BOUSFIELDS INC.

Project No.: 16180-4

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 The Cadillac Fairview Corporation Limited, the manager on behalf of the owner of the properties municipally addressed as 999 Upper Wentworth Street and 508-520 Limeridge Road East, also known as CF Lime Ridge Mall (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.

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:

BOUSFIELDS INC.

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

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

Ishley Paton, MCIP, RPP

cc. The Cadillac Fairview Corporation Limited

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