Public Comment Summary – Property Specific Comments / Requests

Whitebelt Lands – Residential

#	Date:	Name:	Property	Comment:
1	July 27 2017	J Farber	Twenty Rd W	We are the solicitors for the Twenty Road West Landowners Group, owners of lands south of Twenty Road, between Upper James and Glancaster. The southerly portion of the Twenty Road block is currently designated as employment lands within the AEGD Secondary Plan, with the northerly portion designated rural as part of the "Whitebelt". In the context of the Employment Land Review and GRIDS2 our client is currently preparing and will be submitting detailed block planning concepts for the proposed development of the north portion of the block including for residential, commercial and employment uses in contemplation of an urban boundary extension. In connection with the detailed design planning for the Twenty Road West block, our clients will be proposing certain modifications to the existing boundary of the employment area designations within the AEGD in order to conform to proposed road patterns, storm water pond locations, environmental constraints, airport noise contour lines; and land budget and density matters resulting from the recently released Provincial Growth Plan. In addition, we are unable to understand the basis for the City's stated intention to not consider conversion requests within the AEGD. Furthermore, we are of the view that the City would not be fulfilling the requirements of a Municipal Comprehensive Review if it were to exclude certain lands from the analysis. We trust that the City will not prejudge or foreclose consideration of our clients proposed block planning concepts including modification of the existing AEGD boundaries within the Twenty Road West block. Finally, the Twenty Road West Landowners Group has engaged MGP (Lee Parsons and Lincoln Lo) for the purposes of participation in the City's land budget and growth option evaluation to occur in the context of the MCR/GRIDS2. We are concerned that this critical planning initiative is being undertaken without sufficient participation and input from the key stakeholders. As a first step, we would ask that our consultants be provided an opportunity to meet with staff to discuss the MCR/GRIDS2 process so that our consultants are able to provide advice and recommendations to our clients and so that we are able to make the appropriate submissions on behalf of our clients before the deadline of September 15, 2017. We are aware that Public Consultation events will be held in the fall of 2017, but this will be too late to assist us in completing our September submission.

#	Date:	Name:	Property	Comment:
2	June 13 2018	D Anderson (MHBC)	7700 Twenty Rd E	As you may know, MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") was retained by 456941 Ontario Ltd., 1263339 Ontario Ltd. and Lea Silvestri (hereinafter referred to as "the Owner" or "Silvestri Investments") in June 2015 to provide independent professional advice on land use planning and the appropriate policies pertaining to Silvestri Investment's lands. Silvestri Investments owns a 20 ha (49 acre) parcel of land located on the north side of Twenty Road East, between Twenty Road East and the Hydro One Corridor, west of Miles Road and east of Homebrook Drive, known as 7700 Twenty Road East (the "Subject Lands") in the City of Hamilton. The Subject Lands are located adjacent to and immediately south of the current City of Hamilton Urban Boundary. The following letter provides a brief history of the Subject Lands and summarizes the work undertaken to date to advance the Subject Lands to allow for their future development via consideration of their inclusion as part of the City's Urban Boundary. In this regard, a comprehensive Planning Justification Report and technical reports were prepared for the Subject Lands in support of their inclusion within the City's Urban Area Boundary. These reports were formally submitted to the City of Hamilton Department of Planning and Development in November 2017. We also recently submitted these materials for consideration as part of a Formal Consultation meeting. **Background History** As you know, the City of Hamilton Urban Official Plan and Rural Official Plan were adopted by City of Hamilton Council on September 27, 2006 and approved with modifications by the Ministry of Municipal Affairs and Housing ("MMAH") on December 24, 2006. At that time, MMAH modified and approved the Official Plan maintaining the pre-existing urban boundary of the City of Hamilton for the entire 20 year planning horizon of the Plan, which we agree underestimated the land needs within Hamilton. 2 On April 4, 2011, appeals were filed to the Ontario Municipal Board ("OMB") by Silvestri Investments for three of their properties, including the Subject Lands ("Silvestri UHOP Appeal"). Specifically, Silvestri Investments appealed the decision of MMAH to approve and modify the Urban Hamilton Official Plan ("UHOP") and sought modifications to both the Urban Boundary and the specific plan policies to include the Subject Lands. Silvestri's initial appeal letter noted that the exclusion of the Subject Lands from the City's urban settlement area represented poor planning. During the first GRIDS planning process, conducted in 2006 by the City as part of its Official Plan Review, the Subject Lands were identified for inclusion within the urban boundary in the initial growth options. Previous evaluations of the growth options through GRIDS also supported the inclusion of the Subject Lands as a part of an expansion of the City of Hamilton

#	Date:	Name:	Property	Comment:
				Urban Boundary. As specifically indicated in the grounds for the Silvestri Appeal, the Subject Lands should have been included in the urban boundary and placed within the "Neighbourhood" land use designation. The two other properties owned by Silvestri Investments were part of appeals that were directly addressed through the Phase 3 UHOP hearing related to AEGD Secondary Plan. After a lengthy OMB hearing process on the AEGD, a settlement was reached in January of 2015 which provided land use designations and policies for the two Garner Road properties owned by Silvestri Investments. The Subject Lands are part of the remaining appeals still before the Local Planning Appeal Tribunal ("LPAT") related to the City of Hamilton's Urban Official Plan which is currently in adjournment awaiting hearing. **Update – Work Completed on the Subject Lands** Since the filing of Silvestri UHOP Appeal, MHBC has undertaken a comprehensive planning assessment of the Subject Lands and developed a draft plan for development which is supported by a functional servicing report, transportation report and environmental report. As noted earlier, this was formally submitted to the City in November 2017 ("Silvestri Twenty Road Lands Submission") and a Formal Consultation request was submitted to the City on May 18, 2018. The justification for the inclusion of the Subject Lands as part of the City's Urban Boundary provides a complete planning analysis of the City of Hamilton's land area needs, land budget process, urban structure designations, applicable policies, and urban boundary expansion conditions. The report also provides an assessment of the Subject Lands in relation to the Growth Plan (2017) policies. The Subject Lands, given their physical context have also been considered, through our planning assessment, as an intensification site as they can be immediately and efficiently serviced from the contiguous urban neighbourhood and developed for a range of housing types and densities to meet the projected requirements of current and future residents. The Subject Lands are already serviced by adjacent parks, recreational amenities, social services, transportation and servicing infrastructure, To date, no comments have been received from City staff on the Silvestri Twenty Road Submission and we were advised on June 6, 2018, by City staff that in speaking with you, the identified property is included within the 2041 GRIDS review which is still in the preliminary stages and that consideration of any application for the lands before knowing if they could be included in the urban boundary was premature. 3 **The Subject Lands and GRIDS 2**

#	Date:	Name:	Property	Comment:
				The City has now initiated their GRIDS 2 and Municipal Comprehensive Review process. Our client would like to commence a public planning process with respect to inclusion of the Subject Lands within the urban boundary as a logical residential infill development in the context of decisions currently being made by the City to expand its urban boundary. On May 18, 2018, we submitted on behalf Silvestri, a request for pre-submission consultation with respect to the Silvestri Twenty Roads Submission and associated planning applications. As noted, staff stated they could not consider the Subject Lands as they were not in the City's Urban Boundary and would have to be considered through the GRIDS 2 review before knowing if they could be included in the Urban Boundary. We would like clarification as to why or how the lands in the southeast of Hamilton, known as the "Elfrida Lands", also not in the City's Urban Boundary, are in a public planning process for consideration and not subject to GRIDS 2? We are unclear why the Subject Lands are not able to be addressed in a manner consistent with the City's approach to the Elfrida Lands. The Subject Lands are in an identical position to the Elfrida Lands in terms of their status in the planning process. Both are lands presently located outside the urban boundary within the City's Rural Official Plan and both are the subject of the present adjourned LPAT hearing whereby the Tribunal will determine their status in the context of the City's Urban Official Plan. We note that on June 1, 2018, the City gave formal notice of a community meeting to discuss a potential future urban expansion to accommodate future growth on the Elfrida Lands to accommodate growth to 2031. Our clients are seeking to undertake a parallel and concurrent process with respect to the Subject Lands. The Subject Lands should be given an equal opportunity as part of the City's consideration of where it should grow. Given our clients' interest in commencing a public planning process related to the Subject Plans, we would like to set up a meeting with you at your earliest convenience in order to further discuss the November 2017 Silvestri Twenty Road Submission and obtain direction and a response from the City on next steps to move ahead with a planning process for the Subject Lands. As you know our cover letter with our submission asked a number of questions, similar to those below, which were not responded to and for which we are still seeking a response on from the City. We again propose the following questions be answered: • Confirmation that both the Subject Lands and the Elfrida Lands are subject to the Growth Plan, 2017 (there appears to be ambiguity on this point as the public notice for the community meeting for the Elfrida Lands only references growth to 2031, while the Growth Plan 2017 and the GRIDS 2 process require the City to addresses growth within the 2041 planning horizon);

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				• Clarity on the timing, process and milestones for the GRID 2 process as it relates to both the Subject Lands and the Elfrida Lands; • Staff comments on the planning and technical submission, Silvestri Twenty Road Lands Submission, filed with the City in November 2017; and, • Clarification on the next steps including scheduling of public consultation and any additional study requirements for the Subject Lands recommended by staff. 4 We would appreciate if you could please respond at your earliest convenience to schedule this meeting. Thank you for your assistance. We look forward to a discussion with City staff on these matters.
3	Aug 20 2018	D Anderson (MHBC)	832 Garner Rd E	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") to provide independent professional advice on land use planning and the appropriate policies pertaining to Silvestri Investment's lands. Silvestri Investments owns a 12.14 ha (30 acre) parcel of land located on the south side of Garner Road East, west Glancaster Road and east of Southcote Road, known municipally as 832 Garner Road East in the City of Hamilton (the "Subject Lands"). The Subject Lands have remained in the City's Rural Area Plan as a result of the Ontario Municipal Board ("OMB") decision on the Airport Employment Growth District (AEGD) Secondary Plan. The Subject Lands are bounded by the current City of Hamilton Urban Boundary on all four sides. The following letter sets out a brief history of the Subject Lands related to the Airport Employment Growth District ("AEGD") Phase 3 OMB hearing and the disposition of the OMB for the Subject Lands through the Minutes of Settlement. **Current Official Plan** The current Official Plan designation and policies applicable to the Garner Road East Lands are the result of an OMB hearing involving the Airport Employment Growth District (AEGD) Secondary Plan. The property is outside the current City of Hamilton Urban boundary and is located within the City's Rural area and subject to the policies of the Rural Official Plan. The property is designated as *Rural* according to Schedule D of the City of Hamilton Rural Official Plan.

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				Background History As you know, the City of Hamilton Urban Official Plan and Rural Official Plan were adopted by City of Hamilton Council on September 27, 2006 and approved by the Ministry of Municipal Affairs and Housing ("MMAH") on December 24, 2006. At that time, MMAH modified and approved the Official Plan and maintained the pre-existing urban boundary of the City of Hamilton for the entire 20 year planning horizon of the Plan, which underestimated the land needs within Hamilton. On April 4, 2011, appeals were filed to the OMB by Silvestri Investments for three of their properties, including the Subject Lands. Specifically, Silvestri Investments appealed the decision of MMAH to approve and modify the Urban Hamilton Official Plan ("UHOP") and sought modifications to both the Urban Boundary and the specific plan policies. Silvestri's initial appeal letter noted that the decision to establish an "Industrial" designation, within the AEGD, on the Subject Lands represented poor planning. The Subject Lands do not have the necessary locational characteristics required to support the development of an employment area, such as, lack of access to a major transportation network and proximity to existing adjacent sensitive uses both institutional and residential. Instead, these lands should be included, with a "Neighbourhood" designation, within a readjusted urban boundary. During the first GRIDS planning process, conducted in 2006 by the City as part of its Official Plan Review, the Subject Lands were identified for inclusion within the urban boundary in the initial growth options. As specifically indicated in the grounds for the Silvestri Appeal, the Subject Lands should have been included in the urban boundary and placed within the "Neighbourhood" land use designation. The Subject Lands are well located for residential urban development as they form a logical extension to the existing residential area on the north side of Garner Road. After a lengthy OMB hearing process on the AEGD, a settlement was reached in January of 2015. The Minutes of Settlement between the parties established agreement over which lands were included or excluded from the Urban Area. The OMB decision refers to the "lands removed from the AEGD" which includes the Subject Lands. The decision notes: *"The City is Commencing a Municipal Comprehensive Review ("MCR") consistent with the requirements of the Growth Plan for the Greater Golden Horseshoe ("GGH") and intends to consider the appropriate land use designations for these properties within that context, including whether these lands should be within the urban boundary. In the interim, the lands will continue to be outside the urban boundary and governed by the RHOP."*

#	Date:	Name:	Property	Comment:
				The Board maintained that the lands should remain outside the urban boundary in the Rural Hamilton Official Plan until the Municipal Comprehensive Review process was completed. **The Subject Lands and GRIDS 2** The City has now initiated their GRIDS 2 and Municipal Comprehensive Review process. Our client would like to see the inclusion of the Subject Lands within the urban boundary as a logical residential development in the context of decisions currently being made by the City to expand its urban boundary. We understand that as part of the GRIDS 2 and Municipal Comprehensive Review process the City's Land Budget/ Needs Assessment for 2031 -2041 is currently underway and is expected to be completed by the end of August, 2018. **Accordingly, we would like to be on record as recognizing the GRIDS evidence which originally supported the inclusion of the Subject Lands in the City's Urban Boundary as well as current Provincial Planning policies which would support the logical inclusion of the "hole in the doughnut". We would appreciate an opportunity to meet with City staff at your earliest convenience to discuss the Owner's development interests and obtain advice from the City on next steps to move ahead with a planning process for the Subject Lands.**
4	Sept 17 2018	J Farber	Twenty Rd W	We are the solicitors for the Twenty Road West Landowners Group, owners of lands within the block bounded by Upper James, Glancaster, Twenty Road and Dickenson. As the Committee is aware, our clients have been active participants in the City's growth management exercise for many years including both with respect to the Elfrida Growth Area Study and GRIDS2. We also note that our clients have completed, at their own cost and expense, the required planning studies for consideration of their "whitebelt" lands within GRIDS2/MCR for the proposed new "Upper West Side" mixed use community. This includes a complete plan of industrial subdivision application to enable the Garth Street extension from Twenty Road to Dickenson. As noted by staff in its report, the purpose of GRIDS2 is to identify urban boundary expansion areas required to accommodate additional growth to 2041. The GRIDS2/MCR planning process, including all of the required public consultation and technical justification, is the basis upon which the City's growth management policies are to be informed and implemented. We remind both City staff and City Council that there are no predetermined identified areas for urban boundary growth to 2041. That is the issue which GRIDS 2 is to study. To consider Elfrida or any other area as a predetermined or "preferred" place for growth is contrary to provincial law and policy, as confirmed by the Minister's refusal to approve the UHOP Elfrida policies. It is also important for us to point out that there is no lawfully permitted 2031 urban boundary expansion. The requirements of the Growth Plan require the MCR process to plan for the 2041 time horizon. We

#	Date:	Name:	Property	Comment:
				therefore question the basis upon which the staff report continues to reference a 2031 planning horizon which is no longer relevant. Practically, no development of Elfrida could even be realized until 2031 or close to that timeframe so we do not understand how this time horizon can reasonably be applied to justify the Elfrida expansion notwithstanding the legal requirement of the 2041 time horizon. We also do not understand the basis upon which the City continues to move forward with the Elfrida Growth Area study considering that the lands have been designated as a Prime Agricultural Area. In this respect the Provincial Policy Statement specifically states growth cannot be allocated to a prime agricultural area unless there are no reasonable alternatives on lower priority agricultural lands. In early 2018, the Province released detailed agricultural mapping as part of its 2017 Growth Plan implementation exercise. According to this mapping, Elfrida and other "whitebelt" growth areas have been designated "Prime Agricultural". The Twenty Road West lands are not encumbered by a Prime Agricultural designation and as an infill growth area surrounded by the urban area, prevailing Provincial Policy would direct growth to these lower priority agricultural lands through a properly conducted MCR process prior to consideration of prime agricultural lands. We finally note that the staff report, which confirms that Elfrida can only proceed in the context of the 2041 MCR, suggests that there is some basis upon which the MCR process has any bearing on the outstanding UHOP appeals. We do not understand what staff means when it says: *The updated LNA will provide input to address outstanding appeals to the OMB regarding the Elfrida policies in the Rural Hamilton Official Plan and the Urban Hamilton Official Plan, in addition to providing a City-wide detailed, comprehensive approach to residential intensification, urban land inventory and urban boundary expansion.* We would appreciate further clarification of this statement. In the UHOP, the City attempted to identify Elfrida as a future urban growth area subject to a future urban boundary expansion and municipal comprehensive review, but that the Province rejected (and continues to oppose) that attempt. That is the issue in the UHOP appeal, so we have a great deal of difficulty trying to understand the cited statement in the staff report. There cannot be a 2031 MCR process or urban boundary expansion completed in the context of the UHOP appeals. We trust that the City will proceed with GRIDS 2 and the municipal comprehensive review to consider urban expansion on the Twenty Road West block through an appropriate and principled planning process. The MCR must be completed in accordance with provincial policy using a 2041 planning horizon and consistent with the policies to protect prime agricultural areas. The MCR must also be

#	Date:	Name:	Property	Comment:
				completed on the basis of the Ministerial approved UHOP which eliminates any reference to Elfrida as a predetermined area for growth. Based on this submission, we would ask the Committee to include in its resolution on this item, a direction to staff to report back on the status of other "whitebelt" lands in the City which can accommodate future growth before consideration of prime agricultural areas. Without this important information, the City will not have the required information by which to make reasoned planning decisions on its future urban boundary expansions. We are only just in the process of making our way through the attachments to the staff report, including the consultant report but have not been provided with sufficient opportunity to complete our review. Accordingly, we reserve the right to provide further submissions to staff and to Council/Committee on the matter.
5	Nov 4 2019	D Baker	Twenty Road East (Sonoma)	We represent the lands in the area of Twenty Road East and Miles Road in the City of Hamilton, referred to as the "**Twenty Road East Lands**". We are writing further to the GRIDS 2/MCR Council Workshop that was held on October 21, 2019 (the "**Workshop**"). The Twenty Road East Lands are owned by approximately 25 landowners. They are non-prime agricultural lands within the White Belt and have been colloquially described as a "hole-in-thedonut", being immediately adjacent to the southern urban boundary of the City and located between two employment areas. The location of the Twenty Road East Lands can be easily integrated into the urban area through the extension of existing major arterial roads and will provide housing opportunities in close proximity to the City's future employment areas, the AEGD and the Redhill South Business Park, which will optimize the use of existing and planned infrastructure, including transportation infrastructure in a cost efficient manner. We understand that the Workshop was the first of several committee meetings and public consultations in respect of the GRIDS 2/MCR process, and specifically, in respect of the consideration of the appropriate area(s) for urban boundary expansion, to allocate growth to 2041. The Workshop was attended by our client, as well as our client's land use planner, Maria Gatzios. We have been concerned, based upon various City documents and discussions with Staff, that priority is being given to the lands known as the "**Elfrida Lands**", generally bounded by Mud Street, Second Road and Hendershot Road to the east, Golf Club Road to the south, Trinity Church Road to the west, and the urban boundary to the north, when considering the location for a boundary expansion to the City's urban area as part of the GRIDS 2/MCR process. As an example of where our concern stems from, there was a community consultation meeting held in respect of the 2016 Elfrida Growth Area Study, where Staff was explicitly asked whether other lands were being looked at for an urban area expansion. Staff's response was as follows: "No.

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				We are only looking at Elfrida at this time." Similarly, in Staff's August 12, 2019 Report on GRIDS 2, Staff referred to the Elfrida Lands as the preferred area of future growth. These concerns were reinforced by certain comments made at the Workshop, as well as the documents produced for the Workshop. In particular, while Appendix "D" to the Information Report presented to the City at the Workshop contained a label which described certain lands, including the Twenty Road East Lands and the Elfrida Lands, as "Residential to 2031 and beyond" and identified those lands as "Opportunity Land Areas in the Whitebelt", what was again made clear at the Workshop by members of the City's planning staff, is that the Elfrida Lands are the preferred growth area to 2031, and other lands will be only be considered for urban expansion, if needed, between 2031 and 2041. In other words, the Elfrida Lands and Twenty Road East Lands are not being considered on equal footing, but rather that there is a pre-determined outcome to this process favouring the Elfrida Lands. We submit that such a predetermined approach is inappropriate and contrary to the intent of the Provincial Policy Statement and the Growth Plan. Therefore, we respectfully request that Council reflect upon the following points when considering the GRIDS 2/MCR process not only at the Workshop, but throughout the process: 1. The basis for Staff identifying the Elfrida Lands as the preferred future growth area are its identification as a Future Growth Area in the Urban Hamilton Official Plan ("**UHOP**") and the Rural Hamilton Official Plan ("**RHOP**"), both of which have ongoing appeals at the Local Planning Appeal Tribunal. Accordingly, identification of Elfrida as a Future Growth Area has not been decided and should not be treated as a priority growth area by Council or Staff in the GRIDS 2/MCR process. 2. The Provincial Policy Statement and the Growth Plan require that the City consider and assess fairly and equally more than one landholding when determining where growth ought to occur. Not doing so, and instead, embarking on a process which predetermines which lands should be given priority for an urban boundary expansion, would be contrary to Provincial policy. 3. If the Elfrida Lands are not included in the urban boundary expansion as part of the ongoing appeals, and other lands are to be included, the GRIDS 2/MCR work would have been completed without considering other lands, and will therefore be deficient and will have to be repeated, resulting in a costly and inefficient process. 4. Council recognized the Twenty Road East Lands as an appropriate growth area by virtue of the adoption of the enclosed Motion-in-Council dated September 13, 2006,

#	Date:	Name:	Property	Comment:
				directing Staff to "incorporate the lands along Twenty Road in the required five-year review of the Official Plan and Master Plans". Accordingly, we respectfully request that Council analyze all available landholdings, including the Twenty Road East Lands, as part of the GRIDS 2/MCR process to 2031 and beyond on an equal footing. In other words, the GRIDS 2/MCR process should not limit itself to consideration of, or predetermine, the Elfrida Lands as being the preferred future growth area to 2031. Given Staff's position on the Elfrida Lands as the priority future growth area to 2031, we would respectfully request that Council direct Staff to fairly and equally consider and assess the inclusion of all eligible lands as a growth area for urban boundary expansion to 2031 and beyond, within the City's current Land Needs Assessment, GRIDS 2/MCR processes. We also request that Staff confirm to us by way of return correspondence, that they will in fact do so.
6	Feb 28 2020	D Neligan	Twenty Road East (Arbor)	We represent Arbor Developments Inc. (Arbor), owner of a 50% interest in a 50-acre property in Glanbrook municipally known as 6492 Twenty Road (the "Property). The remaining 50% interest in the property is owned by 1694408 Ontario Limited (Sonoma). We have been made aware of correspondence to this Committee by Denise Baker and Susan Rosenthal, counsel for Sonoma and other property owners in the area of Twenty Road East and Miles Road (the Twenty Road East Lands) advocating for the consideration of the Twenty Road East Lands as part of a potential urban boundary expansion brought forward through the GRIDS 2/MCR process. We are also aware that Sonoma and other Twenty Road East landowners have lobbied the mayor s office with respect to a potential urban boundary expansion affecting their lands. Our client wishes to clarify that Arbor has not authorized Sonoma, as co-owner of the Property, to speak on its behalf with respect to this issue. Similarly, and with all due respect to Ms. Baker and Ms. Rosenthal, Arbor has not authorized counsel for the Twenty Road East landowners to act on their behalf or with respect to the Property. The views presented by Ms. Baker and Ms. Rosenthal on behalf of Sonoma and the Twenty Road East Lands do not necessarily represent those of our client. Arbor maintains an interest in the outcome of the GRIDS 2/MCR process and the potential expansion of the urban boundary area and looks forward to City staffs recommendations on this important issue. To that effect, we ask that we be notified of any meetings, workshops, public consultations, or further correspondence respecting the identification of Future Growth Areas and urban boundar expansions affecting the Twenty Road East Lands.

#	Date:	Name:	Property	Comment:
7	May 28, 2021	C. Chiaravalle	Twenty Road East (Sonoma)	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. Climate Change 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. Servicing Infrastructure and Municipal Finance Impacts 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. 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

#	Date:	Name:	Property	Comment:
				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) Complete Communities "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

#	Date:	Name:	Property	Comment:
				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. Protection of Prime Agricultural Areas 100 % of the Twenty Road East Community Lands are designated rural non-prime agricultural (SRG LEAR Study)l. Approximately 85 % Of the Elfrida area is designated "Prime Agricultural" (SRG LEAR Study). Natural Resources Neither area has any Natural Resources. Cultural Heritage 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. The city's Cultural Heritage Resources Interactive mapping identifies (one cultural heritage property, one place of worship (Hindu Temple) and two inventoried properties within the TRE Community land area. Heather I've tried to summarize some of the TRE area's advantages for the Phasing of Development Evaluation Process.
8	May 27 2021	C. Chung (GSAI)	420 & 646 Henderson Rd (Elfrida)	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. 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

#	Date:	Name:	Property	Comment:
				2041 and to 70% between 2041 and 2051, and a density of 77 persons and jobs per hectare (pjh) in new growth areas. 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. *Climate Change* – Adpating 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 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.

#	Date:	Name:	Property	Comment:
				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.

#	Date:	Name:	Property	Comment:
				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.
9	May 28 2021	D. Pitblado (Paletta)	Elfrida	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.

#	Date:	Name:	Property	Comment:
10	May 21 2021	J. Corbett (Corbett Land Strategies)	Twenty Road West lands	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. 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. 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. 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

#	Date:	Name:	Property	Comment:
				Urban Hamilton Official Plan to address themes related to climate change, financial implications, complete community building and infrastructure requirements. The following details the comments that the UWSLG have identified within the proposed Draft Evaluation Framework and Phasing Criteria: 1. Noise Restrictions Within Staff Report PED17010(j), part of the discussion on *Where can the city grow* 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 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. Stage 1 Feasibility Evaluation - Ranking 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:

#	Date:	Name:	Property	Comment:
				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;* 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. 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 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.

#	Date:	Name:	Property	Comment:
				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 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 *Servicing Infrastructure:* 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.

#	Date:	Name:	Property	Comment:
				Transportation System: 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 USWLG 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. *Natural Heritage and Water Resources:* 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. 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. *Complete Communities:* 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 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. 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 *"A Place to Grow is the Ontario*

#	Date:	Name:	Property	Comment:
				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." In response to this guiding principle we remind staff that the evaluation framework should be designed in a manner which prioritizes these objectives. 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.

Whitebelt Lands – Employment

#	Date:	Name:	Property	Comment:
1.	Mar 26 2021	D. Falletta (Bousfields)	2633 Upper James	We are the planning consultants to Movengo Corp., who have an ownership interest in the lands municipally known as 2633 Upper James Street (the "Subject Site"). In reviewing Staff Report PED17010(i) (the "Report"), which is scheduled for the March 29, 2021 General Issues Committee, we have issues with Recommendation (e) and respectfully request that the Committee not endorse this recommendation, especially as it applies to the Subject Site. Recommendation (e) of the Report states: *"(e) That at the conclusion of GRIDS 2 / MCR and the final approval of the implementing Official Plan Amendments identifying the land need to accommodate growth to 2051, staff prepare a report for Council with respect to the necessary steps for recommending to the Province that any remaining Community Area whitebelt lands be added to the Greenbelt."* The Subject Site falls within the whitebelt lands and is currently home to the Cameron Speedway & Amusements, which includes go-kart tracks, paintball fields, rock wall, laser tag arena, target range, bungee trampoline, rope course, bubble soccer, as well as accessory retail and restaurant facilities. The go-kart track and accessory uses have existed on the subject site since for over 40 years and are permitted as per the existing Urban Hamilton Official Plan and Zoning By-law No. 05-200. 2 In our opinion, adding the subject site to the Greenbelt will create a land use issue and restrict the expansion, addition, or modification to any of the existing uses. In addition, removing the subject site from the whitebelt will restrict the ability of the City to expand its urban boundary to accommodate future employment lands. Although the City's Land Needs Assessment (the "LNA") identifies that no additional lands are required to achieve the employment growth target to 2051, it does state: "*Further analysis will also be required from an employment perspective, especially in light of the conclusion that no additional lands are required. Rather than determining the preferred location of a new employment area, the strategic objective under these circumstances is to encourage the most efficient use of the existing land base. To encourage the most efficient use of the occupied supply, intensification must be facilitated especially in the developed central urban employment areas. To encourage an efficient use of the vacant land supply, higher intensity employment uses must be encouraged through a combination of land use planning permissions and incentives for new users to adopt high quality building standards. This objective will be a particular challenge to achieve in the*

#	Date:	Name:	Property	Comment:
				AEGD, where demand is expected to be strong for relatively low-density goods movement and logistics facilities, along with some new manufacturing uses." In this regard, the LNA does identify the need for additional analysis as it relates to the employment lands and how to best capitalize on existing vacant and underutilized land. This analysis may result in the need to reserve potential future capacity, if, for example, some of the vacant employment lands were used to accommodate land-extensive goods movement facilities. Furthermore, the subject site is near the Hamilton International Airport (HIA), which has seen significant growth and development recently. In our opinion, removing whitebelt lands and the potential to add future employment land near the HIA, a major structuring element of the City, is short-sited and would preclude the addition of the subject site to the urban boundary at future official plan reviews or beyond 2051, when a need for additional land may be identified. In our opinion, maintaining the subject site as whitebelt lands provides the City with flexibility to potentially add future urban areas as part of future mandated municipal comprehensive reviews and beyond 2051, especially as the City and Region continue to see unprecedent growth and increased targets with each new Provincial Growth Plan. 3 For these reasons and more, we respectfully request that the Committee not endorse recommendation (e) of the Report, especially as it relates to the subject site. We also request to be added to the notification list regarding the City's LNA and GRIDS 2 process. Thank you for your consideration and please feel free to contact me should you require any additional information or clarification.
2	Aug 17 2021, May 14 2021	R. Stovel	8474 English Church Road, 2907 Highway 6, 3065 Upper James Street,	Further to our correspondence to you dated February 12, 2021, May 14, 2021 and May 31, 2021, my client has had an opportunity to review the revised Final Growth Evaluation Framework and Phasing Criteria (Appendix "A" to Report PED17101(l). As you are aware, my clients, Greenhorizons Holdings Inc. and The Greenhorizons Group of Farms LTD. ("Greenhorizons"), 1231 Shantz Station Road Inc. ("Shantz") and Willow Valley Holdings Inc. ("Willow"), have scoped their request for inclusion in the Urban Area boundary line to include only the following parcels: 1. 8474 English Church Road, 2. 2907 Highway 6, 3. 3065 Upper James Street,

#	Date:	Name:	Property	Comment:
			3005 Upper James Street.	4. 3005 Upper James Street. Please note that both 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. It is our opinion that the lands in question remain a prime candidate for inclusion within the expansion of the Urban Area boundary and should be designated Employment Lands. As previously documented in our correspondence, the primary reasons for inclusion are as follows: 5. **Agricultural Impact:** we have read with interest that the residents of the City are extremely concerned with the impact on agriculture, particularly the removal of specialty crop lands and Class 1, 2 and 3 agricultural lands (in that order of priority). Please note that a substantial portion of my clients' lands have already been removed from agricultural production (i.e. golf course and ponds) and are not rated under the CU system. The background mapping from OMAFRA needs to be updated to illustrate this. In this regard, a substantial portion of my clients' lands meet this planning objective and should be considered a higher priority for possible Urban Area inclusion than any other area near the existing City limits. 6. **Proximity to the Airport:** it is obvious that the Airport is one of the main driving forces for future employment lands in the City. My clients' lands are in immediate proximity to the Airport. **Amazon Fulfillment Centre:** my client's lands are located in close proximity to the recently approved Amazon Fulfillment Centre. We are of the view that the economic pull of this massive warehousing complex, in combination with the presence of the Airport, will outweigh demand for other lands in the City to be used for Employment Land purposes. In short, we are of the view that Amazon and the Airport will create a demand for more Employment Lands around and near the Airport than the City has modelled. 7. **Land Size:** it is clear that the development community, primarily the developers of industrial and commercial uses associated with the Airport, want larger parcels. The larger blocks eliminate the need for massive land assemblies and reduce the overall cost of development. The subject properties are the right size for today's development land size needs.

#	Date:	Name:	Property	Comment:
				8. **Infrastructure:** the balancing act that the City must consider during Land Needs Assessment and Future Planning exercise is complex. One of the key considerations is infrastructure and servicing. Servicing costs are expensive and continue to rise during the COVID pandemic and one way or another, the consumer will pay the toll. My client's lands are already serviced and has excellent location. It seems that this fact has been lost when we consider some of the other areas within the City. On a strict cost per linear metre basis, we submit that my client's lands are substantially more affordable to service because the pipe is already there. At some point in the planning process, cost has to be a consideration. 9. **Rebalancing:** we are aware that the projections indicate that there is a need for additional Residential land in the City and that some of the vacant Employment lands could be converted for Residential purposes. As part of this rebalancing process, we submit that the inclusion of my client's as Employment Lands will assist the City provide shovel-ready lands in close proximity to the Airport. 10. **Chamber of Commerce:** It is our understanding that the Chamber of Commerce ("Chamber") have provided thoughtful comments to the City regarding the City's Growth-Related Integrated Development Strategy (GRIDS) and Land Needs Assessment (LNA) study. The Chamber recognizes that future growth projections and prudential planning warrant that the City will need to utilize its Whitebelt lands for their intended purpose, particularly in terms of Employment Lands, there is greater opportunity to enhance employment investment and prevent the potential loss of new opportunities to other jurisdictions. We concur with the Chamber and we feel that the subject lands are perfectly suited to future Employment Land uses. This letter constitutes our continued request for the lands to be included in the proposed Urban Area expansion of the City of Hamilton and designated Employment Lands. We look forward to participating in discussions with the City and their planning staff/consultant in regards to the Official Plan update. Please do not hesitate to contact me should you have any questions.
3	Feb 12 2021	R. Stovel	8474 English Church Road,	Stovel and Associates Inc. has been retained by The Greenhorizons Group of Farms Ltd. and Greenhorizons Holdings Inc. ("Greenhorizons"), Willow Valley Holdings Inc. ("Willow") and 1231

#	Date:	Name:	Property	Comment:
			2907 Highway 6, 3065 Upper James Street, 3005 Upper James Street, Con 5 Pt Lot 7 GL GB (Airport Road), and Con 5, Pt Lot 8 GB RP 62R11806 Part 1, Airport Road.	Shantz Station Road Inc. ("Shantz") to review the work completed to date in association with the City of Hamilton's Official Plan Update. Greenhorizons, Willow and Shantz own land that is fronting on Upper James and the easterly Urban Area boundary line (see attachment for title documents and property mapping) and immediately east of the John C. Munro International Airport. In total, the lands in question comprise approximately 329.94 acres: 1. 8474 English Church Road, 2. 2907 Highway 6, 3. 3065 Upper James Street, 4. 3005 Upper James Street, 5. Con 5 Pt Lot 7 GL GB (Airport Road), and 6. Con 5, Pt Lot 8 GB RP 62R11806 Part 1, Airport Road. We note that Appendix "H" to Report PED 1701(h) identifies a large blue polygon described as *"Whitebelt Restricted to Employment Only"* on a Figure entitled *Whitebelt Growth Options - City of Hamilton*. My clients' parcels 1-4 inclusive and parcel 6 are wholly contained in this blue polygon. The remaining parcel, (Parcel 5) is mostly contained within the blue polygon with the southernmost portion being mapped as "Whitebelt Outside 28 dB NEF". It is our opinion that the lands in question are a prime candidate for inclusion within the expansion of the Urban Area boundary and should be designated Employment Lands. The following paragraphs set out our rationale for inclusion: - **Amazon Fulfillment Centre:** my client's lands are located in very close proximity to the recently approved Amazon Fulfillment Centre. Please find attached photographs from the driveway of parcel 2 that my client took recently. The tower cranes (4 in total) in the background represent the construction zone for the Amazon Fulfillment Centre. It is located immediately across Highway 6; literally a "stone's throw away". The local effects of the development are (and will continue to be) tremendous. Additional employment lands will be needed in this immediate vicinity as the multiplier effect from Amazon will exceed substantially the availability of Employment Land in this immediate area.

#	Date:	Name:	Property	Comment:
				As the City's Economic Development Officer indicated: *"Hamilton is home to Canada's busiest overnight express cargo airport, the busiest port on the Canadian Great Lakes and one of the lowest rates of traffic congestion in the Greater Toronto/Hamilton Area (GTHA). With Amazon Canada's announcement of their intent to invest in Hamilton, this solidifies Hamilton's position as a Canadian goods movement leader, encapsulates the type of investments targeted for the Airport Employment Growth District and illustrates investor confidence from one of the most recognizable brands and the largest e-commerce company in the world."* - ***Norm Schleehahn, Director, Economic Development, City of Hamilton*** 11. **Municipal Services:** the availability of existing services in this local area is also a consideration. Currently, it is our understanding that municipal services already exist along the frontage of these properties on Upper James Street, in immediate proximity to four of my client's parcels. 12. **Limited Agricultural Use of My Client's Lands:** much of my client's land base has been converted to non-agricultural uses, primarily a golf course and a parking lot/business office, but also non-farm residential parcels. These lands are considered to have a lower agricultural capability than adjacent farmlands and are constrained by the surrounding development for agricultural uses. My client recognizes that the area is in transition, and is prepared to move its existing agricultural type operations to a more suitable rural area to complete the transition. In addition, the potential for impacts on adjacent agricultural operations (i.e. MOS 1 setbacks) have already been addressed through the approval of the golf course. This letter constitutes our request for the lands to be included in the proposed Urban Area expansion of the City of Hamilton and designated Employment Lands. We look forward to participating in discussions with the City and their planning staff/consultant in regards to the Official Plan update. Please do not hesitate to contact me should you have any questions.
4	Sept 22 2021	A Smuk	Upper James & Airport Rd	I am the realtor for the above vacant land property that I listed for my client Jeannette McKibbon. I am wondering if you are receiving phone calls and inquiries about this property. I am receiving quite a lot of

#	Date:	Name:	Property	Comment:
				inquiries from prospective purchasers. With the recent industrial development on Aeropark Rd near the Hamilton Airport that includes Amazon. This land is zoned A2 and has limited use to a farmer, and the permitted uses related only to the agricultural secondary uses. As we know over the past five years, Hamilton's Economic Development goals and new industrial and commercial land will generate in the millions new taxes for the city. The inquiries that I am receiving , can be related to the Hospitality Sector, Gas Station, Retirement Home, and New Manufacturing Opportunities. As I receive the Grids2/MCR emails and have received the email regarding the Urban Growth Survey. Is City of Hamilton firm on the current zoning? Am I to understand clearly that to rezone could take 20-30 years?? Is the current study completed for 2021? Is there any opportunity for a re-zoning amendment?? Certainly new development would be compatible with the surrounding area we see on the other side of the road. I feel that Hamilton is missing out on potential new businesses moving to this city because of land not being available.
5	Sept 29 2021	J McKibbon	Upper James & Airport Rd	My sister and I own just under 10 acres on the north east corner of Airport Road and Upper James (Hwy 6). The city insists that this land remain Rural, when residential development has been approved and is underway closer to the Airport , on the east corners of the intersection. The land is unsuitable for the zoning. The land was pretty much ruined for agriculture when the government built highway 6 through my Grandparents farm . As you know city of Hamilton has decided to develop the area around the Airport and Mount Hope area. We have asked repeatedly to allow this small parcel of land to be developed for commercial or employment purposes. Each time this has been denied. This is a busy intersection and highway which could certainly use commercial services.

#	Date:	Name:	Property	Comment:
6	Sept 28 2021	L Hadcock	Upper James & Airport Rd	From our understanding, our land has been made useless in every possible way; not large enough for agriculture, hampered by airport noise bylaws, thus preventing institutional and residential development--even though there are houses within a stone's throw. For whatever reason, commercial development is also not permitted. Despite the fact, that our land is located at a major intersection and highly desirable for commercial development. But for whatever reason, the City of Hamilton isn't interested in the collection of potential commercial taxes or any developmental fees? Doesn't make much sense, does it? This intersection will no doubt become even more important as the city expands, and will need to be redesigned to handle the future influx of traffic and new residents. Is the City of Hamilton engaging in some sort of stealth confiscation here? Devaluing our land and making it unsellable on purpose? This situation sounds very dishonest, I want our concerns brought to the attention of all members of City Council as soon as possible.

Greenbelt – Waterdown

#	Date:	Name:	Property	Comment:
1.	Jan 12 2021	A Clemencio	E Waterdown	We are property owners in East Waterdown who can no longer farm or safely access our agriculturally-zoned land, as a direct result of the growth in east Waterdown. How might we best go about voicing our need to fold into the urban boundary in this area during the next growth phase? We have been pursuing some kind of resolution to this problem with staff and Council for over 23 years, since before amalgamation. This challenge continues to present significant and escalating challenges within our family and community as the development progresses. The adjacent poultry farming operation is also in the same dilemma, so we would greatly appreciate your urgent assistance.
2.	May 30 2021	N. Freiday (GSP)	513, 531 and 537 Dundas Street East	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. 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"). 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. 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

#	Date:	Name:	Property	Comment:
				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). 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. 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. 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. 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.

#	Date:	Name:	Property	Comment:
				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. Overall, during the 2015 Provincial Plan Review, the NEC supported some minor (technical) Urban Area amendments, refused most requests and deferred a few. While the Province refused the landowners' urban area request in 2017, Provincial staff stated, in their report on the application: "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." 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. While the Provincial Plan Review left the landowners dissatisfied and confused, they vowed to continue to let City officials know how past decisions have jeopardized their ability to efficiently farm their lands which in turn negatively impacts their livelihood. The MCR is ongoing, and the landowners wish to fully participate, make their circumstances and concerns known and request the City's support for their proposed urban area expansion. Existing Incompatible Land Uses Urban development within the Waterdown South Secondary Plan area is proceeding on the south side of Dundas Street East, opposite the agricultural lands. The potential for

#	Date:	Name:	Property	Comment:
				complaints associated with normal farm practices has increased significantly. It has become increasingly more difficult to maneuver and operate farm equipment from Dundas Street East given increased traffic and road reconstruction, including planned medians on Dundas Street East. It is our understanding that Dundas Street East is proposed at seven (7) lanes. Traffic will be encouraged to use the Waterdown By-pass. Avonsyde Boulevard, being part of that by-pass, is located adjacent to 513 Dundas Street East. Waterdown Poultry Farm may wish to expand existing livestock facilities or build a new livestock facility but will be restricted by the OMAFRA Minimum Distance Separation (MDS) formulae. The landowners are seeking recognition from the City that land use incompatibilities exist and will only become more significant in time. There is a current rezoning application on the south side of Dundas Street East near the Subject Lands. The landowners have advised City staff that they wish to seek warning clauses registered on title advising future residents of potential noise, dust, odour and flies associated with normal farm practices. However, even with documents registered on title, it is inevitable that complaints will negatively impact the agricultural operations. New residents, while warned, can still complain to OMAFRA and other agencies and complaints will interrupt and impede the existing agricultural operations. Phase One: Screening Criteria Policy 2.2.8.3 (k) of the Growth Plan identifies criteria for a settlement area expansion within the Protected Countryside in the Greenbelt Area. The Subject Lands are identified as part of the Protected Countryside on Schedule B to the Rural Hamilton Official Plan (see **Figure 2** below). The criteria for a 10-hectare urban area expansion are discussed below. i) the settlement area to be expanded is identified in the Greenbelt Plan as a Town / Village;

#	Date:	Name:	Property	Comment:
				*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).* 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; 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. iii) the proposed expansion would support the achievement of complete communities or the local agricultural economy; 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.

#	Date:	Name:	Property	Comment:
				The proposed expansion to the urban boundary would support the achievement of a complete community. Given the adjacent urban 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). the proposed uses cannot be reasonably accommodated within the existing settlement area boundary; 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. the proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities *in the existing settlement area; and* 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. vi) expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited. The Subject Lands are not designated Greenbelt Natural Heritage System. 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

#	Date:	Name:	Property	Comment:
				urban area designation qualifies their lands as a candidate area in this GRIDS 2 / MCR Review. Phase Two: Evaluation Criteria 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 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." 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. 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. The criteria are listed below, followed by a brief comment. **1.** Can the expansion area be efficiently serviced based on existing water / wastewater and stormwater infrastructure? 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

#	Date:	Name:	Property	Comment:
				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. **2.** Does the expansion area align well with existing and planned road and active transportation networks? 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. **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 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. **Does the expansion area contribute to the surrounding area's completeness?** 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. **Does the expansion area represent a logical rounding out of the urban boundary and / or recognize existing uses?** 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

#	Date:	Name:	Property	Comment:
				of Evans Road to the limit of the City of Hamilton (rounding out the urban area north and south of Dundas Street East). **Does the expansion area present any significant opportunities or risks associated with climate change?** 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. **Does the expansion area demonstrate avoidance and / or mitigation of potential negative impacts on watershed conditions?** 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. **Does the expansion area avoid key hydrologic areas?** 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.

#	Date:	Name:	Property	Comment:
				Does the expansion area maintain, restore or improve the functions and features of the area including diversity and connectively of natural features? 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. **10.** Does the expansion area minimize / mitigate impacts on the agricultural system, including the agri-food network? 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. 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. **11.** Does the expansion area minimize land fragmentation? 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. Is the expansion area in compliance with MDS guidelines?

#	Date:	Name:	Property	Comment:
				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. Does the expansion area have an unreasonable or unexpected financial impact on the City? 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. 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. 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. 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

#	Date:	Name:	Property	Comment:
				farm equipment is increasingly restricted, given existing and proposes transportation infrastructure. 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. 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.
3.	May 4 2021	G Consoli	309 – 311 Parkside Dr	We are part-owners of No. 309 - 311 Parkside Drive South of the Proposed Watertown By-Pass east of Centre Road. We have been working with the City of Hamilton's Planning and Real Estate Department to complete the construction of the Proposed Watertown By-Pass (Corridor). We appreciate your support in the GRIDS2/MCR Evaluation Framework and Phasing Criteria in consideration of the potential 10 hectare expansions from Binbrook and/or Waterdown into the Greenbelt Protected Countryside. **The Proposed Waterdown By-Pass (Corridor) has been in the planning stages for many years and even prior to the implementation of the Greenbelt Plans that were researched in 2003 and approved in 2005.** **There are constant reminders in Watertown with public signs and complaints of traffic issues that impact the safety of the local residents.** **The traffic issues have been ongoing for many years and with the Government of Ontario's growth Policy on intensification for the purpose of increasing the housing density in Ontario.** **The traffic concerns in Waterdown are resulting in greater volumes of traffic, congestion, and delays that are affecting the safety of local residents and their families.**

#	Date:	Name:	Property	Comment:
				Trying to cross Parkside Drive in early morning or evening rush hours is extremely difficult. **The increased traffic due to new construction and projected new housing along Dundas Street is making the Traffic issue an even bigger concern.** **The Watertown By-Pass was initiated to help reduce some of the traffic issues and concerns.** In the last few years, we have been working with the abutting landowners to have IBI Planning Consultants represent the owner's interest as a group to try and work with the City of Hamilton to complete the construction of the By-Pass. **<u>Please review the following documents, reports, and studies:</u>** **1. IBI submitted Planning Justification reports to the City making a justification for the removal of the lands from the Greenbelt Plan area (which was unsuccessful!)** **2. IBI Mapping submissions and removal request letter** **3. City staff reports on the same subject matter, including review of the request for these lands** **4. Dillon Consulting Reports assessing the lands in the context of the request for Greenbelt Removal using the City's criteria** **5. Previous Class EA documents for the Waterdown By-pass, which includes assessment of the lands for natural heritage features, etc.** During the Greenbelt review that was completed, the City of Hamilton retained Dillon Consulting to complete a Greenbelt Boundary Review consultant's Report and a Greenbelt Boundary Review Report. In addition to these reports, the property owners impacted by the Proposed By-Pass East of Centre Road to the Connon Nursery Farm had IBI Planning Consultant's John Ariens and Mike Crough prepare an independent Greenbelt Boundary Review, Planning Justification

#	Date:	Name:	Property	Comment:
				Report and letters directed to the Planning Department, the City of Hamilton Councillors and Mayor **in support of Dillon's Reports and recommendations**. The Staff Report was approved by the City of Hamilton and the Proposed By-Pass seemed to be proceeding in the right direction. The City of Hamilton's Greenbelt Review response and recommendations were submitted to the Provincial Greenbelt Planners. In June of 2017, The Greenbelt Authorities decided to re-approve the 2005 Greenbelt Plans? The Greenbelt Authorities Policymakers indicated that the City of Hamilton would be completing a Comprehensive Review and that under section 3.4.3.3, the City of Hamilton could remove the lands south of the Proposed By-Pass from the Greenbelt Plan and include these lands in the Urban Boundary Expansion. The City of Hamilton has been completing the five-year Comprehensive Review. We have submitted a Planning Rationale Report and Natural Heritage Studies by Stantec as requested by the City of Hamilton Planner in charge of the Comprehensive Review and the City's Natural Heritage Planner to support removing the lands south of the Proposed by-Pass and bringing the lands into the Urban Boundary in accordance with the City of Hamilton's submission to the Greenbelt Authorities Greenbelt Review. The group of owners have also asked the Planning Staff and the Real Estate Department about the lands south of the Proposed By-Pass that were to be included in the Urban Boundary Expansion in accordance to the City of Hamilton's request to the Greenbelt Authorities. We hope that we can continue working with the City of Hamilton to complete the construction of the Proposed By-Pass and the City of Hamilton will include the lands south of the Proposed By-Pass in the Urban Boundary Expansion. We would appreciate your support in the GRIDS2/MCR Evaluation Framework and Phasing Criteria in consideration of the potential 10 hectare expansion for the Waterdown Area.

#	Date:	Name:	Property	Comment:
4.	May 28 2021	A Paton (Bousfields)	309/311 Parkside Drive	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"). 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. 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.
5.	July 19 2021	M Crough (IBI)	Waterdown	We have been monitoring and participating in the GRIDS 2/MCR Process. We have been anticipating the Phase 3 stage to make submissions on potential areas for expansion and the phasing of same. We have a client in the Waterdown area with lands that would be a candidate expansion area. We are looking forward to the opportunity to make a submission regarding these lands, to highlight that it will meet the criteria for the Waterdown/Binbrook areas and accommodate forecasted growth. We realize that the engage website is the formal channel for regular updates from staff, but we are wondering if there are any current updates that can be shared with us regarding timing and process for making location-specific requests and/or submissions such as this. If that window is open now, we would gladly make our submission. Happy to discuss further if you require more detail.
6.	Aug 13 2021	M Crough (IBI)	347 Parkside Dr	This email is an introduction to our group and a brief discussion on a planning issue in Waterdown within the ongoing MCR/GRIDS 2 process. Our client, Mr. Jora Purewal, owns the lands at 347 Parkside Drive. We've been working with him to follow and participate in the MCR/GRIDS 2 process, and we were happy to see that staff proposed a separate screening and evaluation process for potential boundary

#	Date:	Name:	Property	Comment:
				expansions for Waterdown and Binbrook. We have a very good understanding of the planning policy context and believe this is the right approach. I had delegated to speak at last week's GIC meeting to indicate our support for this approach and to highlight our intention to make a future submission for these lands, using the screening and evaluation criteria to make a boundary expansion request within the MCR/GRIDS 2 process. However, after making it through the meeting until about 1 pm, I had to leave and was not able to make my presentation. It was on the agenda however, and I have attached it for your reference. I did get a chance to watch the staff presentation and the Committee questions, and I noted that you had some great questions and showed interest in understanding the proposed process for Waterdown, specifically the 10 ha size maximum in the Growth Plan, the potential uses within an expansion area, and whether an expansion area needs to support the agricultural community. So on that note, given I didn't present, we wanted to take steps to ensure you area aware of our group and our intentions to submit a boundary expansion request for these lands. We do not want you to be caught off guard by our submission. We intend to get something in for early September so that we can role forward with the remainder of the process. And to be clear, our proposed expansion request will be bound by the planning policy and criteria parameters (i.e. 10 ha, etc.) so we will not be proposing an expansion for the entirety of the lands. We have been preparing for this stage in the MCR/GRIDS 2 process for some time, and have a thoughtful approach that we believe meets the proposed screening and evaluation criteria, and will be good planning for the City and the Waterdown community.
7.	May 2021	Multiple submissions: E DiCecca P DiCecca D Pitblado J Cothran	63 Parkside Dr, Lot 12	***Re: Request for 63 Parkside Dr., Lot 12, Waterdown to be included in the 10 hectare urban boundary expansion.*** The purpose of this letter is to express my support for the 10 hectare expansion of the urban boundary in Waterdown. I am requesting that you consider 63 Parkside Dr., Lot 12,

#	Date:	Name:	Property	Comment:
		C DiCecca K Dryden P Restivo J DiCecca J DiCecca D Ligas R DiCecca V Forrington M DiCecca T Viola M Ligas R DiCecca P DiCecca M DiCecca C Rines		Waterdown for the 10 hectare urban boundary expansion, as this Greenbelt settlement area meets the criteria outlined in Appendix B in the Grids2/MCR evaluation framework. Justification for inclusion in the Waterdown urban boundary expansion: * Adjacent to the current urban boundary and residential housing/municipal water and waste * East-West Corridor/Waterdown Bypass planned to bisect the property. * Clappison Avenue extension from the Commercial Power Centre/iConnect Business Community is planned to further fragment the property. * Traffic will be flowing in all directions and make it impossible for agricultural related activity. * Contributes to the surrounding area's completeness as the property borders the Commercial Power Centre, iConnect Business Park and residential housing, making it suitable for residential, commercial or industrial use. * Population of Waterdown is projected to double in the next 5 - 10 years. * Expansion does not affect the Natural Heritage System or pose any significant risks to climate change.
8.	May 2021	Multiple Submissions: J DiCecca P DiCecca C DiCecca R DiCecca P Restivo V Forrington K Dryden	0 Parkside Dr, Lot 13	RE: Request for 0 Parkside Dr. Lot 13 Waterdown to be Included in the 10-hectare Urban Boundary Expansion The purpose of this letter is to express my support for the 10-hectare expansion of the urban boundary in Waterdown. I am requesting that you consider 0 Parkside Dr., Lot 13, Waterdown for the 10-hectare urban boundary expansion, as this Greenbelt settlement area meets the criteria outlined in Appendix B in the Grids2/MCR evaluation framework. Justification for inclusion in the Waterdown urban boundary expansion: • Adjacent to the current urban boundary and residential housing/municipal water and waste • East-West Corridor/Waterdown Bypass planned to bisect the property. • Community is planned to further fragment the property.

#	Date:	Name:	Property	Comment:
				• Traffic will be flowing in all directions and make it impossible for agricultural related activity. • Contributes to the surrounding area's completeness as the property borders the Commercial Power Centre, iConnect Business Park and residential housing, making it • suitable for residential, commercial or industrial use. • Population of Waterdown is projected to double in the next 5 - 10 years. • Expansion does not affect the Natural Heritage System or pose any significant risks to climate change.
9.	Apr 28 2021	C Pidgeon (GSP)	100 Sunnycroft	GSP Group Inc. is the planning consultant of The Estate of Alvin Wesley Thomas, the Owner of the lands municipally addressed as 100 Sunnycroft Court in the City of Hamilton as seen in the hatched area below in **Image 1** (hereinafter referred to as the "Site"). On behalf of the Owner, we are pleased to submit this formal request for the Urban Boundary to be expanded on the northern portion of the Site. ***Image1:****Location and Extent of Site(Source: City of Hamilton Base Mapping)* **Site Description** The Site has a frontage of +18.2 m along Sunnycroft Court with an area of approximately 14.72 ha. **Request for Urban Boundary Expansion** The entirety of the Site is within the plan area of the Niagara Escarpment Plan ("NEP"), 2017 which provides land use planning policies for the maintenance of the Niagara Escarpment and land in its vicinity. Most of the subject lands are designated "Escarpment Natural Area", as shown in **Image 2**, with the northern portion designated as "Urban Area". Approximately 16,300 sq m of the Site is designated "Urban Area". GSP Group | 2 **Image2:** Niagara Escarpment Plan (2017) -Map 2 The City of Hamilton's "Urban Boundary" as defined in the Urban and Rural Hamilton Official Plan is offset from the NEP's Urban Area designation as seen in **Figure 1** located on the following page. The area between the City's Urban Boundary and the NEP's limits of the "Urban Area" is approximately 5,680 sq m. We would like to formally request that the City of Hamilton's "Urban Boundary" be amended to follow the delineated line of the "Urban Area" designation in the Niagara Escarpment Plan

#	Date:	Name:	Property	Comment:
				as shown on **Figure 1.** This represents an additional area of 7,400 sq m to be located within the City's "Urban Boundary", as designated "Urban Area" in the NEP. GSP Group | 3 **Planning Analysis** The portion of land requested to be included within the City's Urban Boundary is currently designated "Open Space" on "Schedule D - Rural Land Use Designations" of the Rural Hamilton Official Plan ("RHOP"). This portion of the Site is also within the City's Natural Heritage System and identified as "Core Areas" on "Schedule B - Natural Heritage System" of the RHOP. Although located within the Core Area, Volume 1, Policy C.2.2.3 states that the Core Area includes key natural heritage features and their associated vegetation protection zones and that minor refinements to such boundaries may occur through an Environmental Impact Statement. An Environmental Impact Statement will be required for any development proposed on the Site to define, delineate, and evaluate the features and their vegetation protect zone as well as to ensure that there will be no negative impact on any natural features and/or their function. The requested expansion of the Urban Boundary will provide the flexibility to delineate an appropriate vegetation protection zone through the completion of an Environmental Impact Study which will be completed as part of any future development application process while also promoting the most efficient use of land within the urban area. We respectfully request that you consider this minor adjustment to the Urban Boundary designation as a part of the Municipal Comprehensive Review. We would appreciate receiving an acknowledgement of this submission to you.
10.	Sept 24 2021	N Borgdorff	151 Highway 5 W	I wanted to reach out with a potential development opportunity, that is somewhat unique in nature. There recently was some development that took place at 151 Hwy 5 W (formerly 119 Hwy 5 W) and I was curious to know if more development could happen there? Considering it's location and access to local businesses in Waterdown and Dundas, it would make for a good logistics location for warehousing. I do understand it is outside the urban area to the direct east, but that there has been discussion of expanding the urban area to envelop these properties.

Greenbelt – Binbrook

#	Date:	Name:	Property	Comment:
1.	June 14 2021	A. Eldebs	McNally lands (SE corner Fletcher Rd & Binbrook Rd)	We have a contract to purchase the lands in Binbrook known as the McNally lands, located at the southeast corner of Fletcher Rd/Binbrook Rd. The draft plan for these lands was approved at the OMB in 2016. I understand that through the City's MCR process, the City is looking to add a small amount of land into the urban boundary in order to achieve 2051 growth requirements, and that Waterdown and Binbrook are both candidate areas. A portion of our land (approximately 15 acres) is located outside of the City's Urban Boundary and the Binbrook Village Secondary Plan Area, as outlined in the image below, and we believe it would be a good candidate to be added to the urban boundary considering its immediate vicinity to future servicing, parks, schools, and other components of complete communities.
2.	May 28 2021	D. Pitblado	Binbrook – Reg Rd 56	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.
3.	Oct 20 2021	G Bluesz (Vrancor)	Reg. Rd 56	I have some questions re: GRIDS 2 /MCR - Screening Criteria and Evaluation Tool (Waterdown and Binbrook) Attached is the document regarding potential boundary expansions specific to Binbrook. It's understood that the City is evaluating potential expansion options using the following criteria is entitled "**GRIDS 2 /MCR – Screening Criteria and Evaluation Tool (Waterdown and Binbrook)**". What is the deadline for requests for urban expansion ?

#	Date:	Name:	Property	Comment:
				We own 2 parcels on the east side of Regional Road 56…just north of Binbrook. The proposal is to submit a request to the city for the 10ha area (shown below in purple) to be consider for urban boundary expansion as per the screening/evaluation tool. Darko's lands are at the north limit of this area. Some additional thoughts on the proposal: • sewer and water located along the frontage of these lands and therefore available for immediate connection. • area is outside existing NHS • some regulated watercourses that would need to be considered, can be dealt with through detailed studies. • Binbrook is also outside the Haldimald Tract (6 miles either side of the Grand River)…therefore should not represent any issues with Six Nations and HDI. • Parcel immediately south of Vrancor's site has exiting zoning for commercial uses (i.e. gas bar) and has recently been approved for sewer/water connection through an OPA (school to north also included). • Existing residential subdivision currently under construction south of this area (south of Cemetery Road and on east side of RR 56) • lands represent a logical extension of the village of Binbrook and rounding out of the existing urban area…**opportunity for a gateway mixed use development area**.

Other

#	Date:	Name:	Property	Comment:
1.	July 21 2021	J Ariens (IBI Group)	1570 Carlisle Rd, Carlisle	IBI Group is representing the property owners of 1570 Centre Road, Carlisle. Please find attached a letter respectfully requesting the inclusion of 1570 Centre Road, Carlisle into the Carlisle Hamlet through the ongoing MCR and GRIDS 2 process. The purpose of this letter is to provide an understanding of the subject lands, surrounding context and existing planning controls to support the inclusion of the subject lands and proposed extension of the Carlisle Hamlet Area. The proposed Hamlet Boundary Expansion is a logical expansion, represents rounding out of the Hamlet in line with an identifiable feature and provides an opportunity to provide diversity in housing options. Dear Ms. Travis: MUNICIPAL COMPREHENSIVE REVIEW - HAMLET EXPANSION - 1570 CENTRE ROAD, CARLISLE IBI Group is representing the property owners of the subject lands, municipally referred to as 1570 Centre Road, Carlisle. In 2006, the City of Hamilton City Council approved the first Growth Related Integrated Development Strategy ("GRIDS"), which was an integrated process that identified a broad land use structure, associated infrastructure, economic development strategy, and financial implications for growth options to serve Hamilton for 30 years. GRIDS planned for growth up to 2031. Now GRIDS needs to be updated to plan for the City's population and job growth to 2051, which is known as GRIDS 2. The City will also complete their Municipal Comprehensive Review ("MCR") concurrently with GRIDS 2. The MCR is the process by which the City brings its Official Plans into conformity with updated policies of the various Provincial plans which apply to Hamilton (PPS, Growth Plan for the Greater Golden Horseshoe, Niagara Escarpment Plan, Greenbelt Plan). The purpose of this letter is to provide an understanding of the subject lands, surrounding context and existing planning controls to support the inclusion of the subject lands and proposed extension of the Carlisle Hamlet Area under the City's GRIDS 2 and MCR process. 1.0 SITE LOCATION AND DESCRIPTION

#	Date:	Name:	Property	Comment:
				The subject lands are located along the eastern side of Centre Road, between Concession Road 10 East and Woodend Drive, as seen in Figure 1. The subject lands are legally described as Part of Lot 7, Concession 9 East, Parts 6 & 7 on Reference Plan 62R4761 subject to HL281035, easement in gross over Parts 1 -3 on Reference Plan 62R17253 as in WE343112 and easement in gross over Parts 1-2 in Reference Plan 62R20228 as in WE1100120 within the geographic township of Flamborough in the City of Hamilton. The subject lands are irregular in shape and have an approximate frontage of 59 metres along Centre Road, a depth of 431 metres with an approximate area of 52,748 square metres (5.2 hectares). The subject lands are currently used for residential purposes and have never been used for agriculture. The northern portion of the subject lands are occupied by a two-storey single detached dwelling accessed by a concrete driveway from Centre Road, as shown in Figure 2. *Figure 1: Aerial Mapping of Subject Lands from Geowarehouse* *Figure 2: Streetview of Subject Lands from Google Streetview* 2.0 SURROUNDING CONTEXT The subject lands are located in the northern portion of the City of Hamilton, adjacent to the Rural Settlement Area of Carlisle, as seen in Figure 3. In terms of a greater surrounding context, the subject lands are found at the northern boundary of the Carlisle Hamlet, illustrated in the Rural City of Hamilton Official Plan. The area south of the subject lands and into the Carlisle Hamlet consist of single detached dwellings. Carlisle Community Centre, Carlisle Memorial Park and commercial uses are centred around the intersection of Centre Road and Carlisle Road, situated approximately 1 kilometre south of the subject lands. As seen in Figures 3 & 4, the Hamlet of Carlisle seems to surrounded by the Natural Heritage System. To the north, the subject lands are bordered by single detached residential uses as well as the Natural Heritage System Corridor, as seen in Figure 4. Further north of the Natural Heritage System are institutional uses, including Our Lady of Mount Carmel Catholic Elementary School and Balaclava Elementary School. Bordering the subject lands to the east and west are single detached dwellings and agricultural uses as well as Natural Heritage System. *Figure 3: Surrounding Context around Subject Lands, from Google Earth* 3.0 PROPOSAL

#	Date:	Name:	Property	Comment:
				Our proposal is to request the inclusion of the entirety of the subject lands into the Carlisle Hamlet, through the ongoing MCR and GRIDS 2 process. The proposed expansion to the Hamlet Area will include the subject lands, which has an area of 5.2 hectares. 4.0 PLANNING POLICY FRAMEWORK The following subsections provide an assessment of the proposed Hamlet Boundary Expansion against current and applicable planning policy, including the Provincial Policy Statement 2020, Greenbelt Plan, Growth Plan for the Greater Golden Horseshoe 2019 and the City of Hamilton Rural Official Plan. 4.1 PROVINCIAL POLICY STATEMENT 2020 The Provincial Policy Statement 2020 ("PPS") provides policy direction on matters of provincial interest regarding land use planning and sets the foundation for land use planning and development regulations. The main considerations of this document pertain to protecting resources of provincial interest, the built and natural environment and public health and safety. The PPS focuses growth within Settlement Areas and away from significant or sensitive resources and areas which may pose a risk to public health and safety. Section 1 of the PPS focuses on building strong, healthy Communities. *Policy 1.1.1 Healthy, liveable and safe communities are sustained by:* *d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;* Subsection 1.1.3 provides development and growth direction for settlement areas. *Policy 1.1.3.8 A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review and only where it has been demonstrated that:* *a) sufficient opportunities to accommodate growth and to satisfy market demand are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon;* *b) the infrastructure and public service facilities which are planned or available are suitable for the development over the long term, are financially viable over their life cycle, and protect public health and safety and the natural environment;* *c) in prime agricultural areas:* *1. the lands do not comprise specialty crop areas;*

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				2. alternative locations have been evaluated, and *i. there are no reasonable alternatives which avoid prime agricultural areas; and* *ii. there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas;* *d) the new or expanding settlement area is in compliance with the minimum distance separation formulae; and* *e) impacts from new or expanding settlement areas on agricultural operations which are adjacent or close to the settlement area are mitigated to the extent feasible. In undertaking a comprehensive review, the level of detail of the assessment should correspond with the complexity and scale of the settlement boundary expansion or development proposal.* Subsection 1.1.4 provides policies relating to Rural Areas in Municipalities. Policy 1.1.4.2 *In rural areas, rural settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted.* Policy 1.1.4.3 *When directing development in rural settlement areas in accordance with policy 1.1.3, planning authorities shall give consideration to rural characteristics, the scale of development and the provision of appropriate service levels* Section 1.4 provides policies relating to Housing. Policy 1.4.3 *Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:* *b) permitting and facilitating:* *1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs* *requirements and needs arising from demographic changes and employment opportunities* Planning Summary: The Rural Hamilton Official Plan identifies that the subject lands are part of the Rural Area, further described in Section 4.4. Within Rural Lands, Rural Settlement Areas otherwise known as Hamlets are where growth and development should be focused. Prime Agricultural uses predominate outside of these areas. Our request to include the subject lands into the Carlisle Hamlet will require a Settlement Boundary Expansion. Policy 1.1.3.8 provides the policy permissions relating to Settlement Boundary Expansions through the Municipal Comprehensive Review process. The criteria listed have to be met to justify the expansion of the Hamlet. These criteria area discussed below in Section 5.0

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				As the subject lands are not considered 'Prime Agricultural', leaving the subject lands outside of the Hamlet Boundary would create a land use pattern that would prevent the efficient expansion of Settlement Areas in those areas which are adjacent or close to Settlement Areas. The proposal is a logical extension of the Hamlet in order to provide a range of housing options to meet the social, health, economic and well being requirements of current and future residents. The subject lands are residential in nature, therefore the proposal would add another type of housing option to the community in the form of 'Rural Estate Residential'. 4.2 GREENBELT PLAN 2017 The Greenbelt Plan was prepared and approved under the Greenbelt Act, 2005 and took effect on December 16, 2004. The Greenbelt Plan took effect on July 1, 2017 and is applicable to the subject lands. The Greenbelt Plan provides policies on the protection of agricultural lands, water resources and natural areas in Ontario's Greater Golden Horseshoe Region. As seen in Figure 4, the subject lands are designated as 'Protected Countryside'. Section 3.1.4 provides policies for lands falling within Rural Lands of the Protected Countryside. Policy 3.1.4.1 *Rural lands support and provide the primary locations for a range of recreational, tourism, institutional (including cemetery) and resource-based commercial/ industrial uses. They also contain many historic highway commercial, non-farm residential and other uses which, in more recent times, would be generally directed to settlement areas but which are recognized as existing uses by this Plan and allowed to continue and expand subject to the policies of section 4.5. Notwithstanding this policy, official plans may be more restrictive than this Plan with respect to the types of uses permitted on rural lands, subject to the policies of section 5.3.* Policy 3.1.4.3. *Settlement area expansions may be permitted into rural lands, subject to the policies of section 3.4.* Section 3.4 provides policies for Settlement Areas. Subsection 3.4.4. outlines policies for Hamlet Areas. Policy 3.4.4.1 *Hamlets are subject to the policies of the Growth Plan and continue to be governed by official plans and related programs or initiatives and are not subject to the policies of this Plan, save for the policies of sections 3.1.5, 3.2.3, 3.2.6, 3.3 and 3.4.2. Limited growth is permitted through infill and intensification of Hamlets subject to appropriate water and sewage services* *Figure 4: Excerpt of Map 97 from the Greenbelt Plan*

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				Planning Summary: The subject lands are an example of existing non-farm residential on Rural Lands. Policy 3.1.4.3 provides the policy permissions relating to Settlement Boundary Expansions on Rural Lands, subject to Section 3.4. This section provides that Hamlets are subject to the Growth Plan and are governed by the municipality's Official Plans. 4.3 GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE 2019 The Growth Plan for the Greater Golden Horseshoe (the "Growth Plan") 2019 was prepared and approved under the Places to Grow Act, 2005. The Growth Plan took effect on May 16, 2019 and is applicable to the subject lands. The Growth Plan provides policies to guide future growth. The Growth Plan provides policies to guide future growth and development, where the major goals are to provide a sufficient housing supply, improving transportation options, encourage a high quality of life and a strong economy, while ensuring a healthy natural environment. The Growth Plan guides development into the Greater Golden Horseshoe ("GGH") to a time horizon to the year 2051. Overall the Growth Plan has projected a 2051 population of 820,000 for the City of Hamilton. Section 2 of the Growth Plan provides direction on how and where development should occur. Subsection 2.2 provides policies for Where and How to Grow. Policy 2.2.1.4 Applying the policies of this Plan will support the achievement of complete communities that: *c) provide a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;* Subsection 2.2.6 provides policies for Housing. Policy 2.2.6.1 *Upper- and single-tier municipalities, in consultation with lower-tier municipalities, the Province, and other appropriate stakeholders, will:* *a) support housing choice through the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan by:* *i. identifying a diverse range and mix of housing options and densities, including additional residential units and affordable housing to meet projected needs of current and future residents; and* Subsection 2.2.8 provides policies relating to the expansion of Settlement Areas. *Policy 2.2.8.1 Settlement area boundaries will be delineated in official plans.* *Policy 2.2.8.2 A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that:*

#	Date:	Name:	Property	Comment:
				a) based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken in accordance with policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the designated greenfield area: *i. within the upper- or single-tier municipality, and* *ii. within the applicable lower-tier municipality;* *b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan, based on the analysis provided for in policy 2.2.8.2 a), while minimizing land consumption; and* *c) the timing of the proposed expansion and the phasing of development within the designated greenfield area will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan.* *Policy 2.2.8.3 Where the need for a settlement area boundary expansion has been justified in accordance with policy 2.2.8.2, the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the comprehensive application of all of the policies in this Plan, including the following:* *a) there is sufficient capacity in existing or planned infrastructure and public service facilities;* *b) the infrastructure and public service facilities needed would be financially viable over the full life cycle of these assets;* *c) the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and stormwater master plans or equivalent, as appropriate;* *d) the proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water;* *e) key hydrologic areas and the Natural Heritage System for the Growth Plan should be avoided where possible;* *f) 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:* IBI GROUP Ms. Heather Travis – July 21, 2021 8

#	Date:	Name:	Property	Comment:
				i. expansion into specialty crop areas is prohibited; *ii. reasonable alternatives that avoid prime agricultural areas are evaluated; and* *iii. where prime agricultural areas cannot be avoided, lower priority agricultural lands are used;* *g) the settlement area to be expanded is in compliance with the minimum distance separation formulae;* *h) any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment;* *i) the policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the PPS are applied;* *j) the proposed expansion would meet any applicable requirements of the Greenbelt, Oak Ridges Moraine Conservation, Niagara Escarpment, and Lake Simcoe Protection Plans and any applicable source protection plan; and* *k) within the Protected Countryside in the Greenbelt Area:* *i. the settlement area to be expanded is identified in the Greenbelt Plan as a Town/Village;* *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;* *iii. the proposed expansion would support the achievement of complete communities or the local agricultural economy;* *iv. the proposed uses cannot be reasonably accommodated within the existing settlement area boundary;* *v. the proposed expansion would be serviced by existing municipal water and wastewater systems without impacting future intensification opportunities in the existing settlement area; and* *vi. expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.* Subsection 2.2.9 provides policies for Rural Areas. Policy 2.2.9.3 *Subject to the policies in Section 4, development outside of settlement areas may be permitted on rural lands for:* *a) the management or use of resources;*

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				b) resource-based recreational uses; and *c) other rural land uses that are not appropriate in settlement areas provided they:* *i. are compatible with the rural landscape and surrounding local land uses;* *ii. will be sustained by rural service levels; and* *iii. will not adversely affect the protection of agricultural uses and other resource-based uses such as mineral aggregate operations* Planning Summary: The Rural Hamilton Official Plan identifies that the subject lands are part of the Rural Area, further described in Section 4.4. The Greenbelt Plan provides that Hamlet Areas are subject to the policies of the Growth Plan and are governed by Official Plans. Our request to include the subject lands into the Carlisle Hamlet will require a Settlement Boundary Expansion. Policy 2.2.8.3 provides the policy permissions relating to Settlement Boundary Expansions through the Municipal Comprehensive Review process. The criteria listed have to be met to justify the expansion of the Hamlet. The Growth Plan provides that to expand within the Protected Countryside in the Greenbelt, the Settlement Area has to be identified as a Town/Village. This is contradictory to the overarching Greenbelt Plan, which provides the same consideration to Hamlets as Towns/Villages. The proposal is a logical extension of the Hamlet in order to provide a range of housing options to meet the social, health, economic and well being requirements of current and future residents. The subject lands are residential in nature, therefore the proposal would add another type of housing option to the community in the form of 'Rural Estate Residential'. 4.4 RURAL HAMILTON OFFICIAL PLAN The Rural Hamilton Official Plan (the "RHOP") was approved in 2006 by the Ministry and was effective in March 2012. It applies to the lands in the rural area of the City of Hamilton. The Official Plan contains goals, objectives and policies that ensure that the City has a strong rural community, protects ecological systems and has a wise use of its infrastructure services. As identified throughout and seen in Figure 5 below, the subject lands are designated 'Rural' and are directly adjacent to the Rural Settlement Area of Carlisle. *Figure 5: Schedule D - Rural Land Use Designations from Rural Hamilton Official Plan* The Rural Settlement Area designation on Schedule D – Rural Land Use Designations comprises those areas outside the Urban Area which are intended to be residential and community service centres that serve Rural Hamilton. As seen in Figure 6¸the subject lands directly abut the Rural Settlement Area Boundary.

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				Volume 2 – Chapter A sets out the policies for the Carlisle Rural Settlement Area. The purpose of this Rural Settlement Area Plan is to provide a policy framework to guide and direct future development and redevelopment in the Carlisle Rural Settlement Area. Section 1.0 provides the general policies for Rural Settlement Area. Policy 1.2.5 *No future expansion to any Rural Settlement Area boundary shall be permitted.* *Figure 6: Map 4 - Carlisle Rural Settlement Area from the Rural Hamilton Official Plan* Planning Summary: While the policy above states that Rural Settlement Area Boundaries shall not be expanded, the MCR and GRIDS 2 review process provides an opportunity for the consideration of this policy and the expansion of Carlisle. The proposal will bring the subject lands more into conformity with the Provincial Plans, as it will provide another housing option to Rural Settlement Areas in the form of Rural Estate Residential. 5.0 PLANNING JUSTIFICATION The subject lands are located adjacent to the Carlisle Rural Settlement Area; therefore, it is a logical extension of the Hamlet. As seen in Figure 7, the Hamlet Boundaries follow the Natural Heritage System, except where the subject lands are located. As such, the proposal would facilitate the expansion of the Hamlet Boundary, further corresponding to where the boundaries line up in all other portions of Carlisle. It would represent a rounding out of the Hamlet, where the boundaries would follow a more distinct feature in the northern portion. *Figure 7: Schedule B - Natural Heritage System from Rural Hamilton Official Plan* The Residential Lands Needs Assessment conducted as part of the GRIDs 2 & MCR process provided that the City needs to plan for 81,250 new housing units through development in the existing Urban Areas for an average intensification rate of 60% between 2021 and 2051. There are very limited intensification opportunities within the Urban Areas to provide Rural Estate Residential lots. The Residential Lands Needs Assessment concluded than an extra 1,340 hectares of Urban Expansion would be required to plan for 28,660 new housing units. Typically a MCR focuses on Urban Areas lands as these areas are fully serviced and can more readily accommodate growth. However, the Provincial Plans advocate for a full range of housing, which includes Rural Estate Residential Lots, therefore it is our opinion that the subject lands would be a viable candidate area to be included within Carlisle to add to the diversity of housing choices available in Hamilton.

#	Date:	Name:	Property	Comment:
				Specifically, in reference to the subject lands suitability to be included within the Settlement Area Boundary, the subject lands are not identified as 'Prime Agricultural Lands'. Furthermore, the subject lands are not used for agricultural purposes, therefore no farmland is being removed from production. There are no livestock operations in the vicinity, and as such, the proposal to include the subject lands within the Hamlet boundaries has no adverse impact on farming. *Figure 8: Agricultural System for the Greater Golden Horseshoe from Agricultural System Portal Mapping* 6.0 CONCLUSION AND RECOMMENDATIONS As part of the Municipal Comprehensive Review, we respectfully request that the subject lands be included within the Carlisle Hamlet Boundary. The purpose of this letter is to justify the inclusion of the subject lands within the Hamlet under the City's MCR and GRIDS 2 process. The proposed Hamlet Boundary Expansion is a logical expansion, represents rounding out of the Hamlet in line with an identifiable feature and provides an opportunity to provide diversity in housing options. We respectfully request that the subject lands be included with other requests. We trust the information and plans contained herein are sufficient to provide staff with sufficient information. If you require any additional information, or have any questions, please do not hesitate to contact the undersigned.
2	April 19 2021	M. Johnston (Urban Solutions)	Barton St & Fifty Rd	Thank you and your Ministry staff for engaging with stakeholders with regards to the Greenbelt consultation and ERO No. 019-3136. In response to this engagement, please see attached, our submission pertaining to the lands at the northwest corner of Barton Street and Fifty Road in the City of Hamilton. Minister Clark, RE: Request for Removal of Lands from the Greenbelt Plan and Specialty Crop Area Northwest Corner of Barton Street and Fifty Road, City of Hamilton ERO No. 019-3136 <u>Introduction</u>

#	Date:	Name:	Property	Comment:
				UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) is the authorized planning consultant acting on behalf of Avatar International and 5000933 Ontario Inc. (Owners) for the lands located at the Northwest corner of Barton Street and Fifty Road, in the City of Hamilton. On February 17, 2021, the Ministry of Municipal Affairs and Housing (MMAH) initiated an invitation for public consultation on growing the size of the Greenbelt. The period established to participate in this public consultation was a timeframe stretching from February 17, 2021 to April 19, 2021. As noted in the Environmental Registry of Ontario (ERO) Notice posted by the MMAH, key provincial policies should be considered when providing input during the public consultation. One of the key provincial policies outlined is Growth Management, as any Greenbelt expansion options must have consideration for areas which are serviced settlement areas where a majority of growth would be directed in the Growth Plan for the Greater Golden Horseshoe. Furthermore, although Principle No. 1 of the ERO Notice states that this proposal will not consider the removal of lands from the Greenbelt, an opportunity to provide a net gain of Greenbelt land is presented through an opportunity to remove the subject lands with low-arability from the Greenbelt and place a greater area of highly arable non-Greenbelt lands within the Greenbelt. Should the Province determine that the current ERO consultation period is not the appropriate time to remove lands from the Greenbelt, then the Ministry is strongly encouraged to consider implementing a Minister's Zoning Order to both improve the current stock and size of Greenbelt designated lands. The MZO would remove the subject lands from the Greenbelt and add lands identified by the City of Hamilton in their recent Staff Report (PED21064) as strong candidates for inclusion in the Greenbelt Plan, contained in Appendix A. <u>Land Proposed for Removal and Planning Merit</u> The subject property is approximately 4 hectares (10.0 acres) in size and is located adjacent to the western edge of the City of Hamilton Urban Boundary. The subject lands are designated as 'Protected Countryside' on Schedule 1 of the Greenbelt Plan (2017) and 'Niagara Peninsula Tender Fruit and Grape Lands' on Schedule 2. The property in question is currently vacant and is completely encapsulated by Barton Street to the South, St. Gabriel's Elementary School to the West, the soon to

#	Date:	Name:	Property	Comment:
				be constructed extension of Sonoma Lane to the North, and Fifty Road to the East. Both Barton Street and Fifty Road are major arterial roads, with a connection to the QEW Highway just 500 metres to the North of the site. As such, the property is fully isolated from any other farmlands and is entirely framed by existing residential development and municipal infrastructure on all four sides. Any agricultural operation on site presents potential conflicts with abutting residential development as a result of potential odor, pesticide application, and traffic impacts. As such, farming activity has not occurred on the lands in over 20 years. The land is located in an area that has been identified by the City of Hamilton for future urbanization during the Growth Related Integrated Development Strategy (GRIDS 2) process of the City's Municipal Comprehensive Review. As the property fronts on Barton Street and Fifty Road, it is worth noting that the Stoney Creek Urban Boundary Expansion Transportation Master Plan Study Report prepared by Dillon Consulting identifies Barton Street as a strong candidate for future road expansion. Further, the Report identified the lands fronting Fifty Road, +/- 200 metres north of the site, as the most suitable location for a proposed Inter-regional Multi-modal Transit Terminal to accommodate future GO Rail Service in the area. The identification of the lands as an area for future urbanization and the proposed transportation improvements provide further justification that the site be removed from the Greenbelt Plan. During the April 6th, 2021 City of Hamilton Planning Committee Meeting, the City reviewed their Staff Report (PED21064) regarding recommendations to be provided to the Province for growing the Greenbelt as per ERO Posting No. 019-3136, contained in Appendix A. In their Report, the City discuss recommendations *for lands to be added to and removed from the Greenbelt Plan.* The emphasized land recommend for addition to the Greenbelt was Coldwater Creek in Dundas as Urban River Valleys have been prioritized in recent years for preservation and protection. Further, the lands noted for deletion from the Greenbelt Plan include the lower Stoney Creek lands of which the subject lands are contained. It is clear that the City of Hamilton is in support of the removal the subject property from the Greenbelt and have determined the area to be devoid of worthy agricultural benefit.

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				As the request to remove the subject lands from the Greenbelt has been made in the past, several studies have been carried out to determine the viability of the lands for farming use and to evaluate its inclusion in the Greenbelt. These studies include an Agricultural Conditions Study completed by DBH Soil Services Inc. in 2016, a Land Evaluation and Area Review (LEAR) Study prepared by AgPlan Limited in 2003, a Planning Opinion prepared by MHBC Planning and a Planning Opinion prepared by Dillon Consulting. The DBH Report concluded that the existing soil on site is predominately *Canada Land Inventory {CL/) Class 4,* which the Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) defines as having severe limitations that restrict the choice of crops and levels of crop productivity. Additionally, the DBH Report states that during their reconnaissance survey, it was determined that the land does not have artificial tile drainage, irrigation, or topsoil which affect soil capability to successfully grow crops. Further, the lands were found to be significantly lower in grade than the surrounding properties, presenting potential for crop loss due to ponding water. Worth noting, the size of the lot in question (4.0 ha) does not even reach half of the required minimum lot size (10.0 ha) for Agricultural Speciality Crop Zones established in the City of Stoney Creek Zoning By-law No. 3692-92. *Previous Submissions* As part of the Provincial Coordinated Land Use Planning Review Process and the Province's Agricultural Land Base Mapping review, our client participated in the Public Consultation that welcomed recommendations for the addition or removal of land from the Greenbelt Plan. A Letter was provided to your office dated September 17, 2018, seeking the removal of the above noted lands from the Greenbelt Plan. As noted in previous submissions, these lands were inadvertently added to the Greenbelt Plan by the City of Hamilton in error due to a fault in the PIN number associated with the subject lands. This was confirmed by the City, who recommended removal of the subject lands from the Greenbelt Plan in their staff report (PED15078(c) dated January 31, 2017. This staff report led to Hamilton City Council passing Item 2 of Planning Committee Report 17-002 on February 17, 2017, in order to approve the removal of the subject lands from the Greenbelt Plan. Hamilton City Council had also previously requested the Province to

#	Date:	Name:	Property	Comment:
				remove the lands from the Greenbelt Plan on December 9, 2015 and again on September 14, 2016. The previous submissions made on this matter along with the corresponding supporting materials are contained within the enclosed Chronology and Document Binder that was previously compiled by MHBC Consulting. This Document Binder provides a history of the correspondence our client has had with both the City of Hamilton and the Province in efforts to coordinate the removal of the subject lands from the Greenbelt. However, despite receiving support from the City of Hamilton for the removal of the lands from the Greenbelt and ample justification through previous submission, the Ministry has not considered the removal of the lands from the Greenbelt. Should our client's request be denied by the Ministry once more, the removal of the lands would not be permitted to be contemplated until the next Provincial Coordinated Land Use Planning Review in 2027. This would result in the subject lands being left in limbo, unable to develop, nor able to be farmed as part of the Greenbelt. For the Ministry to ensure the Greenbelt maximizes its effectiveness and achieves the objectives of the Plan, we recommend the proposed land exchange to add meaningful land to the Greenbelt Plan and remove the subject land to support the·objectives of the Places to Grow Plan through appropriately located development. *Conclusion* Giving consideration to the information outlined above, it can be concluded that the removal of the lands located at the North-East corner of Barton Street and Fifty Road in Hamilton is thoroughly justifiable. As determined through the previous analyses of the property by both planning and soil consultants, the property's minimal size, grading, soil quality, and agricultural history indicate that the land does not, and will not, have the capability to aid in achieving the goals and objectives of lands placed within the Greenbelt Plan. Furthermore, the surrounding context of the site is intrinsically urban in nature. The potential multi-modal transit hub located just north of the lands, the development of a residential subdivision on the abutting land to the north and west, along with the resolution passed by the City of Hamilton recognizing the lands as a strategic growth area for future development also warrants removal from

#	Date:	Name:	Property	Comment:
				the Greenbelt Plan. The site's position is currently contiguous with the City of Hamilton urban boundary and separated from the Greenbelt designated lands by the Fifty Road arterial road. This positioning further cements the subject property as being worthy for consideration for removal from the Greenbelt and subsequent inclusion in the City of Hamilton's urban boundary. A Concept Plan is contained in *Appendix B,* showing how the subject property could be built out and seamlessly integrated into the surrounding built form, should the lands be removed from the Greenbelt. The plan illustrates a design which accommodates 193 townhouse units which would aid the City of Hamilton in achieving the population target of 820,000 people set out in Schedule 3 of the Growth Plan for the Greater Golden Horseshoe. This concept can be easily implemented as the property already has full municipal infrastructure including; servicing, St. Gabriel Elementary School and Daycare, Grocery stores, QEW access, a nearby GO Transit Station and the potential location of a Multi-modal transit hub as discussed earlier. As such, the 10.0-acre subject lands are a justified candidate for removal from the Greenbelt Plan in exchange for the land identified which is better suited for meeting the objectives of the Plan. We look forward to working with you and your staff to discuss the outlined request in greater detail and coordinate the implementation of said request. Should you have any questions or require anything further, please do not hesitate to contact the undersigned. Please advise.