



May 16, 2022

Conner Harris
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VIA EMAIL

Rose Caterini – City Clerk
City of Hamilton
Hamilton City Hall
71 Main Street West, 4th Floor
Hamilton, ON L8P 4Y5

To Whom It May Concern:

**Re: City of Hamilton Municipal Comprehensive Review/Official Plan Review
Staff Report PED21067(b) – Phase 1 Amendments to the Urban Hamilton Official
Plan and Rural Hamilton Official Plan
Urban Boundary Expansion Request – 347 Parkside Drive, Waterdown, ON
Our File No.: 1556**

We are counsel to 2441066 Ontario Inc. (“244”). Our client owns lands known municipally as 347 Parkside Drive, Waterdown, ON (the “Property”). That Property is located on the edge of, but slightly outside, the City of Hamilton urban boundary.

244 has been engaged with, and following, the City’s ongoing municipal comprehensive review (“MCR”) exercise for some time. Our client was disappointed when the City ignored the detailed and extensively justified recommendation of an “ambitious density scenario” as endorsed by its own staff, and instead endorsed a “no urban boundary expansion” approach to its MCR in November 2021.

The “no urban boundary expansion” endorsed by the City lacks a reasonable and objective planning basis. It is not consistent with Provincial Policy and does not conform to the Growth Plan for the Greater Golden Horseshoe. The endorsed approach is unable to accommodate an appropriate level of growth within the City of Hamilton and will excessively tax municipal infrastructure through its proposed density increases. Implementation of this ill-conceived approach will only serve to increase housing scarcity and exacerbate the ongoing affordability crisis in the City’s housing market.

Despite its opposition to the “no urban boundary expansion” approach endorsed by the City, our client was encouraged to see that requests for urban boundary expansions in the Waterdown area (where 244’s Property is located) would be considered as part of the MCR process. In December 2021 our client submitted a request to the City for consideration of an urban boundary expansion to incorporate a portion of its Property into the City’s urban boundary. A detailed planning justification report and rationale for the request was included with that request.

244 was disappointed to learn that City staff recommended approval only of an urban boundary expansion request at 329 and 345 Parkside Drive, and not on our client’s Property. We do note, however, that our client’s Property neighbours 329 and 345 Parkside Drive. Our client submitted its

request, and justification for it, to the General Issues Committee for consideration at its meeting on April 20th, 2022. Its planning consultant attended the April 20th meeting to speak to the matter.

Unfortunately the City elected only to approve an urban boundary expansion at 329 and 345 Parkside Drive. This was in keeping with the limitations imposed by the “no urban boundary expansion” approach endorsed by City Council and the limited discretion for departing from that recommendation.

Our client remains of the view that its proposed urban boundary expansion represents good planning that is consistent with both the “ambitious density scenario” that was previously studied and endorsed by City staff with respect to the MCR, and is consistent even with the limited flexibility to urban boundary expansions afforded by the “no urban boundary expansion” approach that the City insists on pursuing. We urge the City to reconsider this matter and to direct the necessary amendments to the draft Official Plans presented by staff to incorporate our client’s urban boundary expansion request for the Property.

Feel free to contact us with any questions or comments regarding the above. Kindly notify us of any future meetings or decisions of the City of Hamilton with respect to this matter.

Sincerely,

RAYMAN BEITCHMAN LLP



Conner Harris
CH/rf