



March 26, 2021

Chair and Members of General Issues Committee  
City of Hamilton  
71 Main Street West  
Hamilton, Ontario  
L8P 4Y5

Via email: [stephanie.paparella@hamilton.ca](mailto:stephanie.paparella@hamilton.ca)  
and [clerk@hamilton.ca](mailto:clerk@hamilton.ca)

Dear Chair and Members of the General Issues Committee:

**RE: GRIDS 2 & MUNICIPAL COMPREHENSIVE REVIEW – FINAL LAND NEEDS  
ASSESSMENT (PED17010(i))  
MHBC FILE: 1594A**

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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 including parcels adjacent to the City’s current urban boundary at 700 Garner Road East, 832 Garner Road East and 7700 Twenty Road East.

We have reviewed report PED 17010(i), as well as previous documentation related to the GRIDS 2 / MCR project, and commend staff for the important work that has been done to date to advance the City’s growth management. However, we do have some concerns with respect to the recommendation to adopt the “Ambitious Density” scenario as the preferred Community Area land needs scenario at this time. The Ambitious Density scenario proposes a stepwise increase in the City’s intensification target over the next three decades starting at the Growth Plan minimum of 50% (2021-2031) and increasing to 60% (2031-2041) and 70% (2041-2051). These intensification targets represent a substantial deviation from the recent intensification trends experienced by the City for the previous decade which has shown approximately 35% of new growth within the existing built up areas of the City.

We believe that while it is important to continue to push for increased intensification, setting an intensification target that reflects market-based supply needs is also important to ensure that an appropriate mix of housing is provided to maintain choices and accommodate all household sizes while maintaining affordability as per the policies of the Growth Plan. The Residential Market Demand Analysis contained in Appendix B to report PED 17010(i) notes that achieving the Growth Plan minimum intensification target of 50% will require a dramatic shift in housing mix where a significant amount of family-oriented households would need to choose apartment living over more traditional ground-related forms. It concludes that, while a more balanced approach for Hamilton would be an intensification target

between 40% and 50%, the Growth Plan minimum 50% intensification target is still a good aspirational target and is recommended for current planning purposes.

We understand the City's approach is based on achieving a number of policy objectives. However, given the potential market and housing supply risk associated with selecting an imbalanced intensification target, we trust the City will take a careful approach and ensure that additional study, consultation and monitoring take place within the next decade before adopting a firm intensification target above 50% out to 2051. A policy approach that allows monitoring within the next growth period and an ability to adjust the target based on housing demand, supply and affordability data would represent a more pragmatic approach and, given the uncertainties with the market response to the pandemic, may be more appropriate.

As Council proceeds to evaluate growth options as part of the next phase of GRIDS 2 / MCR, we would also like to reiterate that the properties owned by Silvestri have been the subject of previous submissions and discussions regarding their inclusion within the urban boundary (832 Garner Road and 7700 Twenty Road) and conversion to residential land use (700 Garner Road). We would like to emphasize that these properties are located directly adjacent to the current urban boundary making them prime candidates to accommodate residential growth over the 2021-2031 period given their proximity to existing municipal services, parks, community facilities, transportation infrastructure and complementary land uses.

We appreciate the opportunity to provide comments at this stage and work with staff through the next steps in the process.

Sincerely,  
**MHBC**



Gerry Tchisler, M.Pl., MCIP, RPP  
Associate



Dana Anderson, MA, FCIP, RPP  
Partner