Tuesday August 29, 2006

To Mayor Larry Di Ianni, Hamilton City Council and Planning & Economic Development Committee,

The Provincial Policy Statement is issued under the authority of section 3 of the PLANNING ACT and came effect on March 1, 2005. In respect of the exercise of any authority that affects a planning matter, Section 3 of the PLANNING ACT requires that decisions affecting planning matters “shall be consistent with” policy statements issued under the ACT. The Provincial Policy Statement focuses growth within settlement areas and away from significant or sensitive resources and areas which may pose a risk to public health and safety. Hamilton’s Preferred Growth Option, option #5 Nodes and Corridors (Elfrida), proposes to develop in an area designated Prime Agricultural. Not only is Elfrida Prime Agricultural, the Sinkhole Creek which is centred in Elfrida has been identified by the Niagara Conservation Authority as having Karst Topography. Karst lands are considered by the Province as hazard lands (unsafe for development) due to unstable and soluble bedrock. The Elfrida area also has two identified wetlands one of Provincial significance and one of local significance. I am including the letter from the Niagara Conservation Authority identifying these wetlands. The Niagara Conservation Authority in its Twenty Mile Creek Watershed Plan, when talking about the Sinkhole Creek and Karst Topography, they state “due to the location of Karst features, further study of the area from a hazards perspective is not likely”, (Terra Dynamic Consulting Inc. 2005) “BECAUSE THEY WILL NOT BE THREATENED BY DEVELOPMENT”.

The GRIDS process was also very unfair. There were many falsehoods and major omissions that were given to the evaluators. These falsehoods and major omissions were given to favour development in Elfrida. It should be noted that the TRIPLE BOTTOM LINE ASSESSMENTS used by the city planners and the evaluators were based on some of these falsehoods, major omissions and misleading statements outlined in my previous reports. The city planners were in charge of this process and should have guaranteed that the facts about the different growth options were accurate. I will summarize the reasons that option #5 Nodes and Corridors (Elfrida) is not consistent with the Provincial Policy Statement, The Places To Grow Plan, and the Greenbelt Plan. I will also summarize the reasons that the GRIDS process was unfair and tainted with many falsehoods, major omissions, and misleading statements by the city planners.

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TEN REASONS WHY OPTION #5, NODES AND CORRIDORS (ELFRIDA), SHOULD NOT BE CONSIDERED FOR DEVELOPMENT

1) In the key disadvantages chart table #18, Distributed Development, the planners state “removes 1070 acres of Prime Agricultural land for development”. This is not true, all of the lands on Twenty Road East and Twenty Road West are RURAL LANDS. The city did a LEAR STUDY (2003) as part of the GRIDS process. Figure #3: GROWTH CONSIDERATIONS MAP shows all of the Twenty Road area as being rural and not Prime Agricultural. This has great significance.

The Provincial Policy Statement section 2.3.1. states “PRIME AGRICULTURAL AREAS SHALL BE PROTECTED FOR LONG-TERM USE FOR AGRICULTURE”.
P.P.S. 2.3.5. “PLANNING AUTHORITIES MAY ONLY EXCLUDE LAND FROM PRIME AGRICULTURAL AREAS”.
C-3 “there are no reasonable alternative locations which avoid Prime Agricultural areas;” and
C-4 “there are no reasonable alternative locations in Prime Agricultural areas with lower priority agricultural lands”.
The P.P.S. defines RURAL LANDS as “lands in the rural area which are located outside settlement areas and which are outside prime agricultural areas”.

The Province of Ontario states through the P.P.S. that Prime Agricultural Lands must be protected, lower priority lands must be considered FIRST (RURAL) for development. The city planners, even though they did a LEAR STUDY, falsely labeled the lands on Twenty Road East and Twenty Road West as Prime Agricultural instead of Rural in their evaluation charts. This was also done in option #4, Distributed Development, where the lands in the Twenty Road area were falsely identified as Prime Agriculture. The evaluators should have been made aware that the Twenty Road area lands were RURAL and that the Province of Ontario through the P.P.S. considered them to be PRIORITY LANDS for development and option #5 lands (Prime Agricultural) as a last resort, ONLY IF LOWER PRIORITY LANDS WERE UNAVAILABLE.

2) Section 3 of the Provincial Policy Statement under the heading PROTECTING PUBLIC HEALTH AND SAFETY, “Ontario’s long-term prosperity, environmental health and social well being depend on reducing the potential for public cost or risk to Ontario’s residents from natural or human-made hazards. Development shall be directed from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or property damage”.

The definition of a HAZARDOUS SITE according to the P.P.S. “means property or lands that could be unsafe for development and site alteration due to naturally occurring hazards. These may include unstable soils (sensitive marine clays, organic soils) or unstable bedrock (KARST TOPOGRAPHY). KARST TOPOGRAPHY is
recognized by the Province of Ontario as hazard lands and development shall be
directed to other areas and not KARST areas”.

The Sinkhole Creek is centred in Elfrida. The Niagara Conservation Authority in its
Twenty Mile Creek Watershed Plan (April 2006) states that the Sinkhole Creek and
its watershed contain KARST TOPOGRAPHY. The Watershed Plan states that
Conservation Authorities are in the process of identifying Karst Environments as
hazard lands due to potential problems related to flooding, surface collapse, and water
quality. The Twenty Mile Creek Watershed Plan states on page #51 concerning the
Sinkhole Creek, “due to the location of Karst features, further study of the area from
a hazards perspective is likely not necessary because they will never be threatened by
development”. They also state on the same page “the challenge of this sub-water shed
(Sinkhole Creek) will be water quality protection and enhancement due to the Karst
nature of the bedrock which allows for rapid movement of surface water and any
contaminants to ground water resources. RURAL/AGRICULTURAL BEST
MANAGEMENT PRACTICES to enhance water quality are the focus of this
watershed”. The Twenty Mile Creek Watershed Plan was produced in April 2006 and
the city of Hamilton in May of 2006 approved to develop a city of 40,000 people on
HAZARD LANDS (recognized by the Province and the Niagara Conservation
Authority as not suitable for development).

There are also known KARST areas in the Twenty Mile Creek Sub-water shed
around the Trinity Church Road area. Terra-Dynamics Consulting Inc. (2005)
reported that surface water drainage that originates within the jurisdiction of the
NPCA in the Twenty Mile Creek headwaters enter sinkholes and discharges to
springs that are part of the Hamilton Conservation Authority’s jurisdiction in the
vicinity of TRINITY CHURCH ROAD. As part of their OFFICIAL PLAN
REVIEW, the city of Hamilton (2005 b) suggests that the following issues be
addressed when developing on KARST:

1. **STORM WATER DRAINAGE:** The rush of extra water gathered over an area
can cause flooding when the amount of paved surface is increased in
developments.

2. **UTILITIES:** Buried utility lines can serve as a focus for sinkhole development
because they provide a break in the bedrock for storm water to enter and slowly
dissolve the bedrock.

3. **GROUND WATER CONTAMINATION:** Water moves rapidly through Karst
and it undergoes little filtration. Therefor ground water in Karst areas is easily
polluted if contaminants are introduced into a Karst system they will spread
quickly.

4. **FLOODING:** Sinkholes and conduits may become blocked with debris and litter,
resulting in water back-up and flooding. Sinkholes are often used as a convenient
place to deposit trash.

5. **PROTECTION OF UNIQUE FEATURES AND THE DYNAMIC
PROCESSES** that cause the formation of Karst areas provide opportunities for
education, research and recreation. They are also important hydrological systems,
WAS NEVER MENTIONED. KARST AROUND THE TRINITY CHURCH ROAD AREA WAS NEVER MENTIONED. PROVINCIAL AND LOCALLY SIGNIFICANT WETLANDS IN ELFRIDA WERE NEVER MENTIONED.

WHY WOULD THE CITY PLANNERS MAKE SUCH MAJOR OMISSIONS ABOUT OPTION #5, NODES AND CORRIDORS, ELFRIDA? THESE OMISSIONS GREATLY AFFECTED THE DECISIONS MADE BY THE EVALUATORS. THESE MAJOR OMISSIONS GREATLY AFFECTED THE FINAL OUTCOME OF THE GRIDS PROCESS. THESE MAJOR OMISSIONS WILL GREATLY AFFECT THE DIRECTION OF FUTURE GROWTH IN THE CITY OF HAMILTON.

3) The inclusion of 200 acres of Pleasantview in Dundas (November 2005) greatly affected the fairness of the GRIDS PROCESS. The lands in Pleasantview are designated Greenbelt. THESE LANDS IN PLEASANTVIEW WERE INCLUDED ONLY IN OPTION #3, DISTRIBUTED DEVELOPMENT. THE GREENBELT PLAN STATES “GREENBELT LANDS ARE GIVEN PERMANENT PROTECTION AS LANDS WHERE URBANIZATION WILL NEVER OCCUR”. After the inclusion of the greenbelt lands of Pleasantview in Dundas, the comments made by the evaluators about option #3, Distributed Development, changed dramatically. Before the inclusion of Pleasantview, in option #3, there were no concerns about the environment and ecological impacts of this growth option. After the inclusion of Pleasantview, the comments about this growth option were all negative in respect to the negative impacts on the environment and on the ecology. The GRIDS DRAFT REPORT has numerous and significant examples about the negative comments made about Pleasantview. These comments were highlighted in my previous report entitled ANALYSIS OF GRIDS GROWTH STUDY PROCESS. Development in Pleasantview was very controversial, this can be seen by the comments of the evaluators stated in the PUBLIC CONSULTATION EVENT REPORT (shown on opposite page of this report). The great majority of the evaluators were against the inclusion of the Pleasantview lands for consideration for future development. The reasons are quite obvious. Pleasantview was not only GREENBELT but has been considered for protection by the Niagara Escarpment Plan and the Parkway Belt West Plan. In fact, the evaluators suggested that Pleasantview should be included as part of a National Park spanning from the Escarpment to Cootes Paradise.

THE CITY PLANNERS SHOULD NOT HAVE INCLUDED THE GREENBELT LANDS OF PLEASANTVIEW IN ANY OF THE GROWTH OPTIONS. INCLUDING PLEASANTVIEW IN ONLY ONE GROWTH OPTION, OPTION #3, DISTRIBUTED DEVELOPMENT, WAS GROSSLY UNFAIR, IN FACT, THE STAKEHOLDERS THAT WANTED TO INCLUDE PLEASANTVIEW IN THE GRIDS PROCESS, SUGGESTED THAT IT SHOULD BE INCLUDED IN ALL OF THE GRIDS GROWTH OPTIONS.
On page #47 of the FINAL GRIDS REPORT, the city planners state that the inclusion of Pleasantview in option #3, Distributed Development, “as a means of analyzing the potential impacts of future development in Pleasantview”. They state the results of this analysis in section 4.4. on page #64 of the FINAL GRIDS REPORT. On the same page of the same report they also state, “it was noted earlier that option #3 considered future development in Pleasantview area as a BASE CASE FOR ANALYSIS. The results of the analysis show that future development in Pleasantview is NOT A RATIONAL OPTION as it conflicts with the City’s Nine Directions to Guide Development, Vision 2020, the Provincial Policy Statement, draft Places to Grow Plan and the Parkway Belt West Secondary Plan. The conflict results from the fact that future development in Pleasantview is severely limited by existing transportation, water and wastewater and storm water servicing capacities AND ALSO BY SENSITIVE ENVIRONMENTAL AND TOPOGRAPHICAL CONSTRAINTS.

THE PUBLIC CONSULTATION EVENT REPORT OF NOVEMBER/DECEMBER 2005 CLEARLY DEMONSTRATES THAT DEVELOPMENT IN PLEASANTVIEW IS NOT A RATIONAL OPTION AND THAT BY INCLUDING IT, IN ONLY ONE OF THE GROWTH OPTIONS, GROWTH OPTION #3, WAS GREATLY UNFAIR AND NEGLIGENT. THIS IS CLEARLY EVIDENT IN THE NEGATIVE COMMENTS CONCERNING THE ENVIRONMENT AND THE ECOLOGY OF GROWTH OPTION #3 BY THE EVALUATORS.

The TRIPLE BOTTOM LINE (T.B.L) evaluation and analysis and conclusions of the Pleasantview development were made in February 2006. They concluded that development in Pleasantview was not a rational option in February 2006. Why did the planners continue to include Pleasantview in option #3, Distributed Development? The FINAL GRIDS REPORT came out in May 2006 and Pleasantview is listed in the Key Disadvantages chart of option #3. THE CHART STATES THAT PLEASANTVIEW IS COSTLY TO SERVICE, OPTION #3 IS THE MOST EXPENSIVE OPTION FOR DRAINAGE WORKS IN URBAN EXPANSION AREAS. THEY STATE UNDER KEY CHALLENGES OF OPTION #3, LOCATION OF SPECIFIC INFRASTRUCTURE SERVICES TO MINIMIZE IMPACTS ON ENVIRONMENT AND SPECIFIC ECOLOGICAL FEATURES. THEY ALSO STATE FEASIBILITY RELATING TO DEVELOPMENT IN RURAL WATERSHEDS NEEDS TO BE ADDRESSED.

THE CITY PLANNERS DETERMINED THAT PLEASANTVIEW WAS NOT A RATIONAL OPTION FOR DEVELOPMENT IN FEBRUARY 2006, WHY WASN’T PLEASANTVIEW REMOVED FROM GROWTH OPTION #3, DISTRIBUTED DEVELOPMENT? WHY WERE THEY STILL USING THE MAJOR SERVICING AND ENVIRONMENTAL AND ECOLOGICAL DRAWBACKS ABOUT PLEASANTVIEW AGAINST THE WHOLE GROWTH OPTION #3, DISTRIBUTED DEVELOPMENT?
4) The public was presented with the results of the GRIDS five Growth Options on the evenings of Tuesday May 16th, 2006 and Wednesday May 17th, 2006 at Public Information Centres. On Thursday May 18th, 2006, at the afternoon Committee of the Whole meeting, city council was presented with the results of the GRIDS PROCESS. Council endorsed the preferred growth option, option #5 Nodes and Corridors. The Committee of the Whole recommended that the preferred growth option be incorporated through:

- A NEW OFFICIAL PLAN FOR THE CITY OF HAMILTON
- THE STORM WATER MASTERPLAN, THE TRANSPORTATION MASTERPLAN, AND THE WATER AND WASTEWATER MASTERPLAN; AND
- THE PREPARATION OF A NEW DEVELOPMENT CHARGES BY-LAW FOR THE CITY OF HAMILTON

The Public Information meeting of May 17th, 2006 was held in the evening at the Glanbrook Arena Auditorium. The Committee of the Whole meeting was held in the afternoon of May 18th, 2006. The public was given only a few hours of preparation if they had wanted to voice concerns about the GRIDS PROCESS. Over 250 residents of Glanbrook attended the meeting held on May 17, 2006 at the Glanbrook Arena Auditorium. The overwhelming consensus of the people in attendance was that large scale development in the agricultural area of Elfrida, would adversely impact their lives. Many concerns were raised for example, increased traffic and road congestion. They were also concerned that conflicts would arise between their agricultural based way of life and new intense urbanization of their area. Their concerns were well founded, the concept drawing of the FINAL GRIDS REPORT, Figure #4: NEIGHBOURHOOD CONCEPT PLAN, on page #38 shows a large commercial mixed use core area in Elfrida. The concept drawing also shows a great deal of high density and medium density residential development. Their agricultural area is going to be transformed into a large urban centre. The councilor for Ward 11, David Mitchell, was in attendance at the Public Information meeting of May 17th, 2006. At the Committee of the Whole meeting held the next day, he voiced the views of his constituents and he voted against option #5, Nodes and Corridors (Elfrida).

WHY WEREN'T THE CONCERNS AND OBJECTIONS OF THE CITIZENS OF GLANBROOK CONSIDERED BY THE CITY COUNCIL BEFORE MAKING SUCH A HASTY DECISION?

NOT ADDRESS THE CONCERNS OF THE PUBLIC BEFORE MAKING A FINAL DECISION? WHY DID THE CITY COUNCILORS NOT QUESTION THE ACCURACY OF THE GRIDS PROCESS?

The Provincial Policy Statement in section 4.5. states “MUNICIPAL OFFICIAL PLANS shall provide clear, reasonable and attainable policies to protect Provincial interests and direct development to suitable areas”.

In my opinion, option #5 Nodes and Corridors (Elfrida), is completely opposite to the directions of the Province of Ontario.

5) PEAK OIL AND GREENHOUSE GASES
Section 1.8. of the Provincial Policy Statement under the heading ENERGY AND AIR QUALITY and in section 1.8.1. states “Planning authorities shall support energy efficient and improved air quality through land use and development patterns”.

Statistics show that Hamilton has a great number of people that live here and work in other cities. This trend is growing dramatically. In 1986 the percentage was 17.9% and in the year 2001 the percentage increased dramatically to 31.2%. the great concern of the city of Hamilton is that this trend is continuing. This trend has great implications, the term “PEAK OIL” envisions a future of declining availability of oil. This will result in large increases of gasoline and heating oil costs. Greenhouse gases are also a major concern. The less we use our vehicles, the less gas emissions are introduced into the atmosphere, resulting in a healthier and cleaner environment. These concepts and concerns are stated in the Provincial Policy Statement and are also stated by the city of Hamilton in PHASE 1 of the Transportation Master Plan under the headings THE TRANSPORTATION ENERGY USE AND GREENHOUSE GAS EMISSIONS POLICY PAPER.

One of the strategies to lessen the impact of “PEAK OIL” and Greenhouse Gas emissions is urban intensification. The closer we are to our workplace, the less distance we have to travel to get there. The city of Hamilton with all of its established industries, major commercial centres, a major downtown financial centre, and large public and private infrastructure employment centres HAS SEEN A DRAMATIC DECREASE IN THE RESIDENT WORKFORCE. THE NEW URBAN DEVELOPMENT IN ELFRIDA WILL HAVE NO ESTABLISHED INDUSTRIES, AND NO ESTABLISHED MAJOR COMMERCIAL, FINANCIAL AND PUBLIC AND PRIVATE INFRASTRUCTURE CENTRES OF EMPLOYMENT. THE NEW URBAN DEVELOPMENT OF ELFRIDA WILL BE AT A GREAT DISADVANTAGE IN REGARDS TO LIVE/WORK EMPLOYMENT OPPORTUNITIES. THE NEW RESIDENTIAL DEVELOPMENT IN ELFRIDA WOULD MOST CERTAINLY BE A NEW COMMUNITY OF COMMUTERS.

The greatest example of this is the community of Binbrook. There has been and will continue to be large scale residential development in Binbrook. Binbrook is becoming
example is Ward #4 where it is estimated that the cost to replace aging and inadequate sewer and water lines is estimated to cost the city of Hamilton between 60 to 80 million dollars. The city of Hamilton does not have this money and will need Provincial funds to be able to construct new sewer and water lines for this area and some of the other areas within the city. The city of Hamilton also has one of the Province’s highest tax rates, both residential and business industrial.

DEVELOPMENT IN ELFRIDA BECAUSE OF WHERE IT IS LOCATED (EAST OF THE CITY AND REMOVED FROM THE CENTRAL MOUNTAIN AND EXISTING INFRASTRUCTURE AND SERVICES) WOULD BE A VERY COSTLY PROPOSAL FOR THE CITY OF HAMILTON. THE PLACES TO GROW PLAN STATES THAT "BY MAKING THE BEST USE OF EXISTING INFRASTRUCTURE, WE ALSO REDUCE THE NEED FOR LARGE, COSTLY INVESTMENTS AND MAXIMIZE THE VALUE OF THE PUBLIC INVESTMENT THAT HAS ALREADY BEEN MADE".

Growth Option #3 Distributed Development is adjacent to the existing city limits and would utilize existing infrastructure. The significance of this is that both options would need 2080 acres to meet the Province of Ontario’s Greenfield’s Development target of 50-people-and-jobs-per-hectare. The difference between the two growth options is dramatic. The Twenty Road East area would develop along the traditional survey concept, a balanced mix of single family, semi’s and townhouses. THE ELFRIDA CITY CENTRE DEVELOPMENT OF 40,000 PEOPLE WOULD BE A MORE CONCENTRATED FORM OF DEVELOPMENT. THIS IS BECAUSE DUPLICATION OF INFRASTRUCTURE AND SERVICES IN ELFRIDA WOULD UTILIZE A GREATER PORTION OF THE 2080 ACRES REQUIRED FOR DEVELOPMENT. THIS WILL RESULT IN A MORE CONCENTRATED FORM OF RESIDENTIAL DEVELOPMENT. The concept plan FIGURE #4 on page #38 of THE FINAL GRIDS REPORT illustrates this. The yellow part of this FIGURE #4 concept plan is residential low density and is clearly the minority form of development. The largest form of development in this FIGURE #4 concept plan is residential medium and residential high density. The city of Hamilton zoning BY-LAW allows buildings of up to 98.43 feet to be built in the high density zoning areas. The FIGURE #4 concept plan also shows a large core area of commercial and mixed use. A large urban centre on Prime Agricultural lands is not the direction that the Province of Ontario, through the Provincial Policy Statement and the other Provincial legislations, envisioned municipalities to grow. The residents of Glanbrook, as demonstrated in the public information meeting of May 17th, 2006, clearly demonstrated that this is not the direction that they envisioned for the agricultural area of Elfrida.

THE CONCEPT OF DEVELOPMENT IN AN AGRICULTURAL AREA IS ADDRESSED BY THE PROVINCIAL POLICY STATEMENT. SECTION 1.1.5.1. STATES “IN RURAL AREAS LOCATED IN TERRITORY WITHOUT MUNICIPAL ORGANIZATION, THE FOCUS OF DEVELOPMENT ACTIVITY
SHALL BE ACTIVITIES AND LAND USES RELATED TO THE
MANAGEMENT OR USE OF RESOURCES AND RESOURCE BASED
RECREATIONAL ACTIVITIES”.

SECTION 1.1.5.2. PROVINCIAL POLICY STATEMENT STATES “THE
ESTABLISHMENT OF NEW PERMANENT TOWNSITES SHALL NOT BE
PERMITTED”.

8) TRANSPORTATION 1.6.5.P.P.S.
The P.P.S. states in section 1.6.6.2. “Planning authorities shall not permit
development in planned corridors that could preclude or negatively affect the use of
the corridor for the purposes for which it was identified”.

THE HIGHWAY #53 AND HIGHWAY #20 HIGHWAY CORRIDORS ARE
ALREADY BECOMING CONGESTED. THESE TWO HIGHWAYS ARE
PROVINCIAL HIGHWAYS (CORRIDORS). The congestion on these two roads is
already being caused by large scale residential development on Hamilton’s East
mountain (Summit Park and other developments), Stoney Creek mountain along
Highland Road West and First and Second Roads West and large scale new
residential developments in Binbrook. There are also large scale commercial
developments centred around and close to these Provincial road corridors. The new
Wal-Mart department store, Fortino’s Superstore, Hamilton Motor Products, and plus
other future large developments are already zoned commercial and will be built.
These businesses will draw customers from all over the city of Hamilton and
surrounding municipalities. Without the new proposed large urban centre in Elfrida,
the road corridors of Highway #53 and Highway #20 are already congested and this
congestion will continue to grow as the area develops further.

The large scale urban development in Elfrida of 40,000 new people, will make the
Provincial corridors of Highway #53 and Highway #20 much worse and will greatly
affect the purpose of which they were designed (PROVINCIAL HIGHWAYS). The
P.P.S. under the heading TRANSPORTATION states “PLANNING
AUTHORITIES SHALL NOT PERMIT DEVELOPMENT IN PLANNED
CORRIDORS THAT COULD PRECLUDE OR NEGATIVELY AFFECT THE
USE OF THE CORRIDOR FOR THE PURPOSE FOR WHICH IT WAS
IDENTIFIED”. Highway #53 and Highway #20 are both Provincial Highways, they
are not local or arterial roads, they are both DESIGNATED PROVINCIAL
HIGHWAYS AND THEY WERE DESIGNED AS PROVINCIAL CORRIDORS.
These Provincial Highways were built as road corridors for the Province of Ontario
and its citizens. The city of Hamilton has already congested these Provincial corridors
with large scale commercial and residential development on Hamilton’s East
mountain and Upper Stoney Creek area. New large scale development in Elfrida
would only compound an existing and growing traffic problem THAT WOULD
DEFINITELY NEGATIVELY AFFECT THE USE OF THESE CORRIDORS FOR
THE PURPOSES FOR WHICH THEY WERE IDENTIFIED.
Hamilton’s new Official plan amendments would receive scrutiny by the Province of Ontario, not only on matters of the environment, ecology and preservation of agriculture, but on all aspects of the P.P.S., Places To Grow Plan, Greenbelt Plan, and other legislations designed to conform to the directions that the Province of Ontario expects the municipalities to adhere to in the future growth of our communities.

NEGATIVE EFFECTS TO PROVINCIAL HIGHWAYS AND PROVINCIAL CORRIDORS ARE INCLUDED IN THE PROVINCIAL POLICY STATEMENT AND ARE ONE OF THE CONSIDERATIONS THAT THE PROVINCE EXPECTS THE MUNICIPALITIES TO CONSIDER FOR DEVELOPMENT.

9) TRIPLE BOTTOM LINE ASSESSMENTS
Pleasantview in Dundas, as stated on page #64 of THE FINAL GRIDS REPORT, is “NOT A RATIONAL OPTION” FOR THE MANY REASONS LISTED IN FEBRUARY 2006:
➢ CONFLICTS WITH CITY’S “NINE DIRECTIONS TO GUIDE DEVELOPMENT”
➢ VISION 2020
➢ THE PROVINCIAL POLICY STATEMENT
➢ PLACES TO GROW PLAN
➢ PARKWAY WEST SECONDARY PLAN
➢ SEVERELY LIMITED TO EXISTING TRANSPORTATION, WATER AND WASTE WATER AND STORM WATER SERVICING CAPACITIES
➢ SENSITIVE ENVIRONMENTAL CONSTRAINTS

PLEASANTVIEW WAS HIGHLY CRITICIZED IN NOVEMBER/DECEMBER 2006 WHEN IT WAS INTRODUCED FOR CONSIDERATION FOR FUTURE DEVELOPMENT. THE MANY REASONS AGAINST THE INCLUSION OF PLEASANTVIEW IN THE GRIDS PROCESS ARE STATED ON THE OPPOSITE PAGE. PLEASANTVIEW WAS SO CONTROVERSIAL AND THE REASONS FOR NOT INCLUDING IT WERE SO STRONG THAT EVEN THE STAKEHOLDERS THAT WANTED TO INCLUDE IT SUGGESTED THAT IT SHOULD BE INCLUDED IN ALL OF THE GROWTH OPTIONS.

THE CITY OF HAMILTON INCLUDED PLEASANTVIEW IN ONLY ONE OF THE GROWTH OPTIONS, GROWTH OPTION #3, DISTRIBUTED DEVELOPMENT. THE CITY OF HAMILTON, BY INCLUDING THIS HIGHLY CONTROVERSIAL AND SENSITIVE ENVIRONMENTAL AND ECOLOGICAL AREA FOR DEVELOPMENT WAS NEGLIGENT. THE COMMENTS BY THE EVALUATORS IN THE PUBLIC CONSULTATION EVENT REPORT CLEARLY SHOWS THAT DEVELOPMENT IN PLEASANTVIEW WAS NOT A RATIONAL OPTION. THE CITY, BY INCLUDING THE GREENBELT LANDS OF PLEASANTVIEW IN GROWTH OPTION #3, WAS NOT ONLY NEGLIGENT BUT WITH ALL OF
THE OTHER FALSEHOODS, MAJOR OMISSIONS, AND FALSE
CONCLUSIONS SUBJECT TO MAJOR CRITICISMS. HAMILTON'S NEW
OFFICIAL PLAN AMENDMENTS WILL RECEIVE SERIOUS SCRUTINY
AS TO THE LEGITIMACY AND CONCLUSIONS OF THE GRIDS
PROCESS AT THE PROVINCIAL LEVEL.

As can be seen by the GRIDS DRAFT REPORT, option #3 Distributed Development,
had no environmental or ecological concerns by the evaluators before the inclusion of
Pleasantview in this growth option. After the inclusion of Pleasantview this changed
dramatically. The TRIPLE BOTTOM LINE ASSESSMENTS of this growth option
were all negative because of the environmental and ecological drawbacks of
Pleasantview. The Sinkhole Creek was not identified as being part of option #5,
Nodes and Corridors, the TRIPLE BOTTOM LINE assessors were not aware that the
Elfrida development WAS GOING TO BE BUILT ON THE SINKHOLE CREEK
AND THE SINKHOLE CREEK SUB-WATER SHED. The TRIPLE BOTTOM
LINE assessors were not aware that the Sinkhole Creek area of Elfrida was identified
by the Niagara Conservation Authority as having KARST TOPOGRAPHY. KARST
TOPOGRAPHY IS RECOGNIZED BY THE PROVINCE OF ONTARIO AS
HAZARD LANDS (UNFIT FOR DEVELOPMENT). THE TRIPLE BOTTOM
LINE assessors were not aware that option #5, Nodes and Corridors (Elfrida), had
Provicially Significant and Locally Significant Wetlands.

The TRIPLE BOTTOM LINE assessors were not aware that the lands in option #3
(the Twenty Road East and West areas) were RURAL lands (LEAR STUDY) and
were not prime agricultural lands. The Province of Ontario, through the Provincial
Policy Statement, directed the municipalities to develop rural lands and only to
develop prime agricultural lands if lower priority lands were not available (RURAL).
These falsehoods and major omissions RESULTED IN THE WRONG TRIPLE
BOTTOM LINE CONCLUSIONS. THESE CONCLUSIONS WERE NOT ONLY
WRONG BUT COMPLETELY OPPOSITE TO ALL OF THE DIRECTIONS AND
LEGISLATIONS OF THE PROVINCE OF ONTARIO TO GUIDE
DEVELOPMENT. The GRIDS process came to the wrong conclusion, a conclusion
completely opposite to the NINE DIRECTIONS TO GUIDE DEVELOPMENT.
These NINE DIRECTIONS TO GUIDE DEVELOPMENT were identified at the
beginning of the GRIDS process and were to serve as a reference point for the
development of the growth concepts and the growth options of the city of Hamilton.

COMPARE THE TWO GROWTH OPTIONS, OPTION #3 DISTRIBUTED
DEVELOPMENT, WITHOUT THE INCLUSION OF THE GREENBELT
LANDS OF PLEASANTVIEW, AND THE ACTUAL DESIGNATION OF
THES THESE LANDS AS RURAL AND NOT PRIME AGRICULTURAL, AS
IDENTIFIED TO THE EVALUATORS IN THE GRIDS PROCESS.

COMPARE OPTION #5, NODES AND CORRIDORS (ELFRIDA), WITH THE
INCLUSION OF THE TRUE FACTS AND NOT FALSEHOODS AND
OMISSIONS (FOR EXAMPLE THE SINKHOLE CREEK, KARST
TOPOGRAPHY, AND WETLANDS). THE EVALUATORS WERE NOT AWARE THAT ELFRIDA WAS TO BE BUILT ON THE SINKHOLE CREEK AND THE SINKHOLE CREEK SUB-WATER SHED, ELFRIDA AND THE ELFIRDA AREA IS RECOGNIZED BY THE NIAGARA CONSERVATION AUTHORITY AND THE HAMILTON CONSERVATION AUTHORITY (TRINITY CHURCH ROAD AREA) AS BEING KARST TOPOGRAPHY (HAZARD LANDS, NOT SUITABLE FOR DEVELOPMENT). THE EVALUATORS WERE NOT AWARE THAT THE ELFRIDA DEVELOPMENT LANDS CONTAINED PROVINCIALY AND LOCALLY SIGNIFICANT WETLANDS.

IF THESE FACTS AND MAJOR OMISSIONS HAD BEEN IDENTIFIED TO THE EVALUATORS THE TRIPLE BOTTOM LINE ASSESSMENTS WOULD BE VERY MUCH DIFFERENT. OPTION #3, DISTRIBUTED DEVELOPMENT, WOULD MEET ALL OF THE GUIDELINES TO GUIDE DEVELOPMENT BY THE PROVINCE OF ONTARIO AND ALL OF THE GUIDELINES OF THE CITY OF HAMILTON (NINE DIRECTIONS TO GUIDE DEVELOPMENT).

OPTION #5, NODES AND CORRIDORS (ELFRIDA), WOULD FAIL MISERABLY BOTH THE PROVINCIAL AND THE CITY OF HAMILTON GUIDELINES FOR DEVELOPMENT. OPTION #5 WOULD FAIL MISERABLY NOT ONLY CONCERNING AGRICULTURE, ECOLOGY AND THE ENVIRONMENT BUT ALSO ALL OF THE OTHER CONCEPTS TO GUIDE DEVELOPMENT BY THE PROVINCE OF ONTARIO.

10) The city planners were eager to include the 200 acres of Greenbelt lands of Pleasantview in Dundas in option #3. These lands were not only Greenbelt but as stated earlier had many other serious environmental, ecological and servicing drawbacks. The North side of Dickenson Road East is RURAL and not PRIME AGRICULTURAL (between Miles Road and Dickenson Road East). These lands are not part of the airport influence area.

WHY WAS THIS AREA NOT INCLUDED IN ANY OF THE GROWTH OPTIONS? IF THE CITY OF HAMILTON IS SERIOUS ABOUT ADHERING TO THE PROVINCIAL POLICY STATEMENT, WHY WERE THESE RURAL LANDS NOT CONSIDERED FOR DEVELOPMENT? THIS AREA WAS COMPLETELY IGNORED AND WAS NOT PART OF ANY OF THE GROWTH OPTIONS.

The omission of these lands is even more puzzling, since the new waste water and water servicing master plans show that to service the Hamilton Airport, a new trunk sewer line will run along Dickenson Road East. This new sewer line will service John Munroe Airport and run along Dickenson Road East and down Upper Centennial Parkway and eventually to Lake Ontario. This trunk sewer line could certainly service
these lands of Dickenson Road East and all of the lands of Twenty Road East at very little cost.

My first report that I submitted in May 2006, outlined the many advantages of residential development West of the North Glanbrook Industrial Business Park. This development could occur West of this Industrial Business Park along Twenty Road East and along the North side of Dickenson Road East. The report stated that this residential development could be built in conjunction with this Industrial Park and that the availability of residential development in close proximity to this Industrial Business Park would be a great advantage in attracting quality industries to the city of Hamilton. This concept is emphasized in the report entitled PREFERRED GROWTH OPTION OF GRIDS DEVELOPMENT STRATEGY. This growth strategy states that employment areas should be near residential areas to support live/work lifestyles. The report outlined that this could be done at almost no cost to the city of Hamilton by utilizing the infrastructure expenditures (water, sewer, and roads) associated with the development costs of the North Glanbrook Industrial Business Park. The plan of this Industrial Business Park shows that the westerly extension of this park will be built along Twenty Road East and Dickenson Road East for a distance of 600 metres west of Nebo Road. These two sewer and water lines servicing this westerly extension along Twenty Road East and Dickenson Road East could also service the development of 250 – 300 acres of residential development.

THIS RESIDENTIAL DEVELOPMENT WOULD GENERATE IMMEDIATE REVENUES FOR THE CITY OF HAMILTON. NEW DEVELOPMENT CHARGES AND NEW PROPERTY TAX REVENUES COULD BE ACHIEVED AT VERY LITTLE COST TO THE CITY OF HAMILTON.

The North Glanbrook Industrial Business Park Transportation Master Plan – Schedule B PROJECTS – 600 metres west of Nebo Road to future Dartnall Road extension along Twenty Road East shows that there are no negative natural, cultural or socio-economic drawbacks concerning road development in the Twenty Road East area.

As part of the North Glanbrook Industrial Business Park development there will be major road improvements, widenings and road extensions (DARTNALL ROAD FROM RYMAL ROAD EAST TO BE EXTENDED AND WIDENED TO FOUR LANES UP TO DICKENSON ROAD EAST). As stated in my previous report, this Industrial Park and the lands adjacent to it, should be designated an important SUB-NODE FOR DEVELOPMENT. The employment lands of this Industrial Business Park are considered very important for the future growth of jobs for the city of Hamilton.

THE CITY OF HAMILTON SHOULD BE PROMOTING SMART GROWTH, SOME RESIDENTIAL DEVELOPMENT BUILT IN CONJUNCTION WITH THE NORTH GLANBROOK INDUSTRIAL BUSINESS PARK WOULD BE A POSITIVE AND COST EFFICIENT WAY OF ATTRACTING QUALITY INDUSTRIES AND AT THE SAME TIME INCREASE CITY REVENUES.

THESE LANDS ARE ALL DESIGNATED RURAL AND NOT PRIME AGRICULTURAL. THESE LANDS HAVE NO SERIOUS ENVIRONMENTAL AND ECOLOGICAL DRAWBACKS. THE OPPOSITE IS TRUE ABOUT OPTION #5, NODES AND CORRIDORS (ELFRIDA). THE LANDS IN ELFRIDA ARE PRIME AGRICULTURAL. THE LANDS IN ELFRIDA ARE RECOGNIZED AS HAVING KARST TOPOGRAPHY (HAZARD LANDS, UNFIT FOR DEVELOPMENT). THE LANDS IN ELFRIDA HAVE PROVINCIALLY SIGNIFICANT AND LOCALLY SIGNIFICANT WETLANDS. THESE ARE VERY STRONG AND SIGNIFICANT REASONS THAT DEVELOPMENT SHOULD NOT OCCUR IN ELFRIDA. THERE ARE MANY STRONG AND SIGNIFICANT FINANCIAL AND ECONOMIC REASONS THAT DEVELOPMENT SHOULD NOT OCCUR IN ELFRIDA.

I have stated the many reasons that I strongly feel that development in Elfrida is the wrong direction for the future growth of the city of Hamilton. These reasons are stated in the various reports that I have already submitted to the city of Hamilton. They are entitled:

- RESIDENTIAL DEVELOPMENT PROPOSAL TO INCLUDE TWENTY ROAD EAST AREA FOR CONSIDERATION FOR FUTURE DEVELOPMENT IN THE CITY OF HAMILTON
- GRIDS GROWTH OPTION #5 NODES AND CORRIDORS CITY OF HAMILTON MOVING IN WRONG DIRECTION FOR THE FUTURE GROWTH OF CITY
- ANALYSIS OF GRIDS (GROWTH RELATED INTEGRATED DEVELOPMENT STRATEGY) GROWTH STUDY PROCESS

These reports contain many maps and reference pages with key highlights of the PROVINCIAL POLICY STATEMENT, the GREENBELT PLAN, the PLACES TO GROW PLAN, the TWENTY MILE CREEK WATER SHED PLAN, the FINAL GRIDS REPORT, and the GRIDS DRAFT REPORT. THE THREE REPORTS WITH REFERENCE MATERIALS FROM THE ABOVE LEGISLATIONS AND STUDIES COMBINED FORM AN OVERWHELMING CASE THAT URBAN DEVELOPMENT IN ELFRIDA IS NOT A RATIONAL OPTION. THE GRIDS PROCESS WAS TAINTED WITH FALSEHOODS AND MAJOR OMISSIONS.

THESE LANDS ARE ALL DESIGNATED RURAL AND NOT PRIME AGRICULTURAL. THESE LANDS HAVE NO SERIOUS ENVIRONMENTAL AND ECOLOGICAL DRAWBACKS. THE OPPOSITE IS TRUE ABOUT OPTION #5, NODES AND CORRIDORS (ELFRIDA). THE LANDS IN ELFRIDA ARE PRIME AGRICULTURAL. THE LANDS IN ELFRIDA ARE RECOGNIZED AS HAVING KARST TOPOGRAPHY (HAZARD LANDS, UNFIT FOR DEVELOPMENT). THE LANDS IN ELFRIDA HAVE PROVINCIAL SIGNIFICANT AND LOCALLY SIGNIFICANT WETLANDS. THESE ARE VERY STRONG AND SIGNIFICANT REASONS THAT DEVELOPMENT SHOULD NOT OCCUR IN ELFRIDA. THERE ARE MANY STRONG AND SIGNIFICANT FINANCIAL AND ECONOMIC REASONS THAT DEVELOPMENT SHOULD NOT OCCUR IN ELFRIDA.

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There were few comments specific to Option 2 although a number of participants expressed the opinion that the growth options with larger contiguous land mass such as Option 2 provided better opportunity for improved Greenfield development.

Comments noted that for Options 2 and 4 are the most likely options to result in "more of the same".

The ‘distributed development’ Option 3 included growth in the community of Pleasantview. This option was highly criticized. Generally, participants felt that given the history of the ‘development or no development’ issues in Pleasantview, which has included an OMB hearing, this area should not be considered for any future growth. Specifically, arguments for keeping development out of the Pleasantview area included:

- The Pleasantview area has been studied for decades and has been considered for protection by the Niagara Escarpment Plan, the Parkway Belt West Plan and the Greenbelt Plan. Pleasantview is suppose to be a protected area.
- GRIDS indicates that “all options exclude key natural features (e.g. ESAs, greenbelt)”. This statement should result in no development in Pleasantview as it is in the Greenbelt.
- Pleasantview receives a lack of municipal service now; how do you expect to service a larger population? Development in Pleasantview would be expensive and difficult to service.
- The area has been conclusively determined to have biologically significant flora. It is used extensively by wildlife and the fields serve as a vital link and safe passage for wildlife as they travel between different conservation lands. Suburban development would result in a loss of wildlife habitat and developing in Pleasant view could impact the fragile area of Cootes Paradise which has world recognition (National Geographic). The Pleasantview area affords a buffer to Cootes Paradise and preserving and sustaining this resource is paramount.
- Pleasantview has been found to be a challenging place for the construction and maintenance of homes and infrastructure. The water run-off from the Niagara Escarpment has caused significant damage to existing homes and has been the reason for costly and difficult to solve road maintenance issues. Patterson and Valley Roads have been rebuild more than once due to extensive water damage.
- Although the agriculture lands in Pleasantview have been identified as a Class 7, they were productively farmed (soybeans, feed corn) yearly before being purchased by speculators. Also many fruit trees in the area. This is an indication of their good agricultural value.
- City should pursue inclusion of Pleasantview with the NEC jurisdiction. The concept of a National Park from Escarpment to Cootes Paradise is very positive and would increase the profile of Hamilton.
- Greenspace such as Pleasantview should be jealously guarded by the City to help counter the pollution created by urbanization and vehicles.