

September 26, 2022

GSAI File: 1137-002

Hon. Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON  
M7A 2J3

**RE: Urban Hamilton Official Plan Amendment 167 and Rural Hamilton Official Plan Amendment 34  
City of Hamilton  
ERO Number – 019-5743  
Ministry Reference Number – 25-OP-229116**

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Glen Schnarr & Associates Inc. (GSAI) are the planning consultant for Castandgrey 5 Corp. and Castandgrey 7 Corp., the registered owners of 407 & 406 – 526 Fletcher Road in the City of Hamilton (the ‘Subject Properties’). The Subject Properties are located along Fletcher Road, between Rymal Road East to the north, and Golf Club Road to the South and have an area of approximately 25 hectares (62 acres) (refer to Attachment A). In this regard, we are pleased to submit this letter in response to the Ministry’s ERO to the City of Hamilton’s Official Plan Amendments, which contain new policies to guide growth and development to the year 2051.

The Subject Property is located in an area commonly referred to as ‘Elfrida’, which forms part of the City’s Whitebelt area and was previously identified as an area for a potential urban boundary expansion, as part of the City’s 2006 Growth Related Integrated Development Strategy (GRIDS), which was the City’s integrated planning process that identified a broad land use structure, associated infrastructure, economic development strategy and financial implication for growth to the 2031 planning horizon (refer to Attachment B).

The Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe (the ‘Growth Plan’) on land use planning require that housing be delivered in a market-based supply fashion. That includes delivering a full range and mix of housing types to meet market demand. This policy direction is a core planning consideration for when a municipality conducts its municipal comprehensive review exercise. The Provincial policy to deliver housing on a market-based demand is clearly set out in Section 1.4.3 of the Provincial Policy Statement, which reads:

*1.4.3 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area ...*

The Growth Plan directs through Policy 2.2.6.1 a) i), a requirement for municipalities to plan for housing by “*identifying a diverse range and mix of housing options ... to meet projected needs of current and future*

*residents*”. This Growth Plan policy constitutes a direction to municipalities to deliver a housing supply that responds to market demand.

The Provincial Land Needs Assessment Methodology must be followed by municipalities, according to Section 2.2.1.5 of the Growth Plan, to determine “*the quantity land required to accommodate forecasted growth to the horizon of this Plan*”. The Provincial Land Needs Assessment Methodology requires municipalities to use, as the starting point of their Land Needs Assessment, a market-based housing need forecast, with a market-based mix of housing types. That must then be adjusted to achieve the Growth Plan intensification target (50%) and greenfield density (50 people and jobs per hectare). It is important to note, the Land Needs Assessment Methodology restricts the degree of this adjustment strictly. Any departure from the market-based housing need forecast and mix of housing types must be done “*while ensuring the provision of a market-based supply of housing to the extent possible*”. Once the adjustment has satisfied the Growth Plan density and intensification targets, no further departure from the market-based supply is permitted.

As part of the 2051 Growth Plan conformity exercise, the City of Hamilton undertook a Land Needs Assessment (LNA) as part of a new Growth Related Integrated Development Strategy (referred to as ‘GRIDS2’) and Municipal Comprehensive Review process. This process accumulated into an extensive review of the City’s growth projections and the City’s Whitebelt area.

For context and to assist in the Ministry’s review of the City’s Official Plan Amendments, the following provides an overview of the chronology of events:

- In **August 2020** the Province released a new Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and an update to the Land Needs Assessment Methodology. The effect of Amendment 1 is to extend the planning horizon of the Growth Plan to the year 2051 (extended from 2041), including providing population and employment forecasts for the City of Hamilton to 2051.

The 2051 population and employment forecasts require the City of Hamilton to plan for a population of 820,000 people and employment of 360,000 jobs in 2051. This increase represents an additional 40,000 people and 10,000 jobs from the 2041 time period.

- A revised Land Needs Assessment Methodology was released by the Province in **August 2020**. In accordance with the Growth Plan, the City is required to plan utilizing the new provincial LNA methodology.
- In **December 2020**, the City released a draft of the LNA. The draft LNA identified a range of land need scenarios based on different intensification targets and density inputs. Technical background reports (Residential Intensification Market Demand Study, Residential Intensification Supply Update, Existing Designated Greenfield Area Density Analysis) were completed to support inputs and assumptions in the LNA.

The draft LNA provided a review of the City’s whitebelt lands. A large portion of the City’s whitebelt lands are constrained by the airport Noise Exposure Forecast (NEF) contours and / or natural heritage features and are therefore not available to accommodate future Community Area (i.e., residential) growth. The whitebelt lands which can be considered to accommodate future Community Area (i.e., residential growth) total approximately 1,600 ha (after the Growth Plan ‘net-outs’ including natural heritage features are removed).

Of the 1,600 net ha of Community Area whitebelt land which are not constrained by NEF contours or natural heritage features and are therefore available to accommodate residential growth, the majority of the lands are located contiguous to the City's southern urban boundary. The City's whitebelt lands are broadly categorized into four areas (refer to Attachment B).

- 'Elfrida' – most easterly whitebelt lands, in the vicinity of Rymal Road East and Upper Centennial Parkway, bounded by Mud Street East, Second Road West, Golf Club Road and Trinity Church Road (approx. 1,200 gross ha, 930 net ha)
- 'Twenty Road East' – whitebelt lands north and south of Twenty Road East, in the vicinity of Miles Road (approx. 450 gross ha, 270 net ha)
- 'Twenty Road West / Garner Road' – westerly whitebelt lands located on the south side of Twenty Road West and Garner Road (approx. 175 gross ha, 125 net ha)
- 'Whitechurch' – most southerly Community Area whitebelt land, east of Upper James Street, in the vicinity of Whitechurch Road, Miles Road and Airport Road (approx. 350 gross ha, 275 net ha)

It is important to note that City staff are on record not supporting Community Area expansion and growth into the Whitechurch lands.

The draft LNA provided an assessment of the Community Area land need to accommodate growth to 2051. Community Area land need was calculated based on a determination of housing need by unit type and the capacity of the City's existing urban area (through intensification within the built-up area and through development of the City's existing DGA lands) to accommodate that growth.

LNA Scenario	Intensification Target			Community Area Land Need to 2051 (ha)
Current Trends	40%			3,440
Growth Plan Minimum	50%			2,200
Increased Targets	50%	55%	60%	1,640
	(55% average over the period)			
Ambitious Density	50%	60%	70%	1,340
	(60% average over the period)			

The '*Growth Plan Minimum*' Scenario which is based on an intensification rate of 50% throughout the planning period results in a Community Area land need of approximately 2,200 ha. The draft LNA determined that an intensification rate of 50% is deemed to be a suitable aspirational target for the City's planning purposes as per the Residential Intensification Market Demand Study, however, the resulting land need that is in excess of the City's available whitebelt area supply.

The '*Increased Targets*' Scenario proposed a gradually increased intensification rate of 50% between 2021 and 2031, 55% between 2031 and 2041 and 60% between 2041 and 2051 (which averages to an overall intensification target of 55%). This rate of intensification results in a Community Area land need of 1,640 ha, which is approximately equivalent to the City's available Community Area whitebelt land supply.

The ‘*Ambitious Density*’ Scenario proposed an even greater rate of intensification which again increases during the later stages of the planning period at the following rates: 50% between 2021 and 2031, 60% between 2031 and 2041, and 70% between 2041 and 2051 (for an average intensification target over the period of 60%). This increased rate of intensification was determined to be significantly greater than current trends or the aspirational market demand rate identified in the Residential Intensification Market Demand Study. The draft LNA determined that achieving these increased intensification targets would be a challenge and may require significant incentives to assist with achieving the goals. This scenario results in a land need of 1,340 ha.

- In **March 2021**, staff presented a final LNA to General Issues Committee and recommended endorsement of the ‘*Ambitious Density*’ growth scenario which was based on an average intensification target of 60% and density in new urban expansion areas of 77 persons and jobs per hectare, resulting in a Community Area land need of 1,340 ha to the 2051 planning horizon. The LNA did not identify a need for any additional Employment Area lands.
- At the **March 29, 2021** General Issues Committee, approval of the LNA and the Ambitious Density scenario was deferred to a later date. Staff were directed to undertake modelling and evaluation of both the Ambitious Density scenario and a No Urban Boundary Expansion (UBE) scenario, and to report back on the findings of the modelling and evaluation in Fall 2021.
- In **June 2021**, staff were directed to undertake a peer review of the LNA and associated Residential Intensification Market Demand Study to confirm the approach and methodology met all applicable provincial requirements. Overall, the peer review found that the approach and methodology utilized in the City’s LNA and RI Market Demand Study is generally an appropriate application of the Growth Plan and the Provincial LNA Methodology.
- In **November 2021**, a final draft of the LNA was presented to the City’s General Issues Committee. City Planning staff had recommended that Council adopt the “Ambitious Density” scenario, as identified in the LNA to 2051. This recommended was presented on the basis of:
  - A projected household growth of 110,300 households;
  - An intensification target of 50% between 2021 and 2031, 60% between 2031 and 2041 and 70% between 2041 and 2051;
  - A planned density of 60 persons and jobs per hectare (pjh) in existing Designated Greenfield Areas and 77 pjh in new Designated Greenfield Areas (urban expansion areas);
  - A Community Area land need of 1,310 gross developable ha to 2051;
  - An Employment Area land need of 0 ha, to be confirmed subject to the finalization of the Employment Land Review, including deferred requests;

For the purposes of managing growth, the following phasing to 2051 was also recommended.

- For the period from 2021 to 2031, a land need of 305 ha;
- For the period from 2031 to 2041, a land need of 570 ha;
- For the period from 2041 to 2051, a land need of 435 ha;

An addendum to the LNA was prepared to analyze the implications of the No UBE scenario including required housing market shifts resulting from this scenario. The LNA determined that under a no urban boundary expansion scenario, nearly 80% of all new households would need to be accommodated within apartment units, including families.

- The No Urban Boundary Expansion growth option that was adopted by Council on **November 19, 2021**. The UHOP Amendment, and the RHOP Amendment, were prepared to implement Council's direction regarding the No Urban Boundary Expansion growth scenario.

Despite the City's analysis through the Land Needs Assessment, which was peer-reviewed, and confirmed to have an appropriate application of the Growth Plan and the Provincial LNA Methodology, City Council voted in favour of a 'No Urban Boundary' Expansion. On behalf of our clients, we have significant concerns with the City's approach to growth management for the 2051 planning horizon. As noted above, it was determined that in a 'No Urban Boundary' Expansion nearly 80% of all new households would need to be accommodated within apartment units, including families. We fail to see how this approach to growth management is consistent with provincial policy and objectives for a market-based housing supply.

City Council made the decision to adopt an Official Plan with no settlement area expansion in the absence of any supportive planning justification or a Land Needs Assessment. The only Land Needs Assessment and peer review before Council at the time identified a need for significant settlement area expansion. In addition, the only planning reports before Council supported a significant settlement area expansion. As such, the decision of Council to adopt a "no settlement area expansion" plan is not only contrary to the requirements of the Growth Plan and the Provincial Policy Statement, but it is also contrary to the professional planning and Land Needs Assessment reports that Council had in their possession when making their decision. It is our professional planning opinion that a Land Needs Assessment done in accordance with the Growth Plan would include, a settlement area for community area purposes, and all of the City's whitebelt lands outside of those constrained by the Airport's NEF contours.

**We are writing to request that the Province exercise its discretion under Section 17(50) of the Planning Act to modify the City's Official Plan Amendments to expand the City's Urban Boundary to include Community Whitebelt Lands that have been identified and assessed through the City's LNA.**

Clear policy direction provided by the Province has been disregarded by City Council. The *Planning Act* gives the Province the authority to modify the City's decision so that it is consistent with the Provincial Policy Statement and conforms to the Growth Plan of the Greater Golden Horseshoe.

Furthermore, Section 2.2.8.3 of the Growth Plan outlines a list of criteria for selecting which lands should be included in a settlement area expansion. This criterion directs growth and settlement area expansions where there is a sufficient infrastructure and public service facilities; that avoids negative impacts on watershed and key hydrologic areas and natural heritage systems, prime agricultural areas; that avoids impacts on agri-food networks; and is in the public interest.

Specific to the Elfrida Whitebelt Lands, it is understood that a settlement area expansion to include the Elfrida area has been long debated in the City of Hamilton. For context, and to aid the Province in its review of the City's information, it is important to note, through the GRIDS 1 (2006) process, the City identified Elfrida as Hamilton's potential urban boundary expansion area to accommodate growth to 2031, coupled with intensification of the downtown and built-up areas. However, these lands were not formally brought into the City's settlement area at that time. Despite this, in 2017 and 2018, the City held public consultation and community meetings on the "Elfrida Growth Area" Study where they sought public input on 'visioning and design' and community structure scenarios for Elfrida. This exercise was only specific to the Elfrida Whitebelt lands.

Additionally, as part of the Elfrida Growth Area Study, the City initiated a Subwatershed Study (SWS). The Study was well advanced and provided a detailed analysis of the natural heritage and water resources

in the Elfrida area. The SWS establishes a hierarchy of natural heritage features, each requiring different levels of conservation. The SWS also provides further direction as to the extent of the Natural Heritage System (NHS) to be conserved. It is our opinion that the City and the Province should leverage the work undertaken to-date and rely upon the information presented through the SWS, which demonstrates that Elfrida can continue to be planned as a complete community while preserving significant Natural Heritage and Water Resources.

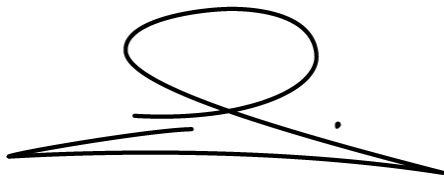
It is important to note that a majority of rural Hamilton is subject to the Greenbelt Plan. Whitebelt lands are those lands located within rural Hamilton, but are not included in the Greenbelt Plan. While Whitebelt lands are currently characterized by rural and agricultural land uses, they are not subject to the same policy framework as 'prime agricultural lands'.

**It is our opinion a settlement area expansion into the City's Whitebelt lands would conform to the applicable Provincial policy for growth, development and resource management.**

We appreciate the opportunity to provide comments on this matter. Should you have any questions or require additional information, please contact the undersigned.

Respectfully Submitted.

**GLEN SCHNARR & ASSOCIATES INC.**



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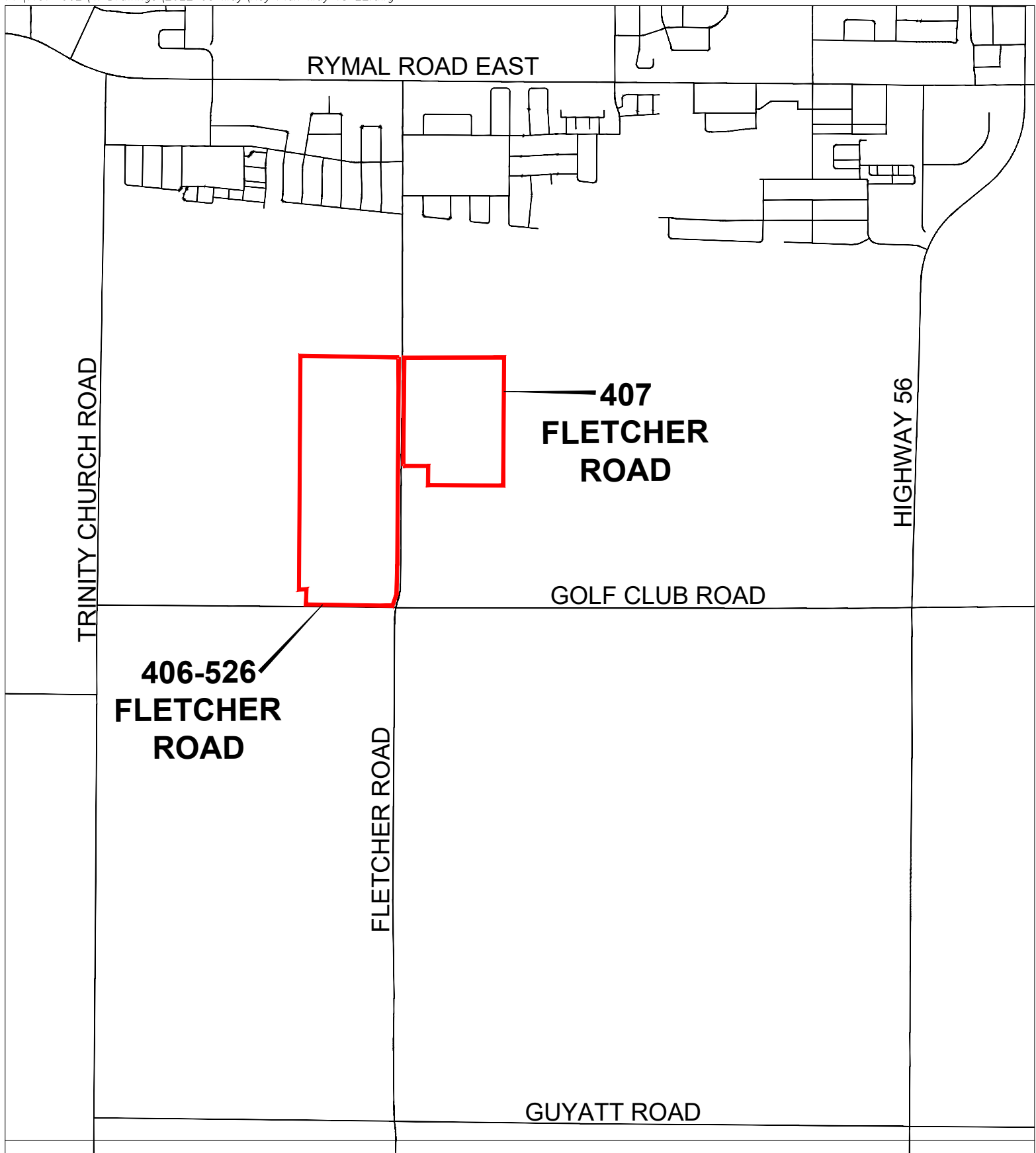
**Colin Chung, MCIP, RPP**  
**Managing Partner**

Cc. Clients

Attachment A – Location Map

Attachment B – Overlay of Subject Property and Elfrida Growth Area

Attachment C – City of Hamilton Whitebelt Land



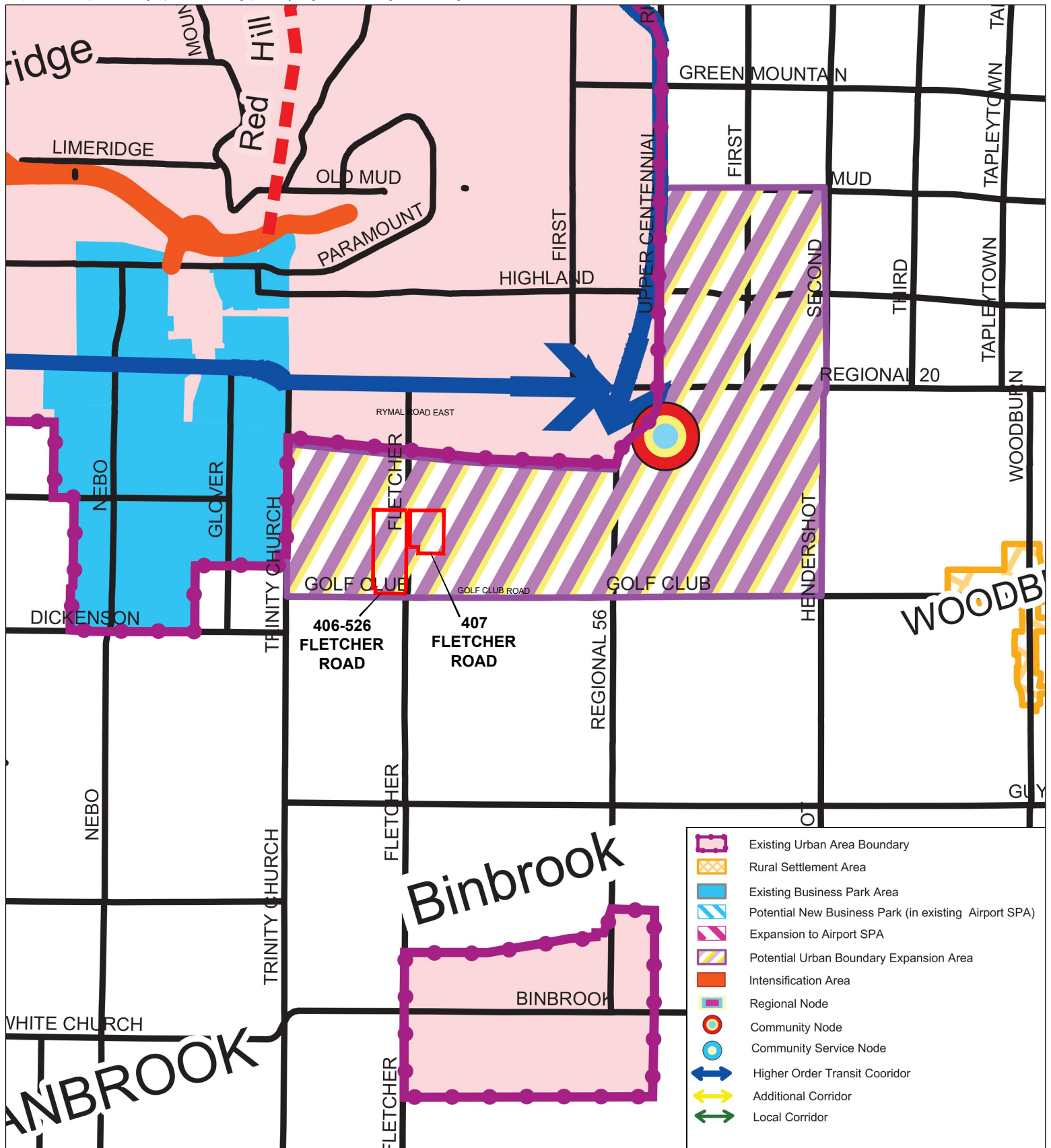
 **Subject Properties**

407 Fletcher Road - Castandgrey 5 Corp.  
406-526 Fletcher Road - Castandgrey 7 Corp.



Scale: N.T.S.  
May 18, 2022





## ELFRIDA GROWTH OPTION

406 - 526 FLETCHER ROAD & 407 FLETCHER ROAD  
CITY OF HAMILTON

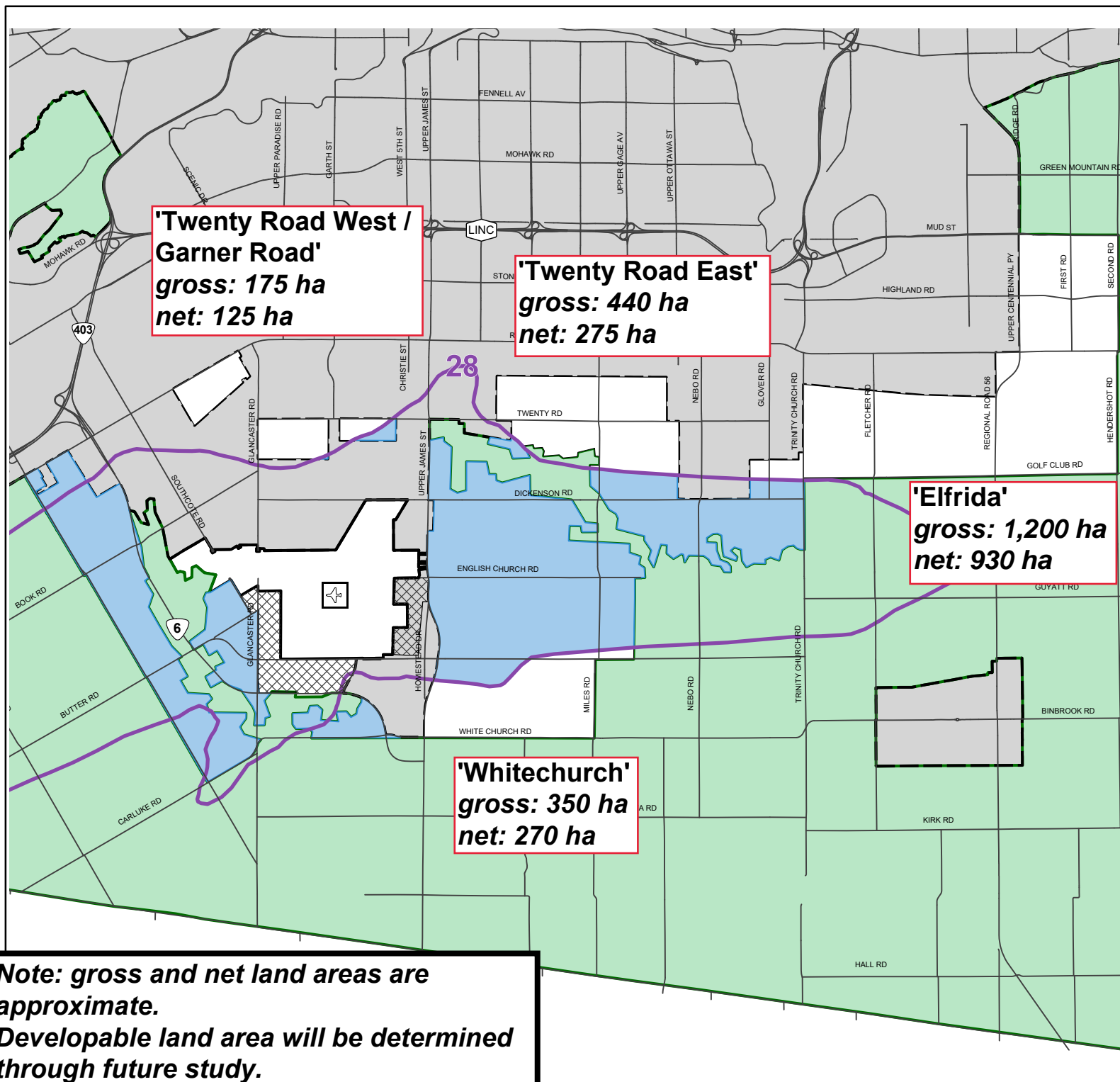
## LEGEND

Subject Properties



SCALE NTS  
AUGUST 8, 2022





## Legend

### Whitebelt

- Whitebelt Outside 28dB NEF
- Whitebelt Restricted to Employment Only

### Other Features

- John C. Munro International Airport
- 28dB NEF Contour
- Airport Expansion Lands
- Greenbelt
- Urban Boundary
- Urban Area

### Whitebelt Growth Options City of Hamilton

Date:  
March 13, 2020



PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT  
GIS - PLANNING & ANALYSIS

Although the information displayed in this map has been captured as accurately as possible, some errors may be present due to insufficient or outdated information.  
For further information, please contact GIS - Planning and Analysis Section at 905-546-2424 or by email at GIS.Planning@analysis.hamilton.ca

**Note: gross and net land areas are approximate.  
Developable land area will be determined through future study.**