https://www.ies.org/pressroom/reducing-light-pollution-and-its-negative-affects-ies-and-ida-new-collaboration/</p>	<p>Comments regarding light pollution are acknowledged and staff note that this issue could be considered at the future Secondary Planning stage for any of the new growth areas.</p>
24	May 31	Rob Stovel	<p>Stovel and Associates Inc. has been requested by Greenhorizons Holdings Inc. and The Greenhorizons Group of Farms LTD. ("Greenhorizons"), 1231 Shantz Station Road Inc. ("Shantz") and Willuw Valley Holdings Inc. ("Willow") to provide comments to the City regarding the GRIDS 2 / MCR - Whitebelt Expansion Lands evaluation framework and phasing criteria.</p> <p>My clients' lands include the following parcels:</p>	<p>Comments are noted.</p>

			<p>8474 English Church Road, 2907 Highway 6, 3065 Upper James Street, 3005 Upper James Street.</p> <p>Please note that these parcels are immediately east of the John C. Munro International Airport ("Airport"); these lands are included within the Airport Influence Area. In total, the lands in question comprise approximately 139 acres.</p> <p>Our comments on the draft Evaluation Framework and Phasing Criteria for the Whitebelt Expansion Lands are summarized in the attached table using the nine evaluation criteria themes suggested in the summary document. It is our opinion that, due to the fact that my clients' lands are in close proximity to the John C. Munro International Airport ("Airport"), we feel that the site is an ideal location for Employment Uses.</p> <p>We wish to re-emphasize that an important criterion that seems to be missing is the need for large blocks of land. This avoids the need to assemble large enough parcels to accommodate future employment developments. When we look at the land fabric currently included within the City limits, it is clear that large blocks of land are a rare commodity. My clients' lands help to satisfy this need.</p> <p>You will note that we have previously provided comments to you regarding the appropriateness of my clients lands, most recently on May 14th, 2021.</p> <p>We look forward to participating in discussions with the City and their planning staff/consultant in regards to the GRIDS2/MCR process. Please do not hesitate to contact me should you have any questions.</p>	
25	May 31	John Corbett	<p>On behalf of the Upper West Side Landowners Group (UWSLG) (formerly Twenty Road West Landowners Group), Corbett Land Strategies Inc. (CLS) is pleased to submit the following comments in response to the staff report PED17010(j). The UWSLG is committed to delivering an infill and complete community for lands located within Twenty Road West, Upper James Street, Dickenson Road and Glancaster Road (see Appendix A for additional deliverables). These submissions are made in addition to and in support of our clients' urban boundary expansion applications submitted under Policy 2.2.8.5 of the Growth Plan.</p>	<p>Staff responses to comments as numbered in the email:</p> <p>1. Noise – the City's UHOP identifies the noise forecast contours being utilized in the GRIDS 2 / MCR study. Any changes to these contours would require collaboration and</p>

	<p>As part of the on-going Municipal Comprehensive Review (MCR), City staff presented an update on the MCR and the results of the recently completed Land Needs Assessment (LNA) at the December 14th and March 29, 2021, General Issues Committee (GIC) meetings. Amongst other items, staff are asking that Council endorse the consolidation of the MCR to identify growth between the 2021 and 2051 planning horizons into one process, that the LNA be received, and that Council authorize staff to commence the public and stakeholder consultation process prior to final approval of the LNA. UWSLG comments specific to the LNA were submitted to the City in response to the December 14th Staff Report. Supplementary comments were also submitted by our legal counsel, Mr. Joel Farber, dated December 4th, 2020.</p> <p>Through the MCR and GRIDS 2, the city is assessing the locations of where and when the City will grow to the year 2051. The growth scenarios presented to GIC included a range of options. Staff have recommended that Council adopt the “Ambitious Density” scenario which would require approximately 1,340 ha of community area lands and 0 ha of employment lands to accommodate growth projected to the year 2051. The intensification targets for this scenario are 50% between 2021 and 2031, 60% between 2031 and 2041 and 70% between 2041 and 2051. A density of 77 persons and jobs per hectare (pjh) would be required for new growth areas. Subsequent to hearing public input on the matter, Council directed staff to consider a growth scenario with no lands to be added to the settlement boundary and that all growth be accommodated within the urban boundary.</p> <p>To assist staff with determining the location and timing of where the growth is to occur, once approved by Council, a Draft Evaluation Framework and Phasing Criteria (Whitebelt Lands) has been prepared. Staff have prepared the materials to be reflective of the policy direction of the PPS, Growth Plan and Urban Hamilton Official Plan to address themes related to climate change, financial implications, complete community building and infrastructure requirements.</p> <p>The following details the comments that the UWSLG have identified within the proposed Draft Evaluation Framework and Phasing Criteria:</p> <p>1. Noise Restrictions</p> <p>Within Staff Report PED17010(j), part of the discussion on <i>Where can the city grow</i> identifies that portions of the City’s whitebelt supply are constrained by the airport Noise Exposure Forecast. Through a net developable area calculation, the city has determined that the whitebelt lands available for development are approximately 1,600 ha. The</p>	<p>agreement with the Hamilton International Airport.</p> <p>2. Phase 1 evaluation – the information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given dataset. The phasing component will include the results of more detailed technical analysis related to agriculture, municipal finance, transportation, water, wastewater and stormwater management.</p> <p>Regarding the Agricultural System criteria, staff note that the criteria as proposed in the Part 1 Evaluation Criteria and Part 2 Phasing Evaluation does consider the agricultural classification of the lands within the candidate areas and the avoidance of prime agricultural lands. However, staff further note that this is one criteria that will be considered comprehensively with the other criteria.</p> <p>2. Evaluation Criteria and Themes:</p> <p>Climate change: comments noted.</p> <p>Municipal Finance: the City has retained Watson & Associates to complete a Fiscal Impact</p>
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	<p>UWSLG would like to advise staff that if this calculation were to be reliant on current UHOP Appendix materials, it would be reflective of materials not illustrating the most current noise exposure forecasts. Further, within the Hamilton Airport Master Plan, it includes forecast mapping to the year 2025 which incorporates planned runway improvements and anticipates technology improvements. The impacts of the 2025 noise forecasts are significant diminished and reduce the amount of land which are identified to be restricted. Staff should take this into consideration in their determination of the available whitebelt land supply.</p> <p>Stage 1 Feasibility Evaluation - Ranking</p> <p>Staff advise that the first phase of the evaluation analysis is based primarily on the Growth Plan criteria identified in Policy 2.2.8.3. In addition, the City applies criteria found within the GRIDS 2 10 Directions to Guide Development and UHOP. This stage is to identify any lands that do not meet the provincial and local criteria and would therefore not progress to the second phase of the evaluation. The Stage 1 evaluation feasibility is not proposed to prioritize or rank one area against another. The UWSLG submits that the evaluation criteria should include a level of prioritization and ranking to the Stage 1. This is particularly relevant as some areas of the whitebelt lands do not conform to Growth Plan policy 2.2.8.3 until other lands have already been identified for growth. Specifically, Growth Plan policy 2.2.8.3.f) establishes that lands identified as non-prime agricultural must be developed prior to lands identified as prime-agricultural:</p> <p><i>prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following: expansion into specialty crop areas is prohibited; reasonable alternatives that avoid prime agricultural areas are evaluated; and, where prime agricultural areas cannot be avoided, lower priority agricultural lands are used;</i></p> <p>As the City's whitebelt land supply includes both prime and non-prime agricultural lands, by not ranking or prioritizing lands being evaluated for eventual inclusion within the urban boundary, Staff run the risk of considering prime lands prior to ensuring that reasonable alternatives which avoid prime agricultural area exist.</p> <p>Although this is one example, it is an important one as the criteria for agricultural should be considered first and foremost in the evaluation of the whitebelt lands. Further, if staff</p>	<p>Assessment of growth options, including financing of growth options.</p> <p>Servicing Infrastructure: comments noted</p> <p>Transportation Infrastructure: comments noted</p> <p>Natural Heritage: comments noted</p> <p>Complete Communities: Under Phasing, Complete Communities, a development readiness criteria has been added to consider existing studies, etc. Additional study requirements will be acknowledged throughout the evaluation.</p> <p><i>Action: Revisions to the framework document included a more detailed explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario.</i></p> <p><i>Action: amended the Part 2 Phasing Criteria to add a criteria related to implementation and readiness of lands for development.</i></p>
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are to consider infrastructure systems, transportation systems or municipal finance ahead of agricultural considerations, it would be contravening Provincial policy. As such, it is recommended that all lands which satisfy all criteria of Growth Plan policy 2.2.8.3 be identified as such and earmarked with the highest standing. It should be noted that by releasing the small amount of land that is non- prime agricultural in the Twenty Road West lands, this would unlock the development potential of the remaining whitebelt lands.

3. Evaluation Criteria and Themes

The UWSLG also provides the following commentary with respect to specific thematic areas for evaluation of Growth Options:

Climate Change:

The key considerations identified related to climate change are best applied when secondary plan level analysis can be provided. Preference should be given to candidate areas that have sufficient sub-watershed planning detail to satisfy the criteria listed.

From a geographic perspective the City can best achieve its Climate Change goals and objectives that essentially do not change the current and designated building footprint of the Urban Area. In this regard, the City has largely satisfied this test by selecting the aggressive intensification option. The next logical step would be to select areas that are infill in nature relative to the geography of the existing urban boundary. Application of a climate change lens necessitates the prioritization of the UWS lands as the first area for growth. The least amount of preference would be given to areas that constitute outward expansion with one or more boundaries extending into the rural Area.

Municipal Finance:

Each growth option (including the 100 per cent intensification scenario) should be subject to a comprehensive financial impact assessment. This assessment should be focussed at measuring total revenue generation potential of the proposed development against the capital and operating costs of servicing (engineering and community services) the area.

The financing analysis should favour those areas that can deliver or front-end finance key infrastructure or facilities under a formalized land owner cost sharing agreement. Such arrangements can not only facilitate the early delivery of infrastructure but also lessen the financial impact on the municipality.

Further, if the 100 per cent intensification scenario were to be advanced, staff must comprehensively measure the cost associated with introducing additional densities into

		<p>the stable and mature neighbourhood of the City. Most of these areas have aging underground infrastructure that will have to be up-graded or replaced which will have a significant financial impact on the municipality. Costs associated with enhanced road network transit, recreational, cultural and educational improvements must also be factored into this assessment</p> <p><i>Servicing Infrastructure:</i> UWSLG whitebelt lands are located adjacent to AEGD which has planned servicing infrastructure. During the planning of the AEGD, the subject lands were included within the planning of the infrastructure needs for this area. As such, the UWSLG whitebelt has been assessed to confirm that there are both existing and planned servicing opportunities. When staff evaluate the subject lands for existing and planned servicing, will they ensure to include these within their assessment.</p> <p><i>Transportation System:</i> The UWS whitebelt areas is located within an area which has a comprehensive Transportation Master Plan currently under review including opportunities for important public transit corridors. In addition, the UWSLG is currently undertaking an Integrated Environmental Assessment to deliver the much-needed Garth Street extension and intersecting collector road system. The highest ranking should be considered for candidate growth areas that have the potential to deliver key municipal infrastructure on an expedited basis through landowner supported planning studies and environmental assessments.</p> <p><i>Natural Heritage and Water Resources:</i> It will be difficult to assess candidate growth areas under this criteria that have not been subject to a sub watershed based environmental impact/natural heritage assessment. However, priority must be given to any area that has advanced assessments of natural heritage and water resources.</p> <p>The UWS area has undergone a natural heritage assessment that enhanced the original sub watershed study that was undertaken as part of the AEGD Secondary Planning Process.</p> <p><i>Complete Communities:</i> The UWSLG have submitted several planning applications to the city to develop both the lands inside and outside the urban boundary. These applications include a draft plan of subdivision which has been designed to enhance the uses permitted along the planned Garth Street extension. This is intended to create a more complete community by</p>	
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			<p>providing additional commercial and office uses in close proximity to future community lands, which are being considered as part of the MCR/GRIDS 2. By doing this, the community is provided with numerous opportunities to reduce reliance on the automobile by ensuring residents can live, work, and play in close proximity. Additionally, opportunities for attainable and affordable housing will be explored. These items will be further refined through a future secondary plan. As such, the UWSLG would like staff to confirm if they will build in some flexibility into the evaluation process that allows future planning approval processes to refine the completeness of the community.</p> <p>In conclusion, the Growth Plan (including previous iterations) has been initiated on the premise of ensuring the continued prosperity of Ontario by offering jobs and the creation of communities with high qualities of life. Specifically, Section 1.2 of the Growth Plan sets out that <i>“A Place to Grow is the Ontario Government’s initiative to plan for growth and development in a way that supports economic prosperity, protects the environment, and helps communities achieve a high quality of life.”</i> In response to this guiding principle we remind staff that the evaluation framework should be designed in a manner which prioritizes these objectives.</p> <p>The Upper West Side Group is pleased to contribute and work with the city in the on-going GRIDS 2 and Municipal Comprehensive Review processes. Should staff require clarification or additional information on the above comments, we would be more than able to discuss further.</p>	
26	June 3	Olivia O’Connor (ACORN Canada)	<p>ACORN Hamilton is an independent community organization with a membership of low and moderate income individuals & families. We join our allies at Environment Hamilton in our submission.</p> <p>ACORN joining our ally Environment Hamilton in advocating for:</p> <ol style="list-style-type: none"> 1. The city needs to have a rigorous evaluation framework and planning criteria applied from the start – so that we are assessing the implications of urban sprawl on the climate emergency, municipal finances, our local agricultural system, natural heritage and water resources, <p>It is inappropriate that staff are consulting on this framework and associated criteria now, given that public input is pending regarding what community members prefer and support where urban growth management in our city is concerned. ACORN is strongly opposed to any urban expansion into the Greenbelt.</p>	<p>Comments noted. Revisions to the framework to address the no urban boundary expansion option will be included.</p> <p>Regarding the comments on food security, staff concur on the importance of this matter and will amend the appropriate sections of the evaluation tools accordingly.</p> <p><i>Action: Agricultural System theme criteria amended to reflect local food security and production.</i></p>

		<p>During the pandemic we have realised how important green space, parks and farmland is essential to strong communities. People need these spaces in their neighbourhoods to have gatherings and local food for food security.</p> <p>We need our local produce, we are trading food for money and properties for money and we are forgetting about the people and community.</p> <p>Every neighbourhood and ward should be consulted, this is a Hamilton expansion. Only having these 2 options is not sufficient for all neighbourhoods, people also need affordable housing not just development boxes which is intended to maximize profit for developers.</p> <p>What kinds of jobs will these areas generate? We need affordable units for the people that work in Hamilton and stay in Hamilton! We need to build a climate resilient city that accommodates all the people in Hamilton.</p>	
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