

**Stakeholder Questions/Comment Summary (January – March 2022)** – Proposed Amendments to UHOP & RHOP (Post Planning Committee)

**Emails to GRIDS2/MCR**

#	Date:	Name:	Comment:	Staff Response / Action Required:
1.	March 8, 2022	West End Home Builders' Association	<p>As a key stakeholder in the GRIDS 2 / MCR process, the West End Home Builders' Association (WE HBA) would like to thank City of Hamilton staff for engaging with our Association. As the voice for the residential land development, new housing and professional renovation industries in Hamilton, WE HBA members are a key partner to the City of Hamilton in the construction of new and complete communities. Our approximately 300 member companies span all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. Our members will be building the future of our City, much as they have been doing for the past 80 years. During the global pandemic, the residential construction industry was a stabilizing force for the Hamilton economy, employing over 20,180 people, paying \$1.3 billion in wages, and contributing over \$2.3 billion in investment value within the Hamilton Census Metropolitan Area in 2020.</p> <p>It is within this context that our association is providing our comments on the City's proposed Official Plan Amendment and zoning changes to implement Council's vision for Hamilton's growth until the year 2051. While WE HBA continues to maintain that an Urban Boundary Expansion is necessary to accommodate future growth, Council's direction to develop a framework for growth based on an 81% intensification rate presents a significant opportunity to rethink Hamilton's current planning framework. This should be done in a significant way through increased as of right official plan and zoning permissions to facilitate greater intensification City-wide. Our submission is broken into two sections. The first focuses on our comments on the official plan amendment, and the second focuses on the proposed changes to the low-density residential zones.</p>	<p>Staff provide the following responses to the comments raised in relation to specific policies:</p> <p><i>Policy A.2.3.4.1: Downtown Urban Growth Centre target - staff do not find a rationale for removing criteria related to building transition, stepbacks or shadowing from the Downtown Secondary Plan. Staff note the density target is based on the Downtown accommodating approximately 30% of planned intensification growth, which is within the limits of the Downtown development build-out. Any updates related to urban design polices will occur through a future phase of the OP Review.</i></p> <p><i>Policy B.2.4.1.4 l) b) – comment regarding support for this policy change related</i></p>

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			<p>Official Plan Policies</p> <p><i>Downtown Urban Growth Centre Density Target A.2.3.4.1 Hamilton’s Downtown Urban Growth Centre has been planned to achieve a minimum gross density of 500 people and jobs per hectare by 2051. Overall density in excess of this target may be achievable and desirable.</i></p> <p>Planning to maintain existing neighbourhood character is essentially planning to maintain the status quo. This new Official Plan framework is not a status quo document and requires a complete paradigm shift in how Hamilton plans for the future. This is consistent with our association’s longstanding support for the evolution of neighbourhood character to allow for flexibility and creativity in neighbourhood design and growth over time. Building upon existing neighbourhoods is a key component to the success of the City’s intensification goals.</p> <p><i>B.3.7.3 The City shall develop and update a sustainable building checklist to promote energy efficient development and redevelopment proposals, and implement the Guidelines through the development approvals process.</i></p> <p>The WE HBA appreciates the City’s intent to develop and update Sustainable Building and Development Guidelines. However, we have noted a discrepancy between the two columns on page 41 of Appendix I. In the left column, the policy reads “<i>The City shall develop and update Sustainable Building and Development Guidelines to promote energy efficient development and redevelopment proposals, and implement the Guidelines through the development approvals process</i>” whereas the right column is noted above as the heading to this section. WE HBA’s feedback to the City on the development of Sustainable Development Guidelines dated on May 25, 2021 iterated that the City should not use a checklist approach to these guidelines. In that vein, WE HBA would recommend that the policy that references guidelines (and not a checklist approach) be implemented.</p> <p><i>C.4.2.5.1 b) supporting transit through an array of incentives and disincentives to automobile dependence and single-occupancy vehicles</i></p>	<p>to intensification criteria is noted.</p> <p><i>Policy B.3.7.3:</i> staff have corrected the error in the draft OPA which referred to a sustainable building ‘checklist’ and changed the reference to Sustainable Building and Development Guidelines which will include a development review checklist.</p> <p><i>Policy C.4.2.5.1 b):</i> Parking requirements have already been eliminated or reduced within the Downtown and along the LRT Corridor / CMU zones. Existing parking requirements will remain for the Neighbourhoods designation until the City has completed the Low Density Residential Zoning project.</p> <p><i>Policy E.1.0 h):</i> comment noted regarding support for revision to this policy goal to remove reference to stable neighbourhoods.</p>

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			<p><i>such as reduced parking standards for some land uses where appropriate and making provisions to support shared mobility such as car-sharing spaces through the site plan process where feasible and appropriate;</i></p> <p>WE HBA appreciates the desire to create disincentives to automobile dependence and the use of single occupancy vehicles. We would suggest the City consider fully eliminating minimum parking standards for residential land uses to facilitate a shift away from automobile dependence. This can have positive impacts on housing affordability, reduced car dependency, encouraging more people to choose active transportation options, enabling more adaptive re-use of heritage structures, facilitating greater levels of intensification, and encouraging more “missing middle” homes city-wide. The City of Hamilton could continue to mandate certain minimum standards for parking (for example accessible parking spots). However, the WE HBA strongly recommends a bold and forward-looking public policy framework with respect to minimum parking standards that eliminates them entirely in the lower city on the LRT corridor (except for accessible spaces) and along the entire BLAST network. The balance of the City of Hamilton should have significantly reduced minimum parking standards that are regularly reviewed.</p> <p><i>E.1.0 h) Recognize that Hamilton’s neighbourhoods will evolve over time to accommodate projected household growth, changing demographics, and respond to the changing needs of complete communities.</i></p> <p>The West End Home Builders Association is appreciative of the City’s removal of the concept of stable neighbourhoods in the above policy. Existing low-density residential zones are anything but stable, in fact recently released census data suggests that some low-density residential neighbourhoods have experienced declining populations over the past half decade. The City of Hamilton should be targeting existing neighbourhoods for incremental growth and change in the coming decades.</p> <p><i>E.3.4.3 Uses permitted in low density residential areas: a) shall include single-detached, semi-detached, duplex, triplex, fourplex, and street</i></p>	<p><i>Policy E.3.4.3:</i> Staff note the support for the proposed UHOP amendments that will facilitate a permissive framework for missing middle housing. Proposed zoning changes are an interim step and future Low Density Residential Zones will examine further support for new construction of different housing types.</p> <p><i>Policy E.3.5.8</i> Concerns that proposals may exceed current maximum density are alleviated through the amendments to those policies prescribing density requirements for the residential categories (eg. Policy E.3.5.7).</p> <p><i>Policies E.3.5.8 and E.4.6.8:</i> Regarding angular plane comment, staff note that any updates related to urban design polices will occur through a future phase of the OP Review.</p>

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			<p><i>townhouse dwellings; and, b) may include multiple dwellings containing a maximum of 6 units for lots in proximity to collector roads or arterial roads. WE HBA is encouraged to see this broad range of missing middle housing typologies being introduced to low density residential areas. The WE HBA strongly recommends that the City of Hamilton also amend its zoning by-laws to ensure that both the Official Plan and Zoning By-Law are in sync and establish a permissive framework allowing for a broad range of missing middle housing through conversions and new construction. Furthermore, WE HBA recommends that lot splitting be allowed and encouraged to facilitate gentle intensification in existing low density residential areas.</i></p> <p><i>E.3.5.8 For medium density residential uses, the maximum height shall be six storeys, but the height may be increased to 11 storeys without an amendment to this Plan, provided the applicant demonstrates: a) there are no adverse shadow impacts created on existing residential uses within adjacent lands designated Neighbourhoods; b) buildings are progressively stepped back from adjacent areas designated Neighbourhoods. The Zoning by-law may include an angular plane requirement to set out an appropriate transition and stepping back of heights; and, c) buildings are stepped back from the street to minimize the height appearance from the street, where necessary.</i></p> <p>WE HBA appreciates that the height for medium density residential may be increased to 11-storeys without an Official Plan Amendment, however our members have raised concerns that without a corresponding density increase, an 11-storey building would likely still be required to go through an Official Plan Amendment.</p> <p>Furthermore, our association has concerns about policy subsection b) that states “<i>buildings are progressively stepped back</i>” and that the zoning by-law may include an angular plane requirement. WE HBA recommends that angular planes not be specified in the Official Plan or zoning by-laws, as emerging practical research from the City of Toronto’s angular plane requirements suggest that their implementation of angular planes as a</p>	<p><i>Policy E.3.5.8:</i> Staff proposed to allow 12 storeys in the medium density category to allow wood construction of up to 12 storeys (updates to the Building Code).</p> <p><i>Policy E.3.6.7:</i> Staff find that the inclusion of a maximum height limit of 30 stories, consistent with the limit established through the Downtown Secondary Plan, is appropriate and will be maintained.</p> <p><i>Policy E.3.6.8:</i> Any updates related to urban design polices will occur through a future phase of the OP Review.</p> <p><i>Policy F.3.5.2:</i> comment and support noted.</p> <p><i>Comments on Zoning Changes:</i> Proposed zoning changes are an interim step and future Low Density Residential Zones will examine further support for</p>

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			<p>policy tool to protect existing residential neighbourhoods has had some significant drawbacks that are now becoming evident. This emerging research suggests that angular planes present barriers to achieving housing supply, a diversity of housing, general affordability objectives, as well as climate change mitigation due to a lack of energy efficiency in the required setbacks (thermal bridging). As we strive toward the implementation of climate friendly built forms, the use of angular planes can significantly reduce the number of units built as well as the overall energy efficiency of a proposed building. While the introduction of angular planes could be used as site specific measure to improve community acceptance of higher-rise built forms, they should not be relied upon as a long-range policy tool to guide development, both in the Official Plan and zoning by-laws. That said, should the City of Hamilton choose to proceed with an angular plane requirement in the official plan, WE HBA has the following text suggestion: “<i>b) buildings are <b>appropriately</b> progressively stepped back from adjacent areas designated Neighbourhoods</i>”. This is to accommodate flexibility in how the policy is applied on a site-by-site basis. Lastly, while WE HBA is appreciative of the consideration for up to 11-storeys, we respectfully submit that 12-storeys may be more appropriate due to ongoing discussions between the provincial and federal government to harmonize the Ontario Building Code with the National Building Code. In the coming years, harmonization will likely result in the adoption of 12-storey tall wood buildings within the building code. These climate friendly structures are a form of carbon sequestration and offer the opportunity for faster, modular building typologies and different architectural expressions and innovation within the residential construction sector. The WE HBA recommends that the City of Hamilton’s Official Plan reflect ambitious and very positive changes coming to the Building Code.</p> <p><i>E.3.6.7 For high density residential uses, the maximum height shall be 30-storeys. For high density residential uses below the Niagara Escarpment, building height shall not exceed the height of the top of the Niagara Escarpment. Applicants shall demonstrate that the proposed development</i></p>	<p>new construction of different housing types.</p> <p><i>Population contingency:</i> The City is planning for the Growth Plan forecast of 820,000 persons by 2051.</p>

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			<p><i>shall not exceed the height of the Niagara Escarpment, to the satisfaction of the City.</i></p> <p>This policy runs contrary to the City’s stated intensification objectives and the goals of accommodating 500 persons and jobs per hectare in Hamilton’s downtown. Further to this, there are existing and proposed developments seeking planning approval for heights greater than the escarpment limit throughout the City. This would indicate that even prior to Council’s direction to accommodate all growth within the urban boundary, a height limit of 30-storeys is overly prescriptive and presents limitations in terms of intensification potential within Hamilton. WE HBA would strongly suggest that the City of Hamilton remove the introduction of policy E.3.6.7. As part of our suggestion to remove this policy, WE HBA notes that the Niagara Escarpment Plan already provides for the protection of the escarpment’s visual resources through the requirement a Visual Impact Assessment for new development. This provides the City and the Niagara Escarpment Commission with the ability to assess the visual impact of developments along the escarpment and determine contextual appropriateness without prescribing specific building heights. This policy had not previously existed in Chapter E of Hamilton’s Official Plan. Given the new context in which the City of Hamilton wishes to transition from an intensification rate of approximately 40% achieved since the implementation of the Growth Plan to approximately 80%, it is respectfully inappropriate to be implementing a 30-storey height limit across the entirety of lower Hamilton where one had not existed previously. Furthermore, WE HBA notes that the Niagara Escarpment is a 725-kilometer-long feature and only a very short segment abuts the ninth largest City in Canada with a small, but dense downtown core that is poised to grow significantly in the coming decades. The provincial government has just opened the West Harbour GO Station with plans to increase service and implement full scale electrification. The province and federal government are investing \$3.4 billion in an LRT with the expectation that significant densification including tall buildings will occur</p>	

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			<p>on the line. A height limit of 30-stories in 2022 in a dense downtown of a city projected to grow by a quarter million people over the next 30-years is inappropriate.</p> <p><i>E.3.6.8 Development within the high density residential category shall be evaluated on the basis of the following criteria: b) Multiple dwellings 12storeys or greater shall not generally be permitted immediately adjacent to low profile residential uses. A separation distance shall generally be required and may be in the form of a suitable intervening land use, such as a medium density residential use. Where such separations cannot be achieved, transitional features such as effective screening, progressive building step backs, and/or other design features shall be incorporated into the design of the high density development to mitigate adverse impact on adjacent low profile residential uses.</i></p> <p>WE HBA would suggest the following amendments to policy E.3.6.8:  <i>Development within the high density residential category shall be evaluated on the basis of the following criteria: b) Multiple dwellings 12 storeys or greater shall not generally be permitted immediately adjacent to low profile residential uses. A separation distance shall generally be required and may be in the form of a suitable intervening land use, such as a medium density residential use. Where such separations cannot be achieved, transitional features such as effective screening, progressive appropriate building step backs, and/or other design features shall be incorporated into the design of the high density development to mitigate adverse impact on adjacent low profile residential uses.</i> The reason for deleting the section focused on requiring a suitable intervening land use is to not require multiple land use designations on a tall building site.</p> <p><i>E.4.6.8 Additional height up to a total of eleven storeys may be permitted without an amendment to this Plan, provided the applicant demonstrates: a) there are no adverse shadow impacts created on existing residential uses within adjacent lands designated Neighbourhoods; b) buildings are progressively stepped back from adjacent areas designated Neighbourhoods. The Zoning by-law may include an angular plane</i></p>	

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			<p><i>requirement to set out an appropriate transition and stepping back of heights; and, c) buildings are stepped back from the street to minimize the height appearance from the street, where necessary.</i></p> <p>Similar to our comments on policy E.3.5.8, WE HBA would recommend that the City consider the use of the term “appropriately” stepped back as opposed to progressively and that the eleven-storey limit be amended to twelve-storeys</p> <p><i>F.3.5.2 The City shall monitor the cost of housing and land development and provide annual reports on housing and land development costs, including social housing development costs.</i></p> <p>The WE HBA is strongly supportive of the City of Hamilton’s monitoring of plan implementation including the cost of housing and land development. Our association would be pleased to partner with the City of Hamilton to inform the ongoing monitoring program.</p> <p>Proposed Changes to the City’s Zoning By-laws</p> <p>The West End Home Builders’ Association is pleased to see the City’s ambitious approach to low-density residential zoning reform that permits as of right new-build street townhouses in all low-density residential zones. We are also pleased to see that duplexes, triplexes and quads will be permitted through conversion and additions; however, we are disappointed that new-build duplexes, triplexes and quads will not be permitted through the construction of new buildings. WE HBA recommends that the City of Hamilton not take a tentative approach with interim steps, but rather take a bolder approach and allow for new construction in addition to conversions and renovations as soon as possible.</p> <p>Data from the Bay Area Climate Change Council suggests that to meet the City of Hamilton’s climate objectives approximately 98% of residential buildings built before 2017 will need to be retrofitted to be more energy efficient. With a significant portion of Hamilton’s existing residential building stock reaching the end of its lifespan and/or requiring deep retrofits, limiting the construction of more units to the adaptive re-use of existing structures is a missed opportunity to further the goals of both residential</p>	



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			<p>intensification and building climate friendly homes. Additional Recommendations – Population Contingency WE HBA notes that recent research by the Smart Prosperity Institute (“Forecast for Failure” released in February 2022) notes that the population forecasts underpinning Ontario’s Growth Plan for the Greater Golden Horseshoe substantially underestimated population growth since 2016 from international sources, specifically immigration and international students particularly in the GTA region. The report further notes that in just the last five years, Ontario’s population of adults grew by several hundred thousand more than forecasted, each of whom needs a place to call home. The growing imbalance between housing demand and supply has contributed to higher housing prices and a migration of young families out of the GTA to other parts of the province. WE HBA further notes that the Schedule #3 population forecasts in the Growth Plan are <i>minimum</i> targets. These targets can become stale quickly if populations grow faster than anticipated. WE HBA strongly recommends that the City of Hamilton plan for a contingency buffer over and above the minimum Schedule #3 population targets to avoid problematic social, economic and environmental costs of failing to build enough housing to support population growth to ensure there is a place for every Hamiltonian to call home.</p> <p>Conclusion: The West End Home Builders’ Association appreciates the time City Staff have taken to review our comments on the proposed Official Plan Amendments and Zoning By-Law changes. WE HBA would like to request a meeting between our association’s Official Plan Working Group and the City of Hamilton’s Policy and Zoning Reform team members working on the implementation of this important initiative.</p>	
2.	March 9, 2022	Environment Hamilton	Please accept this submission as Environment Hamilton’s input regarding the draft official plan amendments proposed as part of the City of Hamilton GRIDS2/MCR process. Overall, we strongly support the new direction the city has embraced for accommodating urban growth to 2051; we believe	Staff provide the following responses to the comments by Topic Area, as per the submission:

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			<p>this direction is the right way to go in order to begin to build a climate resilient, inclusive Hamilton. We do recognize, however, that there are additional, critically important policy pieces that are yet to be finalized or initiated – and we want to acknowledge that these policy pieces are also essential in this process. These plans include: the Urban Forest Strategy (and the need for associated by-laws to ensure the plan’s success), the Community Energy &amp; Emissions Plan (CEEP) which will provide the urgently needed blueprint for getting to zero emissions by 2050, a Green Development Standards policy that incentivizes actions beyond what the municipality can mandate, a stormwater fee with incentives for green infrastructure/ LID, and an inclusionary zoning policy designed to usher in more affordable housing as an integral part of urban intensification efforts. These are only a few of the additional pieces that we believe must be developed and implemented to ensure that the planning pathway forward is a viable one. We have organized our feedback below around each topic area set out by city planners.</p> <p><u>Topic Area 1 – Growth Management</u> - We support the commitment to a minimum of 80% intensification in the built-up urban area, and we support the method by which the city is proposing to achieve this level of intensification. We support an approach that sees development within the built-up urban area that is a mix of low, middle and high density within appropriate urban contexts (low in low density urban neighbourhoods, middle on neighbourhood edges and along corridors, and high in nodes, some corridor locations, and in the Downtown Hamilton Growth Centre). -We support the aim to achieve a density target of 500 p+j/ha for the Downtown Hamilton Growth Centre -We urge the city to set a higher density target for the number of people + jobs per hectare (p+j/ha) that will be accommodated in 'designated greenfield areas'. As made clear in the proposed changes to sA.2.3.3.3 – the city had previously planned to achieve a target of 70 p+j/ha in designated greenfields – back when employment lands had to be included when calculating average densities.</p>	<p><i>Growth Management</i></p> <ul style="list-style-type: none"> <li>• Support for higher intensification target and UGC density target noted.</li> <li>• Greenfield density target of 60 p+j/ha is an average across the entire Designated Greenfield Area, including lands that are already built or have existing approvals at lower density. To provide clarity, staff propose an updated policy that identifies that greenfield lands that are undeveloped and not subject to existing approvals will be planned to achieve a density target of 70 p+j/ha.</li> <li>• Support for 'no urban boundary expansion' policies noted.</li> <li>• Reference to Climate Action Plan to remain. CEEP is not approved. Policies will be updated upon approval of that Plan.</li> <li>• Reference to the Urban Forest Strategy may be added to section A.1.6 through a future</li> </ul>

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			<p>But now that this is not required in the calculation, that number has been reduced to 60 p+j/ha. But clearly the higher target was a viable one so why was it abandoned? Further, we urge the city to make the target a minimum of 80 p+j/ha in order to accommodate frequent transit service (bus every 10 to 15 minutes) as per the Ministry of Transportation’s transit supportive densities guidelines. This is critical to avoid building more car-dependent suburban areas in a climate emergency, especially given the reality that transportation emissions continue to increase in Hamilton. -Generally speaking, EH supports the policy changes proposed to ensure that no urban boundary expansion can occur. - We remain concerned about the references to the Community Climate Action Plan – including the staff explanation justifying changes to UHOP s. A.1.3. This plan should not be put forth as the city’s ‘key climate change plan/ policy’ because that is not what it is at this point in time – 7+ years after it was finalized. The reference here should be to the forthcoming Community Energy &amp; Emissions Plan (CEEP) which we hope will provide the serious pathway forward for reaching zero emissions by 2050. The same concern exists for UHOP sA.1.6 – ‘Other initiatives’ again here – reference should be made to the soon-to-be-completed CEEP that will provide the serious targets &amp; actions we need but currently do not have detailed in a finalized plan, to address the climate crisis. It is probably also worth referencing the soon-to-be-completed Urban Forestry Strategy here too.</p> <p>- The modified UHOP policy B.2.2.2 is a new policy and, given b) to e), it appears to be designed for more than just minor adjustments to the urban boundary. What is the intended purpose of this policy change? Why did the city’s Planning Department determine that a policy of this nature should be included in the proposed UHOP amendments? How is ‘reserve infrastructure’ defined and what does it include? The policy reads as follows: <i>Notwithstanding Policy B.2.2.1, adjustments to the urban boundary may be permitted through a municipal comprehensive review provided:</i></p> <p><i>a) there is no net increase in land within the urban area;</i></p>	<p>amendment upon approval of the strategy.</p> <ul style="list-style-type: none"> <li>• Policy B.2.2.2 regarding urban boundary adjustments is the implementation of Growth Plan policy 2.2.8.4. It would allow for a minor technical adjustment of the urban boundary provided no new net land area is added to the urban area.</li> <li>• Table A.2 will be updated to refer to households.</li> </ul> <p><i>Employment:</i></p> <ul style="list-style-type: none"> <li>• Employment density targets by designation are specified in the proposed policy updates. 29 jobs per hectare is an average across all designations and assumes significant intensification of the City’s employment lands.</li> <li>• Support for mixed use developments and employment land conversions is noted.</li> </ul>

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			<p><i>b) the adjustment would support the City’s ability to meet intensification and redevelopment targets provided in Section A.2.3 – Growth Management – Provincial;</i></p> <p><i>c) prime agricultural areas are avoided where possible. Alternative locations will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating impacts on the Agricultural System;</i></p> <p><i>d) the lands are not located within the Greenbelt Area and, e) there is sufficient reserve infrastructure capacity to service the lands. - *NB - in sA.2.3.2 in Appendix C – the table with ‘Household’ numbers has that column incorrectly labelled as ‘Population’ numbers.</i></p> <p><u>Topic Area 2 – Employment</u> - We are concerned that the city’s proposed employment density targets to 2051 are too low. The proposed average of 29 jobs/ha set out in new policy A.2.3.3.5 seems to be lower than employment density targets being pursued in other Ontario municipalities. For instance, the Region of Waterloo has proposed 35 jobs per gross hectare and 43 jobs per net hectare – higher than what Hamilton is proposing. Just like residential sprawl, employment sprawl must also be tackled – for many of the same reasons. Hamilton needs to set more ambitious targets for higher densities in employment in order to make more efficient use of employment. - We support efforts to plan infill development to support, wherever possible, more live/work/play (mixed use) developments that enable people to live close to where they work. This must also include ensuring that areas designated for employment uses are also serviced by reliable, frequent public transit and viable active transportation infrastructure connections to surrounding non-employment lands. -We support the staff recommended ‘employment land conversions’ to mixed use higher density/commercial/retail that are currently under consideration in locations where mixed use development makes more sense (eg. around the new Confederation GO Station in east Hamilton which will have full GO Train service in the future). We note that more such</p>	<p><i>Cultural Heritage:</i></p> <ul style="list-style-type: none"> <li>• Support for inclusion of land acknowledgement is noted. Staff note that the land acknowledgement requires updating and will be added through a future amendment.</li> <li>• Support for policies on indigenous engagement is noted. Further enhancements to these policies have been proposed to provide clarity.</li> <li>• Support for policies regarding proper evaluation and preservation of heritage properties and preserving and repurposing heritage properties as part of new development is noted.</li> </ul> <p><i>Housing:</i></p> <ul style="list-style-type: none"> <li>• Support for intensification criteria and policies is noted.</li> <li>• Support for commitment to fulfill housing targets is noted.</li> </ul>

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			<p>conversions might be possible with more ambitious density targets for existing employment lands.</p> <p><u>Topic Area 3 – Cultural Heritage</u> - We support the inclusion of a land acknowledgement and respect for First Nations, First Nations history in our city, and the commitment to meaningful engagement with Indigenous communities. We also support the city’s recognition that it must ‘understand the important of stewarding this land for future generations’. More explanation in both the UHOP and RHOP about how this will be achieved would be helpful.</p> <p>-We support policies that commit the city to the proper evaluation and preservation of heritage properties in Hamilton. -Very generally speaking, we support the idea of preserving and, where appropriate, repurposing or integrating existing buildings into new developments in order to avoid unnecessary demolition and the associated loss of embodied energy and generation of unnecessary demolition debris.</p> <p><u>Topic Area 4 – Provincial Plans</u> - No comments on this section.</p> <p><u>Topic Area 5 – Housing</u> - We support the evaluation criteria set out in Policy B.2.4.1.4 and acknowledge that these criteria are important for working with community to facilitate positive and productive outcomes as low/medium/high density development unfolds across urban Hamilton. Further, we recognize that an appropriate balance must be struck to enable more growth to be accommodated within the urban boundary. Worth noting here, too, is our concern about the harsh shift in the opposite direction recommended by the province’s Housing Affordability Task Force, that would see local community engagement effectively eliminated; this approach is not the answer moving forward. -We support the city’s commitment to ensure that it fulfills its housing strategy targets as set out in its Housing Action Plan, and urge the city to take every opportunity to do everything it can to provide more affordable + deeply affordable housing</p>	<ul style="list-style-type: none"> <li>• Inclusionary zoning will be considered as part of Phase 4 of the OP Review in mid-2023.</li> <li>• Family friendly housing policy updates will be undertaken following the City’s review of Family Friendly Housing policies.</li> </ul> <p><i>Climate:</i></p> <ul style="list-style-type: none"> <li>• Support for revisions to section A.1.2, the references to climate and the climate crisis throughout the Plan, and new policies promoting climate-friendly building design is noted.</li> <li>• The City is developing Sustainable Development and Building Standards. Public consultation on these standards will occur, targeting late 2022.</li> <li>• Both the Urban Forest Strategy and the Community Energy &amp; Emissions Plan are underway. The CEEP is expected to commence</li> </ul>

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			<p>options in Hamilton. This should include an ambitious ‘inclusionary zoning’ policy around all ‘major transit station areas’ (future LRT stations, existing GO Stations), and a ‘community benefits charges’ policy that includes affordable housing as an eligible charge. These are optional tools that municipalities can use for this purpose, but we urge the city to make use of these opportunities, along with any other opportunity to provide more affordable, and deeply affordable residential units in the city. - We recognize that the city is currently undertaking a process to look at family-friendly housing and how best to ensure family-friendly units are available in urban Hamilton. We will engage in this process, and we urge the city to adopt policies that require ‘family friendly’ housing in higher density areas like Downtown Hamilton, and in higher density buildings. - We support the proposed residential intensification policies as an important way to provide more housing options, and options that span a range of affordability. -We support official plan criteria designed to balance the need for more housing with the importance of building liveable communities (including policies related to green development). We continue to urge the municipality to develop and implement Green Development Standards that include incentives for going beyond what the municipality can require. It is also worth noting that the city can make creative use of community benefits charges to make some of these greening elements reality in the public realm around areas where intensification is happening. This could help to provide active transportation infrastructure, enhanced street trees, and innovations like bioswales, and other greening to help to manage stormwater flows in these areas.</p> <p><u>Topic Area 6 – Climate</u> - We support the strong wording that is being proposed for s.A.1.2 – These details need to be included to provide the critical context within which the city needs to plan our community moving forward. -We support the integration of references to climate and the need to address the climate crisis throughout the Official Plan. - We support the inclusion of new policies (eg B.3.2.1.7., B.3.2.4.7 &amp; B.3.3.2.8) that promote</p>	<p>public consultation in the coming months.</p> <p><i>Urban Structure / Zoning:</i></p> <ul style="list-style-type: none"> <li>• Major Transit Station Area delineation and consideration of inclusionary zoning will be undertaken through Phase 4 of the OP Review.</li> <li>• Support for amendments to allow fourplexes and sixplexes as of right in low density areas is noted.</li> <li>• Support for increased height limits with appropriate criteria and location requirements is noted.</li> </ul> <p><i>Infrastructure:</i></p> <ul style="list-style-type: none"> <li>• Support for new Policy C.2.11.5 and the Urban Forest Strategy is noted.</li> <li>• Support for new policy C.2.13.4 regarding restoring the quality and quantity of water is noted.</li> <li>• Comments on new Policy F.3.7.1 regarding infrastructure risk and</li> </ul>

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			<p>climate friendly neighbourhood and building design and we urge the city to continue to add to the actions that will help to build climate resilient neighbourhoods. - We support the commitments – set out in B.3.7.2 &amp; B.3.7.3 that, combined, will bring us Green Development Standards for Hamilton. We look forward to learning more and engaging in a community conversation about such standards. We urge the city to consider incentivizing actions that go beyond the mandated elements of the GDS. - We urge the city to apply a climate lens to all planning decisions as committed to in the Climate Emergency Declaration and reinforced by Direction #1 of the 9 Directions to Guide Development: “Plan for climate change mitigation and adaptation, and reduce greenhouse gas emissions”. - And, again, we urge the city to finalize key municipal plans - including the Community Energy &amp; Emissions Plan (CEEP) &amp; Urban Forest Strategy which are both still in draft form- and properly reference commitments to these plans in Hamilton’s official plans. In the interim, recognition of the fact that these plans are in the works and, hopefully, close to completion, should be made in Hamilton’s official plans.</p> <p><u>Topic Area 7 – Urban Structure/ Zoning By-Law</u> - We support the urban structure policies designed to build ‘complete communities’ – communities that are higher density and, therefore, more transit supportive, walkable/bikeable, and better able to support neighbourhood amenities. - We urge the city to move more quickly with the formal delineation of major transit station areas, and to initiate the necessary background work now that will ultimately support the adoption of inclusionary zoning for development around MTSAs. We know developers are already moving forward and, in some cases, already building. Hamilton cannot lose important opportunities to secure more affordable housing options for Hamiltonians. - We support higher density targets around ‘major transit station areas’ - but urge city to ensure it is utilizing all tools at its disposal to ensure that deeply affordable/affordable housing is part of the mix - key tools include inclusionary zoning and community benefits charges. - We</p>	<p>vulnerability assessment are noted.</p> <p><i>Transportation:</i></p> <ul style="list-style-type: none"> <li>• Support for active transportation and public transit policies is noted.</li> <li>• The importance of planning for a safe and sustainable goods movement network is recognized. Staff propose a further update to Policy C.4.6.2 to recognize the importance of road safety for all users as part of the goods movement network. Staff note the update to Policy C.4.1.1 address the sustainability of the integrated transportation network, including goods movement.</li> <li>• Support for policies C.4.1.8 and C.4.2.2 is noted.</li> </ul> <p><i>Firm Urban Boundary (RHOP):</i></p> <ul style="list-style-type: none"> <li>• Support for policies is noted.</li> </ul>

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			<p>support the city proposal to allow up to fourplexes in urban neighbourhoods as of right &amp; the possibility of six-plexes on a neighbourhood’s outer edges. We believe these policies should apply across all urban neighbourhoods. - We support the height restriction policy proposed in s.E.3.6.7 and urge the city to uphold this policy as we move into the future. High density development is needed in appropriate locations – like the Downtown Growth Centre – but it needs to be pursued in a manner that is framed by some limitations so that community knows what the ground rules are, but also to respect important community contexts like the natural geography of Hamilton. We support height limits meant to ensure natural features like our Niagara Escarpment are not overwhelmed by the built form of our downtown. -We support the policy in s.E.4.6.8, that increases the allowable height as of right’ from 8 to 11 storeys in areas designated mixed use medium density.</p> <p><u>Topic Area 8 – Infrastructure</u> - We support new policy C.2.11.5 – which references the Urban Forest Strategy. We urge the city to ensure that the strategy is carefully integrated into other efforts – like a Green Development Standard. Ensuring that we establish a healthy urban forest is a critical part of building a climate resilient future for Hamilton. The task will be that much more challenging as we intensify our urban area. We need an Urban Forest Strategy with a minimum 40% urban canopy cover that is equitably distributed across urban Hamilton. -We support new policy C.2.13.4, focused on restoring water quality and quantity. It would be helpful to acknowledge the connection between these goals, and the need to embrace green standards/ low impact development/green infrastructure in the text of this section. -We support policy F.3.7.1 and urge the city to include commitments here to consider the impacts that the infrastructure itself imposes where the climate emergency is concerned. For example – expanding the number of lanes of a roadway likely induces more traffic – an impact worthy of evaluation using a climate lens, and consideration of alternative pathways forward.</p>	



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			<p>-We continue to support the urgent need for a stormwater fee in Hamilton. We also support a stormwater fee framework that incentivizes positive action by private property owners. This is an effective way to get everyone from residential homeowners to business and industry to pursue green infrastructure/LID in order to slow/reduce stormwater flows from their properties – reinforcing commitments the city is making too.</p> <p><u>Topic Area 9 – Transportation</u> - Support policies focused on ensuring urban Hamilton has extensive active transportation infrastructure (walking, cycling), public transit, and that recognize the health benefits of these forms of mobility. -We urge the city to consider, whenever referencing the need for goods movement corridors, to also recognize the critical need to ensure goods movement does not inflict problematic impacts (air pollution, noise, safety issues) on surrounding urban uses – especially sensitive land uses. - We support new policy C.4.1.8 – which will help to ensure that people of all mobility abilities are able to safely move through our streetscapes. -We support new policy C.4.2.2 and are eager to better understand how the city plans to make this policy reality on the ground. - We support the prioritization of transit enhancements along major corridors; this is a key element in efforts to intensify along nodes and corridors in urban Hamilton. -We support the call for ‘urban form’ - including grid patterned streets - that facilitates active transportation and easy access to public transit. - We support policies designed to ensure mobility justice - easy movement for people of all mobility abilities, and all socio-economic levels. - Overall, we support the various changes proposed that are designed to promote and support public transit and active transportation across Hamilton. We also support the recognition that the support must be provided in a manner that supports people of all mobility abilities. We also support the recognition of the need for vibrant streetscapes and policies to ensure that such streetscapes can be developed.</p>	

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			Rural Hamilton Official Plan Proposed Updates: Topic Area – Firm Urban Boundary - We support policy changes in the Rural Official Plan that prohibit the expansion of urban Hamilton into rural Hamilton	
3.	March 18, 2022	Conservation Halton	<p><u>Climate – Appendix C5</u>            General            Recommend adding a policy to address/highlight nature-based climate solutions. For example: “The City will work with the Conservation Authorities to promote the use of watershed based natural solutions to biodiversity and ecological services including carbon removal, flood management and water quality improvement.”            B.3.1 Strong Economy – Recommend expanding the provided list to include “access to nature” as a key interdependent factor.            B.3.2.1.7 – Recommend that the list of subdivision and building design considerations include the protection/enhancement of natural features. Recommend adding the following word for clarity:            Promote subdivision design and building orientation to maximize energy efficiency and conservation, improved air quality, reduction of greenhouse gas emissions and promote green infrastructure.            B.3.6.2 Air Quality and Climate Change – Recommend expanding the new development prohibition to include natural heritage features and the natural heritage system.            B.3.6.5 – Recommend wording for updated mapping be applied to all hazard lands, not just hazardous forest types, as Conservation Authority mapping is also updated on an ongoing basis.            B.3.7.2 – Recommend including bird friendly design practices to list in bullet ‘n’.            C.5.3.17 – Recommend including adaptive management for existing ponds, where function is hindered, where possible.</p>	<p>Staff provide the following responses based on the Topics identified in the comments:</p> <p><i>Climate:</i></p> <ul style="list-style-type: none"> <li>• Suggestion to add policy on the City working with Conservation Authorities to promote watershed based natural solutions to biodiversity will be considered during a future amendment (Phase 2 of the MCR OP Review or a future amendment addressing outcomes of the Biodiversity Action Plan)</li> <li>• Policy B.3.1 – staff concur and will add ‘access to nature’ to the policy list.</li> <li>• Policy B.3.2.1.7 – staff concur and will add “protection and / or enhancement of natural features” to the policy</li> </ul>

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			<p><u>Urban Structure – Appendix C5</u>  Zoning Amendments – The proposed zoning amendments allow additional residential units within existing buildings. CH supports the proposed policy direction, however, please note that additional residential units may be restricted within natural hazards. We understand the city’s zoning bylaw makes use of overlays to identify CA regulated areas and to notify the public of the potential constraints and permit requirements. In order to ensure effective implementation of the additional permissions, recommend ensuring all CA regulated area/hazard overlay mapping is up-to-date, along with any asterix or other language to notify the public of potential hazard constraints.</p> <p><u>Infrastructure – Appendix C7</u>  C.5 - Recommend highlighting the relationship between subwatershed planning and stormwater management in the preamble.  C.5.4.9 – Recommend adding salt management best management practices to the list of stormwater quality improvements.  C.5.7.2 – To fully compensate for the impacts of essential infrastructure on the key natural heritage features, recommend that offsetting be considered in addition to avoiding, minimizing and mitigation.  F.3.1.5.1 – Recommend adding fish and wildlife to list of items to protect in bullet ‘f’.</p> <p><u>Transportation – Appendix C8</u>  B.3.6.2 – To improve air quality, recommend expanding the new development prohibition to include natural heritage features and the natural heritage system.  C.2.5.1 – To mitigate the potential impacts of transportation in Core Areas, recommend including a policy to provide wildlife crossings where suitable habitat is present.</p>	<ul style="list-style-type: none"> <li>• Policy B.3.6.2 – staff are not recommending changes to this policy which is referring to the prohibition of development on hazard lands</li> <li>• Policy B.3.6.5 – staff concur and have added the requirement for hazard land mapping to be updated on an ongoing basis</li> <li>• Policy B.3.7.2 – staff are not recommending changes to this policy as the existing wording is broad and captures the suggested intent</li> </ul> <p><i>Urban Structure:</i></p> <ul style="list-style-type: none"> <li>• Zoning amendments – comment on overlay is noted</li> </ul> <p><i>Infrastructure:</i></p> <ul style="list-style-type: none"> <li>• Policy C.5 – staff concur and reference to subwatershed planning added</li> <li>• Policy C.5.4.9 – staff concur and reference to salt management added</li> </ul>

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			<p>C.2.5.1 – To fully compensate for the impacts of transportation in Core Areas, recommend that offsetting be considered in addition to avoiding, minimizing and mitigation.</p>	<ul style="list-style-type: none"> <li>• C.5.7.2 – staff are not recommending change to this policy which is implementing Growth Plan direction</li> <li>• F.3.1.5.1 – staff concur and reference to fish and wildlife added.</li> </ul> <p><i>Transportation:</i></p> <ul style="list-style-type: none"> <li>• C.2.5.1 – staff are not recommending change to this policy which is implementing Growth Plan direction.</li> </ul>
4.	March 9, 2022	<p>Niagara Escarpment Commission</p> <p>(Note: comments directed to Ministry of Municipal Affairs &amp; Housing and copied to City staff)</p>	<p>Staff of the Niagara Escarpment Commission (NEC) has reviewed the above-noted Official Plans. Generally speaking, we find that the City of Hamilton has addressed comments previously provided to them by NEC staff. We offer the following comments.</p> <p><u>Urban Official Plan (UHOPA)</u></p> <p>Policy B.2.2.2 – the proposed policy states that adjustments to the urban boundary may be permitted through municipal comprehensive review (MCR). Within the Niagara Escarpment Plan Area (NEP), the <i>Niagara Escarpment Planning and Development Act (NEPDA)</i> applies. The NEPDA only permits urban boundary changes, requests for urban servicing or changes in land use designation to Urban, Minor Urban or Escarpment Recreation Area during a Provincial Plan Review (S. 6.1(2.3)). The Provincial Review must precede the MCR. This distinction in process within the NEP Area should be noted in the UHOPA. In other words, the</p>	<p>Staff provide following responses to Policy references / concerns identified in letter:</p> <p>B.2.2.2: staff concur and have added new subclause to B.2.2.2 to clarify that for lands within the Niagara Escarpment Plan, only those lands designated as Urban Area may be considered for urban boundary adjustment.</p> <p>B.3.6.5: staff have updated reference to Ministry name in this policy and throughout the</p>

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			<p>City cannot designate new urban areas in the UHOPA, unless or until they are designated urban in the NEP.</p> <p>Policy B.3.6.5 – should change the name of the Ministry to the Ministry of Northern Development, Mines, Natural Resources and Forestry (in this section and elsewhere).</p> <p>Policy C.1.0 – we request that the policy be revised to include reference to the Niagara Escarpment Plan specifically, not just the Growth Plan and the Greenbelt Plan.</p> <p>Policy E.3.5.8 – consideration for the impact of height increases on views of the Niagara Escarpment or through the Plan Area are a significant concern for the Niagara Escarpment Commission as set out in Part. 2.13 of the NEP. NEC staff comment on proposed development under the <i>Planning Act</i> both for properties in and adjacent to the Plan Area with respect to the proposed height of urban buildings above the as of right zoning allowance. If this proposed policy or others in the UHOPA would allow significant height increases without an OPA, the NEC would not be aware or able to provide comment. We recommend that this policy be revised to incorporate wording such as:</p> <p>a) Unduly overshadow, or block light on adjacent sensitive land uses, the public realm, outdoor amenity areas or negatively impact views of the Niagara Escarpment and views of the Niagara Escarpment Plan Area.</p> <p>If the applicant has not demonstrated through the completion of a visual impact assessment, to the satisfaction of the NEC, that there is no visual impact, then the development should have to be revised in consultation with our agency. This comment may similarly apply to other proposed policies such as E.4.6.8.</p>	<p>draft Official Plan Amendment.</p> <p>C.1.0: reference to Niagara Escarpment Plan added to policy.</p> <p>E.3.5.8: to address concern related to impact on views of the Niagara Escarpment, staff propose to add new subclause (f) to require: “The orientation, design, and massing of a building or structure higher than six storeys shall take into account the impact on public view corridors and general public views of the area of the Niagara Escarpment, waterfront, and other parts of the City as identified through secondary plans or other studies.”</p> <p>Note: same policy wording to be added as New Policy E.4.6.29 to address visual impact within the Mixed Use – Medium Density designation.</p>

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			<p>Policy E.3.6.7 – we appreciate the City’s interest in protecting views of the Niagara Escarpment as set out in this policy, however we are of the opinion that the policy needs to be revised in order to properly address the impact of tall buildings on views of the Escarpment. We have the following questions and would welcome further discussion with the City to discuss modifications to the proposed policy to better achieve conformity with the NEP in Part 2.13, (Scenic Resources)</p> <ol style="list-style-type: none"> <li>1. What is meant by “top of the Escarpment”? Is that a reference to the top of the rock feature or the top of the trees on the Escarpment?</li> <li>2. The policy “shall not exceed the height of the top of the Niagara Escarpment” is not clear. The height viewed from where? In elevation (imagine a cross section), the top of the building may ‘not exceed’ the top of the Escarpment, but when viewing that from the public realm (the ground), those buildings would skyline above the brow resulting in visual impact. A current planning application we are commenting on is the proposed John/St Joseph towers (~25 storeys). In cross-section the towers finish level with the brow, but from representative viewpoints on the ground, they skyline above the Escarpment substantially.</li> <li>3. “Not exceeding the top of the Niagara Escarpment” would mean that when looking out from on top of the brow (like at Sam Lawrence Park), you could still see over the tops of the buildings. This is good but doesn’t take into account the potential impact on long distance views to the Escarpment to the north (or the lake).</li> <li>4. Mechanical suites are not considered in building height/storey count. These suites can add 1-2 more storeys on the height of buildings and so they would exceed the height of the Niagara Escarpment.</li> </ol>	<p>E.3.6.7: responses to numbered points as follows:</p> <ol style="list-style-type: none"> <li>1. the “top of the Escarpment” refers to the top of the rock feature.</li> <li>2. the policy “shall not exceed the height of the top of the Escarpment” is consistent with wording in the Downtown Secondary Plan (DTSP). The requirement for the VIA will allow for view impacts to be evaluated.</li> <li>3. see answer to #2 above – wording is consistent with DTSP. The requirement for the VIA will allow for view impacts to be evaluated.</li> <li>4. Correct – mechanical equipment is not included in definition of height as per Zoning By-law, but mechanical suites can be included in evaluation of VIA.</li> <li>5. “Below the escarpment” refers to the lower city below the escarpment.</li> </ol>

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			<p>5. How would the area considered “below the Escarpment” be determined? Would the policy apply to the entire area of the City below the Escarpment?</p> <p>6. What would be the maximum allowed building height be on top of the brow be? Can there be a policy that requires a minimum setback from the brow to mitigate the impact of such buildings (e.g. Chedoke Browlands proposed 30-metre setback to built form). If not, there will be visual impact when viewed from below the Escarpment or at a distance looking toward the Escarpment.</p> <p>7. The measurement of proposed building height varies depending on the viewing position where the height is taken from as does the actual height of the Escarpment feature itself.</p> <p>8. How will the NEC be consulted on height increases within the Urban Area that impact views of the Escarpment if no OPA is required?</p> <p>9. Will certain building heights in the Urban Area be as of right so that the NEC would again not be consulted and have no opportunity to comment on development proposals, request visual impact assessment or influence building height, design or orientation for tall buildings in the Urban Area that could block views of the Escarpment?</p> <p>Policy E.3.6.8g – by increasing the limit of consideration of height impacts to the Niagara Escarpment from 6 to 12 storeys, there is potential that buildings between 6 and 12 storeys could be approved that have a significant impact on views of and to the Escarpment, but we would not have an opportunity to comment on those impacts. We appreciate the need to balance increases in density to achieve growth targets and prevent sprawl but protecting views of the Niagara Escarpment through careful analysis and mitigation of negative impacts through sympathetic building design and placement are essential. We would prefer that the policy not be amended and that it stays at 6 storeys.</p>	<p>6. Maximum building height on the brow would be determined through policies of the Neighbourhoods designation and existing zoning regulations. If there is a need to address setbacks from the Brow this can be considered through a future planning exercise.</p> <p>7. Comment is noted. Requirement for VIA will address this concern.</p> <p>8. NEC will be circulated on applications within the NEP area as per the current process.</p> <p>9. As per #8, NEC will be circulated on applications within the NEP area as per the current process. For applications outside of the NEP area, City staff will request and review VIAs as required.</p> <p>E.3.6.8g): see answers to #8 and 9 above.</p>

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			<p>If we have mis-interpreted the City’s proposed policy approach to considering the impact on views of the Escarpment, we would be pleased to discuss the implications of the revisions with Ministry and City staff. We have arranged a meeting with City staff to discuss the proposed visual impact policies on March 11, 2022, to discuss the possibility of refining the proposed policies for greater clarity and alignment with the NEP.</p> <p>Glossary – update the name of our Ministry in the definition of all terms where it is mentioned.</p> <p><u>Map comments</u>            We have reviewed the proposed maps and believe that to the extent possible at the scale of the review, the proposed Official Plan designations are not in conflict with the designations of the NEP 2017.</p> <p><u>Rural Official Plan (RHOPA)</u>            NEC staff has no comment on or objection to the proposed amendments to the RHOPA.</p> <p>Thank you for the opportunity to comment on the City of Hamilton’s Official Plans. Please let us know if you have any questions or need us to participate in any consultation with the City of Hamilton staff.</p>	