



Project No. 21P579

March 26, 2021

VIA E-MAIL

Chair & Members of the General Issues Committee
c/o Stephanie Paparella (stephanie.paparella@hamilton.ca)
City of Hamilton
71 Main Street West
Hamilton, ON L8P 4Y5

Dear Chair & Members of the General Issues Committee,

**Re: 2633 Upper James Street, Hamilton
GRIDS 2 and Municipal Comprehensive Review – Final Land Needs
Assessment (PED17010(i))
Item 8.1 of the March 29, 2021 GIC Meeting**

We are the planning consultants to Movengo Corp., who have an ownership interest in the lands municipally known as 2633 Upper James Street (the “Subject Site”). In reviewing Staff Report PED17010(i) (the “Report”), which is scheduled for the March 29, 2021 General Issues Committee, we have issues with Recommendation (e) and respectfully request that the Committee not endorse this recommendation, especially as it applies to the Subject Site.

Recommendation (e) of the Report states:

“(e) That at the conclusion of GRIDS 2 / MCR and the final approval of the implementing Official Plan Amendments identifying the land need to accommodate growth to 2051, staff prepare a report for Council with respect to the necessary steps for recommending to the Province that any remaining Community Area whitebelt lands be added to the Greenbelt.”

The Subject Site falls within the whitebelt lands and is currently home to the Cameron Speedway & Amusements, which includes go-kart tracks, paintball fields, rock wall, laser tag arena, target range, bungee trampoline, rope course, bubble soccer, as well as accessory retail and restaurant facilities. The go-kart track and accessory uses have existed on the subject site since for over 40 years and are permitted as per the existing Urban Hamilton Official Plan and Zoning By-law No. 05-200.

In our opinion, adding the subject site to the Greenbelt will create a land use issue and restrict the expansion, addition, or modification to any of the existing uses. In addition, removing the subject site from the whitebelt will restrict the ability of the City to expand its urban boundary to accommodate future employment lands. Although the City's Land Needs Assessment (the "LNA") identifies that no additional lands are required to achieve the employment growth target to 2051, it does state:

"Further analysis will also be required from an employment perspective, especially in light of the conclusion that no additional lands are required. Rather than determining the preferred location of a new employment area, the strategic objective under these circumstances is to encourage the most efficient use of the existing land base. To encourage the most efficient use of the occupied supply, intensification must be facilitated especially in the developed central urban employment areas. To encourage an efficient use of the vacant land supply, higher intensity employment uses must be encouraged through a combination of land use planning permissions and incentives for new users to adopt high quality building standards. This objective will be a particular challenge to achieve in the AEGD, where demand is expected to be strong for relatively low-density goods movement and logistics facilities, along with some new manufacturing uses."

In this regard, the LNA does identify the need for additional analysis as it relates to the employment lands and how to best capitalize on existing vacant and underutilized land. This analysis may result in the need to reserve potential future capacity, if, for example, some of the vacant employment lands were used to accommodate land-extensive goods movement facilities. Furthermore, the subject site is near the Hamilton International Airport (HIA), which has seen significant growth and development recently. In our opinion, removing whitebelt lands and the potential to add future employment land near the HIA, a major structuring element of the City, is short-sited and would preclude the addition of the subject site to the urban boundary at future official plan reviews or beyond 2051, when a need for additional land may be identified.

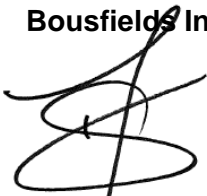
In our opinion, maintaining the subject site as whitebelt lands provides the City with flexibility to potentially add future urban areas as part of future mandated municipal comprehensive reviews and beyond 2051, especially as the City and Region continue to see unprecedented growth and increased targets with each new Provincial Growth Plan.

For these reasons and more, we respectfully request that the Committee not endorse recommendation (e) of the Report, especially as it relates to the subject site. We also request to be added to the notification list regarding the City's LNA and GRIDS 2 process.

Thank you for your consideration and please feel free to contact me should you require any additional information or clarification.

Respectfully Submitted,

Bousfields Inc.



David Falletta MCIP, RPP

/DF:jobs

cc. *Client*
H. Travis, City of Hamilton (via e-mail)