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May 16, 2022

Project: FE.HA

Mayor Eisenberger & Councilors of the Planning Committee

c/o Clerk
City of Hamilton
Hamilton City Hall
71 Main Street West
Hamilton, ON L8P 4Y5

Attention:

Re: Statutory Public Meeting on Draft Official Plan

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.

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.

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 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.

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) attached as Appendices A and B to Report PED21067(b) 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:

- A.2.1 Direction 3 on concentrating new development within existing built-up areas with no reference to need for greenfield growth;
- A.2.3.3.4 with a minimum 80% of residential develop to occur within the built-up area;
- A.2.4 in reference to a No Urban Boundary Expansion and accommodating all growth within the existing Urban Area;
- B.2.1.1 in reference to the existing urban boundary representing all of the City's project urban growth for 30 year;
- B.2.2.1 referring to the City's urban boundary as firm and no expansion being required;
- B.2.2.3 not permitting expansions of 40 hectares or less;
- 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
- Schedule A and the lack of a settlement boundary expansion.

The proposed policy changes to the RHOP to implement the no boundary expansion include:

- B.2.1 in reference to maintaining a firm urban boundary and not adding lands to the Urban Area;
- The deletion of Special Policy Area B; and
- Volume 3: Map A – the deletion of the Elfrida Special Policy Area B.

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.

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.

The City has spent or allocated hundreds of millions of dollars on infrastructure projects servicing each of 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.

Yours very truly,

SGL PLANNING & DESIGN INC.

A handwritten signature in dark ink, appearing to read 'Paul Lowes', with a large, stylized loop at the end.

Paul Lowes, MES, MCIP, RPP

c.c. David Sunday, Gowling WLG
Jonathan Minnes, Gowling WLG
Frisina Group