
Stovel and Associates Inc.
Planners, Agrologists and Environmental Consultants

November 08, 2021

Hamilton City Hall
71 Main Street West
Hamilton, Ontario
L8P 4Y5

Attention: **Heather Travis**, Senior Project Manager, Policy Planning

RE: City of Hamilton Official Plan Update

Dear Ms. Travis:

Further to our correspondence to you dated February 12, 2021, May 14, 2021, May 31, 2021 and August 17, 2021, my client has had an opportunity to review the revised Final Land Needs Assessment and Addendum and Peer Review Results (Report PED17010(n) (City Wide).

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:

- 8474 English Church Road,
- 2907 Highway 6,
- 3065 Upper James Street,
- 3005 Upper James Street.

Please note that these parcels are immediately east of the John C. Munro International Airport ("Airport"); these lands are included within the Airport Influence Area.

In total, the lands in question comprise approximately 139 acres.

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.

We have reviewed with interest the peer review comments, in particular, the comments from the Ministry of Municipal Affairs and Housing ("MMAH") dated September 17, 2021. Our read of the MMAH letter is that the Ministry staff is concerned that No Urban Boundary Expansion scenario is likely to bring about a shortage in land available to accommodate forecasted growth and the LNA Methodology also prohibits planning for population or employment in a manner that would produce growth that is lower than Schedule 3 of A Place to Grow.

We cannot help but wonder why City Staff are being so conservative with the growth scenarios. There is no benefit to the community to be conservative on the growth scenarios as it will affect housing and employment opportunities in the future. We suggest that a less conservative approach would be in keeping with Provincial direction, and would benefit the public interest.

The issue related to Employment and Employment Lands is also a matter of ongoing concern. It is clear that the City's Employment Lands are in transition; some lands need to be converted to residential uses

and some lands should replace these converted lands. The clear pull to the Airport is undeniable. Businesses want to set up in proximity to the Airport.

Other existing Employment Lands in the City are not viewed as favourably as the lands in proximity to the Airport. It is our view that the market desires land next to the Airport, but the current direction being taken by City Staff seeks to place a barrier to future growth in this area. The problem with this approach is that if provisions for future growth are not made, the City of Hamilton could miss out on Employment opportunities when large businesses seek lands to establish warehousing or related uses.

It is our view that the market desires land next to the Airport. Through a rebalancing process, the City could achieve Win-Win-Win scenario: urban boundary expansion would be limited, residential land need requirements would be met and employment lands would be redistributed. For instance, our lands which are next to the Airport could be exchanged for currently designated Employment Lands along the Rymal Road and Twenty Road area (which could be used for Residential purposes).

As previously documented in our correspondence, the primary reasons for inclusion of the subject properties are as follows:


- **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 CLI 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.
- **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.
- **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.
- **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 (water and sewer is available), already on an arterial road and has excellent location in proximity to the Airport. 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.
- **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. If the City does not want to expand the urban boundary, the City should substitute the

subject properties with existing Employment Lands that are currently that are currently in the Employment Lands (within the City's Urban Boundary) but outside the Airport Influence Area. The existing Employment Lands could be used for medium to high density residential uses.

- **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 to be designated as 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.

Yours truly,



Robert P. Stovel, M.Sc., M.C.I.P., R.P.P., P.Ag.

cc. Clerks Department, City of Hamilton
Steve Schiedel, Greenhorizons Holdings Inc., Willow Valley Holdings Inc.,
Jeff Wilker, Thomson, Rogers Lawyers