

**Public Question/Comment Summary (January – March 2022)** – Proposed Amendments to UHOP & RHOP (Planning Committee and Post Planning Committee)

**Emails to GRIDS2/MCR**

#	Date:	Name:	Comment:	Staff Response / Action Required:
1.	January 13, 2022	Daniel Borrelli	<p>I have a few questions regarding the proposed changes to the UHOP. I was looking forward to your presentation because I thought that it would be a good resource to help me relay the amendments to my colleagues.</p> <p>My first questions is with respect to the changes to the permissible height. I understand that in some cases height can be increased to 11 storeys without an amendment to the plan. However, according to the tall buildings guidelines a mid-rise building can be envisioned for up to 12 storeys provided that the lot meets the criteria developed. Could you please shed some light on why height is capped at 11 storeys as opposed to 12?</p> <p>My second question is about the density ranges in the Neighbourhoods designation. Specifically, if in fact those are now not policy to conform to for each development application, but as the added verbiage says, only for review of secondary planning?</p> <p>Thank you in advance, and I look forward to your response. If you think a call would be best, I can make myself available tomorrow for a chat.</p>	<p>Staff responded via telephone and answered questions.</p> <p>The current Tall Buildings Guidelines is referenced within the Downtown Hamilton Secondary Plan and applies to lands within Downtown Hamilton. The policies being considered for amendment under the MCR concern lands outside Downtown Hamilton that are designated Neighbourhoods.</p> <p>Staff are proposing to increase the maximum height to 12 storeys for medium density uses without the need for an Official Plan Amendment, based on recent changes to the Ontario Building Code that allow timber construction of buildings up to 12 storeys in height.</p>

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2.	January 12, 2022	<p>NHDG (Waterfront) Inc. (c/o Goodmans, LLP)</p> <p>Need to acknowledge and advise comments will be included in report.</p>	<p>We are solicitors for NHDG (Waterfront) Inc., who is the owner of the property known municipally in the City of Hamilton (the “City”) as 310 Frances Avenue (the “Property”). We are writing on behalf of our client to provide comments regarding Report PED21067(a) (the “Report”). This report includes proposed official plan amendments relating to the City’s GRIDS2/MCR process and conformity of the City’s Urban Official Plan (“UHOP”) with provincial policies through a fixed urban boundary growth scenario. Note that the Report was listed as Item 10.1 on the agenda for the Planning Committee meeting scheduled for January 11, 2022. We understand that Item 10.1 was referred to be heard at the next Council meeting scheduled for January 19, 2022.</p> <p>Our client understands that the intention is not to have the Planning Committee or City Council approve the proposed amendments at this time. The Report recommends that the proposed amendments be submitted to the Minister of Municipal Affairs and Housing (copied on this letter) for review and comment, in accordance with the requirements of the <i>Planning Act</i>.</p> <p>Appendix A to the Report outlines the proposed amendments to the UHOP. In particular, a new policy has been added as E.3.6.7 as follows:  <i>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 shall not exceed the height of the Niagara Escarpment, to the satisfaction of the City.</i></p> <p>(Current Policy E.3.6.7 has been proposed to be renumbered to E.3.6.8 and includes proposed modifications relating to design criteria.)</p> <p>As background, the Property is currently zoned “MUC-4” (Site-Specific Mixed Use Commercial Zone in Zoning By-law No. 3692-92 of the former City of Stoney Creek (“Zoning By-law 3692- 92”). The height regulation in Zoning By-law 3692-92 is: “Maximum Height – none”.</p> <p>Zoning By-law 3692-92 was approved in 2010. While the UHOP was not in force and effect at that time (subsequently approved by the Ontario Municipal Board, coming into effect on August 16, 2012), our understanding is that the UHOP had</p>	<p>Comments noted.</p> <p>It is the opinion of staff that there is no requirement to apply a site specific policy to the lands at 310 Frances Ave for the purposes of exempting the subject lands from the 30 storey height limit required by the proposed policy E.4.6.8. The subject lands are currently zoned “MUC-4” in the City of Stoney Creek Zoning By-law which requires no maximum height restriction on the subject lands. The City is not proposing any zoning changes through the MCR process which would impact the subject lands, and therefore the unrestricted height limit provided by the zoning on the subject lands would not be impacted by the policy changes unless the applicant seeks to amend or vary the existing zoning permissions subsequent to the adoption of any height limit through the MCR UHOPA.</p>

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			<p>been adopted by City Council on July 9, 2009 and in advance of approval of Zoning By-law 3692-92. The staff report at that time indicated that Zoning By-law 3692-92 “would conform to the ‘Neighbourhoods’ designation of the New Hamilton Urban Official Plan.”</p> <p>The above-noted proposed policy addition to the UHOP is imposing a policy that conflicts with and is inconsistent with the current zoning for the Property. Our client has submitted and appealed a site plan application to permit the redevelopment of the Property in accordance with Zoning By-law 3692-92, subject to variances unrelated to height. As such, it is clear that the Property should be exempted from the above-noted proposed policy to reflect the existing as-of-right permissions for the Property.</p> <p>We would appreciate being included on the notice list for this matter. Please let us know if any additional information is required to implement this request for notice.</p>	<p>Further, staff recognize that there are active appeals before the Ontario Land Tribunal for this property for the existing site plan control (DA-19-020) and minor variance applications. Staff note that these applications were submitted prior to any future approvals of the MCR UHOPA. The impact of any future approval of the MCR UHOPA on these appeals is within the Tribunal’s jurisdiction to determine.</p>
3.	January 18, 2022	<p>Frank Jalsevac</p> <p>Need to acknowledge and advise comments will be included in report.</p>	<p><i>RE: Agenda Item 4.10.</i>  <i>Correspondence from David Bronskill, Goodmans LLP respecting 310 Frances Avenue, City of Hamilton, Municipal Comprehensive Review/Official Plan Review - Draft Urban Hamilton, Official Plan Amendment - Conformity Amendment and Draft Rural Hamilton, Official Plan Amendment - Firm Urban Boundary (PED21067(a)).</i></p> <p>I wholeheartedly disagree with Mr. Bronskill's assertion that "The above-noted proposed policy addition to the UHOP is imposing a policy that conflicts with and is inconsistent with the current zoning for the Property". In fact, I believe the opposite is true.</p> <p>Mr. Bronskill's letter raises some questions I have in regards to why the site-plan process for this development application has not identified the need for the applicant to submit an Official Plan amendment from the outset. Prior to considering the exemption requested in the Council correspondence, please note the following:</p>	<p>Comments noted.</p> <p>As per response to comment above, no site specific exemption is being proposed.</p>

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			<p>(a) Yes, there was a Zoning amendment approved in 2010. There was also a site specific amendment to the <i>old Stoney Creek Official Plan</i> made at that time which <u>gave effect</u> to that unprecedented ZBLA. There was not however an amendment made to the Urban Hamilton Official Plan as has been implied in Mr. Bronskill's letter. Comparable approvals made under the old Stoney Creek Official Plan have had to undergo a 2nd OPA process when the UHOP was eventually approved by the Ministry due to the <u>revocation</u> of the SCOP. There has been no explanation provided as to why this land has been exempt from re-application and inconsistent with other lands.</p> <p>(b) Yes, the UHOP designates this land as 'Neighbourhoods'. Yes, the ZBA in 2010 included a minimum density of 585 units / hectare and no maximum height. However, 'Neighbourhoods' also are capped at 200 units / hectare in the UHOP. Another block of land of this subdivision also had a minimum density and no maximum density however, in 2016 when Phase 2 was being proposed, that block of land had to undergo an OPA in order to exceed the 200 unit cap of our High Density 'Neighbourhoods' UHOP policy. (Reference: Page 4 of 31 <a href="https://pub-hamilton.escribemeetings.com/filestream.ashx?DocumentId=118828">:https://pub-hamilton.escribemeetings.com/filestream.ashx?DocumentId=118828</a>)</p> <p>There has been no explanation provided as to why this development has been undergoing the site plan &amp; minor variance application process at a density far greater than 585 units without the need to apply for a site specific Official Plan amendment to our governing High Density Neighbourhoods designation of 200 units / hectare.</p> <p>In reviewing the intent of our Urban Hamilton Official Plan, the wording of the site specific MUC-4 Zoning, the intent of Stoney Creek Zoning By-law 3692-92 and based on my calculations, the amendment proposed by Staff to add a 30 storey height limit in our Official plan would effectively result in the current zoning being more consistent with the density limits in our Official Plan.</p> <p>As such, I'm requesting Council deny any requests to exempt this land from the proposed Official Plan changes.</p>	

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4.	Feb. 2, 2022	David King	<p>30 year resident and taxpayer here. Sprawl in this city must stop. It is destroying farm land, not carbon friendly, and finally, expensive to the taxpayer. Low density sprawl is a ponzi scheme perpetrated on the taxpayers by developers. We need medium density on brownfield sites within the city to fight global heating. Hamilton has an opportunity here to be a leader, instead of belatedly and poorly following other municipalities, as usual, if you folks can find the stones to stand up to the development industry.</p>	Comment received.
5.	February 23, 2022	Dina D’Ermo	<p>Hello, I was part of the virtual meeting yesterday and wanted to make a few comments.</p> <p>I first want to say thank you for involving the public into this conversation. Open communication throughout this process will be very important.</p> <p>During the meeting, I understood that you did not have answers to many questions as yet, as this was just Phase 1, and realistically the province might send you back to the drawing board if they do not accept the no boundary expansion.</p> <p>At the same time, no matter what happens in the decision making, densification will occur and I am quite worried about a few things.</p> <p>Coming from Montreal and Ottawa, I have lived in Hamilton for 25 years now, I see vast differences in the way each City has dealt with densification.</p> <p>In Montreal and Ottawa, the densification is esthetically pleasing. In Hamilton, unfortunately, illegal dwellings were grandfathered and derelict buildings remain, absentee landlords don't care, and several dilapidated areas remain in the City.</p> <p>When I asked yesterday about expropriation, parking issues and frontage landscape I was left worried about the future of Hamilton. I was hopeful that the City had considered the possibility of expropriation, as waiting for landlords and developers to develop the very dilapidated areas of Kenilworth and Barton (and the many other areas in the City) might never happen. That means that densification may occur in neighbourhoods such as ours, where parking on the street is not available, already now, and the possibility of losing the 50% landscaped frontage to parking for multiple tenants might be considered under the residential zoning bylaw review. What will our neighbourhoods look like if</p>	<p>Comments received.</p> <p>Proposed changes to the existing low density residential zones are considered an interim step and staff will bring forward new low density residential zones for inclusion in Hamilton Zoning By-law No. 05-200 as part of the Residential Zones project that will provide a comprehensive framework to address neighbourhood character and parking requirements.</p>

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			these parking and zoning bylaw changes result in very negative outcomes for neighbourhoods. I hope that creative ways to ensure that densification beautifying the City with every permit approval wins, over the paving of green space and unhappiness with residents of our neighbourhoods from decisions the City makes to ensure they meet the densification targets.	
6.	March 4, 2022	Lyn Folkes	<p>Due to health issues I can't spend a lot of time in front of a screen right now, so I'd just like to make a few comments in this email for the GRIDS 2 planning team. I'm a retired environmental consultant who started studying climate warming in 1990 at the University of Waterloo. The predicted changes in our climate then seemed scary and now that they are happening so much faster than we'd predicted then, we should all be terrified today.</p> <p>I don't see the urgency needed in politics to control our climate much at all, unless some miracle is discovered soon.</p> <p>So, here are a few recommendations on development around our City as temperatures rise, and weather becomes more extreme and less predictable:</p> <ul style="list-style-type: none"> <li>- Protect every natural wetland we can, even small ones which provide needed habitat. This is important to preserve the quality and quantity of our water supply, so please resist the province's desire to replace lowlands with warehouses. Lowland areas are often deemed as 'worthless waste lands' by those who are not aware of how the hydrological cycle really works. We NEED all the wetlands we have left.</li> <li>- Protect natural habitats that provide nectar and pollen so our wild pollinators can do their job in fertilizing food crops. If we lose too much of these natural lands, we will lose too many of our wild pollinators too. Pollinators include birds, bats, bees, beetles, moths, butterflies, etc. We NEED habitat for them to survive so that we don't threaten our own food security.</li> <li>- Preserve all of the best farmland we have left instead of turning it into sod fields and then urban developments in turn. This has to stop to secure our food security in the face of this climate crisis.</li> <li>- We don't need more highways -- we NEED better modes of transportation. The highways proposed by the province through the Holland Marsh are particularly</li> </ul>	<p>Comments noted.</p> <p>Existing policies of the Urban and Rural Hamilton Official Plans provide protection to Core Areas including wetlands. Natural heritage system policy mapping updates will be considered as part of Phase 2: MCR RHOPA and UHOPA of the Official Plan Review (Q2, 2023).</p> <p>The City's Biodiversity Action Plan and Community Energy and Emissions Plan are currently underway and any associated updates to the City's Official Plans will occur as part of Local Context (Phase 3) of the Official Plan Review (Q2 2023).</p> <p>Proposed policy updates are implementing Council's direction for a No Urban</p>

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			<p>disturbing as a threat to our food security in Ontario. Hamilton has a large amount of prime farmland that continues to be converted to urban developments at an alarming rate.</p> <ul style="list-style-type: none"> <li>- Please don't allow urban development near the lakeshore. We NEED to restore Lake Ontario borders to their natural state as much as is possible in order to protect water quality, as well as ecological habitat and species diversity.</li> <li>- Reducing air pollution, increasing the percentage of permeable land surface and reducing single use plastics in our City would all benefit our residents as well.</li> <li>- We especially need to continue moving away from our dependence on fossil fuel energy in Ontario but the province is increasing our use through expansions of natural gas. Please don't let them pressure Hamilton into poor energy decisions that will harm us for years to come.</li> </ul> <p>These are just a few recommendations to help us deal with the negative effects that our changing climate is bringing. Trees are burning in warmer climates due to extreme heat in warm seasons -- we're next if Canada continues to promote and expand the use of fossil fuel energy.</p> <p>Hamilton is positioned to play a major role in how our province moves forward -- will that be with disabandon for our world or respect for our people's well-being, and in particular our youth? We are all already suffering severe losses of agricultural lands, fatal major droughts and storms, the high death toll from our first modern world pandemic and now also war -- ironically over fossil fuels which we need to stop relying on.</p> <p>Clearly fossil fuels and urban sprawl are not good for the people of Hamilton or anyone else. This is a bigger issues than it may seem to many who are only looking to profit margins.</p> <p>I'm waiting and hoping for the day when I hear and see reason in the world concerning our energy dilemma and finding a path to sustainable living. We all need to do our part and come up with new attitudes and plans for how we live in our very rich North American societies.</p>	<p>Boundary Expansion growth scenario and no expansions into prime agricultural land are proposed.</p>

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			<p>We're lucky to live in Hamilton and we have the choice to do better. Now we need the will of politicians to make significant progress on the climate emergency, like we've done with the pandemic.</p> <p>I see positive changes in Hamilton and I believe we are starting to move in the right direction. Please don't let the Province, Alberta big business companies or the few unaware urban-sprawl supporters on Hamilton's Council deter Hamilton's good leaders from their goals.</p> <p>Our family is depending on you to make sure we have a livable future. We are willing to help pay for that as long as we are seeing these changes on the ground in our community. For example, the bicycles and protected lanes for those who use them are a great improvement in our City; the refusal to allow Amazon warehouses to be more important than Hamilton's water security or species biodiversity is highly respected; and the Biodiversity Action Plan are all excellent steps forward. Keeping more employees working online to reduce GHG emissions would also be helpful, etc., etc.</p> <p>Thank you to those progressive thinkers on Council who are doing wonderful things in our City! These actions give me hope and I'd love to see more -- ban all new fossil fuel infrastructure projects in Hamilton, like so many other cities have already done!; encourage divestment from fossil fuel companies and encourage a fair transition for those employees into healthier jobs; plant more native trees, shrubs and flowers in and around our City instead of out-dated plastic hanging baskets of annuals that only waste vital water resources without any tangible benefit, etc...</p> <p>Think big and go GREEN as fast as we can.</p> <p>With respect for your difficult job ahead, please strive to make our choices meaningful for the majority of Hamilton taxpayers.</p> <p>And thank you very much for allowing me to voice my opinion, unlike our undemocratic provincial leaders. That must also change...</p>	
7.	March 5, 2022	Joseph Dubonnet	Part of the design of the official plan for future housing in Hamilton must include better use of the housing stock for University students at McMaster.	Comments noted.

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			<p>Currently, West Hamilton is plagued with students' "houses" which do not provide adequate housing for students and only serve to deteriorate the neighbourhoods for regular residents.</p> <p>The City must work with McMaster and local citizen's organizations to develop a better plan to provide permanent solutions to the housing needs of its student population and redevelop the neighbourhood to make them available to families again.</p>	<p>The City has established a Rental Housing Licensing Pilot Program in Wards 1, 8 and part of 14 to address issues related to student rental housing in these areas.</p> <p>Future policy updates may be incorporated in Phase 3 – Local Context of the OP Review to address housing related issues and requirements arising from the Residential Zones project.</p>
8.	March 7, 2022	Frisina Group (c/o SGL)	<p>We are planners to 1507565 Ontario Limited otherwise known as the Frisina Group, who own approximately 106 acres of land located within the Elfrida Community.</p> <p>Your staff and your highly experienced and respected consultants previously recommended the Ambitious Density Scenario although noting that that scenario will be challenging to achieve. The intensification and greenfield density targets in that scenario were in combination the highest being proposed in the Greater Golden Horseshoe.</p> <p>Although your staff noted that it will be a challenge to implement the high levels of intensification, the Ambitious Density Scenario provided a balance of intensification and greenfield growth and addressed climate change by creating compact new communities with the highest greenfield density in the Greater Golden Horseshoe. The Growth Plan sets out an intensification first approach, but the Growth Plan needs to be read as a whole. The Growth Plan, Provincial Policy Statement and the land needs assessment methodology all require that growth to 2051 satisfy market demand as well as to provide intensification. Satisfying market demand requires intensification primarily in the form of</p>	<p>Comments noted.</p> <p>Proposed policy updates implement the Council direction for the No Urban Boundary Expansion Growth Scenario as the preferred growth strategy.</p>

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			<p>apartments in the Built-up Area, but also requires greenfield growth to provide for market-based family housing. The Ambitious Density Scenario provided for much needed ground related housing to satisfy market demand and to address the housing affordability and housing supply crisis for families.</p> <p>Despite the professional recommendations received, on a very aggressive growth scenario, Council chose a no urban boundary expansion. As a result of Council’s decision, the proposed amendments to the Urban Hamilton Official Plan (UHOP) and Rural Hamilton Official Plan (RHOP) as set out in Report PED21067 contain policy changes to implement the no urban boundary expansion. The proposed policy changes to the UHOP to implement the no urban boundary expansion include:</p> <ul style="list-style-type: none"> <li>• A.2.1 Direction 3 on concentrating new development within existing built-up areas with no reference to need for greenfield growth;</li> <li>• A.2.3.3.4 with a minimum 80% of residential develop to occur within the built-up area;</li> <li>• A.2.4 in reference to a No Urban Boundary Expansion and accommodating all growth within the existing Urban Area;</li> <li>• B.2.1.1 in reference to the existing urban boundary representing all of the City’s project urban growth for 30 year;</li> <li>• B.2.2.1 referring to the City’s urban boundary as firm and no expansion being required;</li> <li>• B.2.2.3 not permitting expansions of 40 hectares or less;</li> <li>• The deletion of current policies B.2.2.3 and B.2.2.4 requiring a municipal comprehensive review for an urban boundary expansion; and</li> <li>• Schedule A and the lack of a settlement boundary expansion.</li> </ul> <p>The proposed policy changes to the RHOP to implement the no boundary expansion include:</p> <ul style="list-style-type: none"> <li>• B.2.1 in refence to maintaining a firm urban boundary and not adding lands to the Urban Area;</li> <li>• The deletion of Special Policy Area B; and</li> <li>• Volume 3: Map A – the deletion of the Elfrida Special Policy Area B.</li> </ul>	

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			<p>We do not support these changes. Although they seek to increase the supply of housing through apartments, they will not satisfy market demand. Council needs to be cognizant that apartment units on a per square foot basis are more expensive than an equally sized townhouse. Placing a reliance on apartments through the no urban boundary expansion scenario, will result in higher costs for families looking for three bedroom accommodation.</p> <p>In our opinion the proposed policy changes do not conform to the Growth Plan and are not consistent with the Provincial Policy Statement and ignore the considerable amount of work undertaken by the City’s consultants and Staff on the Land Needs Assessment and Municipal Comprehensive Review. In addition, this policy direction will not help to address the housing crisis for families who seek ground related housing.</p> <p>The City has spent a considerable amount of money in the range of \$300 million on secondary plan studies and infrastructure within the areas being studied for settlement expansion in anticipation of an approved urban boundary expansion. Conversely, the City has not identified the cost required to upgrade the current infrastructure in order to accommodate the no urban boundary expansion and associated 80% intensification target in the Built-up Area. I am informed that this infrastructure cost within the Built-up Area is estimated to be many hundreds of millions of dollars and will take years to complete. Due to this infrastructure requirement, the no urban boundary expansion will do little to address the lack of affordable housing supply in Hamilton over the next 10 years and will not help to address the housing crisis for families who seek ground related housing. Areas outside the urban boundary, including those where the City has invested hundreds of millions of dollars in public infrastructure could be developed in a shorter period of time and accommodate the need expressed by the market for ground level development.</p>	
9.	March 7, 2022	Greenhorizons Holdings Inc., Greenhorizon	Further to our correspondence to you dated February 12, 2021, May 14, 2021, May 31, 2021, August 17, 2021, and November 08, 2021 my client has had an opportunity to review the proposed MCR GRIDS 2 - Official Plan Review (Topic 2 - Employment).	<p>Comments noted.</p> <p>The City’s Land Needs Assessment has identified</p>

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		s Group of Farms Ltd., 1231 Shantz Station Road Inc. and Willow Valley Holdings Inc. (c/o Stovel and Associates Inc.)	<p>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:</p> <ul style="list-style-type: none"> <li>• 8474 English Church Road,</li> <li>• 2907 Highway 6,</li> <li>• 3065 Upper James Street,</li> <li>• 3005 Upper James Street.</li> </ul> <p>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. We continue to request that these lands be included within the Urban Area of the City of Hamilton and designated as Employment Lands.</p> <p>In the alternative, we request that the lands in question be considered as part of Special Study Area for future Employment Lands. We have outlined the many beneficial qualities associated with these lands, including proximity to the Airport and existing municipal services and the size of the lands (making it easier to develop).</p> <p>Furthermore, we note that new policy E.5.1.18 establishes a policy framework that would support the future needs of Agri-Food businesses, including transportation considerations, with available serviced lands located in the transition zone between existing Employment Uses (associated with the Airport) and Agriculture. We see a high demand for these types of land uses, especially given the planning paradigm that will be defined by global events like COVID-19. We are of the view that additional policies could be put in place to assist our client in developing its lands for supportive employment uses in keeping with this new policy.</p> <p>We look forward to participating in discussions with the City and their planning staff/consultant in regards to the Official Plan update.</p>	<p>that the City’s employment land supply and demand is in balance. No additional employment land is needed over the planning horizon.</p> <p>Employment area lands will be reassessed through future Municipal Comprehensive Reviews.</p>
10.	March 8, 2022	Artstone Holdings Ltd.	UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) is the authorized planning consultant acting on behalf of Artstone Holdings Ltd.,	Comments noted.

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		(c/o Urban Solutions)	<p>(the Owner) of the property municipally known as 467 Highway No. 56 in the City of Hamilton, who have been participating in the related growth discussions since 2006. Most recently, UrbanSolutions has submitted comments on behalf of the owner on May 29, 2021 and November 9, 2021 in relation to the Growth Related Integrated Development Strategy 2 and Municipal Comprehensive Review (GRIDS2/MCR).</p> <p>It is with great frustration and disappointment we provide this submission in response to the draft changes contemplated to the Urban Hamilton Official Plan and Rural Official Plan that are required to implement Council’s November 2021 decision ignore the expert advice of City staff and attempt to accommodate all the City’s growth within the existing urban boundary.</p> <p>The draft policy changes have been reviewed and are fundamentally flawed as there has not been sufficient analysis to demonstrate proposed amendments will provide the necessary wide range and healthy supply of housing options for current and future residents. Further, no analysis has been completed to confirm how this growth strategy will be serviced.</p> <p>With an understanding of the complexity of development proposals within the urban boundary, it is very apparent, the City is not in a position to review, evaluate and approve the required 88,820 units within the existing built-up area by 2051. Having an Official Plan that does not accommodate the required population targets is in consistent with the Provincial Policy Statement and fails to conform to the Growth Plan for the Greater Golden Horseshoe.</p> <p>Accordingly, on behalf of the owner, UrbanSolutions recommends Council direct staff to bring forward the necessary amendments to the Urban and Rural Official Plans that are consistent and in conformity with the Provincial policy documents. In keeping with the Planning Act we request to be notified of any future meetings or decision of the City of Hamilton.</p>	<p>Proposed policy updates implement the Council direction for the No Urban Boundary Expansion Growth Scenario as the preferred growth strategy.</p> <p>Master Plans are in the process of being completed that will address how servicing will support proposed growth.</p>
11.	March 8, 2022	Corpveil Holdings Ltd. (c/o Urban Solutions)	<p>UrbanSolutions Planning &amp; Land Development Consultants Inc. (UrbanSolutions) is the authorized planning consultant acting on behalf of Corpveil Holdings Ltd., (the Owner) of the property municipally known as 467 Highway No. 56 in the City of Hamilton, who have been participating in the related growth discussions since</p>	<p>Comments noted.</p> <p>Proposed policy updates implement the Council</p>

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			<p>2006. Most recently, UrbanSolutions has submitted comments on behalf of the owner on May 29, 2021 and November 9, 2021 in relation to the Growth Related Integrated Development Strategy 2 and Municipal Comprehensive Review (GRIDS2/MCR).</p> <p>It is with great frustration and disappointment we provide this submission in response to the draft changes contemplated to the Urban Hamilton Official Plan and Rural Official Plan that are required to implement Council’s November 2021 decision ignore the expert advice of City staff and attempt to accommodate all the City’s growth within the existing urban boundary.</p> <p>The draft policy changes have been reviewed and are fundamentally flawed as there has not been sufficient analysis to demonstrate proposed amendments will provide the necessary wide range and healthy supply of housing options for current and future residents. Further, no analysis has been completed to confirm how this growth strategy will be serviced.</p> <p>With an understanding of the complexity of development proposals within the urban boundary, it is very apparent, the City is not in a position to review, evaluate and approve the required 88,820 units within the existing built-up area by 2051. Having an Official Plan that does not accommodate the required population targets is in consistent with the Provincial Policy Statement and fails to conform to the Growth Plan for the Greater Golden Horseshoe.</p> <p>Accordingly, on behalf of the owner, UrbanSolutions recommends Council direct staff to bring forward the necessary amendments to the Urban and Rural Official Plans that are consistent and in conformity with the Provincial policy documents. In keeping with the Planning Act we request to be notified of any future meetings or decision of the City of Hamilton.</p>	<p>direction for the No Urban Boundary Expansion Growth Scenario as the preferred growth strategy.</p> <p>Master Plans are in the process of being completed that will address how servicing will support proposed growth.</p>
12.	March 8, 2022	Flamborough Power Centre (c/o MHBC)	<p>MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) is retained by Flamborough Power Centre Inc. (“FPCI”) on land use planning matters. FPCI owns lands known as the Flamborough Power Centre North Business Park (“Subject Lands”) which is located south of Parkside Drive, east of Highway 6, north of Borer’s Creek and west of the existing residential neighbourhoods in Waterdown. These lands are part of an approved Draft Plan of Subdivision (25T-</p>	<p>Comments noted.</p> <p>Through Staff Report PED17010(p) considered at GIC on April 20, 2022, staff recommended refinement of</p>

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			<p>201507) with phase 1 of the subdivision registered as Plan 62M-1270. The subdivision contains two active businesses (Stryker and Burlington Automation) with a third building expecting site plan approval imminently.</p> <p>We have reviewed the proposed draft amendment to the Urban Hamilton Official Plan (“UHOP”) included in staff report PED21067(a) and understand that several changes are being proposed to UHOP mapping for the Subject Lands. Appendix E to staff report PED21067(a) indicates that portions of the Subject Lands are proposed to be re-designated from Employment Areas to Neighbourhoods on Schedule E – Urban Structure and from Business Park to Open Space on Schedule E-1 – Urban Land Use Designations (see excerpts below).</p> <div data-bbox="653 662 1461 954" data-label="Image"> </div> <p><i>Excerpts from Appendix E to staff report PED21067(a). Proposed change in urban structure from Employment Areas to Neighbourhoods on Schedule E – Urban Structure (left panel) and proposed change in land use designation from Business Park to Open Space on Schedule E-1 – Urban Land Use Designations (right panel), both identified in orange.</i></p> <p>These proposed changes appear to coincide with the existing P5 zoning applicable to those portions of the Subject Lands. However, we note that the area proposed to be re-designated to Open Space along the existing utility corridor (shown in gray above) does not appear to coincide with the existing P5 zoning or the approved Draft Plan of Subdivision. The Draft Plan of Subdivision (attached) shows two 32 metre wide blocks which are identified as “Existing Pipeline Easement”, are zoned P5 and are consistent with the alignment of the</p>	<p>the approved conversion in the Flamborough Business Park to not include the lands that form the utility corridor.</p> <p>Staff have determined that UFE-2 may be deleted in its entirety, as a result of the above redesignation.</p>

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			<p>Utility designation identified above. Therefore, the way in which the proposed land use change is depicted in the excerpts above appears to indicate that, in addition to the 32 metre wide area zoned P5, there will be an additional strip of land to the west of that corridor that will be designated Open Space, but is currently identified as development blocks in the approved Draft Plan of Subdivision. This redesignation is not consistent with the approved Draft Plan of Subdivision and its supporting documentation. Given that the Open Space and Utility designations are mutually exclusive, we request that lands along the utility corridor not be re-designated as proposed to avoid future confusion with respect to the applicable land use designations within the Subject Lands. These lands have been extensively studied through previous development applications that have resulted in the establishment the limits in the current approved Draft Plan of Subdivision and zoning. Therefore, the designations in UHOP Schedule E-1 should remain as-is with respect to the Business Park designation abutting the Utility designation. This is consistent with the treatment of this corridor south of the Subject Lands. Additionally, the existing P5 zoning, the identification of this corridor as a Linkage on Schedule B – Natural Heritage System and Site Specific Policy UFE-2 is sufficient to protect this corridor from incompatible development. Please keep us informed as to staff’s decision with respect to this proposed change. We would be pleased to meet and discuss this change with staff directly. Please do not hesitate to contact us should you have any questions.</p>	
13.	March 8, 2022	Silvestri Investments Inc. (c/o MHBC)	<p>MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) is retained by Silvestri Investments Inc., 456941 Ontario Ltd., 1263339 Ontario Ltd. and Lea Silvestri (collectively, “Silvestri”) on land use planning matters. Silvestri owns several parcels of land within the City of Hamilton (the “City”) including parcels adjacent to the City’s current urban boundary at 140 Garner Road East, 700 Garner Road East, 832 Garner Road East and 7700 Twenty Road East. We have reviewed the proposed draft amendment to the Urban Hamilton Official Plan (“UHOP”) included in staff report PED21067(a). We recognize that City Council has directed staff to proceed with a “No Urban Boundary Expansion” growth option wherein all future growth until 2051 will be accommodated within</p>	<p>Comments noted.</p> <p>The draft Official Plan Amendments have been prepared to implement Council’s decision for a No Urban Boundary Expansion Growth Scenario.</p>

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			<p>the existing urban boundary and that this growth option is reflected in the proposed amendment. However, we note the inclusion of certain policies that further restrict urban boundary expansions outside of a Municipal Comprehensive Review (“MCR”). This includes proposed Policies B.2.2.2 and B.2.2.3 which read as follows:</p> <p><i>“B.2.2.2 Notwithstanding Policy B.2.2.1, adjustments to the urban boundary may be permitted through a municipal comprehensive review provided:</i></p> <ul style="list-style-type: none"> <li><i>a) there is no net increase in land within the urban area;</i></li> <li><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></li> <li><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></li> <li><i>d) the lands are not located within the Greenbelt Area and,</i></li> <li><i>e) there is sufficient reserve infrastructure capacity to service the lands.</i> <p><i>B.2.2.3 Expansions of the Urban Area of 40 hectares or less in accordance with policy 2.2.8.5 and 2.2.8.6 of the A Place to Grow: Growth Plan shall not be permitted in advance of a municipal comprehensive review.”</i></p> <p>These policies stem from Policies 2.2.8.4 - 2.2.8.6 of the Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) which permit municipalities to adjust their urban boundaries outside of the MCR process subject to a set of criteria which include, among others, that there be no net increase of land within the settlement area (in the case of expansions permitted under Policy 2.2.8.4) or that expansions be no greater than 40 hectares (in the case of expansion permitted under Policy 2.2.8.5 and 2.2.8.6). However, proposed UHOP Policies B.2.2.2 and B.2.2.3 quoted above specifically restrict any expansions that may be permitted through Growth Plan Policies 2.2.8.4 – 2.2.8.6.</p> <p>We believe that the Growth Plan policies provide municipalities with important tools be able to respond to changes in the supply and demand for different land uses and in different locations. They offer the ability to make minor adjustments</p> </li></ul>	<p>Proposed policy B.2.2.2 implements Growth Plan policy 2.2.8.4 by permitting adjustments to the urban boundary to be considered through a municipal comprehensive review which is the appropriate time to consider such adjustments and ensure that there is no net increase in land area within the urban area and all other criteria is met.</p> <p>Proposed policy B.2.2.3 implements Council’s direction to accommodate all forecasted growth within the existing urban area to 2051. Inclusion of Growth Plan policies 2.2.8.5 and 2.2.8.6 would be contrary to this direction.</p>

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			<p>to the urban boundary and the rounding out of developed areas to realize location-specific opportunities and accommodate growth in accordance with Provincial and local policies. Although the <i>Planning Act</i> requires that municipalities review official plans at least every five years through an MCR process, these processes can take several years to complete and can therefore result in timelines of longer than five years between plan implementation and the completion of the review process. It is therefore important that Growth Plan Policies 2.2.8.4 – 2.2.8.6 be considered within the UHOP policy framework to ensure that the City has the fullness of tools it needs to accommodate future growth and realize growth-related opportunities. We recommend that further consideration be given to how these policies can be incorporated within the City’s growth management framework, including consideration of any local factors that may form criteria in the evaluation of any development proposals that are made under these policies.</p> <p>We would be pleased to provide examples of such policies for consideration and appreciate staff’s consideration of our comments.</p>	
14.	March 8, 2022	Urban Solutions	<p>As a private planning consulting firm based in Hamilton working on numerous proposed developments throughout the City, UrbanSolutions Planning &amp; Land Development Consultants Inc. (UrbanSolutions) is a key stakeholder in the GRIDS 2 / MCR consultation process. During the January 11, 2022 Planning Committee, the City brought forward the draft Urban Hamilton Official Plan Amendment to accommodate Council's vision for a 'No Urban Boundary Expansion' growth and intensification scenario through to 2051. At this stage, our office has taken the time to carefully review the City-initiated Official Plan Amendment proposed and have made note of our input on various provisions. At this stage, the City of Hamilton have been engaging in productive settlement discussions.</p> <p>The purpose of this letter is to acknowledge and provide comments on the City of Hamilton's proposed Urban Hamilton Official Plan policies contained in the Official Plan Review. We recognize the variety of considerations that are contemplated in developing the applicable regulations to facilitate a 'No Urban</p>	<p>Comments noted.</p> <p>Responses are provided in order of the policies referenced in the letter:</p> <p><i>E.5.2.7.1 m):</i> Provincial policy prohibits the conversion of employment lands to non-employment uses outside of a municipal comprehensive review.</p> <p><i>E.2.3.3.12:</i> The Ancaster node target is implementing</p>

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			<p>Boundary Expansion' growth scenario and hope that our comments below can be used to further improve the proposed changes.</p> <p><i>E.5.2.7.1. m) - Conversation of any lands in the Employment Area designations to permit non-employment uses, including major retail uses, shall only be undertaken as part of a Municipally Initiated Comprehensive Review in accordance with Policy F.1.1.13</i></p> <ul style="list-style-type: none"> <li>• We believe in order to achieve the intensification targets necessary to grow exclusively within the existing Urban Boundary, conversion of Employment Lands should be evaluated on a case-by-case basis to ensure appropriateness rather than restricting Employment Land conversions to Municipally Initiated Comprehensive Reviews. Given the need to greatly increase the number of residential dwellings within the City, completely removing the ability to apply for the conversion of Employment Land for residential growth seems overly restrictive and unnecessary.</li> </ul> <p><i>E.2.3.3.12 - Notwithstanding Policy E.2.3.3. 7, some Community Nodes may be developed as lower intensity nodes appropriate to the character of their adjacent neighbourhoods, other infrastructure, or transportation constraints as follows: a) For the Ancaster Community Node, a target density in the range of 50 persons and jobs per hectare shall apply due to transportation constraints and the existing character of the adjacent neighbourhoods.</i></p> <ul style="list-style-type: none"> <li>• We believe all Community Nodes should be expected to take on their fair share of intensification if 81% of growth is to be accommodated within the existing Urban Boundary. It is unrealistic to expect the Downtown core and City Corridors to develop the vast majority of density for the City given existing policies in relation to compatibility and massing. Specifically, Ancaster's Community Node should not be immune to greater densities when many other nodes in the City with similar transportation networks and neighbourhood character are to achieve target densities 2 to 3 times that which is prescribed to Ancaster. Should a Secondary Plan establish lower density targets, the Secondary Plans should be updated versions which appropriately contemplate the increase in intensification</li> </ul>	<p>the direction of the Ancaster Wilson Street Secondary Plan. Any updates to Secondary Plans would occur through a future phase of the OP Review (Phase 3: Local Context).</p> <p><i>E.3.4.3: multiple dwellings with a maximum of 6 units is considered appropriate within low density areas. No revisions to the policy are necessary.</i></p> <p><i>E.2.3.1.9 – Staff note the concurrence with the increased density target for the Downtown. Further, staff note that all parts of the urban structure will be accommodating significant intensification over the planning horizon, including neighborhoods (approx. 27,000 units) and other nodes and corridors (approx. 35,000 units).</i></p> <p><i>E.3.4.4, E.3.5.7: Master Plans have informed the formulation</i></p>

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			<p>targets brought about by the 2020 Growth Plan for the Greater Golden Horseshoe and the City of Hamilton No Urban Boundary Expansion decision.</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 townhouse dwellings; and, b) may include multiple dwellings containing a maximum of 6 units for lots in proximity to collector roads or arterial roads.</i></p> <ul style="list-style-type: none"> <li>• While the additional types of built form permitted in low density areas is supported, it would be beneficial to include 'townhouses in all forms' as a permitted use to provide flexibility in the different types of townhouse dwellings that can be accommodated in these areas.</li> </ul> <p><i>E.2.3.1.9- The Downtown Urban Growth Centre shall generally have the highest aggregate density within the City with a minimum target density of 500 persons and jobs per hectare. The Downtown Urban Growth Centre may evolve over time to a higher density without an amendment to this Plan.</i></p> <ul style="list-style-type: none"> <li>• An increase in the Downtown Urban Growth Centres' minimum density is appropriate in order to accommodate the increase in infill development necessary to facilitate an 81% intensification rate within the Urban Boundary. However, our firm feels it is unrealistic to accommodate all intensification within the Downtown Urban Growth Centres. Accordingly, the other elements of the Urban Structure should clearly prescribe a notable increase in density from what was previously required for each designation. Additionally, existing policies related to compatibility of massing within the Downtown Urban Growth Centre should be made more flexible to enable developments to provide the level of density prescribed for the area without contradicting compatibility and transition policies (i.e. angular plane requirements, etc.).</li> </ul> <p><i>E.3.4.4 For low density residential areas, the maximum net residential density for the purpose of estimating unit yield and/or population growth, as part of the preparation of Secondary Plans, Special Policy Areas, Infrastructure Master Plans and Community Plans, shall be 60 units per hectare.</i></p>	<p>of Secondary Plans, including prescribed residential density ranges, so it is not appropriate to increase flexibility to the residential density ranges within existing Secondary Plans at this time. Following the completion of Master Plans to implement the preferred growth strategy for the GRIDS2 Process, the future OP Review – Phase 3 (Local Context) could address any updates necessary to implement Council’s decision for a No Urban Boundary Expansion growth scenario.</p> <p><i>E.3.5.8 / E.3.6.8 – Any changes related to urban design policies and requirements would occur through a future phase of the OP Review.</i></p> <p><i>E.3.6.7: The 30 storey height limit and restriction to not exceed the height of the escarpment is consistent with the limit established by the Downtown Secondary Plan.</i></p>

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			<p><i>E.3.5. 7 For medium density residential areas, the maximum net residential density for the purpose of estimating unit yield and/or population growth, as part of the preparation of Secondary Plans, Special Policy Areas, Infrastructure Master Plans and Community Plans, shall be greater than 60 units per hectare and not greater than 100 units per hectare.</i></p> <ul style="list-style-type: none"> <li>• With regards to the two policies noted above, although language has been added noting that the maximum densities outlined are for the purposes of the preparation of Secondary Plans, etc. The true density ranges envisioned for these areas should be clearly stated so as to not encourage consistent disputes over what density is considered appropriate for an area when a development is proposed. Our concern is that, by not providing a direct maximum or minimum, the process for providing appropriate intensification will be unnecessarily lengthened by forcing case-by-case density debates between the public and private sector for each development within a low or medium density area. Bearing this in mind, we believe the density ranges prescribed should be greater than those currently listed in order to recognize the intent to freeze any future expansions of the Urban Boundary.</li> </ul> <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:</i></p> <ol style="list-style-type: none"> <li><i>a) there are no adverse shadow impacts created on existing residential uses within adjacent lands designated Neighbourhoods;</i></li> <li><i>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,</i></li> <li><i>c) buildings are stepped back from the street to minimize the height appearance from the street, where necessary.</i></li> </ol> <ul style="list-style-type: none"> <li>• The proposed policy change to allow for increased height to 11-storeys is supported, however the requirements to support an increase in height should ensure flexibility in order for the policy direction to be implemented. Specifically, angular plane requirements are often not the true representation of appropriate</li> </ul>	

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			<p>transition as they generally tend to overly restrict massing in an interest of maintaining 45-degree planes with abutting properties. In doing so, angular plane requirements often result in inefficient developments from a construction, energy efficiency and unit yield perspective. We recommend that emphasis is not placed on angular plane requirements as a test to demonstrate conformity. Combining E.3.5.8 b) and c) generates an appropriate policy which applies an adequate amount of control over massing transition while upholding flexibility to accommodate the intensification targets prescribed. Accordingly, the combined policy should be revised to read E.3.5.8 b): "buildings are appropriately stepped back from adjacent areas designated Neighbourhoods as well as stepped back from the street to minimize the height appearance from the street, where necessary."</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 shall not exceed the height of the Niagara Escarpment, to the satisfaction of the City.</i></p> <ul style="list-style-type: none"> <li>• Restricting the maximum height of high density residential uses to 30-storeys based on the height of the Niagara Escarpment is an outdated regulation which we believe should be removed from the proposed UHOP Amendment altogether. The City of Hamilton is the 3rd largest City in Ontario and has committed to accommodating 81% of intensification within the existing Urban Boundary. Further, the City is presently contemplating a 45-storey residential tower as part of the Pier 8 waterfront redevelopment of which the City is a partner. It is not realistic for an urban area like Hamilton to restrict all building height to 30-storeys if it is to achieve it's intensification targets. It is also worth noting that a majority of sites where a structure is being built to 20-storeys+ inherently blocks views of the escarpment for pedestrians to begin with, with the only measurable impact being a 'puncturing' of the skyline from the top of the Escarpment. As several projects in the City already puncture the existing skyline, it is unclear why this height limit</li> </ul>	

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			<p>is still being valued as an important restriction. We strongly urge the City to remove the introduction of policy E.3.6.7 altogether on this basis.</p> <p><i>E.3.6.8 Development within the high density residential category shall be evaluated on the basis of the following criteria:</i></p> <p><i>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 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> <ul style="list-style-type: none"> <li>• An alteration to the wording of the above noted policy is recommended to apply a policy direction which places importance on the evaluation of transition as opposed to requiring intervening land uses between multiple dwellings over 11-storeys and abutting low profile residential uses. To reiterate what has been raised earlier in this letter, accommodating a residential intensification rate of 81% will require infill development of greater scale than what is typically seen in the City. Further, this infill development will need to occur both in existing dense areas of the City and in low-profile residential areas of the City. The proposed policy should recognize this fact and stress the importance of implementing appropriate transition to abutting low-rise properties rather than suggesting the intervening land uses is the first path forward in these scenarios.</li> </ul> <p>We ask that our office is notified of any updates on the development of the Hamilton Official Plan Review, as well as any decisions that are made on this matter.</p> <p>On behalf of UrbanSolutions, we appreciate the City's efforts in this regard and for the opportunity to participate in this important process.</p> <p>Please feel free to contact the undersigned with any questions or comments.</p>	
15.	March 9, 2022	DiCenzo (Golf Club	On behalf of our client, DiCenzo (Golf Club Road) Holdings Inc., we are providing this letter to, once again, voice our client’s support for the previous	Comments noted.

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		Road Holdings) Inc. (c/o Biglieri Group Ltd.)	<p>recommendation of the “Ambitious Density” scenario as the preferred Community Area land needs scenario to accommodate the Provincially mandated forecasted growth to 2051.</p> <p>We have read Staff Report PED21067 and we do not support the proposed changes to the UHOP and RHOP which seek to implement a no boundary expansion scenario. Some of the proposed revisions to UHOP polices include:</p> <ul style="list-style-type: none"> <li>• A.2.1 Direction 3 concentrating new development within existing built-up areas through intensification and adaptive re-use but with no reference to development within greenfield areas;</li> <li>• A.2.3.3.4 - The requirement of a minimum of 80% intensification rate for residential development to occur within the built-up area;</li> <li>• A.2.4 reference to a No Urban Boundary Expansion scenario;</li> <li>• B.2.1.1 which states that the existing urban boundary will accommodate all of the City’s projected urban growth for the next 30 years;</li> <li>• B.2.2.1 which states that the City’s urban boundary is firm and no expansion is required to 2051;</li> <li>• B.2.2.3 which would have the effect of not permitting expansions of 40 hectares or less outside an MCR which further includes the deletion of the current B.2.2.3 and B.2.2.4 policies and instead requiring a municipal comprehensive review for consideration of an urban boundary expansion; and</li> <li>• The revised Schedule A which implements no settlement boundary expansion by exclusion of any boundary expansion. Similar proposed policy changes to the RHOP to implement the no boundary expansion include:</li> <li>• B.2.1 – maintaining a firm urban boundary</li> </ul> <p>While we support the principle of allocating growth within the existing Urban Boundary through intensification, it is our opinion that this could have been achieved with a more balanced approach to provide greater housing options within an Urban Boundary Expansion area as carefully and comprehensively laid out by your City Planning Staff in the Ambitious Density Scenario.</p> <p>In conclusion, we do not support the proposed UHOP and RHOP policies as contemplated in Report PED21067, and we ask that Council reconsider their</p>	<p>The draft Official Plan Amendments have been prepared to implement Council’s decision for a No Urban Boundary Expansion Growth Scenario.</p>

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			<p>position for a no urban boundary expansion option to deal with the significant urban growth over the next 30 years, and revisit Staff’s recommendation of the “Ambitious Density” growth scenario.            Thank you for your time and consideration.</p>	
16.	March 9, 2022	Masonry Works Council of Ontario (c/o Armstrong Strategy Group)	<p>We are reaching out to touch base after our recent engagement with your planning team. Masonry Works Council of Ontario is the voice of Ontario’s brick, stone and block masonry sector, and we’re pleased to provide input to help communities raise the bar on urban design and built form.</p> <p>The neighbourhoods communities plan and build today will be part of the urban fabric for generations. Whether they become the heritage landmarks of the future or the eyesores of the next generation comes down to the decisions urban planners will make today. It makes sense to go into these development projects with a planning vision that prioritizes building the most high-quality possible buildings and neighbourhood, ones with the architectural beauty and durability to stand the test of time. Strong urban design policy, enabled through Official Plans and other supporting documents, is vital to ensuring that new communities are built to standards that residents and planners can take pride in, now and in the future.</p> <p>The Province of Ontario has empowered communities, through provisions in the <i>Planning Act</i>, to have significant input into matters of exterior design and character. The applicability of council-approved Urban Design Guidelines has been upheld by the Local Planning Appeals Tribunal in various cases over the years. These powers were granted to communities to be used.</p> <p>For the better part of a decade, Masonry Works has been working with Ontario municipalities to provide advice, recommendations and best practices on policies that can help raise the bar on urban design and built environments at all scales of development. We’re pleased to offer recommendations here based on that advice. It’s our hope these recommendations will help you develop strong, comprehensive design policies and continue to build tomorrow’s heritage neighbourhoods, today.</p> <p><b>OUR RECOMMENDATIONS</b></p>	<p>Comments noted.</p> <p>Responses are numbered in accordance with letter:</p> <ol style="list-style-type: none"> <li>1. Climate related updates to urban design policies encourage locally sourced building materials and recycled building materials to address impacts of a changing climate, but does not specify brick, stone and glazing.</li> <li>2. Permeable pavers are included in the new definition of low impact development. Policy updates encourage the use of low impact development techniques including C.5.3.17, C.5.6, C.5.6.1.</li> <li>3. Updates to Secondary Plans, if required, would be considered through future</li> </ol>

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			<p>We recommend the following adjustments to the Official Plan and supporting planning documents:</p> <ol style="list-style-type: none"> <li>1. Include durability and longevity as part of the OP’s criteria for locally sourced materials. The new Policy B.3.2.4.7 encourages the use of locally sourced materials in both new construction and retrofits. Not only should these materials be local, they should also be chosen for their durability, longevity and recyclability. This is a particular advantage for Hamilton in that it is located near the Niagara Escarpment’s outcropping of the Queenston Shale, the source of the vast majority of brick masonry produced in Ontario. Masonry is long-lived and emits no carbon once laid, allowing it to pay down the carbon debt accrued during the manufacturing process by simply lasting so long that no replacement is needed. It can be repurposed as aggregate for road beds following its useful life. The proximity advantage allows it to be trucked to job sites easily from locations as close as Burlington.</li>   <li>2. Ensure that stormwater management policies encourage the use of permeable pavement systems. Section C.5.4.9 notes that stormwater quality management should be achieved in part through stormwater management best practices provided for by the City’s Urban Design policies. These guidelines should include strong encouragement or requirement for the use of permeable paving systems in areas such as parking spaces, plazas, sidewalks and some lower-traffic streets. These systems allow water to filter through a sub-pavement filtration level. They allow for the elimination of large stormwater retention ponds, facilitating increased density, while also eliminating puddling and filtering pollutants from runoff. While these systems are encouraged in section 5.6.1, they should be given greater emphasis.</li>   <li>3. Ensure that all new Secondary Plans are required to outline specific guidance for the built form. While the revisions to the OP envision detailed SPs for all Sub-Regional Service Nodes, with focus on factors such as built form, this guidance should be specific and take into account the building envelope. At a time when</li> </ol>	<p>Phase 3 of the OP Review (Local Context).</p> <p>4. Regarding deconstruction policies, staff propose to revise Policy B.3.2.4.7 to encourage recycling of materials as part of building construction or redevelopment.</p>

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			<p>the Province is considering policies to help speed development times and increase supply, it is vital for communities to eliminate time-wasting ambiguity in policy. Language such as “a high quality of built form” leaves it open to debate as to what constitutes high quality. The City can help curtail this ambiguity by specifying primary building materials to be preferred in Secondary Plan areas, such as brick, stone and glazing, with other materials discouraged (such as low-durability materials) or used as secondary cladding in combination with the primary materials.</p> <p>4. Implement deconstruction policies that discourage outright demolition and encourage recycling of preservable materials. Many large municipalities are implementing ordinances emphasizing resource recovery of old buildings, including Seattle, Portland and Vancouver. In keeping with this, the Municipality should require not demolition, but deconstruction, in which as much heritage material as possible is preserved. In particular 100% of masonry can be saved in a proper deconstruction process and recycled into new building material or road bed bases. Refer to the City of Seattle’s policies concerning deconstruction for further detail.</p>	
17.	March 11, 2022	Jennifer Kinnunen	<p>Topic Area 1 – Growth Management</p> <ul style="list-style-type: none"> <li>- Support policy changes that ensure no urban boundary expansions occur.</li> <li>- Support the city’s commitment to 80% intensification in the built-up urban area, to be achieved by building low, middle + high density neighbourhoods in the Downtown Hamilton Growth Centre (high density), in nodes + corridors (middle density), + with gentle infill development in low density urban neighbourhoods (low density).</li> <li>- ‘designated greenfield areas’ in medium and low density suburban areas need higher people + jobs per hectare (p+j/ha) targets to achieve a minimum density required to support frequent transit service (bus every 10 to 15 minutes)</li> <li>- proposed increase to 100 p+j/ha * intensification needs to be undertaken with civic design at the forefront, recognizing the public spaces that are essential to support the community.</li> </ul>	<p>Comments noted.</p> <p>Responses are provided by Topic Area identified in letter:</p> <p><i>Growth Management:</i>  The DGA density target of 60 pjh is an average measured across the entire DGA. Much of the DGA is already developed or approved for development at a lower density. Undeveloped lands</p>

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			<p>Topic Area 2 – Employment</p> <ul style="list-style-type: none"> <li>- Suburban areas need higher people + jobs per hectare (p+j/ha) targets, suggest increasing it to 100 p+j/ha</li> <li>- More live/work/play (mixed use) developments</li> <li>- Leading to an increase in transportation services and transportation employment</li> <li>- Review existing employment areas for opportunities to increase jobs per hectare (p+j/ha) targets of employment lands (potential for 3P projects)</li> <li>- Invest in the protection and celebration of natural features to create recreation, tourism and public works employment</li> <li>- Support staff-proposed ‘employment land conversions’ to mixed use higher density/commercial/retail in locations where mixed use development makes more sense</li> <li>- Focus on existing end of life infrastructure before future developments such as the Confederation GO Station</li> <li>- Major employment areas/coordoors demand frequent &amp; reliable transit service and good active transportation infrastructure.</li> <li>- This includes associated public spaces and the city employment associated with maintaining them</li> </ul> <p>Topic Area 3 – Cultural Heritage</p> <ul style="list-style-type: none"> <li>- First Nations and First Nations history in our city needs to be acknowledged and respected through meaningful engagement with Indigenous communities and embodied in city governance and policy (ex. seven generations, environmental stewardship)</li> <li>- It is not enough to engage, Indigenous placemaking including spaces for gathering and ceremonial fires needs to be undertaken,</li> <li>- City policies and positions on cultural heritage need to be decolonized to demonstrate the understanding that cultural heritage persists before settlement.</li> <li>- The preservation of heritage properties should be done with civic scrutiny</li> </ul> <p>Topic Area 4 – Provincial Plans</p>	<p>with no existing approvals will develop at higher densities, including the Fruitland Winona area, which is planned to develop at 70 pjh. Policy has been clarified to reflect this distinction.</p> <p><i>Employment:</i> See comment above regarding greenfield density target.</p> <p>Density targets for employment areas were established by land needs consultant and assume significant intensification of existing employment lands.</p> <p>Staff are undertaking various initiatives to boost awareness and protection of natural heritage features. Phase 2 of the Municipal Comprehensive Review will involve refinements to natural heritage system mapping and policy updates.</p>

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			<ul style="list-style-type: none"> <li>- While municipalities must conform to provincial plans, the municipality maintains the authority (and responsibility to its citizens) to determine how these targets are reached</li> <li>- Any change to the Provincial Plan that reduces a municipality or citizens ability to advocate for higher quality built environments should be scrutinized</li> <li>- The municipality (as the representative of citizens) should not allow political and financial collusion to create subpar built environments</li> </ul> <p>Topic Area 5 – Housing</p> <ul style="list-style-type: none"> <li>- Support for the Housing Action Plan, city targets and progress to be made more accessible to citizens</li> <li>- Policy changes required to support more affordable + deeply affordable housing</li> <li>- Policy changes to support citizens from renovictions</li> <li>- Ambitious ‘inclusionary zoning’ policy required around all ‘major transit station areas’ (LRT stations, existing GO/HSR Stations), and a</li> <li>- Aggressive ‘community benefits charges’ policy that includes affordable housing as an eligible charge.</li> <li>- Urgent ‘family friendly’ housing policies required in higher density areas like Downtown Hamilton, and in higher density buildings. Policies to include public spaces and amenities.</li> <li>- Support the proposed residential intensification policies as an important way to provide more housing options and options that span a range of affordability.</li> <li>- 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).</li> </ul> <p>Topic Area 6 – Climate</p> <ul style="list-style-type: none"> <li>- All planning decisions require a decolonial climate lens</li> <li>- Climate change impacts require more aggressive sustainability and resilience policies</li> <li>- Targets need to be intersectional (mitigation, adaptation and reduction)</li> <li>- Standards for new construction need to be higher (Green Development Standard, Green Building Standards)</li> </ul>	<p>Proposed policies encourage reuse of existing infrastructure.</p> <p>Existing and proposed policies identify need for transit service to employment areas (e.g., C.4.4.3).</p> <p><i>Cultural Heritage:</i> Implementation work on the Urban Indigenous Strategy will consider gathering spaces and ceremonial spaces.</p> <p>Alterations to designated built heritage resources are considered by Heritage Committee. The Heritage Act allows municipalities to pause the review of building permits, while non-designated building heritage resources are considered by Heritage Committee.</p> <p><i>Provincial Plans:</i> The Planning Act requires municipal official plans to be</p>

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			<ul style="list-style-type: none"> <li>- Community Energy &amp; Emissions Plan (CEEP) &amp; Urban Forest Strategy need immediate attention for finalization to ensure the Official Plan captures all commitments.</li> <li>Topic Area 7 – Urban Structure/ Zoning By-Law</li> <li>- Urban structure policies designed to build ‘complete communities’ are urgently needed</li> <li>- communities that are higher density and, therefore, more transit supportive, walkable/bikeable, able to support neighbourhood amenities.</li> <li>- Low and Mid-rise developments in urban and suburban neighbourhoods are supported but must include provisions/upgrades for public space.</li> <li>- Achieve density increases through zoning policies for deeply affordable/ affordable /rent controlled units targeted at ‘major transit station areas</li> <li>- key tools include inclusionary zoning and community benefits charges</li> <li>Topic Area 8 – Infrastructure</li> <li>- Target community facilities that cannot be maintained for adaptive reuse projects</li> <li>- Green infrastructure policies needed to better manage impacts of the climate crisis</li> <li>- Adopt ambitious targets for Urban Forest Strategies (ex. minimum 40% urban canopy cover) and Green Development Standard (complete with incentivized actions for upgrades vs new construction)</li> <li>- Urgent policies are needed to support stormwater management and upgrade existing infrastructure</li> <li>- Opportunity to subsidize green infrastructure renovations/upgrades</li> <li>- Low impact development standards for new construction</li> <li>Topic Area 9 – Transportation</li> <li>- Urgent aggressive policies are required to establish extensive active transportation infrastructure (walking, cycling) and public transit, complete with public spaces and provisions</li> <li>- focus should be shifted from ‘urban hamilton’ to reflect the quality and reliability of services provided</li> </ul>	<p>consistent with the Provincial Policy Statement. Phase 3 – Local Context of the Official Plan Review will consider any additional local matters beyond what is included in provincial planning policies.</p> <p><i>Housing:</i>  Additional policies to support affordable, family friendly housing, inclusionary zoning and community benefits charges will be considered through Phase 3 – Local Context and Phase 4 – Major Transit Station Area of the Official Plan Review.</p> <p><i>Climate:</i>  Phase 3 – Local Context of the Official Plan Review will consider additional policy updates to the proposed Community Energy &amp; Emissions Plan (CEEP), Sustainable Building and Development Standards, and Urban Forest Strategy, once approved by Council.</p>

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			<ul style="list-style-type: none"> <li>- Active transportation incentives to recognize the health benefits</li> <li>- Transportation infrastructure must include public spaces and provisions (ex. public bathrooms)</li> <li>- The definition of ‘urban form’ should be revised to incorporate and elevate civic/public design as a means to facilitate active transportation and easy access to public transit</li> <li>- Current standards such as ‘grid patterned streets’ are limiting and unimaginative</li> <li>- Support policies designed to ensure mobility justice - easy movement for people of all mobility abilities, and all socio-economic levels.</li> <li>- Mobility justice can be used to measure the quality of public space and should be used to measure for all the sections identified here March 2022 - Rural Hamilton Official Plan</li> <li>Topic Area – Firm Urban Boundary</li> <li>- Support policy changes in the Rural Official Plan that prohibit the expansion of urban Hamilton into rural Hamilton.</li> <li>- Policies required to support the circular economies in rural and rural-adjacent areas complete with incentives for green economies, food security and renewable energies</li> </ul>	<p><i>Urban Structure / Zoning:</i>  Comments noted.</p> <p>As per above, policy updates to address inclusionary zoning and community benefits charge, if required, would occur through a future update.</p> <p><i>Infrastructure:</i>  Phase 3 – Local Context of the Official Plan Review will consider additional policy updates to the proposed Community Energy &amp; Emissions Plan (CEEP), Sustainable Building and Development Standards, and Urban Forest Strategy, once approved by Council.</p> <p><i>Transportation:</i>  Policy updates address need for complete streets approach and provision for active transportation.</p> <p><i>Firm Boundary:</i>  Phase 2 – Rural of the Municipal Comprehensive</p>

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				Review / Official Plan Review will address updates to the Rural Hamilton Official Plan to respond to Provincial Conformity Matters.