



November 13, 2025

462-22

Via Email

Mr. Charlie Toman, MCIP, RPP
Program Lead – Policy Planning and Municipal Comprehensive Review
Planning and Economic Development, Planning Division

and

Ms. Allison Martin, MCIP, RPP
Senior Planner
Planning and Economic Development, Planning Division

City of Hamilton
71 Main Street West, 5th Floor
Hamilton, ON L8P 4Y5

**RE: Report No. PED25182 – Request for Redesignation of Subject Lands
128 Tope Crescent, Hamilton**

UrbanSolutions Planning & Land Development Consultants Inc. (“UrbanSolutions”) is the authorized planning consultant acting on behalf of Alexander Tools (2021) Inc. c/o Mr. Ronald Braley, the registered owner of the lands municipally known as 128 Tope Crescent in Hamilton (“Subject Lands”). On behalf of the owner, we are pleased to submit the following request for redesignation through Phase 1 of the City Wide Employment Area Review, as described in Report No. PED25182.

Subject Lands

The subject lands are designated as *Neighbourhoods* and *Primary Corridor* on Schedule E – Urban Structure of the Urban Hamilton Official Plan (“UHOP”), as *Industrial Lands* on Schedule E-1 – Urban Land Use Designations, and as *Employment Area – Industrial Lands* on Map B.6.2-1 – Land Use Plan of the Ainslie Wood Westdale Secondary Plan. The lands are currently zoned *Light Industrial (M6)* in Zoning By-law No. 05-200.

Proposed Development

As outlined on the enclosed Concept Plan prepared by KNYMH Architects, the proposed development consists of seven (7) street townhouse dwellings fronting onto Tope Crescent with two (2) parking spaces per dwelling unit on both 128 and 130 Tope Crescent. It should be noted that 130 Tope Crescent is currently zoned and designated to accommodate residential uses in keeping with the existing neighbourhood directly to the west.

Since receiving Formal Consultation Document FC-24-027 on April 24, 2024, UrbanSolutions has been working with the project team to compile all required materials in support of an Official Plan Amendment and Zoning By-law Amendment application to facilitate the proposed development.

Requested Redesignation

As outlined in Report No. PED25182, the implementation of the Provincial Planning Statement (2024) and recent legislative changes to the *Planning Act* have changed that way that municipalities both define and plan for employment areas. Specifically, the amended definition of “Area of Employment” in the *Planning Act* has been narrowed to capture only lands designated for “... clusters of business and economic uses” which meet the criteria of Section 1(1.1) of the *Act*.

While the term “cluster” is not defined in the *Planning Act*, Provincial Planning Statement, or the UHOP, it is interpreted as large areas of land comprised of multiple individual parcels which are designated to accommodate uses that meet the criteria established in Section 1(1.1) of the *Planning Act*. Referring to Figure 1 below (which contains a copy of Appendix G from Report PED25182), we are of the opinion that the designated area of employment in which the subject lands are located in does not constitute a “cluster” given its size, isolation, and existing uses within.

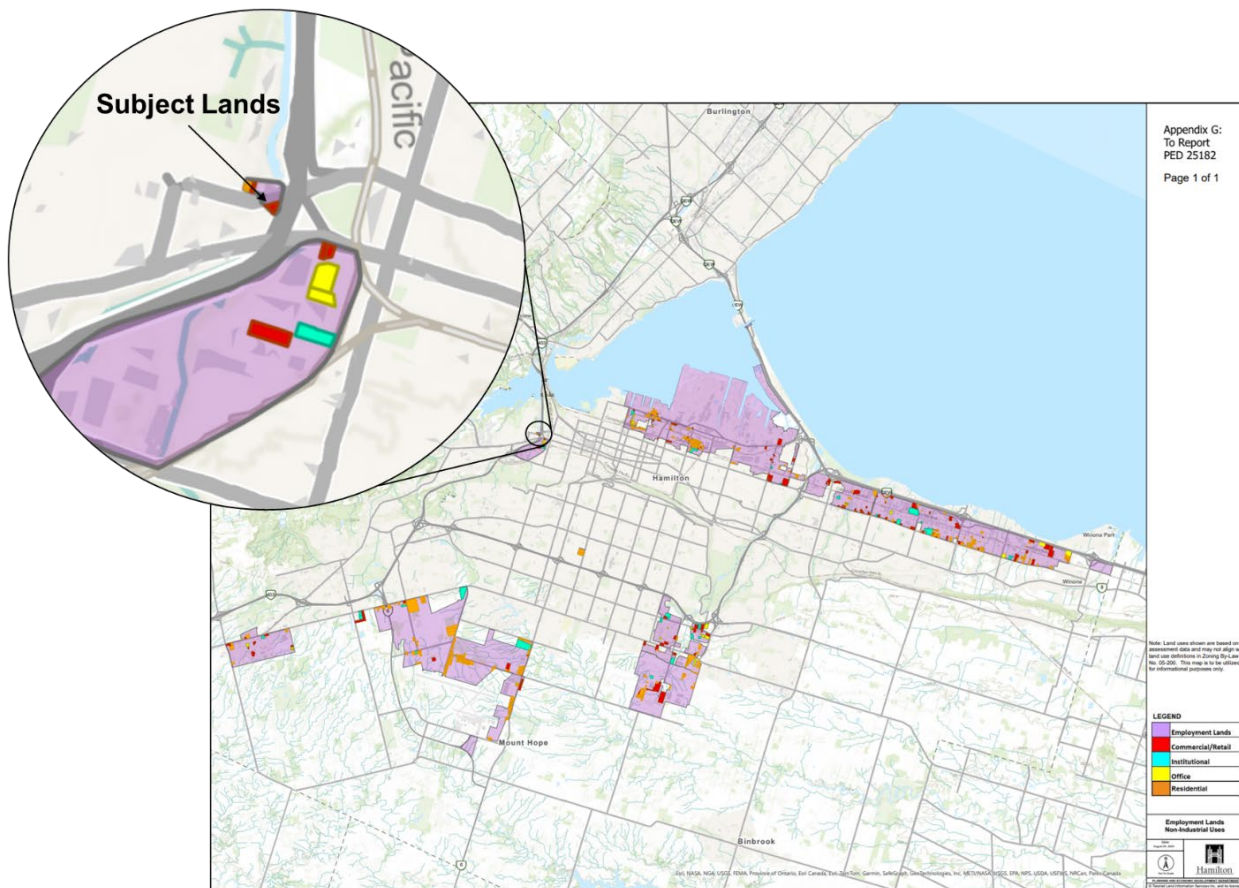


Figure 1 – Subject Lands Highlighted on Appendix G to Report PED25182

There are five (5) parcels comprising the employment area in which the subject lands reside, including the subject lands which have remained vacant for over 35 years, an industrial equipment supplier office located at 35 Glen Road, a household appliance retailer and repair shop at 37 Glen Road, another vacant

parcel at 43 Glen Road, and a place of worship at 49 Glen Road. It should be noted that none of the aforementioned uses within the area adhere to the *Planning Act's* updated definition of an "area of employment" and are instead characterized by stand-alone office, retail, and institutional uses which are explicitly excluded by Section 1(1.2) (outlined below):

"1(1) In this Act,

"area of employment" means an area of land designated in an official plan for clusters of business and economic uses, those being uses that meet the following criteria:

- 1. The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:*
 - i. Manufacturing uses.*
 - ii. Uses related to research and development in connection with manufacturing anything.*
 - iii. Warehousing uses, including uses related to the movement of goods.*
 - iv. Retail uses and office uses that are associated with uses mentioned in subparagraphs i to iii.*
 - v. Facilities that are ancillary to the uses mentioned in subparagraphs i to iv.*
 - vi. Any other prescribed business and economic uses.*

- 2. The uses are not any of the following uses:*
 - i. Institutional uses.*
 - ii. Commercial uses, including retail and office uses not referred to in subparagraph 1 iv; ("zone d'emploi")*

In terms of compatibility, a Noise and Vibration Impact Study has been prepared by dBA Acoustical Consultants as a part of the ongoing Official Plan and Zoning By-law Amendment application process. This Study was subject to a City-initiated peer review conducted by Dillon Consulting and an Addendum has been prepared in response which confirms that the proposed development is able to meet the Ministry of the Environment, Conservation, and Parks' (MECP) NPC-200 guidelines and criterion for indoor and outdoor noise levels through the implementation of the recommended mitigation measures.

Additionally, UrbanSolutions has conducted a detailed analysis in support of a future Land Use Compatibility Study (to be submitted in support of a future planning application) which includes an assessment of the proposed residential development with regards to compatibility with nearby industrial uses in accordance with the MECP's D-6 Guidelines. Through this analysis, all industries which previously received Environmental Compliance Approvals were identified and classified into one of the following three (3) Class categories based on their scale, level of output, and potential for adverse impacts on sensitive land uses:

Class I Industrial Facility – *A place of business for a small scale, self-contained plant or building which produces/stores a product which is contained in a package and has low probability of*

fugitive emissions. Outputs are infrequent, and could be point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration. There are daytime operations only, with infrequent movement of products and/or heavy trucks and no outside storage.

Class II Industrial Facility – *A place of business for medium scale processing and manufacturing with outdoor storage of wastes or materials (i.e. it has an open process) and/or there are periodic outputs of minor annoyance. There are occasional outputs of either point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration, and low probability of fugitive emissions. Shift operations are permitted and there is frequent movement of products and/or heavy trucks during daytime hours.*

Class III Industrial Facility – *A place of business for large scale manufacturing or processing, characterized by: large physical size, outside storage of raw and finished products, large production volumes and continuous movement of products and employees during daily shift operations. It has frequent outputs of major annoyance and there is high probability of fugitive emissions.*

Additionally, Section 4.1 of the D-6 Guidelines identifies potential influence areas of 70 metres for Class I industries, 300 metres for Class II industries, and 1,000 metres for Class III industries. Through our analysis, we were able to confirm that all industries located within 1,000 metres of the subject (being the largest potential influence area) which received Environmental Compliance Approval are classified as Class I industries and therefore, are not anticipated to generate any adverse impacts on the proposed residential development.

Policy Analysis

Understanding that Section 2.8.2.5 of the Provincial Planning Statement (2024) contains criterion for assessing privately initiated removals of land from employment areas, the following section of this Letter contains an assessment of the requested redesignation in accordance with this policy:

“2.8.2.5 Planning authorities may remove lands from employment areas only where it has been demonstrated that:

- a) There is an identified need for the removal and the land is not required for employment area uses over the long term;*

Planning Comment: In accordance with Section 2.4.1.3 c) of the UHOP, the City’s Neighbourhoods designation is planned to accommodate 30% of the City’s residential intensification target to reduce the need for greenfield development and urban boundary expansions. Accordingly, the proposed development of the subject lands will aid the City in achieving this growth objective and represent a natural extension of the existing neighbourhood to the west. Further, existing site constraints such as lot size (+/- 0.1 hectares) and parcel fabric have prevented employment uses from operating on the subject lands to date. Therefore, the removal of such lands from the City’s employment

area designation will not hinder the City’s ability to achieve its employment targets nor impact the City’s long-term demand for employment area, as these constraints will continue to prevent any form of development or use envisioned for these areas.

- b) incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities;*

Planning Comment: A Functional Servicing and Stormwater Management Report has been prepared by LandSmith Engineering and Consulting Ltd. in support of the proposed development, which confirms that adequate servicing capacity and infrastructure exists to accommodate the proposal in accordance with City of Hamilton requirements.

- c) support energy conservation and efficiency*

Planning Comment: Provisions for the inclusion of green infrastructure and sustainable design features which support energy conservation and efficiency will be explored and implemented during detailed design processes at the Site Plan stage.

- d) promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and*

Planning Comment: Provisions for the inclusion of green infrastructure and low-impact development features which support energy conservation and efficiency will be explored and implemented during detailed design processes at the Site Plan stage. Additionally, sidewalks are provided along the west side of Tope Crescent which connect to those located along Carling Street and Glen Road to support active transportation.

- e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.*

Planning Comment: Further opportunities for the incorporation of green infrastructure and sustainable design features will be explored and implemented during detailed design processes at the Site Plan stage.

Based on the above, we are requesting that the following Map revisions be included in the Draft Official Plan Amendment contained in Appendix A of Report PED25182:

“Map

4.1.5 Schedule E-1 – Urban Land Use Designations

- a. That Volume 1: Schedule E-1 – Urban Land Use Designations be amended by redesignating the lands located at 128 Tope Crescent from Industrial Lands to Neighbourhoods”***

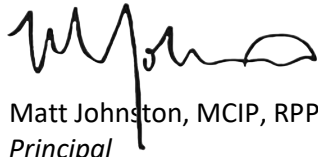
"Map

4.2.2 Chapter B – Secondary Plans – Map B.6.2-1 – Ainslie Wood Westdale – Land Use Plan

- a. That Volume 2: Chapter B – Secondary Plans – Map B.6.2-1 – Ainslie Wood Westdale – Land Use Plan be amended by redesignating the lands located at 128 Tope Crescent from Employment Area – Industrial Lands to Low Density Residential 3c."***

We trust the enclosed is in order, however, please feel free to contact the undersigned with any questions or concerns.

Regards,
UrbanSolutions



Matt Johnston, MCIP, RPP
Principal



Matthew LeBlanc, MCIP, RPP
Planner

cc: Alexander Tools (2021) Inc. and Mr. Ronald Braley



November 27, 2025

462-22

Via Email

Mr. Charlie Toman, MCIP, RPP
Program Lead – Policy Planning and Municipal Comprehensive Review
Planning and Economic Development, Planning Division

and

Ms. Allison Martin, MCIP, RPP
Senior Planner
Planning and Economic Development, Planning Division

City of Hamilton
71 Main Street West, 5th Floor
Hamilton, ON L8P 4Y5

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128 Tope Crescent, Hamilton**

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Subject Lands

The subject lands are designated as *Neighbourhoods* and *Primary Corridor* on Schedule E – Urban Structure of the Urban Hamilton Official Plan (“UHOP”), as *Industrial Lands* on Schedule E-1 – Urban Land Use Designations, and as *Employment Area – Industrial Lands* on Map B.6.2-1 – Land Use Plan of the Ainslie Wood Westdale Secondary Plan. The lands are currently zoned *Light Industrial (M6)* in Zoning By-law No. 05-200.

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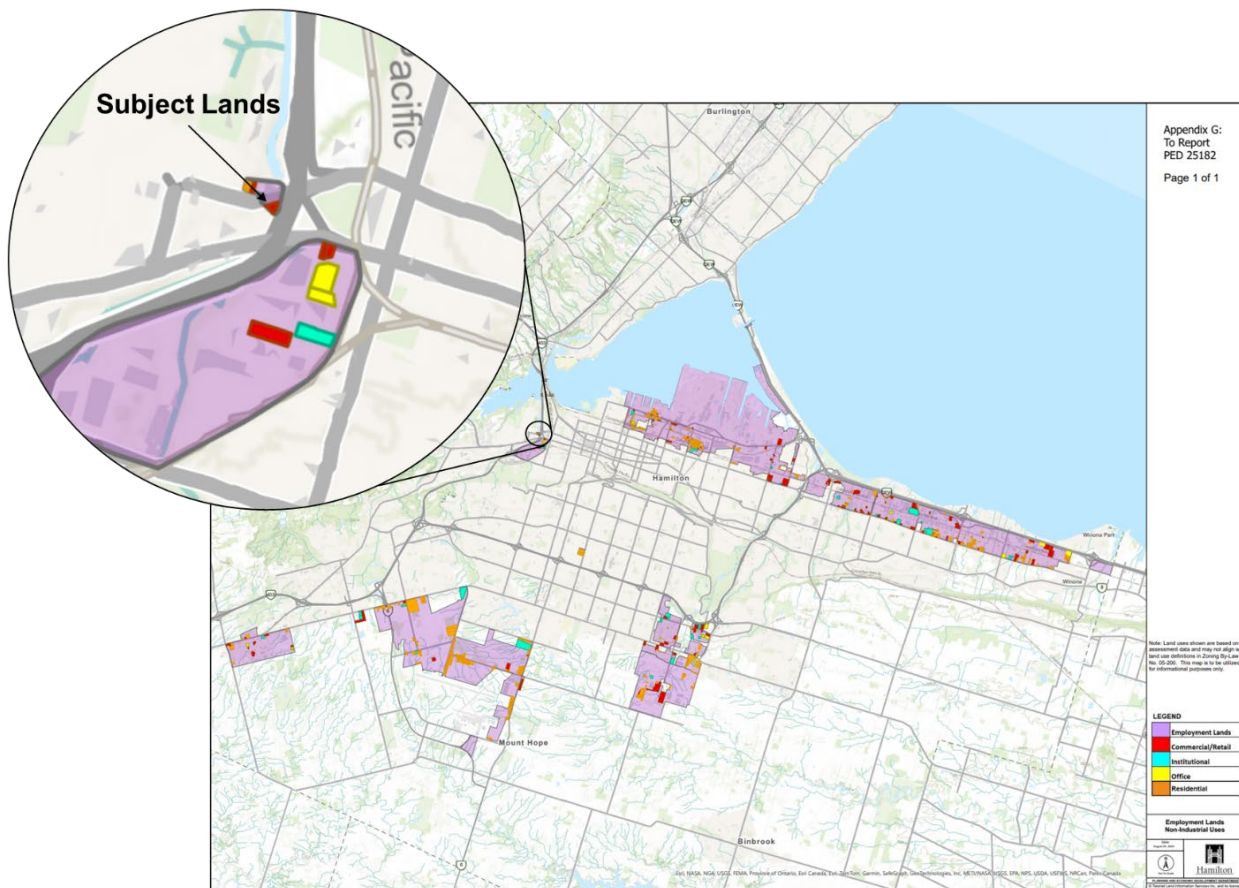


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- a) there is an identified need for the removal and the land is not required for employment area uses over the long term;*

Planning Comment: In accordance with Section 2.4.1.3 c) of the UHOP, the City’s Neighbourhoods designation is planned to accommodate 30% of the City’s residential intensification target to reduce the need for greenfield development and urban boundary expansions. Accordingly, the proposed development of the subject lands will aid the City in achieving this growth objective and represent a natural extension of the existing neighbourhood to the west. Further, existing site constraints such as lot size (+/- 0.1 hectares) and irregular parcel fabric have historically prevented employment uses from

operating on the subject lands. Therefore, the removal of such lands from the City's employment area designation will not hinder the City's ability to achieve its employment targets nor impact the City's long-term demand for employment area, as these constraints will continue to prevent any form of development or use envisioned for these areas.

b) the proposed uses would not negatively impact the overall viability of the employment area by:

- 1. avoiding or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;*
- 2. maintaining access to major goods movement facilities and corridors;*

Planning Comment: As the area in which the subject lands reside does not exhibit the characteristics of an employment area (i.e., limited number of parcels and lot sizes, proximity to existing residential uses, and composition consisting of exclusively commercial uses as defined in Zoning By-law No. 05-200), the proposed redesignation will not negatively impact the overall viability of the area. Further, the proposal will not in any way prohibit access to major goods movement facilities and corridors.

c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and

Planning Comment: A Functional Servicing and Stormwater Management Report has been prepared by LandSmith Engineering and Consulting Ltd. in support of the proposed development, which confirms that adequate servicing capacity and infrastructure exists to accommodate the proposal in accordance with City of Hamilton requirements. Additionally, the subject lands are in proximity to a range of existing public service facilities which support the proposed use, including three (3) childcare centres, Fire Station No. 11, the McMaster University Medical Centre and Hospital, the Coronation Arena and Pool Recreation Centre, three (3) long-term care facilities, two (2) elementary schools, a pre-school, and a secondary school all within 2 kilometer radius.

d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.

Planning Comment: The subject lands' irregular parcel fabric, limited size (+/- 0.1 hectares), and proximity to adjacent residential uses has historically prevented their development with employment-related uses. Accordingly, while the proposed redesignation would technically reduce the availability of employment lands within the City, the removal of +/- 0.1 hectares is negligible and will not impede the City from achieving its employment targets and objectives.

Based on the above, we are requesting that the following Map revisions be included in the Draft Official Plan Amendment contained in Appendix A of Report PED25182:

"Map

4.1.5 Schedule E-1 – Urban Land Use Designations

- a. ***That Volume 1: Schedule E-1 – Urban Land Use Designations be amended by redesignating the lands located at 128 Tope Crescent from Industrial Lands to Neighbourhoods"***

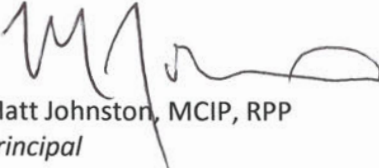
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We trust the enclosed is in order, however, please feel free to contact the undersigned with any questions or concerns.

Regards,
UrbanSolutions


Matt Johnston, MCIP, RPP
Principal


Matthew LeBlanc, MCIP, RPP
Planner

cc: Alexander Tools (2021) Inc. c/o Mr. Ronald Braley & Mr. Frank Monachino

November 13, 2025

Allison Martin, MCIP, RPP
Senior Planner, Sustainable Communities
Planning and Economic Development Department
Planning Division, City of Hamilton

Dear Ms. Martin:

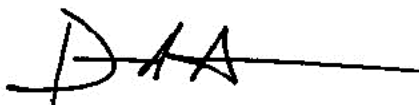
**RE: City of Hamilton Employment Area Review – 1400 South Service Road
OUR FILE 14196R**

On behalf of our client, Losani Homes (1998) Ltd., we are pleased to submit this letter as it relates to the lands municipally addressed as 1400 South Service Road, Hamilton (the subject lands).

The subject lands were subject to an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA), which were approved by the Ontario Land Tribunal (OLT) on July 22, 2025 (OLT-23-001146). As part of the approval of the applications, the majority of the subject lands were redesignated in the City of Hamilton Urban Official Plan (UHOP) from Employment Areas to Neighbourhoods, and redesignated in the Fruitland Winona Secondary Plan from Business Park to Medium Density Residential. The approved ZBA implemented the OPA by rezoning the majority of the subject lands from Prestige Business Park (M3) to Mixed Use Medium Density (C5-XXX) permitting residential uses.

We have reviewed the City Staff Report (PED25182) and the associated mapping included as Appendix G and would note that the subject lands are identified as Employment Lands. This mapping is not correct and should be revised reflect the OLT decision and not identify these lands as Employment Lands, or Employment Area moving forward. We would kindly ask staff for confirmation of this revision.

MHBC



Dave Aston, MSc, MCIP, RPP
Vice-President, Partner



Stephanie Mirtitsch, BES, MCIP, RPP
Associate

cc. William Liske, Losani Homes
Denise Baker, Weir Foulds



SHAPING GREAT COMMUNITIES

November 13, 2025

File No. 25112

Legislative Coordinator,
Planning Committee
City of Hamilton

Email Only: clerk@hamilton.ca

Members of the Planning Committee:

**RE: City Initiated Official Plan Amendments for Phase 1
of the Employment Area Review (PED25182)
Public Hearing – November 14, 2025
510 Beach Road**

GSP Group Inc. represents the Owner of 510 Beach Road in the Bayfront Industrial Area and submits this letter as part of the record for the November 14, 2025 Public Hearing regarding the above-referenced matter.

Subsequent to the release of Information Report PED24203, titled *Implementation Plan for Area of Employment Changes Under the Planning Act and Provincial Planning Statement, 2024*, we prepared a letter to Planning staff, dated August 29, 2025, advising of the Owner's request to remove the small 0.17 hectare parcel of land from the Employment Area in order to permit a motor vehicle sales use, in association with the existing lawfully established motor vehicle repair use.

We understand that the proposed Official Plan Amendments (OPAs) in Phase 1 include changes to the permitted uses for all City Employment Area designations to align with the new definition in the *Planning Act*. Phase 2 of the Implementation Plan includes consideration of potential restructuring of the land use designations with the potential to consider the removal of certain lands / locations from an Area of Employment and re-designate the lands / locations appropriately.

The Phase 1 OPAs are an interim measure to protect the supply of Employment Land while further studies are completed. The consideration of individual parcels and the merits of remaining in an Employment Area, where only new manufacturing, warehousing and research and development uses related to manufacturing are permitted, will be established through Phase 2. There are doubtless several areas in the City that accommodate non-

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162 Locke Street South, Suite 200, Hamilton, ON L8P 4A9 905 572 7477
gspgroup.ca

complying uses (lawfully established non-industrial uses) and further review will determine the future land use designation.

We understand the need for the Phase 1 amendments as an interim protection measure but write this letter to re-iterate the request to ultimately be removed from an Area of Employment. No objection to the interim amendments should not be construed as support for the continued application of Area of Employment (as defined by the Province) on the Subject Land.

Respectfully submitted,
GSP GROUP INC.

A handwritten signature in cursive script that reads "Nancy Frieday".

Nancy Frieday, M.Sc.(Pl.), RPP, MCIP
Senior Planner

Attachment

Copy: Owner



gspgroup.ca

SHAPING GREAT COMMUNITIES

August 29, 2025

Project No. 25112

Allison Martin, MCIP, RPP
Senior Planner, Sustainable Communities
Planning and Economic Development Department
City of Hamilton

Email Only: Allison.Martin@hamilton.ca

Dear Ms. Martin:

**Re: Implementation Plan for Area of Employment Changes Under the Planning Act and Provincial Planning Statement, 2024
Request to Consider the Removal of 510 Beach Road from the Employment Area**

On behalf of the owner of 510 Beach Road (“Subject Land”) in the Bayfront Industrial Area, GSP Group Inc. is writing to request that we be advised of the status of the work program to implement the change to the definition of “Area of Employment” in the *Planning Act* and the related policies in the PPS, 2024. We specifically request that as part of the Implementation Plan referenced in Report PED24203, City staff consider and apply a commercial land use designation to the Subject Land to permit the existing motor vehicle repair use to continue and to allow for a motor vehicle sales use.

This request potentially aligns with Phase 2 of the Implementation Plan wherein the City may consider amendments to Commercial designation policies in the UHOP and zoning to ensure appropriate locations are available for uses now excluded from the “Area of Employment” definition in the *Planning Act*.

Background

As of October 20, 2024, the definition of “Area of Employment” changed in the *Planning Act*. The new definition excludes retail, commercial, office and institutional uses in an Area of Employment. Uses that do not meet the new definition are no longer permitted in an Area of Employment. Uses that were lawfully established may continue, however, Official Plan policy must not allow further non-conforming uses in an Area of Employment.

A City Information Report was presented to the Chair and Members of the Planning Committee on November 5, 2024 (PED24203). The report states that City staff have

prepared an Implementation Plan to address the *Planning Act* definition and new policies within the PPS, 2024.

Phase 1 of the Implementation Plan includes changes to the permitted uses for all City Employment Area designations to align with the new definition. This will involve an Urban Hamilton Official Plan Amendment (UHOPA) to exclude certain uses and permit the continuation of lawfully established uses.

Phase 2 of the Implementation Plan includes a review of uses which should be permitted in each employment designation and “if a restructuring of the land use designations is required.” There is the potential to consider the removal of certain lands / locations from an Area of Employment and re-designate the lands / locations appropriately.

Subject Land - 510 Beach Road

510 Beach Road (“Subject Land”) is situated at the southeast corner of the intersection of Beach Road and Kenilworth Avenue North. It has a unique polygonal shape with an area of approximately 0.17 hectares.

The land and building were purchased by the current owner in November 2024. Prior to this date, the building was occupied by a company that sold mechanical bearings and related components.

The current owner established JSP Motors (motor vehicle repair use) based on the current *Employment Area - Industrial Land* designation and the existing Light Industrial (M6) Zone within Zoning By-law 05-200. The M6 Zone permits a Motor Vehicle Collision Repair Establishment, a Motor Vehicle Service Station and a Motor Vehicle Washing Establishment and these uses are defined in the Zoning By-law. The M6 Zone excludes motor vehicle sales.

In 2025, the owner made enquiries with the City regarding adding motor vehicle sales to the list of permitted uses for the Subject Land. City Planning staff, in consultation with Zoning staff, confirmed that motor vehicle sales would not be permitted as an “accessory use” to the repair use under the current zoning. As of October 20, 2024, an application to amend the Zoning By-law or a minor variance application to add the use would be contrary to provincial policy.

Section 1.1 of the *Planning Act* contains a provision that protects legally established uses that no longer comply with the definition of Area of Employment. The non-complying use must have been lawfully established before the *Helping Homebuyers, Protecting Tenants Act, 2023* came into force which was October 20, 2024.

The motor vehicle repair use was not established as of October 20, 2024, but rather shortly thereafter. The owner wishes to legalize the 'motor vehicle repair use' on the Subject Land and add motor vehicle sales to the uses permitted. To achieve this, the Site cannot remain in an Area of Employment land use designation.

The Subject Land is part of the larger Bayfront Industrial Area which is a 1,607 hectare mixed industrial area. The City prepared a Strategy and Action Plan for the Bayfront Industrial Area dated March 2022. The Subject Land is in close proximity to both the Neighbourhoods and Community Node urban structure elements, as shown in Figure 1, an extract from Schedule E to the UHOP titled Urban Structure.

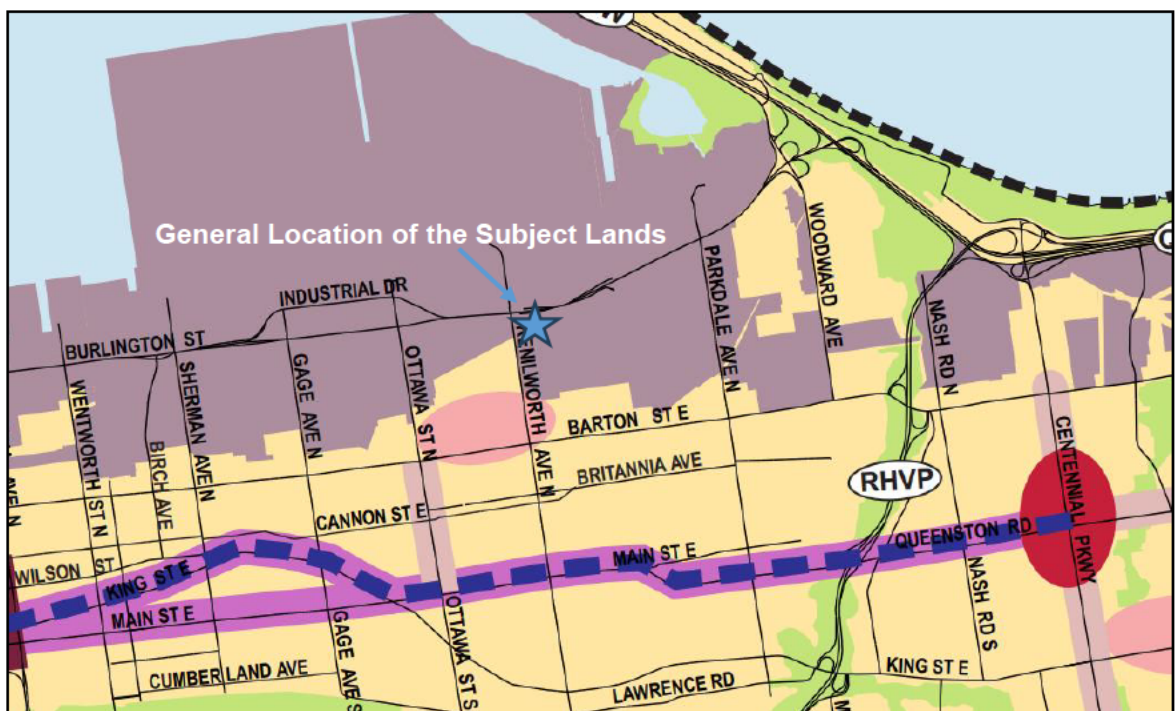


Figure 1 - Extract from Schedule E, Urban Structure in the UHOP

Figure 2, on the following page, is taken from Appendix B to a staff report titled "GRIDS 2 and Municipal Comprehensive Review – Employment Land Review (PED17010(k)) (City Wide)" dated August 4, 2021. Appendix B to the report shows Employment Area Conversion Sites in the Bayfront Industrial Area (Pages 1 and 2 of 6). There were no proposed conversion sites in the immediate area of the Subject Land.

The staff report recommended the conversion of five (5) sites within the Bayfront Industrial Area. The current owner did not own the Subject Land during Phase 1 of the Municipal Comprehensive Review and a conversion request was not submitted.

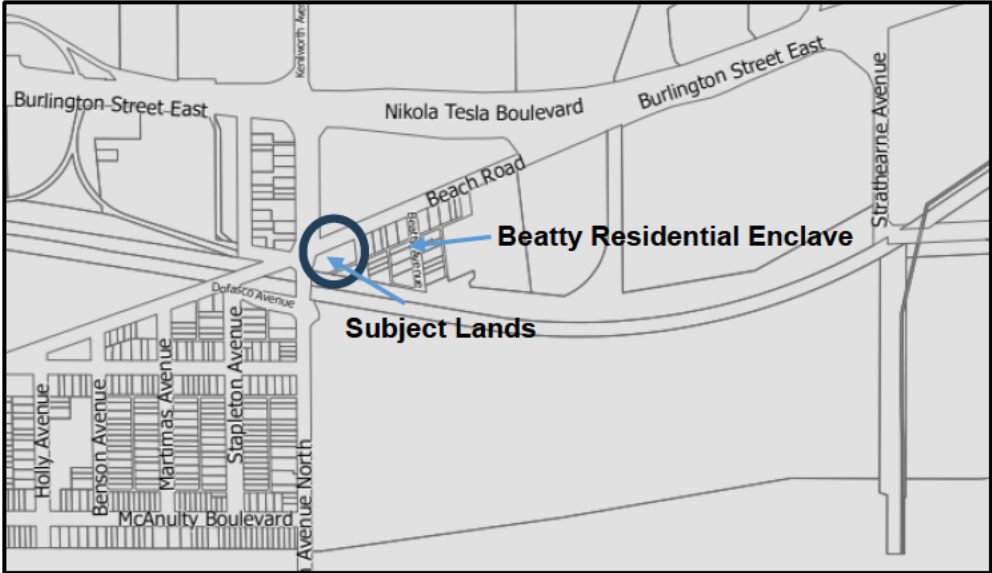


Figure 2 - Extract from Appendix B to Report PED17010(k) (Page 2 of 6 – Bayfront 2)

The Employment Land Review completed as part of the GRIDS 2 and Municipal Comprehensive Review, dated August 2021 addressed the seven (7) residential enclaves in the Bayfront Industrial Area. The Subject Land is adjacent to the Betty Residential Enclave (designated *Employment Area - Industrial Land*) which is approximately 0.93 hectares in area with 76% of the area in residential land use and 9% in industrial land use (see Figure 3). The land is zoned Light Industrial (M6) Special Exception 375 which permits an existing dwelling and an expansion to the existing dwelling.

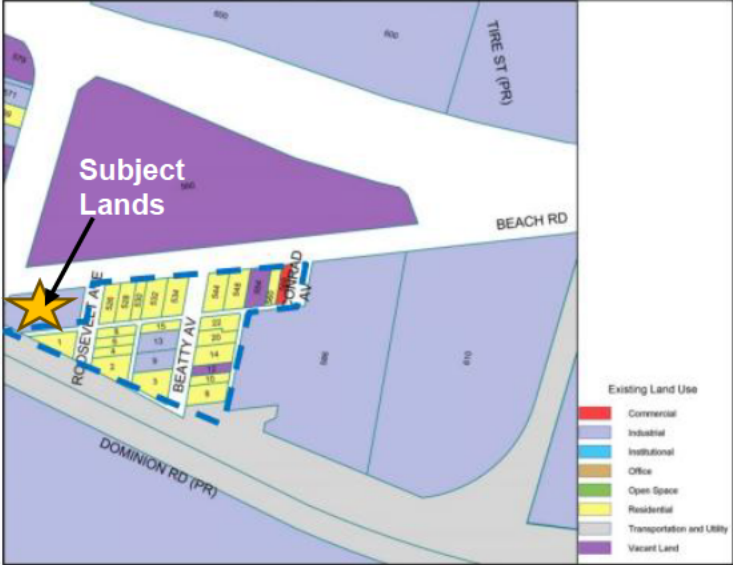


Figure 3 - Land Use in Betty Residential Enclave [from Employment Land Review, 2021]

The Subject Land is in close proximity to residential development in a *Neighbourhoods* designation and adjacent to residential uses in an existing residential enclave that remains designated *Employment Area - Industrial Land*.

The Subject Land is small and would benefit from an alternative land use designation, i.e., non-employment / commercial land use designation that would allow a range of uses, not just those now permitted in an Area of Employment.

Currently, the *Employment Area – Industrial Land* designation permits industrial land uses, limited office uses and accessory uses, such as limited retail and office. Motor vehicle repair is a permitted use. Ancillary uses which primarily support businesses and employees within the Employment Area may also be permitted. Permitted uses include hotels, fitness centers, financial establishments, restaurants, personal services, motor vehicle service stations, retail establishments, labour association halls, conference and convention centres, trade schools, commercial parking facilities, commercial motor vehicle and equipment sales, and commercial rental establishments. Based on the definition of Area of Employment in the *Planning Act*, many of these uses will no longer be permitted in the *Employment Area – Industrial Land* designation and those existing will become legal non-conforming uses.

We note that currently all automotive related uses, including vehicle sales, service and rental are permitted in the *Arterial Commercial* land use designation in the UHOP. Motor vehicle repair is permitted in the *Employment Area – Industrial Land* designation. Only the sale of commercial motor vehicles is permitted in the *Employment Area – Industrial Land*, *Business Park* and *Airport Employment Growth District* designations. We are interested in knowing the direction City staff are taking regarding land use designations wherein automotive related uses will be permitted, i.e., smaller, independent businesses that are now excluded from the *Employment Area – Industrial Land* designation. Currently, there is a reference to a Motor Vehicle Sales and Service Establishment in Zoning By-law 05-200, but to the best of my knowledge there is no definition in the Zoning By-law.

To legalize the existing repair use at 510 Beach Road and to permit motor vehicle sales on the Site, in our opinion, the Site must be removed from the *Employment Area – Industrial Land* designation.

Conclusion

GSP Group will be pleased to provide further justification for the removal of the Subject Land from the *Employment Area – Industrial Land* designation.

We request that GSP Group receive any and all correspondence related to the City's employment Implementation Plan.

Please contact me at nfrieday@gspgroup.ca or at 289-778-1431 should you have any questions or comments regarding this letter. Thank you for your attention to this matter.

Yours truly,
GSP Group Inc.

A handwritten signature in cursive script that reads "Nancy Frieday".

Nancy Frieday, MCIP, RPP
Senior Planner

Copy: Sam Patel

Martin, Allison

From: Jason Leach [REDACTED]
Sent: Thursday, December 4, 2025 2:06 PM
To: clerk@hamilton.ca; Martin, Allison; Jackson, Tom
Subject: City Initiated Official Plan Amendments re: Employment Areas

External Email: Use caution with links and attachments

Good Afternoon,

Dear Clerk, I would like to be kept in the loop regarding any decisions or updates on this file as I am one of the land-owners involved.

Allison, I am the owner of 600 Pritchard Rd in Hamilton and my land development engineer brought this current file to my attention regarding the review of employment areas.

We are a local church that has operated in Hamilton since 1973 and we purchased this property 20 years ago with plans to build a newer facility in the future.

At that time, churches were approved on this property, and when zoning bylaws were changed several years ago we received an exemption (370) permitting 1 place of worship on this land.

We had this zoning verified earlier this year as we are now in early stages of planning our new project.

As part of this planning process, we have decided to sever and sell roughly half of this land which will bring it back onto the market as employment land. At one point we envisioned building on all 17 acres, but have since had a change of heart and will only require about half of the land.

I am writing to advocate for our special exemption 370 to please remain so we can proceed with our expansion.

If needed, I would gladly provide a statement outlining all of the charitable work our church does in Hamilton.

Annually we spend 10's of thousands of dollars (100% donated) and thousands of volunteer hours

- feeding and clothing the homeless multiple times a week, year round.
 - feeding and clothing seniors in poverty
 - providing full Christmas meals and gifts for hundreds of people in need
 - giving away hundreds of bikes, helmets and locks to children who have no access to bikes
 - providing groceries and financial aid to young moms and families who have encountered job loss
 - working to assist the rehab of former addicts of all backgrounds as they leave behind the vices that have ruined their lives and begin to live a clean life
- etc.....

Our dream is to build a new facility that will allow us to better serve the physical and spiritual needs of our fellow citizens. Those needs are huge at the moment, but we are more than willing to roll up our sleeves and make a difference wherever we can.

Our current facility is simply out of room and unable to meet our needs going forward.

Please let me know anything I can do to advocate for our special policy exemption 370 on 600 Pritchard Rd as you undertake this current land review.

With much thanks,

Jason Leach



"Love God. Love People."



Date: December 15, 2025

**Legislative Coordinator,
Planning Committee
City of Hamilton**

Email Only: clerk@hamilton.ca

Members of the Planning Committee:

RE: City Initiated Official Plan Amendments for Phase 1 of the Employment Area Review (PED25182) & Phase 2 Next Steps | Public Hearing – November 14, 2025

On behalf of the Upper West Side Landowners Group (“**UWSLG**”) Corbett Land Strategies Inc. (“**CLS**”) is pleased to provide this submission letter in response to Phase 1 of the City’s initiated Employment Area Review, presented to Members of the Planning Committee on November 14, 2025.

As you are aware, UWSLG consists of a group of landowners that represent the majority of the lands bounded by Twenty Road West, Upper James Street, Dickenson Road and Glancaster Road, located within and adjacent to the Airport Employment Growth District (“**AEGD**”).

Upon review of Information Report PED25182 and review of the Planning Committee Meeting proceedings, we understand that the City’s Phase 1 Official Plan Amendments (“**OPAs**”) include permitted land use changes for all Employment Areas that are intended to align with the new definitions for employment lands in both the *Planning Act* and the Provincial Planning Statement 2024.

We also understand that Phase 2 of the Employment Area Review will undertake an extensive policy review and consideration of restructuring land use designations for ‘Areas of Employment’. This may include adding/removing certain lands to accommodate Employment Land needs based on the findings of a Land Needs Analysis (“**LNA**”). This may also include initiatives to further intensify existing Employment Lands within the urban boundary.

With respect to the proposed OPA for the Phase 1 work, our client does not support the changes as they fail to reflect and implement the clear intention of the provincial changes to the employment

land definitions. Moreover, the proposed OPA will have a negative impact on addressing the housing crisis.

With respect to Phase 2, our client requests confirmation of the anticipated timeline for Phase 2. During the public meeting city staff advised that Phase 2 is anticipated to take 18-24 months to complete. Please confirm that this remains accurate.

Please include us on the list of persons to be receive all communications, notice of meetings and notice of decisions respecting this matter.

Nick Wood

Nick Wood, MES(Pl), MCIP, RPP
Vice President of Development Planning
Corbett Land Strategies Inc.
nick@corbettlandstrategies.ca
(416) 420-5544

December 16, 2025

Allison Martin, MCIP, RPP
Senior Planner, Sustainable Communities
Planning and Economic Development Department
Planning Division, City of Hamilton

Dear Ms. Martin:

**RE: City of Hamilton Employment Area Review - 386 Wilcox Street Hamilton (Steelport)
OUR FILE 17370B**

On behalf of our client, Slate HWD Inc. ("Slate") we are pleased to submit this letter as it relates to the lands located at 386 Wilcox Street (the "Subject Lands"). This letter is in response to Report PED25182 - City Initiated Official Plan Amendments for Phase 1 of the Employment Area Review and supports ongoing discussions with City staff regarding the process. We have significant concerns with the proposed modifications to the employment areas policy framework and the implications to the successful implementation of the on-going Steelport Master Plan.

Draft Plan of Subdivision and Steelport Master Plan

The Subject Lands have a long history of being used for steelmaking by Stelco, which continues to operate on site in a reduced capacity at its cold rolled steel mill. Over time, the scale of steelmaking operations on site has been decreasing with a majority of the site sitting vacant and underutilized.

Slate acquired the Subject Lands in 2022 with the intent of redeveloping them into a modern, master-planned employment area including municipal roads, public spaces, and flexible development parcels that could accommodate a wide range of employment and supportive uses.

The Subject Lands are subject to an ongoing Draft Plan of Subdivision Application (25T-202403), and Slate and its project team have been developing a conceptual master plan to guide the comprehensive redevelopment of the Subject Lands. The Draft Plan of Subdivision application was submitted in February, 2024 and the third submission of materials was recently filed and is under review by the City. These materials represent the vision that has been developed through the conceptual master planning exercise, including public consultation and detailed technical review.

The Steelport Master Plan is intended to provide approximately 211 hectares of developable site area accommodating upwards of 1,000,000 square metres (11,000,000 square feet) of gross floor area for a range of employment uses. The transportation and infrastructure network has also been developed to contemplate the proposed land uses, with a focus on the public realm and waterfront

access. The Subject Lands are ideally located for employment uses with unparalleled access to goods movement networks in the form of an on-site rail network connected to a CN main line, close proximity to the QEW and Red Hill Valley Parkway via Burlington Street, and direct access to Hamilton Harbour for shipping, with 1.4 km of deep-water access accommodating the largest of lake freighters. The proposed draft plan of subdivision will implement the Steelport Master Plan vision and create blocks for employment uses, open space uses and establish the public road network, including the extension of existing municipal roads, Gage Street and Depew Street northerly into the subject lands.

Policy Framework

The Subject Lands are designated 'Industrial Land' and zoned 'General Industrial (M5) with site exception 433' and a Holding provision which permits a range of industrial and supporting uses including limited retail and office, repair and service uses, restaurants, production studios etc.

The Steelport vision intends to capture these existing land use permissions for a modern employment area with a range of other compatible and supporting uses. The vision supports various City objectives including shifting to more sustainable employment uses, remediation of contaminated lands, encouragement of multi-modal transportation, and opportunities for public access and open space.

The Subject Lands are within the City's Bayfront Industrial Area, which was prepared by the City to encourage economic growth and investment and identify opportunities where public investment is required to support this objective. The vision in the Strategy is to transition the Bayfront Area into "a modern industrial campus for innovation, clean industry, resilience and progress." The Steelport application represents a significant step towards achieving the vision outlined in the Strategy.

Request

We have reviewed the City Staff Report (PED25182) and the associated mapping included as Appendix G and would note that the subject lands are identified as Employment Lands.

We acknowledge that the intent of the phased Official Plan Amendment ("OPA") is to maintain the integrity of City's formal employment areas and that phase 2 will implement the details. However, this results in significant uncertainty with respect to the future land use and investment decisions for the site, including a potentially substantial gap in time until phase 2 is concluded.

The following summarizes our concerns as it relates to the Phase 1 OPA:

- Identifying the subject lands as "Area of Employment" / "Employment Areas" as per the Planning Act / PPS definition, would limit the permitted uses on the subject lands to only:
 - i. Manufacturing uses.
 - ii. Uses related to research and development in connection with manufacturing anything.
 - iii. Warehousing uses, including uses related to the movement of goods.
 - iv. Retail uses and office uses that are associated with uses mentioned in subparagraphs i to iii.
 - v. Facilities that are ancillary to the uses mentioned in subparagraphs i to iv.
 - vi. Any other prescribed business and economic uses.

- While these uses are contemplated on the Subject Lands, this will create challenges for attracting modern employment uses and implementing the unique elements of the project including complementary office and commercial uses, adaptive reuse of cultural heritage features, public realm and public amenities.
- Given the status of the ongoing Draft Plan of Subdivision application, this proposes a substantial policy shift which may jeopardize approval of the subdivision and impact the potential for early implementation of employment growth in this location, particularly through an initial phase 1 development as contemplated for the corner of Depew Street and Industrial Drive. As a result, the Steelport project may be on hold until phase 2 of the employment policy updates is concluded.
- Restricting the types of employment uses that can locate on the Subject Lands may discourage potential tenants/investors who are concerned with the uncertainty regarding future land use permissions or looking for more flexible opportunities.
- The OPA may complicate amendments or minor variances to the zoning by-law which may be required in the short term to implement phase 1 development or register an initial phase of the subdivision.

Given the scale and opportunity of Steelport, and the ongoing Draft Plan of Subdivision application, **we request that the Steelport lands not be included in the City's future "Area of Employment" / "Employment Areas" as per the Planning Act / PPS definition, and that the in effect land use permissions remain as they are today to allow for the continuation of a range of employment uses.**

Our opinion is that removing this site from a formal Employment Area is of minimal risk to the City given that there is little to no chance that any sensitive land uses can be developed on site, given site context, existing land uses, existing conditions and the proposed Steelport application.

We look forward to continuing to collaborate with staff on this monumental project and seeing the vision of Steelport come to life. The in-effect land use framework is an essential part of realizing this vision.

Should you have any questions, please do not hesitate to contact us.

Yours truly,

MHBC



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



Stephanie Mirtitsch, BES, RPP, MCIP
Associate

cc: Steven Dejonckheere, Senior Vice President, Slate Asset Management
Allison Gilks, Vice President, Slate Asset Management

January 16, 2026

Allison Martin, MCIP, RPP
Senior Planner, Sustainable Communities
Planning and Economic Development Department
Planning Division, City of Hamilton

Via email: employmentreview@hamilton.ca

Dear Ms. Martin:

**RE: City of Hamilton Employment Area Review – Flamborough Power Centre North Business Park, 105 Clappison Avenue et al
OUR FILE 17190AO**

On behalf of the Owners, Flamborough Power Centre Inc., Ankara Realty Limited and Flamborough Capital Corporation Inc., we are pleased to submit this letter as it relates to the Flamborough Power Centre North Business Park ("FPCN"). This letter is in response to Report PED25182 - City Initiated Official Plan Amendment ("OPA") for Phase 1 of the Employment Area Review. We have significant concerns with the proposed modifications to the employment areas policy framework and the implications to the build-out of FPCN.

BACKGROUND

FPCN was approved in 2016 on the lands generally bounded by Highway 6, Parkside Drive, the North Waterdown Community and Borer's Creek, totalling approximately 38.2 ha (see Figure 1). Site development proceeded shortly thereafter, including significant investment to deliver shovel-ready lands including roads, services, stormwater management, intersections, bridge, etc. to bring the City's employment vision to fruition. This was followed by the Owners securing high-profile medical and advanced manufacturing tenants including Stryker Medical, Lincoln Electric and XYZ Automation. Stryker Medical subsequently expanded their facility with a 40,000 SF expansion in 2024. Furthermore, the first Phase of a Medical Hub and Planned Business Centre was completed in 2024 with the introduction of a 2-storey medical office building containing a variety of integrated medical uses. This has yielded substantial development charge and tax revenue for the City, the continuity of which can be put in jeopardy with the implementation of this OPA.

Currently, Phase 2 of the Medical Hub and Planned Business Centre is nearing final Site Plan Approval under application DA-25-042 which includes the introduction of a 2-storey, multi-tenant sister office building and the completion of the existing parking area. Phase 2 has always been contemplated in the plans and was integral to the decision by the existing group of doctors in selecting this location

as it provided opportunities to continue to build out this portion of the development with complementary and ancillary uses needed for the success of the Phase 1 tenants. Future phases of the Medical Hub and Planned Business Centre are being planned on the east side of Clappison Avenue. A key goal for the northern portion of FPCN has always been the establishment of a medical and business hub that is anchored by the presence of Stryker Medical, a leading name in the field of medical device manufacturing. High profile tenants like Stryker Medical have been an important factor in attracting other high-tech, high-wage employers to the area, including L3 Harris.



Figure 1: Flamborough Power Centre North Business Park

FPCN exists within the broader area known as the iConnect Community, a mixed-use community envisioned by the Owners that is centered around the recently approved conversion of underutilized commercial lands into medium and high-density residential uses (see Figure 2). iConnect capitalizes on existing commercial and employment land uses to deliver residential intensification that rounds out a complete community concept. A key driver of this concept is the diversity of land uses and employers that can create the necessary synergies between residential, commercial and employment land uses to allow for a vibrant and walkable community where residents can live, work, shop and play all within a short walk or bike ride. It is imperative that this land use diversity, including the permissions within FPCN, is maintained uninterrupted so that development within the iConnect Community can continue at the steady pace it has been for the past two decades.



Figure 2: iConnect Community Concept

POLICY FRAMEWORK

Within the Urban Hamilton Official Plan ("UHOP"), FPCN is identified as Employment Areas on Schedule E and designated Business Park on Schedule E-1. FPCN is zoned with a combination of M2 (General Business Park), M3 (Prestige Business Park) as well as M3 with Special Exceptions 388 and 437. In particular, the area intended for the Medical Hub and Planned Business Centre is zoned M3 and M3-437 (see Figure 3 below), with the latter permitting Medical Clinics and Fitness Centres, in addition to the office and other permissions within the M3 parent zone.



Figure 3: Zoning in Area for Medical Hub and Planned Business Centre

CONCERNS AND REQUEST

We acknowledge that the intent of the phased Employment Area Review is to maintain the integrity of City's formal employment areas and that the Phase 1 OPA is an interim measure that applies blanket restrictions across all employment areas in the City, leaving the detailed assessment of each employment area for Phase 2.

The Phase 1 OPA would scope permitted uses in all employment areas to those identified in the Provincial definition of Areas of Employment which is limited to the following:

- i. Manufacturing uses.
- ii. Uses related to research and development in connection with manufacturing anything.
- iii. Warehousing uses, including uses related to the movement of goods.
- iv. Retail uses and office uses that are associated with uses mentioned in subparagraphs i to iii.
- v. Facilities that are ancillary to the uses mentioned in subparagraphs i to iv.
- vi. Any other prescribed business and economic uses.

This results in significant risk to employment areas not only due to the smaller range of potential employers that can now be accommodated but also due to the uncertainty Phase 1 creates with respect to tenancing and investment decisions for business parks that are actively developing and in discussions with prospective tenants. Our requests with respect to FPCN stem from the following issues:

- 1) Impact to the construction and tenancing of the multi-tenant office building currently completing Site Plan Approval through application DA-25-042;
- 2) Impact to the ability to build out the future phases of the Medical Hub and Planned Business Centre on the east side of Clappison Avenue; and,
- 3) Impact to the vacant areas of FPCN.

Impact to Multi-Tenant Office

Site Plan Approval application DA-25-042 is nearing final approval with a small number of conditions still outstanding which are being actively addressed. The Owners are currently in leasing discussions with several prospective tenants who are interested in occupying this building. Should the Phase 1 OPA be approved as is, this building could not be tenanted with office uses as currently planned, creating significant disruption and hardship to the Owners' business given the amount of time and resources spent to develop the Medical Hub and Planned Business Centre and commitment made to the Phase 1 tenants. It may also leave the Phase 2 building site and parking area undeveloped indefinitely given that it is sized to accommodate the sister building, as always intended and shown as a future phase during Phase 1 approval, rather than a traditional employment use.

We request that Phase 1 and Phase 2 of the Medical Hub and Planned Business Centre be removed from the Phase 1 OPA. This area is already identified in Appendix G to Report PED25182 (see Figure 4). This is critical to ensuring that the Phase 2 building is constructed and that both buildings can be tenanted not only with the existing medical uses, but also other office uses (as is largely the plan for Phase 2). It would also ensure that any future planning applications that are required to facilitate tenants and necessitate consideration of the official plan, can be processed appropriately.

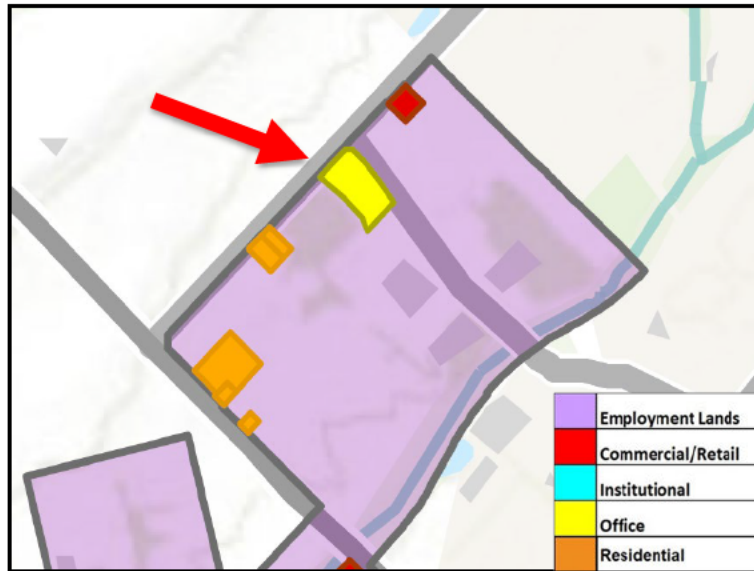


Figure 4: Excerpt of Appendix G to Report PED25182

Impact to Medical Hub and Planned Business Centre

The Owners are in the preliminary planning stages for a third building for the portion of the Medical Hub and Planned Business Centre area located on the east side of Clappison Avenue (see Figure 1). Although we understand that detailed reviews of all employment areas will occur as part of Phase 2 of the City's review, we request that this area also be removed from the employment area as part of the Phase 1 OPA. This would ensure the Owners can continue planning out the remainder of the Medical Hub and Planned Business Centre with the prospect of bringing more employers to Hamilton, including retaining existing ones looking for new facilities.

Impact to Remaining Vacant Areas of FPCN

Part of FPCN's success in attracting modern, high-tech and high-wage employers, and the driving force underpinning the transformation of the broader area into a mixed-use community as envisioned in the iConnect Community concept, is the diversity of land uses that are existing and permitted within a relatively small geographic area. Scoping the permitted uses within the remaining vacant areas of FPCN to those identified in the Provincial definition would hinder the Owner in attracting further high-tech and high-wage employers due to the reduction in use types that could create synergies amongst businesses within FPCN. Furthermore, the Owners have submitted a bid and are in discussions to bring upwards of 50,000 square feet of additional office space on the vacant lands. We request that these areas also be removed from the employment area as part of the Phase 1 OPA to ensure that this employment growth opportunity can be maintained.

CONCLUSION

FPCN and the iConnect Community area have tremendous potential to develop into a complete community where people can live, work, shop and play. The Owners have been consistently investing in this area since 2003 starting initially with the development of the Flamborough Power Centre shopping centre, then FPCN, selling land to establish L3 Harris and most recently converting underutilized commercial lands to allow medium and high-density residential uses to round out the

complete community concept. This development activity builds upon the upcoming investments by several levels of government in improving the transportation infrastructure anchoring the iConnect Community which includes a grade separate interchange and car pool lot for Highway 6 and Dundas Street by the Ministry of Transportation, the Dundas Street BRT by Metrolinx and the L-Line Rapid Transit by the City as identified in the BLAST Network / (Re)envision HSR Plans. The Owners' investments into this area have secured significant jobs for the City of Hamilton and the Owners would like to maintain this momentum to complete the entire node in a timely manner. Therefore, it is imperative that staff and Council approach the Employment Area Review with utmost caution to ensure that this development activity and investment is not disrupted, particularly in the current economic conditions.

Our opinion is that removing FPCN from the employment, and certainly some of its component areas, is of minimal risk to the City from the perspective of residential conversions given the existing employment uses spread throughout FPCN and on abutting lands. There is effectively no room to create standalone pockets of residential development within FPCN while maintaining appropriate buffer distances and creating a residential environment. Furthermore, FPCN only forms a portion of the iConnect Community concept which already provides for complementary residential zoned land. This substantial amount of residential land located south of Borer's Creek will accommodate residential growth in the area for years to come.

We will also be closely monitoring Phase 2 of the Employment Area Review and look forward to working with staff to protect existing land use permissions in FPCN so that new employers can continue to establish themselves here, providing quality jobs to the residents of Waterdown and Hamilton.

Should you have any questions, please do not hesitate to contact us.

Yours truly,

MHBC



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

January 16, 2026

Allison Martin, MCIP, RPP
Senior Planner, Sustainable Communities
Planning and Economic Development Department
Planning Division, City of Hamilton

Via email: employmentreview@hamilton.ca

Dear Ms. Martin:

**RE: City of Hamilton Employment Area Review – 700 Garner Road East
OUR FILE 1594D**

On behalf of the Owner, 1036210 Ontario Ltd, we are pleased to submit this letter as it relates to the property located at 700 Garner Road East (the "Subject Lands"). This letter is in response to Report PED25182 - City Initiated Official Plan Amendment ("OPA") for Phase 1 of the Employment Area Review. We have significant concerns with the proposed modifications to the employment areas policy framework and the implications to development of the Subject Lands.

BACKGROUND AND POLICY CONTEXT

The Subject Lands are approximately 21 ha in area. They were previously 26.6 ha in area until a 5.6 ha portion was sold to the City with the intent of being transferred to the French language school boards (Conseil scolaire Viamonde and Conseil scolaire catholique MonAvenir) for the construction of a new French language school (the "School Block"). A Draft Plan of Subdivision ("DPOS") for institutional uses was approved by Council on November 19, 2025 for the Subject Lands which contains 14.9 ha of developable area and the roads and infrastructure required to access and service the School Block (see Figure 1). To accommodate access and services to the School Block, the Owner is expediting the preparation of the first detailed engineering design submission to the City which is expected to be made by end of February 2026.

In the Urban Hamilton Official Plan ("UHOP"), the Subject Lands are identified as Employment Area on Schedule E: Urban Structure but designated Institutional on Schedule E-1: Land Use Designations. The Subject Lands are within the Airport Employment District Secondary Plan ("Secondary Plan") where they are also designated Institutional on Map B.8.1: Land Use Plan and subject to Site Specific Policy Area D which permits trade schools and prohibits residential uses except as ancillary uses. The Subject Lands are zoned with a site specific I3-27 (Major Institutional) Zoning which implements the institutional designation and Site-Specific Policy Area D. Holding Provisions H37 also applies which

prohibits development until such time as municipal services area available to the site (this is being completed by the Owner through the DPOS process).

The Subject Lands are subject to an unusual policy framework in that they are technically within an employment area but are designated and zoned only for institutional uses. They are therefore caught under the City's Employment Area Review even though they are not designated or zoned for employment uses nor do they permit any uses other than institutional uses.

As such, the Owner has designed the DPOS consistent with the policies of the UHOP, Secondary Plan and zoning by-law, including setting aside the necessary land for new collector roads identified in the Secondary Plan as well as stormwater infrastructure. As such, the DPOS did not require any amendments to the City's official plan policies and zoning.

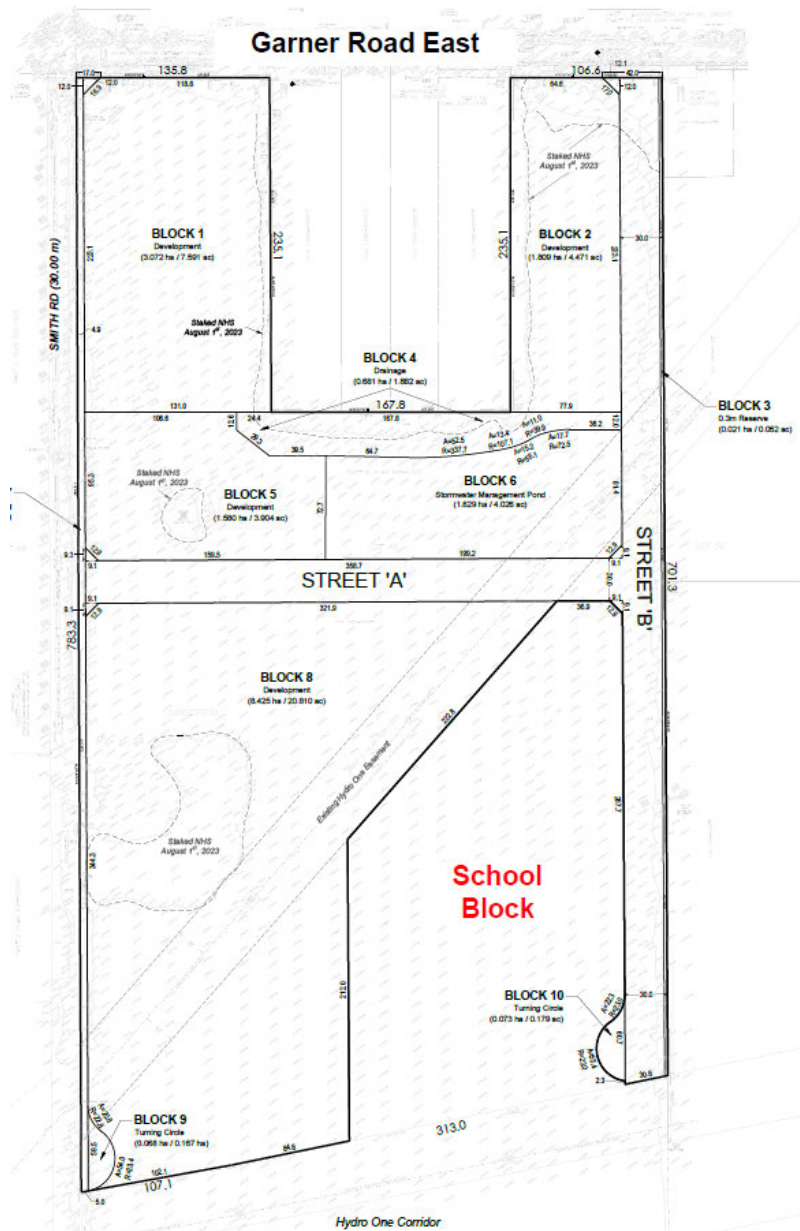


Figure 1: Approved Draft Plan of Subdivision for 700 Garner Road East

CONCERNS AND REQUEST

We acknowledge that the intent of the phased Employment Area Review is to maintain the integrity of City's formal employment areas and that the Phase 1 OPA is an interim measure that applies blanket restrictions across all employment areas in the City, leaving the detailed assessment of each employment area for Phase 2.

The Phase 1 OPA would remove permitted uses on the Subject Lands (and the School Block) that are inconsistent with provincial definition of Areas of Employment. Since the lands are designated and zoned for institutional uses in the UHOP, Secondary Plan and zoning by-law, this change would remove ALL permitted uses from the Subject Lands, effectively sterilizing them until such time they are further reviewed through Phase 2 of the Employment Area Review.

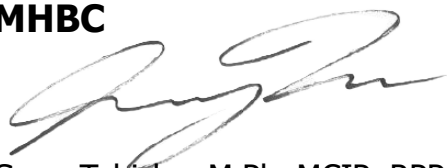
We understand that the City intends to proceed expeditiously with Phase 2 once Phase 1 is complete. However, the interim sterilization of the lands and the uncertainty with the timing and outcomes of Phase 2 causes substantial harm to the Owner given that it cannot market the lands or make investment decisions for an indefinite period. This harm is compounded by the fact that the Owner has invested significant time and funds into obtaining approval of the DPOS and will be making additional expenditures to deliver roads and infrastructure for the School Block. Therefore, we request that the Subject Lands be removed from the Employment Area through the Phase 1 OPA so that they may continue to exist within the same institutional policy framework under which the DPOS was approved. Doing so would allow the Owner to continue with the detailed engineering design and construction of the DPOS to provide road access and services to the School Block with the understanding the balance of the Subject Lands are not sterile.

We look forward to continuing to collaborate with staff on Phase 2 of the Employment Area Review and the detailed engineering design and implementation of the DPOS.

Should you have any questions, please do not hesitate to contact us.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read 'Gerry Tchisler', written over a light blue horizontal line.

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