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May 16, 2022

GSAI File No. 709-014

City of Hamilton  
71 Main Street West  
Hamilton, ON  
L8P 4Y5

**Attention: Stephanie Paparella, Legislative Coordinator**

**RE: GRIDS 2 and Municipal Comprehensive Review  
City of Hamilton**

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Dear Chair and Members:

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants for Hamilton Country Properties Ltd. (c/o Country Homes), who own lands within the Elfrida Whitebelt area which are municipally known as 646 Henderson Road (the 'Subject Property').

On behalf of Hamilton Country Properties Ltd and further to our previous correspondences dated January 29, 2021, and May 27, 2021, we are pleased to provide this letter in relation to the ongoing GRIDS 2 and Municipal Comprehensive Review (MCR) process.

GSAI has been participating in the City's ongoing MCR process. We understand that this process will culminate in a comprehensive Official Plan Amendment ('OPA') that will modify policy permissions for lands across the City of Hamilton, including the Subject Property. We understand the City of Hamilton is completing the MCR process to update the Urban and Rural Hamilton Official Plans to conform with Provincial planning documents and to implement City Council's direction for the "No Urban Boundary Expansion" growth scenario.

In our opinion, City Council's decision to maintain a firm urban boundary to the year 2051 does not conform to the MCR policy requirements outlined in A Place to Growth: Growth Plan for the Greater Golden Horseshoe, 2020 (the 'Growth Plan') and is inconsistent with the Province of Ontario's Land Needs Assessment Methodology. Our opinion herein is consistent with the technical opinion provided by City staff and its consultants through the Land Needs Assessment, in that additional urban boundary expansion is required to meet projected population and employment growth to the year 2051.

We support a growth management strategy across the City of Hamilton that conforms with the policies of the Growth Plan and is consistent with the Provincial Land Needs Assessment Methodology. We believe that it is good planning to allocate future growth through intensification in the existing urban area supported

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by sufficient community services, infrastructure, and amenities and new growth that achieves compact, walkable, and sustainable communities in the new urban expansion areas. We do not believe the City's "No Urban Boundary Expansion" growth scenario and corresponding OPAs achieve this balance of growth.

We continue to support City staff's recommendation that an urban boundary expansion into the City's existing Community Area Whitebelt lands, including the Elfrida, Twenty Road East, and Twenty Road West lands, are required to accommodate population and employment growth to the year 2051. We maintain the position that Elfrida lands, in its entirety, remain a logical, appropriate, and needed expansion to the City's urban boundary. Through the previous GRIDS 1 and subsequently the Elfrida Secondary Plan process, a Nodes and Corridors land use structure was endorsed. Following GRIDS 1, significant resources were spent to implement the City's growth management strategy, which includes a subwatershed study for the Elfrida lands, and the extension of services. An urban boundary expansion into the City's Community Area Whitebelt lands, including the Elfrida lands, provides a balanced growth strategy to accommodate a market-based approach for housing supply, while prioritizing key growth management objectives such as climate change, complete communities, preserving and enhancing the natural heritage system and effectively planning around existing and planned infrastructure.

Thank you for the opportunity to provide these comments. Our Client wishes to be informed of updates and future meetings. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

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Colin Chung, MCIP, RPP  
Managing Partner

cc. Mr. Steve Robichaud, City of Hamilton  
Mr. Heather Travis, City of Hamilton.  
Hamilton Country Properties Ltd.  
Mr. Patrick Harrington, Arid & Berlis LLP