January 19, 2009

City of Hamilton, Planning Department  
77 James Street North, Suite 250  
Hamilton, Ontario  L8P 4Y5

Attention:  Paul Mallard, Director of Planning  
Re: Revised Parkland Dedication Bylaw

Paul:

Thank you for the opportunity to review and comment on the City of Hamilton’s proposed revisions to the Parkland Dedication Bylaw. Our organization welcomes the collaborative approach to development issues which help to advance the city’s strategic plans and contribute to stronger, more vibrant communities.

The report and proposed bylaw recognizes some of our key issues of concern as it relates to parkland dedication and has addressed many of them. However, we do have some comments on the amendments as follows:

1) Amendment: On communities for densities of greater than 120 units per ha, dedication be reduced from 0.6ha/300 dwelling units to 0.5ha.

HHHBA Comment: We strongly support this adjustment as comparative analysis of other municipalities by city staff and HHHBA has shown that this is justifiable for reasons of fairness in addressing intensification and to avoid disproportionate dedication relative to other densities.

This adjustment brings the rate closer in alignment with other municipalities, which have similar or even lower ratios. For example: Toronto 0.4ha, Waterloo 0.5ha, Oshawa 0.3ha, Brantford at only 5% land dedication and Burlington has a cap of $5500/unit. Other municipalities have set caps for cash-in-lieu: London $385/unit for apartments and $525 for townhouses and Windsor $800/unit for townhouses and apartments.

2) Amendment: Maximum dedication of 5% for multiple unit developments of 20 units/ha or greater that qualify as eligible affordable housing projects.

HHHBA Comment: This provision should be applied the private sector as well as the not-for-profit if Hamilton is to realistically achieve its affordable housing targets. Such partnership arrangements were advanced at the recent city workshop on housing.

3) Amendment: The former Council resolution is to be incorporated into the Bylaw for 5% dedication regardless of density for certain geographic areas, including the Downtown CIP and brownfield sites in areas 2 and 3.

HHHBA Comment: Council should consider extending this provision to city-wide brownfields, along nodes and corridors as identified in the city’s GRIDS Plan and to all projects of intensification within the existing built boundary. This would help advance the city’s intensification strategy and the Urban Structure Plan. This was alluded to in the staff report and should be considered at this time.
Comparison analysis of other municipalities has shown Hamilton to be very aggressive in its Parkland Dedication requirements. This will only work to negatively impact our competitiveness in the marketplace at a time when every advantage will be measured. It is also counter-productive to seriously addressing the need for affordable housing in a City which at 20 per cent, has one of the highest poverty rates in Ontario.

In closing, we would like to thank staff for inviting us to participate in this important matter and I respectively request consideration of our comments. In closing, let me say the HHHBA is committed to continue working collaboratively with the city. Please don’t hesitate to contact me should you wish to discuss the issue further.

Sincerely,

Steve Spicer, HHHBA President

cc: Tim McCabe, General Manager Planning and Economic Development