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July 30, 2020

Sandra Bickford
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street, Suite 2304
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Dear Ms. Bickford:

COMMENTS ON PROPOSED AMENDMENT 1 TO A PLACE TO GROW: GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE (ERO #019-1680)

1.0 Introduction

On behalf of our clients, IBI Group would like to acknowledge and thank you for the opportunity to review and provide comments on the Proposed Amendment#1 to A Place to Grow: The Growth Plan for the Greater Golden Horseshoe 2019 (“Growth Plan”), posted on the Environmental Registry of Ontario website under ERO #019-1680. IBI Group has been retained by Helderleigh Holdings Inc., the owner of the property known municipally as 938 Barton Street East, to make this submission with respect to all of the Subject Lands.

The proposed amendment includes changes to the population and employment forecasts, an increased planning horizon year to 2051, and policy revisions relating to Mineral Aggregate Operations (MAOs) and Major Transit Station Areas (MTSAs) in Provincially Significant Employment Zones (PSEZs).

In addition to these proposed changes, it is our written submission that the Province include another matter for consideration within the proposed amendment, specifically with respect to establishing a policy basis to permit a process to refine or re-designate Specialty Crop Areas at the local level. This pertains to lands designated as such in both the Greenbelt Plan 2017 (“Greenbelt Plan”, as may be amended) and the Growth Plan. We recognize that this request is not within the current scope, however we believe that this planning issue is not properly addressed in the Growth Plan and corresponding Greenbelt Plan and poses a gap in the provincial policy framework which should be addressed in the short term. As we explain in this letter, there is a current scenario where lands are being negatively affected by the lack of options when Specialty Crop production is not viable.

The purpose of this letter is to provide a focused review and recommendation for a policy and process that will allow for Specialty Crop Areas to be considered for re-designation and/or refinement. This proposal will use as an example a block of lands which are affected by the issue at hand, and for which a similar submission was made through the previous Coordinated Review exercise. Within this letter these lands are referred to as the Subject Lands, and they are located within the City of Hamilton, in the former Municipality of Stoney Creek (further described in **Section 3** of this letter). Our opinion is that these lands should not be designated Specialty Crop and should eventually be included in the City of Hamilton urban area through an urban boundary expansion.

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2.0 Policy Context

Within the Provincial Policy Statement (“PPS”) and the Growth Plan, the “Agricultural System” is defined as:

*The system mapped and issued by the Province It has two components – 1. An agricultural land based comprised of prime agricultural areas, **including specialty crop areas** and rural lands **that together create a continuous productive land base for agriculture**” (emphasis added)*

While Specialty Crop Areas are defined as:

*Areas designated using guidelines developed by the Province, as amended from time to time. **In these areas, specialty crops are predominantly grown** such as tender fruits (peaches, cherries, plums), grapes, other fruit crops, vegetable crops, greenhouse crops and crops **from agriculturally developed organic soil** usually resulting from; **soils that have suitability to produce specialty crops or lands that are subject to special climatic conditions or a combination of both, farmers skilled in the production of specialty crops and a long term investment of capital in areas such as crops, drainage, infrastructure and related facilities and services** to produce, store or process specialty crops.(emphasis added)*

Section 2.3.5.1 of the Provincial Policy Statement provides that Planning Authorities may only exclude land from Prime Agricultural Areas for expansions or identification of Settlement Areas.

Section 4.2.6 of the Growth Plan provides policies discussing the Agricultural System.

1. *An Agricultural System for the GGH has been identified by the Province*
2. *Prime Agricultural Areas, **including Specialty Crop Areas** will be designated in accordance with mapping identified by the Province and these areas will be protected for long-term use for agriculture.*
8. *Outside of the Greenbelt Area, provincial mapping of the agricultural land base does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, prime agricultural areas identified in upper- and single-tier official plans that were approved and in effect as of July 1, 2017 will be considered the agricultural land base for the purposes of this Plan.*
9. ***Upper- and single-tier municipalities may refine provincial mapping of the agricultural land base at the time of initial implementation in their official plans, based on implementation procedures issued by the Province. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After provincial mapping of the agricultural land base has been implemented in official plans, further refinements may only occur through a municipal comprehensive review (emphasis added)***

Section 2.2.8 of the Growth Plan provides policies relating to Settlement Boundary Expansions.

3. *Where the need for a settlement area boundary expansion has been justified in accordance with policy 2.2.8.2, the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the comprehensive application of all of the policies in this Plan, including the following:*

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- f) **prime agricultural areas should be avoided where possible.** To support the Agricultural System, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following:
- i. **expansion into specialty crop areas is prohibited;**
 - ii. *reasonable alternatives that avoid prime agricultural areas are evaluated; and*
 - iii. **where prime agricultural areas cannot be avoided, lower priority agricultural lands are used;**

Currently, there are no policies concerning the re-designation or refinement of the mapping for Specialty Crop Areas within the Growth Plan by a local, upper, or single tier municipality. Furthermore, the PPS only allows the removal of land from Prime Agricultural Areas for expansions or identifications of Settlement Areas, while the Growth Plan prohibits expansion of Settlement Area Boundaries into Specialty Crop Areas.

Even though the definition of the Specialty Crop Areas indicates that the designation is based on soil and climatic conditions and/or a combination of labour and agricultural infrastructure specific to specialty crop production, the policies contained within the Growth Plan do not allow for the re-designation of Specialty Crop Areas based on these defined criteria, and thus constrain the potential of non-viable Specialty Crop Areas to be designated for other land uses. **This renders lands within this designation that are no longer viable for Specialty Crop production as frozen without any opportunity or policy basis to change or remove the designation.**

Given this, we submit that there should be allowance for a study process that could be undertaken at the municipal level to permit re-designation and/or refine the extent of Specialty Crop Areas during either a Municipal Comprehensive Review (“MCR”) or Official Plan Review. This process could use the established criteria listed in the Specialty Crop definition, and would be similar in intent and effect to the permissions for refinement of the provincial mapping for the Agricultural land base, identified above in Policy 4.2.6.9, and the Natural Heritage System as identified below in policies 4.2.2.1, 4.2.2.2, 4.2.2.4, 4.2.2.5:

Policy 4.2.2.1 *A Natural Heritage System for the Growth Plan has been mapped by the Province to support a comprehensive, integrated, and long-term approach to planning for the protection of the region’s natural heritage and biodiversity. The Natural Heritage System for the Growth Plan excludes lands within settlement area boundaries that were approved and in effect as of July 1, 2017.*

Policy 4.2.2.2. *Municipalities will incorporate the Natural Heritage System for the Growth Plan as an overlay in official plans, and will apply appropriate policies to maintain, restore, or enhance the diversity and connectivity of the system and the long-term ecological or hydrologic functions of the features and areas as set out in the policies in this subsection and the policies in subsections 4.2.3 and 4.2.4.*

Policy 4.2.2.4. **Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan.** *Until that time, the policies in this Plan that refer to the Natural Heritage System for the Growth Plan will apply outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.*

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Policy 4.2.2.5. Upper- and single-tier municipalities may refine provincial mapping of the Natural Heritage System for the Growth Plan at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the Natural Heritage System for the Growth Plan has been implemented in official plans, further refinements may only occur through a municipal comprehensive review (emphasis added)

These subject-area examples illustrate that the Growth Plan already provides permissions for refinement of geographic and subject-based designation areas based on local assessment and through comprehensive planning. We submit that the same approach should be applied to Specialty Crop lands through specific policy amendments.

Under this approach, the policy framework would permit a process to be conducted at the municipal level to re-designate and refine the mapping of Specialty Crop Areas, which would be submitted to the approval authority (i.e. Province) through the typical MCR and/or Official Plan Review process. This would also then permit municipalities the ability to consider other planning options and/or land uses for converted lands, which would be supported by appropriate planning analysis and justification in the context of the range of applicable land use policies.

We must note at this time that while we understand that the focus of the proposed Amendment#1 is the Growth Plan, if a broader amendment to include our recommendation above is considered it would also necessitate changes to the Greenbelt Plan. Please see commentary below.

2.1 Greenbelt Plan

The Greenbelt Plan identifies the boundaries of Specialty Crop Areas in mapping and requires that they be identified and designated in municipal Official Plans. Therefore, to adequately create the opportunity to allow consideration of potential re-designation and or refinement of the extent of designated Specialty Crop lands, a Greenbelt Plan amendment is also required. In other words, to properly deal with the issue of allowing an opportunity to re-designate Specialty Crop Areas that are effectively frozen and constrained by the current policy framework requires a concurrent Greenbelt Plan Amendment which would also permit a study process to re-designate and refine the mapping for Specialty Crop Areas at the municipal level.

Section 3.1.2 of the Greenbelt Plan provides policies for lands falling within Specialty Crop Areas of the Protected Country Side as follows:

- 1. All types, sizes and intensities of agricultural uses and normal farm practices shall be promoted and protected and a full range of agricultural uses, agriculture-related uses and on-farm diversified uses are permitted based on the provincial Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas. Proposed agriculture-related uses and on-farm diversified uses shall be compatible with and shall not hinder surrounding agricultural operations.*
- 2. Lands shall not be redesignated in official plans for non-agricultural uses. Non-agricultural uses may be permitted subject to the policies of sections 4.2 to 4.6. These non-agricultural uses are generally discouraged in specialty crop areas and may only be permitted after the completion of an agricultural impact assessment (emphasis added)***

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Section 4.1.1 provides policies for general non-agricultural uses:

1. ***Non-agricultural uses are not permitted in the specialty crop areas as shown on Schedule 2 and Schedule 3 of this Plan or within prime agricultural areas in the Protected Countryside, with the exception of those uses permitted under sections 4.2 to 4.6 of this Plan (emphasis added)***

The policies above relating to Specialty Crop Areas do allow the potential for consideration of non-agricultural uses on 'Specialty Crop Areas' for infrastructure, natural resources, cultural heritage, existing uses, and lot creation. While it does set a base condition for considering other uses on Specialty Crop designated lands, the list prevents lands designated as Specialty Crop but no longer viable for Specialty Crop production from being re-designated and considered for other land uses.

Similar to the Growth Plan, the Greenbelt Plan also includes policies that allow the refinement of the Natural Heritage System by a municipality.

Policy 3.2.2.4 The Natural Heritage System, including the policies of section 3.2.5, does not apply within the existing boundaries of settlement areas, but does apply when considering expansions to settlement areas as permitted by the policies of this Plan. Municipalities should consider the Natural Heritage Systems connections within settlement areas when implementing municipal policies, plans and strategies.

Policy 3.2.2.5 When official plans are brought into conformity with this Plan, the boundaries of the Natural Heritage System may be refined, with greater precision, in a manner that is consistent with this Plan and the system shown on Schedule 4.

Section 5.4.2 Boundaries Internal to the Greenbelt Plan

Boundaries of the Natural Heritage System may be refined at the time of municipal conformity in accordance with the Natural Heritage System policies of section 3.2.2.5. No further refinements to the boundaries of the Natural Heritage System can occur after a municipality has made this one-time refinement (emphasis added)

The Greenbelt Plan also includes policies that allow the boundary of the Agricultural Areas to be adjusted within Official Plans by upper tier and single tier municipalities.

Section 1.4.2 Structure

The Agricultural System is comprised of the agricultural land base (prime agricultural areas, including specialty crop areas, and rural lands) and the agrifood network, which has components (infrastructure, services and assets) that support agricultural viability but is not a designation with a list of permitted uses. While the Greenbelt Plan identifies the boundaries of the specialty crop areas, it relies on official plans to further delineate prime agricultural areas and rural lands based on provincial mapping and guidance in accordance with section 5.3.

Section 3.1.1 Description of Agricultural System

The delineation of the Agricultural System is guided by a variety of factors, including a land evaluation area review (LEAR), which assesses such matters as soils, climate, productivity and land fragmentation; the existing

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pattern of agriculturally protected lands set out in official plans; the availability of infrastructure, services and assets important to the viability of the agri-food sector and a consideration of projected future growth patterns.

When official plans are brought into conformity with this plan, the mapping of the Agricultural System may only be refined and augmented in a manner that is consistent with the policies of section 5.3

Section 5.3 Municipal Implementation of Protected County

Within the Protected Countryside, upper- and single-tier municipalities shall refine and augment official plan mapping to bring prime agricultural areas, including specialty crop areas, and rural lands into conformity with provincial mapping and implementation procedures. Until the province has completed mapping and the Agricultural System implementation procedures, municipalities shall continue to retain existing designations for prime agricultural areas within the Protected Countryside.

Section 5.4.2 Boundaries Internal to the Greenbelt Plan

Boundaries of prime agricultural areas and rural lands are as established in official plans, subject to section 5.3 (emphasis added)

As described above, a one-time refinement to the boundaries of the Natural Heritage System may be implemented in a manner that is consistent with the Greenbelt Plan. The Plan also puts the onus on upper tier and single tier municipalities to further delineate prime agricultural areas based on provincial mapping. It also includes guidelines that factor into the delineation of the Agricultural System.

Building upon the Natural Heritage and Agricultural System policies within the Greenbelt Plan, the recommendation for an Amendment in both the Greenbelt Plan and Growth Plan to include a study process to re-designate and/or refine the limits of Specialty Crop Areas should at the very least be permitted through a one-time refinement based on guidelines in Section 3.1.1 and provided within the definition of Specialty Crop Areas. This refinement should be permitted with adequate justification during an MCR, consistent with Section 5.4.2 of the Greenbelt Plan.

However, to go a step further, lands which may be converted from Specialty Crop but which remain in the Greenbelt Plan cannot be considered for urban uses if the abutting areas are part of a defined Urban Boundary. This is because urban boundary expansion policies in the Growth Plan are currently restricted, as **Policy 3.4.2.1** states that “*settlement areas outside the Greenbelt are not permitted to expand into the Greenbelt*”. Therefore, we propose another amendment to the Greenbelt Plan which would include a provision to allow for the consideration of Settlement Area expansions outside the Greenbelt (i.e. to allow some expansion into the Greenbelt) based on justification provided during an MCR or Official Plan Review.

3.0 Example

The current policy regime renders Specialty Crop Areas that are no longer viable for Specialty Crop production as effectively frozen without any opportunity or policy framework to change or remove the designation. An obvious example of the negative impact of this policy regime pertains to the Subject Lands, outlined in **Figure 1** below.

The lands are currently designated as Specialty Crop in the Greenbelt Plan and City of Hamilton Official Plan, even though they are no longer viable for Specialty Crop production and are

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essentially orphaned from contiguous Specialty Crop areas to the east (i.e. majority of Niagara Tender Fruit and Grape lands) north of Highway 8 in the City of Hamilton, as seen in **Figure 2** below. The lands are surrounded on three sides by existing and planned urban development. Bound by Barton Street to the north, McNeilly Road to the east, Regional Road 8 to the south and Glover Road to the west, this creates the context where the Subject Lands are essentially a “hole in the doughnut” for the City of Hamilton’s Fruitland Winona Secondary Plan area, which is completely within the urban boundary.

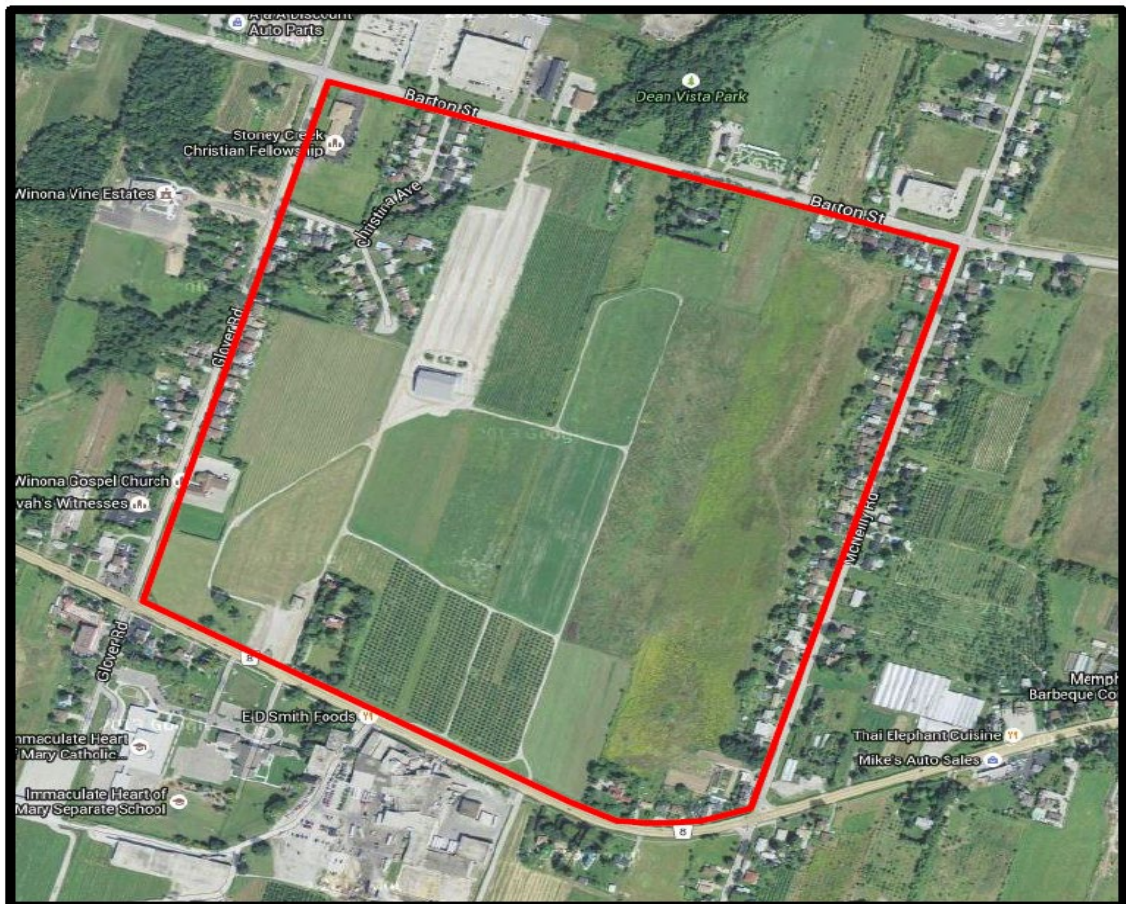


Figure 1: Air Photo Location Map of Subject Lands

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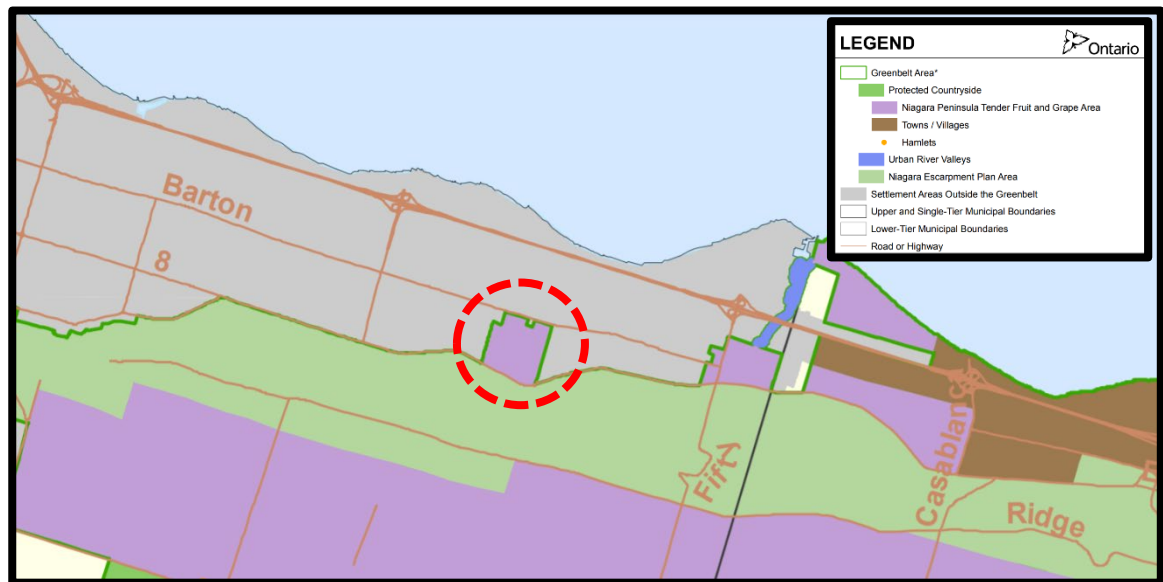


Figure 2: Speciality Crop Mapping

As seen in **Figure 1 and 3**, the subject lands are on the existing urban fringe, with low-density residential development on relatively small lots along each of the bounding roads. There is an existing subdivision of residential dwellings within the block. **Figure 3** depicts the surrounding uses, illustrating that the subject lands are surrounded by existing employment lands to the north and future urban development to the east and west within the planned Fruitland Winona Secondary Plan Area. The City's Urban Area Boundary follows the black dashed line and includes some parcels within the block.

The existing conditions of the subject lands and proximity to existing and planned urban development to the north, east and west makes the Specialty Crop area an orphaned parcel of designated agricultural land that is no longer viable for Specialty Crop production. Rather, the lands are a pocket of undeveloped land that is essentially frozen due to the identified policy constraints, and this condition will only be exacerbated as actual development of the Fruitland Winona Secondary Plan area proceeds to implementation. The existing and future context is for the subject lands to effectively be an island of agricultural land surrounded by urban development. In terms of the broader surrounding context, the subject lands are also located in an optimal location between two proposed GO Rail Stations along the planned expansion of GO Service from Hamilton to Niagara. As such, they present an opportunity to regularize the City's urban boundary, providing infill urban development which would support regional and local transit use.

As a result of the location and proximity to planned higher order transit, it is our opinion that the lands should ideally be incorporated within the City's urban area to contribute to developing a complete community and accommodating forecasted growth. The Proposed Amendment #1 to the Growth Plan forecasts a low growth scenario of 790,000 people and 340,000 jobs in 2051 and a high growth scenario of 850,000 people and 370,000 jobs in 2051. Incorporating the subject lands within the City's urban area would be an efficient and cost-effective approach to accommodate planned growth while effectively utilizing municipal transportation, sewage, water and electricity resources, and reducing outward sprawl and encroachment onto significant natural heritage features. These factors are all consistent with the Province's current emphasis on reducing regulatory barriers and red tape, increasing housing supply, making efficient use of existing and planned infrastructure investments, and assisting with economic recovery and growth (particularly

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in light of recent legislative changes in response to COVID-19), and the positive contributions the lands can make to these issues should not be overlooked.

It is without question that the viability of the subject lands should be critically examined against the appropriateness of the current Specialty Crop designation, which could occur through allowing the proposed recommendation of a study process to refine the mapping of the Specialty Crop Areas at the municipal level.

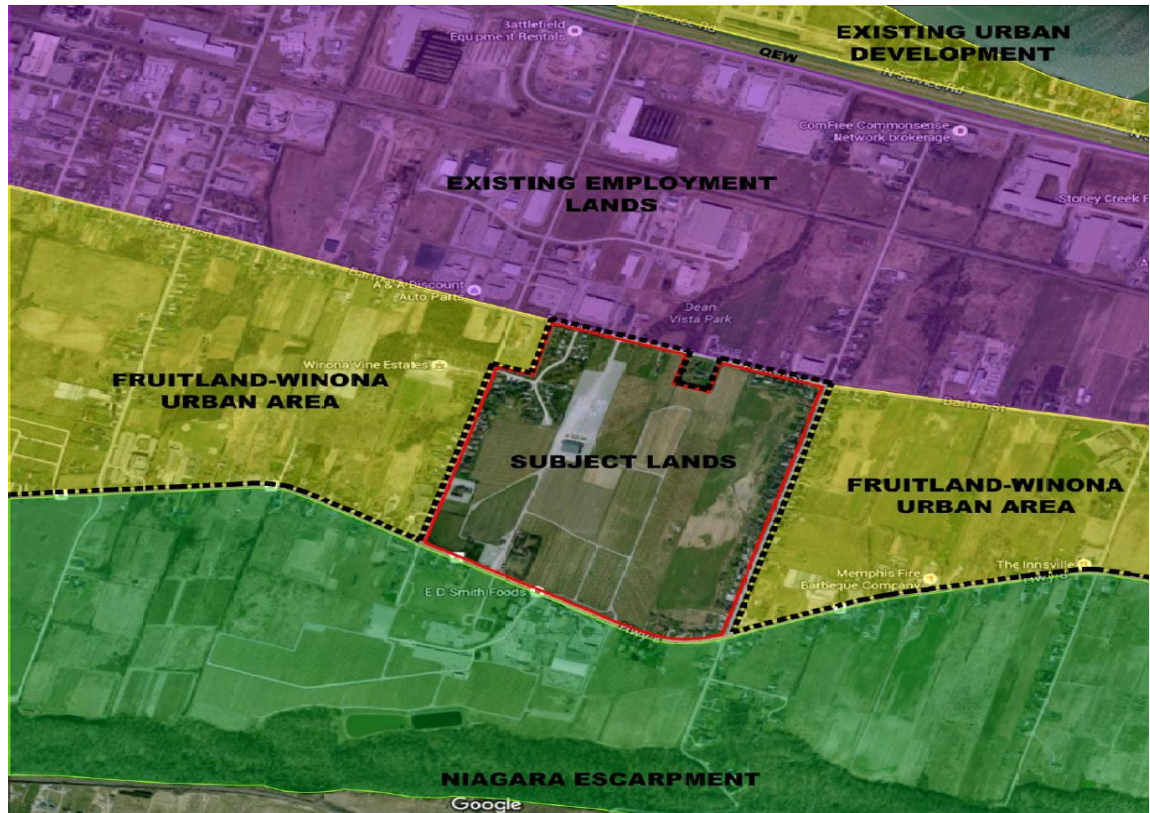


Figure 3: Surrounding Context Map of Subject Lands

With respect to connecting this submission to the proposed Growth Plan amendments, the Specialty Crop designation is preventing the consideration of these lands for other land uses, which was highlighted during the 2015 City of Hamilton Boundary Review and Stakeholder Consultation Exercise. On September 10, 2015, the City of Hamilton released a document highlighting proposed areas for Greenbelt Boundary Adjustments, which included both addition and removals, and which indicates the subject lands as a prime candidate for removal from the Greenbelt Plan Area. The City of Hamilton also retained Dillon Consulting to undertake a Greenbelt Boundary Review Report, which independently assessed the lands against established criteria for Greenbelt Plan removal, providing the following statements of advantages and disadvantages of removing the subject lands from the Greenbelt Plan:

Area R1 – Lower Stoney Creek is Suitable for Removal because

- Connects residential development planned in neighbouring areas immediately to the east, north, and west (Fruitland-Winona Secondary Plan; Town of Grimsby Secondary Plan)
- Adds virtually isolated blocks to urban area

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- Reported concerns with retaining viable farms in remnant parcels
- No NEF 28 constraints
- Suitable for both employment and residential uses
- Contiguous with existing urban boundary
- Potential Rapid Transit Route along Barton Street
- Adjacent to Barton Street Promenade
- Some existing servicing in the area
- Potential multi-modal hub north of the area
- ***Land Evaluation and Area Review (LEAR) (2005) did not identify these lands as specialty crop (emphasis added)***

Area R1 – Lower Stoney Creek is Not Suitable for Removal because

- Contains some Natural Heritage features (City)
- Contiguous with existing Greenbelt.
- Greenbelt Plan Designation: Tender Fruit and Grape.
- Official Plan designation: Specialty Crop.
- Allows for some rural amenities and assets (i.e., Winona Gardens and Imperial Precast Corp. by Fifty Road).

The key takeaways for this area are:

- Area R1, due to its configuration, is a natural addition to the existing urban area in considering transportation, servicing and land use
- Area R1 is designated as Greenbelt Tender Fruit and Grape which is identified as a provincial resource, though there was some feedback that these lands may not be viable for tender fruit or other agricultural uses
- ***Area R1 was not identified as specialty crop through the Land Evaluation and Area Review (2005) (emphasis added)***

Municipal Planning Staff recommended that the Province consider removal of the subject lands from the Greenbelt Boundary, noting this would be considered a minor revision to the Greenbelt Boundary that lines up with the recommendations from the Dillon Review and is relatively small in land area. This motion was carried by Planning Committee and City Council along with several others to form the complete recommendation which was sent out to the Province. Of note with respect to our recommendation to allow local refinement is the emphasized point that the City's LEAR processed did not identify the lands as being Specialty Crop. This predates the establishment of the Greenbelt Plan, and highlights that from that point forward the City was not able to implement Official Plan mapping consistent with its own agricultural analysis.

Further, as seen in **Figure 2** above, portions of the Subject Lands are already excluded from the Greenbelt Plan. We believe this is the result of an OMB Decision (PL031256) in September 2010, which deemed that those lands should be included within the City's urban boundary. The same arguments and result should be applied to the Subject Lands. They are not viable as Specialty Crop lands and would more appropriately be included within the City's urban boundary, but are unable to do so until a policy framework is established which permits municipal re-designation and refinement of designated Specialty Corp areas.

We note that IBI Group submitted a report to the Province in 2016 through the Coordinated Review exercise, highlighting that the Specialty Crop designation was not appropriate and that the Subject Lands would better serve other contemporary planning objectives, including efficient development contiguous with an existing urban area, completing the Fruitland Winona Secondary Plan, etc.,

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This submission did not result in any of the recommendations being adopted into the updated Greenbelt Plan nor the Growth Plans

3.1 Supplementary Studies/ Reports

Since the Coordinated Review and the submission of the report prepared by IBI Group in 2016, more work has been completed concluding that the Subject Lands are not viable for Specialty Crop or agricultural production.

A Survey of Barton Street by Profile Geomatics was completed in October 2016 to evaluate the suitability of the subject lands for productive agricultural development. Factors that were taken into consideration include site location (specifically proximity to urban encroachment), surface topography, ground orientation and micro-topographic variation, soil composition, and predominant airflow patterns. The findings concluded that any agricultural use of the subject lands would be ineffective and it would be better served under a non-greenbelt designation.

A study of the Economic and Agricultural Viability of the subject lands was completed by MNP in February 2016. MNP determined that it is not economically viable to proceed with an agricultural based operation and that there is limited agricultural viability for specialty crops on the subject lands based on the following:

- Urban development from the Fruitland Winona Secondary Plan continues to encroach on the property, making it an island of agriculture in a predominantly urban area which would result in compatibility issues
- The characteristics of the land, including soil and prevailing climate patterns result in substandard growing conditions

Lastly, a report titled “Increased Density from Proposed Growth Plan Will Seriously Impact Specialty Crop Farming on Subject Lands” by OTB Farm Solutions was completed in June 2016. It can be considered as an agricultural impact assessment and concludes that it is not reasonable to conclude that a horticultural grower would purchase these properties to farm them or grow agricultural crops full time in the future. As a result of existing and surrounding conditions, these properties would not be feasible for another farmer to grow agricultural crops and would be frozen and undeveloped without a study process to re-designate ‘Specialty Crop’ areas.

Full reports may be provided upon request.

4.0 Conclusion

This request to include a study process to allow Municipalities to re-designate and refine the mapping of Specialty Crop Areas within their official plans is logical and consistent with how other subject areas (i.e. Natural Heritage, Prime Agricultural) are addressed in the current policy framework. It is our submission that Municipalities should be able to consider the re-designation of Specialty Crop Areas where supported by analysis (i.e. through a MCR process), based on criteria already contained within the definition and similar to the Prime Agricultural and Natural Heritage policies within the Growth Plan and Greenbelt Plan. These recommendations require amendments to both the Growth Plan and the Greenbelt Plan to establish the formal policy basis to do this work. Further, our recommendations are directly tied to the example of the Subject Lands, which clearly illustrate the negative impacts and lack of options imposed by the current policy framework. These lands are effectively frozen from consideration for other uses, even though sufficient analysis by the City of Hamilton through a LEAR process as well as through privately-commissioned reports has demonstrated the lands are not viable for Specialty Crop

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production. The work even highlights the lands have little to no success of even being sold for potential farming purposes. Our proposed policy recommendations would allow re-designation of these lands at the Municipal level, so that the lands could be put to a more effective use, consistent with the Province's current emphasis on reducing regulatory barriers and red tape, increasing housing supply, making efficient use of existing and planned infrastructure investments, and assisting with economic recovery and growth (particularly in light of recent legislative changes in response to COVID-19, aligning with efforts to make the Province "open for business".

We thank you once again for this opportunity to provide comments on Proposed Amendment to the Growth Plan. We trust that our review and recommendations will be considered fully. Should you have any questions, please contact the undersigned directly.

Yours Truly,

IBI Group



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