



March 24th, 2023

City of Hamilton
 Council Chambers
 71 Main Street W
 Hamilton ON L8P 4Y5

TO:	Clerks Department clerk@hamilton.ca 905-546-4408
RE:	Secondary Planning Strategy for Urban Expansion Areas and Municipal Comprehensive Review Update (PED21067(d))

Dear Council,

Corbett Land Strategies Inc (CLS) is writing on behalf of the Upper West Side Landowners Group (UWSLG) (formerly Twenty Road West Landowners Group). The UWSLG lands are identified as “Area 2” and “Area 3” of the Twenty Road West (Appendix C to Staff Report PED21067(d)).

This letter is in response to the City’s Secondary Planning Strategy for Urban Expansion Areas and Municipal Comprehensive Review Update as discussed at Planning Committee on March 21st (PED21067(d)).

We have read the report, and our summarized comments can be found below.

- The UWSLG is supportive of the proponent leading the secondary plan process, where appropriate;
- Supportive of the proposed Secondary Plan Guidelines, with due public consultation on the final set;
- In support of the proponents incurring the costs for the studies, background work and all associated public consultation; and,
- Supportive of landowner groups being formed in terms of finalizing cost sharing agreements to advance proponent led Secondary Plan processes.

In support of a secondary plan for the subject Lands, to date we have advanced the following:

- Cost and Funding Agreements amongst landowners;
- Functional Servicing and Stormwater Management Report
- Environmental Impact Study and Linkage Assessment

- Transportation Analysis on Internal Collector Road Network
- Community Level Urban Design Guidelines
- Community Level Planning Justification Report
- Fluvial Geomorphological Assessment
- Financial Impact Assessment

To offer some suggestions to the challenges presented by staff in Report PED 21067, we offer the following:

- Acknowledgement of past work which determining completion of Secondary Plan stage/phase
- Additional public consultation where secondary plan process is landowner led
- Municipal staff to lead public consultation where secondary plan process is landowner led
- Landowner groups directly fund dedicated staff to Secondary Planning
- Elimination of unnecessary planning approvals, such as unnecessary Block Plans.

The following offers useful background for Staff and members of Council to consider along with comments on the proposed strategy.

BACKGROUND

UWSLG has been actively involved in the City's Municipal Comprehensive Review (MCR) including to advocate for the inclusion of the former whitebelt lands into the settlement area. Through the Minister's decision on UHOPA No.167, the subject lands are now designated as "Urban Expansion Area – Neighbourhoods" and "Urban Expansion Area – Employment Area".

Following that decision, the UWSLG has submitted an application for Formal Consultation to amend the North-West Glanbrook Secondary Plan. Given the size of the urban boundary expansion areas and direct adjacency to other urban uses, the amendment to the Secondary Plan makes sense both from a planning as well as an administrative perspective. The community envisioned for the subject lands would result in approximately the following:

- A total of up to 15,198 residential units (approximately 1,216 singles/semis, 10,639 townhomes and 3,344 apartment units)
- A population of up to 36,542 persons
- An employment base of 958-1,404 jobs
- Overall density of up to 142.1 people and jobs per net hectare.

The proposed community is an infill project which has been advanced in consultation with a project team who has completed the following studies/ reports:

- Functional Servicing and Stormwater Management Report;
- Environmental Impact Study and Linkage Assessment Report;
- Agricultural Impact Assessment;
- Financial Impact Analysis;
- Fluvial Geomorphological Report;
- Hydrogeological Assessment;
- Geotechnical Investigation;
- Noise Feasibility Study;
- Urban Design Brief;
- Transportation Study;
- Stage 1 Archaeological Assessment,
- Cultural Heritage Impact Assessment; and,
- Planning Rational with a supportive Parks and Community Infrastructure Report and Energy and Environmental Assessment Report.

URBAN EXPANSION AREAS

Staff report PED21067 provides background information on the urban expansion areas which have been designated Urban Expansion Area, through the Minister's decision on UHOPA NO.167. It provides useful information as to the existing works which have been completed or are underway both from the City or from the landowners.

Twenty Road West is advised (both in the table as well as Appendix C to PED21067) to consist of three areas, generally located south of Garner Road East (between Smith Road and Glancaster Road) and south of Twenty Road West (between Glancaster Road and Upper James Street). Please note, the UWSLG represents the majority of landowners for only Areas 2 and 3 (not Area 1). This distinction is relevant should Secondary Plan permissions be established against the general urban boundary expansion requirements. If this were to occur, it is recommended that Areas 2 and 3 be separated from Area 1.

The provided table (page 16 of PED21067(d)) outlines background work which has been completed for all of the urban boundary expansion areas except for Twenty Road West. Although this may have been an oversight, due consideration within the staff report should be provided for the extensive background work which has occurred to date. In addition to the above studies conducted wholly by the landowners the following studies have been completed which include the subject lands:

- Stage 1 Archaeological Assessment (City – 2008, UWSLG – 2020)
- Detailed Sub-Watershed Study

- Transportation Management Plan (TMP)(2011), update currently underway with preferred alignment released in June 2021
- Water and Wastewater Servicing Master Plan
- Class Environmental Assessments
 - Dickenson Road, Twenty Road West, Glancaster Road (City)
 - Garth Street Extension – Privately Initiated (UWSLG)

SECONDARY PLAN STRATEGY AND PLANNING OPTIONS

The staff recommendation of PED21067 to consult with the public and stakeholders on the draft Secondary Plan Guidelines and bring a final Secondary Plan Guideline document, with any amendments resulting from public consultation for approval at a future Planning Committee meeting was endorsed. UWSLG understands the current Secondary Plan guidelines are an interim measure, we request that the ultimate guidelines go through a consultation process. Additionally, it would be our opinion, that should portions of the guidelines change for a Stage of the process already completed in a Secondary Plan process, that the landowners are not required to revisit a Stage already completed.

City Staff have set out options for Council consideration (Options 1 – 5) most of which establish the City as preferring to lead the secondary planning process. While UWSLG does not oppose the City’s involvement or even oversight, it is suggested that additional efficiencies may be found with an increased role of the applicant. However, it is the preference of the UWSLG that the Secondary Plan process be led by the landowners based on the level of work that has already been completed. CLS also respectfully suggests that a policy creating a reasonable framework for a proponent led process should be included.

In the case of UWSLG, (as mentioned above) extensive background work has already been completed, much of which has been done in coordination with city staff. The suggested proponent led process would still give oversight to the City in the sense that the landowners would be willing to perform above and beyond public consultation to ease any concerns and would be willing to have the City manage the public consultation component and review of all of the reports, making way for a cohesive working relationship and outcome. As such, UWSLG recommends the consideration of a modified Option 3 or 4 whereby, the Secondary Plan process is landowner led and which has oversight by the City.

To further reduce the financial burden to the City, as well as to ensure the City maintains a “leadership” role, it may be fiscally prudent for the City to request the development group in need of a Secondary Plan, to fund dedicated staff. Part of the concern of both the City and development industry involves the resourcing of staff to a project. From the City’s

perspective, the revenues gained from property taxes and other sources are not limitless and staff allocation must be completed appropriately to maximize expenditures. From the development industry perspective, this widespread allocation of staff limits the time and attention necessary to review and process the applications in a time sensitive manner. The direct funding by the proponent of dedicated staff could unlock some of these challenges. Please note, this may also offer solutions to challenges raised in the Staff Report on page 26 and 27 with staffing. Examples of similar staffing models have been employed in the Town of Milton as well as the City of Brampton (amongst others).

Finally, the UWSLG strongly opposes higher level Secondary Plans that may result in additional layer of Block Planning. An increased Block Plan layering would not improve the timeline or efficiency of work load with a shared partnership.

DRAFT SECONDARY PLAN GUIDELINES

The UWSLG is generally supportive of the intent of the draft guidelines which set out the requirement for the Secondary Plan process which at this time are to include (at a minimum) area-specific Terms of Reference, addressing the City's Ten Directions for Development, phasing, required components, minimum standards for public engagement and a Secondary Plan Report.

It is noted that while the guidelines provide interim direction which is helpful to navigate the Secondary Plan process, more consideration should be provided to existing and previously completed technical work. From the perspective of the UWSLG, the entirety of Phase 1, which includes the collection of data and identification of opportunities and constraints, has been generally completed through previous or ongoing processes some of which have been completed in coordination and involvement of city staff. Further, the UWSLG has hosted previous consultation events which should be accepted as part of the overall consultation strategy with the public. To date, the UWSLG has conducted 3 or more events (both virtual and in-person) with area residents and has already activated a dedicated email and webpage to the project.

CONCLUSION

As the UWSLG is an infill project that has made significant overtures in the completion of most of the necessary materials required for a Secondary Plan. As such there is an opportunity for the development of an infill community to be advanced quickly.

It is the hope of the UWSLG that the above comments will assist Council, in determining an appropriate Secondary Plan process to successfully accommodate new growth areas within the City of Hamilton.



Ultimately, the UWSLG maintains that a Secondary Plan process which is based on a reasonable framework to allow for a proponent led process should be allowed

Should there be any questions or a need for further information, feel free to reach out to the below.

Sincerely,

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