



BOUSFIELDS INC.

Project No.: 21229

May 16, 2022

VIA E-MAIL

Lisa Kelsey
Legislative Coordinator
Planning Committee
City of Hamilton
71 Main Street West
Hamilton, ON L8P 4Y5

Dear Ms. Kelsey:

**Re: GRIDS2/MCR – Municipal Comprehensive Review/Official Plan Review –
Phase 1 Amendments to the Urban Hamilton Official Plan and Rural
Hamilton Official Plan (PED21067(b))
Agenda Item 9.2 – May 17th, 2022, Planning Committee**

We are the planning consultants for Hammer GP LP and Hammer GP Services Corp. (the “Owners”) the owners of the property municipally addressed as 75 Centennial Parkway North, also known as Eastgate Square (the “subject site”). We are writing on behalf of our client to provide comments regarding Report PED21067(b), specifically the proposed Urban Hamilton Official Plan Amendment (Appendix A to PED21067(b)).

The subject site is one of two Sub-Regional Service Nodes within the City, as shown on Schedule E – Urban Structure of the Urban Hamilton Official Plan (“UHOP”) and is currently designated *Mixed Use – High Density* on Schedule E-1 – Urban Land Use Designations of the UHOP. The subject site is also designated *Mixed Use – High Density* on Map B.6.7-1 of the Centennial Neighbourhoods Secondary Plan.

Our Request:

We have reviewed the Proposed Urban Hamilton Official Plan Amendment (Appendix “A” to Report PED21067(b)) and are generally supportive of the proposed amendments as it relates to the subject site. We request the following minor textual modifications:

<u>Current Policy (Urban Hamilton Official Plan)</u>	<u>City-Proposed Change to Policy</u>	<u>Recommended Change to Policy</u>
Volume 1 – E.2.3.2.7 Sub-Regional Service Nodes shall generally have some of the higher densities within the City with a target density of 100 to 150 persons and jobs per hectare across each node.	Volume 1 – E.2.3.2.7 Sub-Regional Service Nodes shall generally have some of the higher densities within the City with be planned to achieve a target density of 100 to 150 to 200 persons and jobs per hectare measured across each node.	E.2.3.2.7 Sub-Regional Service Nodes shall generally have some of the higher densities within the City with be planned to achieve a minimum target density of 100 to 150 to 200 persons and jobs per hectare measured across each node and shall recognize the potential for a phased approach to intensification.

Rationale for Requested Modifications

The requested modification is intended to provide further clarity that the proposed density target is a *minimum* for the City to accommodate the minimum forecasted population and employment growth to 2051, which aligns with the City’s Municipal Comprehensive Review (GRIDS 2) that establishes an aggressive intensification rate. In our opinion, including any maximum density provisions for the Sub-Regional Service Node does not align with the applicable provincial and evolving UHOP planning policy framework, which seeks to optimize density on *strategic growth areas* and especially sites like the subject site which is well served by existing and planned higher order transit. Furthermore, the applicable UHOP and secondary plan policies will ensure that redevelopment of the subject site will be compatible with the surrounding context and will be planned in a coordinated manner.

In addition, the requested policy modification will allow for a phased approach where the intensification of the subject site can occur through a phased approach so that the first phase of development does not need to meet the minimum density target for the entire site. In our opinion, this modification is necessary and represents good planning, since it would allow for orderly and phased redevelopment of the subject site, which would protect for the subject site’s planned function as a commercial amenity for the surrounding area, while accommodating new housing opportunities.

We understand that the proposed changes to the Centennial Neighbourhoods Secondary Plan in Appendix “A” to Report PED21067(b) are intended to implement approved employment land conversions and address provincial conformity matters and that additional changes to the Secondary Plans will be completed through a

separate amendment process with additional engagement. We look forward to working with staff during that engagement process.

Future Development Applications

We have been working with Development Planning Staff on the introduction of residential uses and modifications to the mall edges with new commercial amenities. In this regard, a formal consultation application was recently filed with the City, and we look forward to working with the City to modernize the existing mall and add new residential housing for the community. In this regard, the proposed policy modifications will ensure that the subject site is able to optimize density in a phased approach in order to help accommodate the City's planned growth over the next 30 years.

Thank you for the opportunity to comment on the draft UHOP amendment and we look forward to continuing to work with you to ensure the best planning policy framework for the subject site and the City. Should you require any additional information or clarification, please feel free to contact the undersigned.

Respectfully Submitted,



David Falletta, MCIP, RPP



Ashley Paton, MCIP, RPP

cc. Hammer GP LP and Hammer GP Services Corp.

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