

December 23, 2022

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**Via Email**

Attn: Honourable Steve Clark,  
Minister of Municipal Affairs and Housing

Provincial Land Use Plans Branch  
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**RE: MTSA Designation - Request for Changes to the Growth Plan  
ERO No. 019-6177**

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) provides expert land use planning advice and assists proponents secure the required municipal approvals for a variety of development projects throughout southern Ontario and would like to thank you for the opportunity to comment on the proposed amendment to A Place to Grow; Growth Plan for the Greater Golden Horseshow (Growth Plan) via ERO No. 019-6177. We represent the landowner of the property municipally known as 186 Hunter Street East, Hamilton, which is located approximately 415.0 metres from the Hamilton GO Station at the southwest corner of John Street South and Hunter Street East. Currently, the lands are subject to an Official Plan & Zoning By-law Amendment to accommodate a 104 unit development having a density of 578 units per hectare.

As the Province works to address the housing crisis currently facing Ontario, it will become even more critical for Major Transit Station Areas (MTSAs) to achieve their role as strategic growth areas to be the focus of higher densities and intensification across the various regions of the Greater Golden Horseshoe. Given their connectivity within and across municipalities, MTSAs are strong candidates for the high density mixed use development to facilitate the creation of complete, transit-oriented communities.

In response to Provincial direction, the City of Hamilton has begun the mapping and development of policies for Major Transit Station Areas in the City to account for the planned Light Rail Transit (LRT) network proposed to be constructed across the Urban Area. The City will delineate all MTSAs throughout the municipality inclusive of the proposed LRT Station locations and the two existing GO Transit Stations. Along with the delineation of these areas, the City will prepare prescribed density targets for MTSAs. The delineation and creation of policy for these MTSAs is anticipated to be completed by the City of Hamilton by Spring of 2023.

The above-noted Hunter Street East property is currently designated as 'Neighbourhoods' in the Urban Hamilton Official Plan (UHOP). However, as MTSA's generally encompass a 500 – 800 metre radius around a transit station, the property is anticipated to be located in the Hamilton Go Centre MTSA designation once created by the City of Hamilton. The purpose of this submission is to provide comment and recommendations with regards to the Major Transit Station Area (MTSA) population target policies within the Growth Plan as they relate to the City of Hamilton and Greater Golden Horseshoe.

**Major Transit Station Areas**

As stated in Section 2.1 of the Growth Plan, growth is to be directed to settlement areas with prioritization of intensification within strategic growth areas including urban growth centres and MTSA's. Development in these areas provide a focus on investment in transit as well as other infrastructure to support forecasted growth and a diverse range and mix of housing options. In Section 2.2.4.3 of the Growth Plan, MTSA's are prescribed to accommodate a minimum of 150 residents and jobs per hectare for those that are served by the GO Transit rail network. This intensification target is insufficient given the anticipated scale of development in MTSA's.

The Urban Hamilton Official Plan Amendment No. 167 that was passed on November 4, 2022 included a number of policy changes including a change to Section B.2.4.1.2 of the UHOP which includes MTSA's with urban nodes as strategic growth areas. The UHOP notes that Urban Nodes are intended to provide areas of higher density and activity than surrounding neighbourhoods. Further, the UHOP previously set out net residential density ranges of between 100 and 500 units per hectare for these high density residential areas. Also included in the Urban Hamilton Official Plan Amendment No. 167 policy changes was the removal of all density caps within all land designations on a site-specific basis. As such, it can be concluded that the Growth Plan's prescribed MTSA density of 150 residents and jobs per hectare should be increased to 500 residents and jobs per hectare at a minimum to better align with the anticipated scale and density of development within a strategic growth area like an MTSA.

Given that a majority of regional and municipal growth will need to be directed to strategic growth areas like MTSA's, the prescribed rate of 150 residents and jobs per hectare established by Section 2.2.4.3 is in need of an increase to better represent the intensification needed to facilitate the targeted growth. As it is anticipated that many other sites will be developed and a majority of those sites located within the MTSA areas will contain high density development, it is clear that there is a disconnect between the provincial growth targets and those which will be constructed in reality.

## Recommended Change to the Growth Plan

MTSAs require a consistent, suitable policy framework for the vital role they play in realizing the Province's intensification targets. UrbanSolutions recommends the following change to the Growth Plan to achieve the vision for transit-oriented communities that MTSAs emphasize:

1. Modify Policy 2.2.4.3 to increase the proposed density target from 150 to 500 residents and jobs per hectare for Major Transit Station Areas served by the Go Transit rail network to accurately reflect the planned built form envisioned by the MTSA.

As proposed, the aforementioned change will strengthen the policy framework to provide clarity of implementation, ensure the goals and objectives of the MTSAs are realized and align with realistic growth and development outcomes. The balance of the Growth Plan contains the appropriate range of policies to protect the matters of provincial interest while also ensuring sufficient transportation and infrastructure requirements of any residential intensification development are secured.

Kind Regards,  
**UrbanSolutions**



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*Principal*



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cc. Wellington Hamilton Non-Profit Housing Inc.