

City of Hamilton  
Audit, Finance and Administration Committee  
71 Main Street West  
Hamilton, ON L8P 4Y5

February 15, 2024

**RE: Comments on the 2024 Development Charges Background Study**

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On behalf of Cachet Developments (Binbrook) Inc. and the landholdings of the company within Binbrook, we are writing to provide comments and feedback on the 2024 Development Charges Background Study recently conducted by the City of Hamilton. Having reviewed the study and associated materials posted through the consultation process, we would like to offer the following comments:

Project Related Comments – Binbrook

1. The project under Services Related to a Highway described as “Binbrook at Pumpkin Pass (Binbrook) Roundabout” is mislabeled. The description should be revised to clarify that the project pertains to the planned roundabout at the intersection of Binbrook Road and Fletcher Road. Tu Vu and Steve Molloy of the City of Hamilton have confirmed via email that this is a labelling error.
2. *Section 4.5 – Capital Forecast* – indicates that the costs to acquire land or an interest therein are included in the capital forecast. We seek clarification whether the cost to acquire the lands west of Fletcher Road to facilitate the Binbrook Road/Fletcher Road roundabout is included in the study.
3. As per the draft plan conditions and subdivision agreement, subdivision 25T-201405 (3105 Fletcher Road) is required to urbanize Fletcher Road from the southerly limit of the draft plan of subdivision to Binbrook Road. The draft plan condition states that the financial responsibility of the owner is limited to the New Roads Servicing Rate. However, the 2024 Development Charges Background Study and the supporting report titled Strategic Transportation Network Review by Arcadis, do not appear to budget for the urbanization of this stretch of Fletcher Road. We request that this project be included in the 2024 Development Charges Background Study.
4. *Table 4-1 (page 4-3)* indicates that roundabouts are eligible for inclusion in the Development Charges calculation. Subdivision 25T-201405 (3105 Fletcher Road) is required to construct a roundabout at the intersection of Windwood Drive and Alway Road. We request clarification on whether this roundabout is eligible for Development Charge recoveries.
5. The project under Services Related to a Highway described as “Binbrook at Fall Fair Way (Binbrook) Roundabout” appears to be constructed. We seek clarification as to why this roundabout remains in the 2024 Development Charges Background Study.

General Comments

1. *Section 5.3 – Services Related to a Highway* – we note discrepancies between the 2019 and 2024 Development Charges studies in terms of total road and sidewalk lengths. Despite

there being a lesser amount of roads and sidewalks in the 2024 study, there is a significant increase in per capita investment in the 2024 study (\$22,998 per capita in 2019 vs. \$41,962 per capita in 2024). We seek clarification on the reasons for this discrepancy and the significant increase in per capita investment in the 2024 study.

2. *Section 7.3.2 – Determination of the Amount of the Charge* – The 2024 Development Charge study appears to significantly shift the burden of Development Charge growth onto residential development compared to the 2019 study, without adequately justifying the change in allocation. For instance, in the 2024 study, a significantly higher percentage of charges related to services such as highways and stormwater drainage are allocated to residential development compared to the 2019 study. This change in allocation has major implications but lacks justification. Therefore, there is a need for the 2024 study to provide clear justification for these shifts in allocation compared to the previous study conducted in 2019.

We appreciate the opportunity to provide feedback on the 2024 Development Charges Background Study. We trust that our comments will be given due consideration as the City continues to refine its Development Charges policies. Should you require any further information or clarification, please do not hesitate to contact me.

Thanks,

Andrew Eldebs  
Cachet Developments (Binbrook) Inc.

