To Mayor Fred Eisenberger and Hamilton City Council,

The Upper James Street and Rymal Road East intersection of a Primary and a Secondary Corridor ranks this important area of commerce as the second highest order transit of the City of Hamilton second only to the city's Downtown Primary Node. The Upper James Primary Corridor connects this area directly to Hamilton International Airport and future Mobility Hub and the City of Hamilton’s future employment lands. The Urban Structure Report states “the most successful nodes are the ones that exhibit a wide variety of land uses including higher density residential and employment uses, and have access to higher order transit’. Is there any reason that the Upper James Rymal Road East area with the second highest order transit in the city of Hamilton and directly connected and in close proximity to the city of Hamilton’s future employment lands was not identified as an important community node in the city of Hamilton’s Urban Structure Plan.

The Urban Structure Plan also states on numerous occasions that it “only addresses the recommendations from GRIDS and other foundation studies that apply within the existing urban boundaries”. The Urban Structure Plan states on page # 53 “community nodes as a whole should generally achieve a target density of 100 persons and jobs per hectare”. The Elfrida community node has 21 persons and jobs per hectare, by far the least dense of all the city of Hamilton’s community nodes. Their report states “the Elfrida node has only recently began to develop and vacant lands remain within the node, new development will result in an increased overall density”. This statement would generally be true except as the Appendix C Corridors, infrastructure constraints and opportunities chart of Elfrida in the Urban Structure Report demonstrates, the Elfrida node is seriously restricted by major environmental and ecological constraints and drawbacks that will greatly limit the amount of intensification possible. These constraints include potential significant hydrological impacts, watershed has PSW’s ESA’s and ANSI, KARST TOPOGRAPHY and increase in urban contamination by development. The Elfrida Area falls dismally short of the recommended density of 100 persons and jobs per hectare for community node designation. The Upper Centennial - Rymal Road Corridors are only secondary corridors and the employment opportunities as defined for node designation in the Urban Structure Plan are very limited in the Elfrida area. What were the reasons that the Elfrida area was designated a community node in the Urban Structure Plan?
The City of Hamilton has an abundance of future intensification and vacant lands within the urban boundary (14-16 year supply). GRIDS was originally a growth study that addressed the city of Hamilton’s future growth projections until the year 2031. What was the purpose of the City of Hamilton including Special Policy Area B “FUTURE URBAN GROWTH DISTRICT” in Hamilton’s Official Rural Plan? The City of Hamilton’s Preferred Growth Option has an area of 3,600 acres, this Special Policy Area Designation for Elfrida and Upper Stoney Creek would ensure that future growth will occur exclusively in these areas for the next 40-50 years.

The Committee of the Whole on the afternoon of May 18th 2006 formally recommended and endorsed GRIDS as the city of Hamilton’s Growth Management Strategy. The Public Information meeting was held the night of May 17th 2006 at the Glanbrook Arena Auditorium. In other words the Committee of the Whole Rubber – Stamped the City of Hamilton’s 30 year Growth Strategy one half day after the public information meeting about Grids. The exclusion of the Upper James Street – Rymal Road area of the central mountain in the Urban Structure Plan should not be Rubber Stamped. This area is strategically placed and connected to and in close proximity to the City of Hamilton’s future employment lands and Hamilton International Airport. The Upper James Rymal Road area has high order transit second only to the Downtown Primary Node and Upper James has been known for years as the Golden Mile an important centre of commerce. I am including a report summarizing the Grids Growth Process since the Urban Structure Plan is based on the recommendations of Grids and the Urban Structure Plan will be the basis of the City of Hamilton’s new Official Plan.

Yours Truly,

Dr. Tom Nugent

9 Grandview Avenue
Stoney Creek, Ontario  L8E 5A5
(905) 643-9036
Monday, November 18, 2008

To Mayor Fred Eisenberger, Hamilton City Council, and the City of Hamilton’s Planning and Development Department,

Hamilton City Council formally adopted the recommendations of the Growth Related Integrated Development Strategy (GRIDS) on May 24th, 2006. On November 27th, 2008, the Planning and Development Department of the City of Hamilton will be presenting a draft Urban Structure Plan which will formally implement GRIDS. The Planning and Development Department in their Urban Structure Report are careful to point out on many occasions that the Urban Structure Plan only addresses the recommendations of GRIDS within the existing urban boundaries and that urban expansion recommendations from GRIDS will be addressed in other studies and Official Plan Amendments. On page #3 of the Urban Structure Report it is stated “the Urban Structure Amendment will build upon the RURAL OFFICIAL PLAN.” The City of Hamilton’s Rural Official Plan proposes to designate the lands east of Upper Centennial and south of Rymal Road as SPECIAL POLICY AREA B “FUTURE URBAN GROWTH DISTRICT”. The Urban Structure Report states on page #3 “the Urban Structure Amendment will build upon the RURAL OFFICIAL PLAN and create the first component of the urban section of the new City wide Official Plan” does not make any sense. HAMILTON’S RURAL OFFICIAL PLAN AND SPECIAL POLICY AREA B HAS NOT YET BEEN APPROVED BY THE PROVINCE OF ONTARIO. The Urban Structure Report on page #4 further states “the Urban Structure Plan elements (eg. cultural heritage policies, land use designations, housing policies etc) will be approved through individual amendments to the RURAL OP.” The Urban Structure Plan is based on the assumption that the Province of Ontario will approve SPECIAL POLICY AREA B as a future URBAN GROWTH DISTRICT and that the foundation studies for development will occur exclusively in Elfrida and Upper Stoney Creek (individual Plan Amendments to RURAL OP).

There are presently 58,400 future residential units within the existing urban boundary (26,500 residential units of intensification and 31,900 residential units on vacant designated lands). The city of Hamilton has enough development land within the urban boundary for the next 14-16 years. The SPECIAL POLICY AREA B future Urban Growth District designation of the Preferred Growth Option will ensure that no other areas of development will be considered for the next 40-50 years ((PREFERRED GROWTH OPTION HAS 1,455 HECTARES, (230 HECTARES SCUBE, 1,130 ELFRIDA AND UPPER STONEY CREEK AND 95 HECTARES GLANCASTER ROAD AND TWENTY ROAD WEST) 3,600 ACRES OF FUTURE GROWTH EXCLUSIVELY IN THE PREFERRED GROWTH OPTION)).

Hamilton City Council on September 13th, 2006, realizing the importance of the Twenty Road East lands and the fact that these lands were not part of the Preferred Growth Option, passed a motion in council 7.8, this motion stated “therefore it is resolved that staff be directed to incorporate the lands along Twenty Road in the required five-year review of the Official Plan and Master Plans.” Hamilton City Councilors should be made aware that if the Special Policy Area designation of Elfrida and Upper Stoney Creek is approved, the Twenty Road East area will not see any development for 40-50 years. There are enough lands within the existing urban boundary for 14-16 years and by the time that Elfrida and Upper Stoney Creek (SPECIAL POLICY
AREA B) is built out it will probably be another 25-30 years after that. The Urban Structure Report states it clearly "GRIDS did not produce a statutory plan under the Planning Act, rather it produced a council-adopted long term growth strategy for the City of Hamilton." They also state that the Urban Structure Amendment will build upon the RURAL OFFICIAL PLAN. My interpretation of their statements is that the SPECIAL POLICY AREA designation of the Elfrida and Upper Stoney Creek area in Hamilton’s Official Rural Plan, would allow development exclusively to this area and would require only future plan amendments, no other areas would be considered. The Planning and Development Department should state clearly whether the approval of SPECIAL POLICY AREA B (FUTURE URBAN GROWTH DISTRICT) will constitute a future urban boundary expansion to this area by the City of Hamilton and that areas that are outside of this designated urban expansion district could be considered for development (THE TWENTY ROAD EAST LANDS). The Ministry of Municipal Affairs and Housing has stated numerous times that they were not in favour of Special Policy Areas. The reasons stated were "Special Policy Areas lead to confusion and uncertainty and that the Special Policy Area designation should be removed".

The Urban Structure Report states that “the purpose of the Urban Structure Plan is to formally implement the nodes and corridors structure recommended in GRIDS”. GRIDS is a highly controversial and seriously flawed growth study that will face serious challenges and scrutiny by the Province of Ontario.

Some of these flaws associated with GRIDS I will briefly list below:

- The Planning and Development Department’s interpretation “Compact Urban Form”.
- Development of Prime Agricultural Lands in Elfrida, (Lear Study 2005) when lower priority Non Prime Agricultural Lands in the Twenty Road East area, (Lear Study 2005) were available.
- Development of lands with the largest impact on the environment and the ecology (Elfrida Triple Bottom Line evaluation of the Grids Growth Process).
- Not developing area of moderate impact on the environment and the ecology (Twenty Road East lands Triple Bottom Line Evaluation of Grids Growth Process).
- The inclusion of the Pleasantview area in the Twenty Road East Growth Option # 3. These lands are designated GREENBELT LANDS by the Province of Ontario.
- Major omissions that greatly affected the evaluation Growth Process, the Sinkhole Creek and Karst Topography in Elfrida.
- After the T.B.L. evaluation process, city staff refined the Preferred Growth Option by adding 420 acres from Growth Option # 2 (Growth Option # 2 was rejected by the Grids Evaluation Process because this Growth Option would remove too much agricultural lands for development). A comparison of the maps of these two areas will show that Option # 2 and the Preferred Growth Option are identical. THE LANDS WERE CONVENIENTLY RE-LABELLED.
- After the T.B.L. evaluation process city staff refined the Preferred Growth Option by adding 250 acres of unevaluated lands (Mud Street East and Second Road East in Upper Stoney Creek). These lands were not part of the Grids Growth Evaluation Process.
The Province of Ontario directs the municipalities to build new residential in close proximity to employment lands (LIVE/WORK LIFESTYLES). The city of Hamilton’s Planning Department completely ignored this consideration, the Preferred Growth Option is located at a distance of over 20 kilometres from the city of Hamilton’s future employment lands (49,000 future jobs) centred around Hamilton International Airport.

The Primary Corridor designation of Upper James Street in the Urban Structure Plan and the potential of a LRT Transit Line on this Primary Corridor further emphasizes the flawed Grids results and the importance of the Twenty Road East area. In a recent interview with a Hamilton Spectator columnist Mayor Hazel McCallion of Mississauga stated that “much of Mississauga’s growth is a direct result of Pearson International Airport, which sprawls within the city’s borders”. She then stated that “Hamilton should put a priority on enhancing its Airport and the lands around it”. The Grids Growth Process completely ignored the connectivity and close proximity of the Twenty Road East lands to Hamilton International Airport.

Upper James Street and Rymal Road intersect, a Primary and Secondary Corridor, yet this important intersection and area of commerce (The Golden Mile) was not identified as an important Community Node in the Urban Structure Plan. The city of Hamilton’s Downtown Primary Node is the only higher order Corridor designation than Upper James Street and Rymal Road. The Urban Structure Plan states “an essential element for establishing successful Nodes and Corridors is the presence of higher level transit service running along Corridors linking Nodes and Corridors together. This important intersection and area is directly linked and in close proximity to Hamilton International Airport and future Mobility Hub and the future Airport Employment Lands. This area is also directly linked to the Downtown Primary Node and future Mobility Hub, Hunter Street GO STATION, the planned LIUNA GO STATION and the West Harbour Development Zone. Why was this important intersection of higher order transit and commerce not identified in the Urban Structure Plan as an important Community Node?

The Urban Structure Plan states on page #38 of its report, “the most successful nodes are the ones that exhibit a wide variety of land uses, including higher density residential and employment uses, and have access to higher order transit.” According to this definition the Upper James Street and Rymal Road area is more qualified for community node designation than Elfrida. The Upper James Street and Rymal Road intersection of a Primary and Secondary corridor ranks this area only below the Downtown Primary Node as to higher order transit. This area is also directly linked to the future Airport employment lands and Hamilton International Airport and has a much higher residential density than the Elfrida Node. In fact, the Elfrida Node is by far the least dense of all the nodes in the Urban Structure Plan (21 combined people and jobs per hectare).
The Urban Structure Report states on page #53 under the heading SCALE, “the Community Nodes as a whole should generally achieve a target density of 100 persons and jobs per hectare”. The table 3.6 Community Node, Density Chart on page #57 of the Urban Structure Report (attached with this report) shows that at 21 combined people and jobs per hectare, the Elfrida Community Node is by far the least dense of all the city’s nodes and falls dismally short of the Urban Structure Plan’s recommended 100 persons and jobs per hectare to qualify as a Community Node. The 21 persons and jobs per hectare of the Elfrida Community Node is even far short of the Places To Grow Plan’s target of 50 persons and jobs per hectare for Greenfield Development. The Urban Structure Report states on page #56 under the heading INTENSIFICATION POTENTIAL, “that even though the Elfrida area is well short of not only the Node target but also the Growth Plan target for new Greenfield areas (ie. 50 persons and jobs per hectare), they state that the Elfrida Node has only recently began to develop and vacant lands remain within the Node, new development, will result in an increased overall density”. This statement would generally be true except as the APPENDIX C Corridors, infrastructure constraints and opportunities chart of Elfrida demonstrates the Elfrida Node is seriously restricted by major environmental and ecological constraints that will greatly limit the amount of intensification possible (attached with this report). The following are some of the constraints:

1. Potential significant hydrological impacts such as increased runoff, and increased erosion potential and reduction in ground water recharge
2. Watershed has PSW, ESA’s and ANSI’s
3. Potential increased flow volumes (+17%) and erosion and reduced ground water recharge (-10%)
4. Increase in urban contamination
5. Karst geology ((Definition of hazardous sites according to the PPS: “means property or lands that could be unsafe for development and site alteration due to naturally occurring hazards. They may include unstable soils or unstable bedrock (KARST TOPOGRAPHY)” ))

The other Nodes in the Urban Structure Plan are existing areas and communities that have already been built out and the Urban Structure Report gives firm density figures for these nodes. The Heritage Green and Elfrida Nodes are emerging residential and commercial developments, the urban Structure Report states that when Heritage Green when fully developed, will have an anticipated 83 combined people and jobs per hectare. Why didn’t the Urban Structure Report make the same anticipated density calculations for the Elfrida Community Node? The calculations could have easily been made factoring in the gross available lands of 75 hectares in Elfrida. We know that the current development of Elfrida has a growth density of 21 people and jobs per hectare. They could then have calculated the amount of density possible of the remaining vacant lands by factoring in the serious environmental and ecological constraints for development. In fact, the Urban Structure Plan should already have these figures and they should be made public and be subjected to scrutiny before approval of Community Node Designation of Elfrida in the Urban Structure Plan.
<table>
<thead>
<tr>
<th>Master Plan</th>
<th>Opportunities</th>
<th>Constraints</th>
<th>Connections</th>
<th>Notes/Comments</th>
</tr>
</thead>
</table>
| Transportation | Transit  
- Proposed Transit Priority Corridor/future RT route west on Rymal  
- Proposed Transit Priority Corridor/future RT route north Upper Centennial  
- Proposed park and ride facility  
- Road Widening (Rymal)  
- Road improvements (Upper Centennial)  
- Road widening project |  
- Potential significant hydrological impacts such as increased runoff, and increased erosion potential and reduction in groundwater recharge  
- Watershed has PSW, ESA’s and ANSI’s  
- Potential increased flow volumes (+17%) and erosion and reduced groundwater recharge (-10%)  
- Increase in urban contamination  
- Karst geology |  
- Connected to Rymal and Upper Centennial Corridor  
- Links to Eastgate and Stoney Creek nodes |  
- Road widening, Trinity Church to Hwy 20, (2012-2021) |
| Stormwater |  
- Potential to reduce impacts through source control and conveyance control infiltration techniques/BMPs  
- Two stormwater ponds to be retrofitted  
- Significant urban potential (21% of watershed)  
- Ability to apply best management practices and upgraded urban stormwater management facilities  
- No significant sewer upgrades may be required |  
- Connected via Upper Centennial Trunk watermain |  
- Node within Twenty Mile Creek Sub watershed  
- Constraints based on 21% or 2,300ha of additional urban development within watershed |
Urban Structure External/Public Consultation

External Consultation

Stakeholder Meeting - November 12
Invites included:
- Agency Circulation (including some internal staff)
- All members of HABIA
- Contacts for current applications involving employment lands
- Contacts for current major commercial applications
- Other stakeholders - (e.g., Hamilton Halton Homebuilders, Chamber of Commerce, Tradeport, Dofasco, Harbour Commission, …)

Attendance:

Open House - November 12
Open House - November 13
Published in At Your Service on Friday, November 3, 2007
Published in the Brabant Papers on Friday, November 9, 2007
Advertisement circulated to all Neighbourhood Associations, HABIA, Other Community Groups (e.g., CATCH, Environment Hamilton…), Media, Councillors
Total Attendance:

Additional Meetings
Councillor Mitchell's Constituents Meeting - November 21, 2007 at 7:00 p.m. at the Glanbrook Community Service Centre

Second Stakeholder Meeting for Neighbourhood Associations (as requested at Committee by Councillor McHattie) - CANCELLED - based on further discussions with Councillor McHattie

Hamilton-Halton Homebuilders - November 22, 2007 at 12:00 at the Hamilton Halton Homebuilders Association Office

Hamilton Chamber of Commerce Joint Meeting of the Transportation Committee and Business Development Committee - December 12 at 10:00 a.m. at the Chamber Offices
Table 3.6: Community Node, Density

<table>
<thead>
<tr>
<th>Node Type</th>
<th>Existing Population and Employment</th>
<th>Preliminary Area (ha.)</th>
<th>Density (combined people and jobs per ha.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Downtown Dundas</td>
<td>4,210</td>
<td>47</td>
<td>90</td>
</tr>
<tr>
<td>Downtown Ancaster</td>
<td>1,890</td>
<td>57</td>
<td>33</td>
</tr>
<tr>
<td>Downtown Stoney Creek</td>
<td>3,085</td>
<td>28</td>
<td>110</td>
</tr>
<tr>
<td>Downtown Waterdown</td>
<td>2,545</td>
<td>45</td>
<td>57</td>
</tr>
<tr>
<td>Centre Mall</td>
<td>2,525</td>
<td>37</td>
<td>68</td>
</tr>
<tr>
<td>Meadowlands</td>
<td>2,925</td>
<td>89</td>
<td>33</td>
</tr>
<tr>
<td>Elfrida</td>
<td>1,600</td>
<td>75</td>
<td>21</td>
</tr>
<tr>
<td>East Mountain/Heritage Green</td>
<td>1,740 (anticipated)</td>
<td>21</td>
<td>83 (anticipated)</td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td>2,565</td>
<td>50</td>
<td>51</td>
</tr>
</tbody>
</table>

In order to meet the targets, a greater amount of intensification will be required in some nodes than others. However, there is a large disparity amongst the Community Nodes in ability to meet the target density range and this will be a challenge. From a supply perspective, such intensification is possible on large parking lots and under-utilized commercial sites, but this supply varies amongst the nodes. The main street character of some of the Nodes will be quite attractive for residential intensification and demand in some areas may outstrip supply. In other more auto-dominant Community Nodes, demand may be much more of a constraint.

Detailed secondary plans should be prepared for each of the Nodes which consider land use and policy changes and strategies to address supply and demand challenges. Until that time, applications for development within the nodes should provide a concept plan demonstrating how the Node can evolve into a more mixed use area in the future (additional policies will be needed to implement this interim policy measure).
The record of Public Consultation comments APPENDIX A states that there were a number of stakeholder meetings to discuss the Urban Structure Plan. The Hamilton Halton Home Builders, the Hamilton Chamber of Commerce, Tradeport, Dofasco, and the Harbour Commission were by invitation. They also state that there were Open Houses on November 12th, 2007 and November 13th, 2007 and that these Open Houses were advertised to the public in At Your Service and the Brabant Newspapers. I did not see any advertising of the Public Open Houses in the Hamilton Spectator. **Is it possible that something as important as an Urban Structure Plan was not advertised in the Hamilton Spectator?** I am including a copy of External Consultation of the Urban Structure Plan. As can be seen, the Hamilton Spectator is not mentioned. **Is there evidence from the city of Hamilton and the Planning and Development Department verifying that the Urban Structure Plan Public Open Houses (in November 2007) were advertised in the Hamilton Spectator?**

The proposed Elfrida Community Node has only 21 persons and jobs per hectare, well below the recommended Community Node designation density target (100), and well below the Provincial Greenfield Residential Density Target (50). The serious environmental and ecological constraints of Elfrida will seriously limit the amount of intensification possible. The Special Policy area B “FUTURE URBAN GROWTH DISTRICT” (Elfrida and Upper Stoney Creek), have not yet been approved by the Province of Ontario. The Urban Structure Plan Report’s statements that “the Urban Structure Plan only addresses the recommendations from GRIDS and other foundation studies that apply within the existing Urban boundaries” is subject to serious scrutiny. The Elfrida lands in the existing Urban boundary fall dismally short of Community Node status and designation in both anticipated density and commercial and community significance of this area. The Urban Structure Report mentions numerous times that the Urban Structure Plan is based on the current Urban boundary, the Community Node designation of Elfrida demonstrates that even though the Province of Ontario has not approved Special Policy Area B, the City of Hamilton’s Planning and Development Department **were assuming that it would have been approved by now.** This further emphasizes the point that the urban Structure Plan and the City of Hamilton already consider Special Policy area B as a foregone conclusion even though it has not yet been approved by the Province of Ontario.

A further example that the Urban Structure Plan and the Foundation Studies are not restricted to the existing Urban boundary. Metrolinx and the Rapid Transit Feasibility Study are proposing to build a Rapid Transit Line connecting Elfrida and the Ancaster Industrial Park (S LINE). Bad planning policies are compounded by other bad planning policies! The GRIDS Growth Results of building future residential development at a great distance from the city of Hamilton’s existing employment areas and infrastructures and future employment lands was a great planning mistake. The Rapid Transit Feasibility Study is proposing to build an expensive Rapid Transit Line that would enable the residence of Elfrida and Upper Stoney Creek to commute great distances to access their jobs in Ancaster or Mount Hope. Instead of building an expensive Rapid Transit Line to access these jobs why not develop more appropriate lands located closer to these same employment areas.
The Twenty Road East lands are designated NON-AGRICULTURAL and the Elfrida lands are designated PRIME AGRICULTURAL in the GRIDS Growth Process TBL Evaluation Charts. The Twenty Road East lands have moderate impact on the environment as a result of development and the Elfrida lands have the greatest impact on the environment as a result of development (the GRIDS Growth Process TBL Evaluation Charts).

I want to make some comments on the GRIDS Growth Process since the Urban Structure Plan formally implements the Nodes and Corridors Structure recommended in GRIDS. Clearly, the Urban Structure Plan as demonstrated by the Special Policy Area B designation of Elfrida and Upper Stoney Creek, does not deal solely with the existing Urban Boundary but also with this proposed large future urban expansion area. The Foundation Studies deal not only with the existing Urban Boundary but also with this same future urban expansion area Special Policy Area B one example of this is the proposed S Line, rapid transit line R.T.F.S. to the area of Elfrida.

**THE GRIDS GROWTH PROCESS WAS STRUCTURED IN A WAY THAT DIRECTED GROWTH TO ONLY ONE LOCATION, ELFRIDA AND UPPER STONEY CREEK.**

1) The city planners identified the Twenty Road East lands as PRIME AGRICULTURAL during the GRIDS Growth Process and in the GRIDS Final Report. The Elfrida lands were identified as only being AGRICULTURAL and not PRIME AGRICULTURAL during and after the GRIDS Growth Process.

The city, before the beginning of the GRIDS Growth Process, commissioned SOIL RESOURCE GROUP to do a soil evaluation to identify the agricultural designations (LEAR). The Twenty Road East lands were identified as “NON PRIME AGRICULTURAL” and the Elfrida lands as “PRIME AGRICULTURAL”. **Is it possible that the city planners went through a three year growth study and continued to have the wrong agricultural designations for both Elfrida and the Twenty Road East area? What was the purpose of the LEAR STUDY?**

2) The city planners insisted on the inclusion of the Greenbelt lands of Pleasantview in Dundas, in only one Growth Option, the Twenty Road East Growth Option #3. The Public Consultation Report of November/December 2005 gave a full page of reasons stating why the evaluators felt that the Greenbelt lands of Pleasantview in Dundas should not be included. The TBL Evaluation comments, outlined in the GRIDS Draft Report, make it clear that the Twenty Road East option #3 was not taken seriously by the evaluators. The reasons given were that Pleasantview in Dundas, proposed development of Greenbelt lands, and Pleasantview had serious environmental and ecological constraints and drawbacks for servicing. The city planners, after the TBL Evaluation Process of the different Growth Options, in February 2005, stated on page #64 of the GRIDS Final Report, that the reason that Option #3 was not chosen was that “future development in Pleasantview is not a rational option”, the GRIDS Final Report came out three months later, in May 2005. **Why weren’t the Twenty Road East lands evaluated on their own merits without the inclusion of the Greenbelt lands of Pleasantview?**
3) The TBL Evaluations of the GRIDS Growth Process under the heading ECOLOGICAL WELL BEING stated that the Twenty Road East area would have “moderate potential for some impact on water quality and quantity in downstream watersheds as a result of development.” This same GRIDS TBL Evaluation states that the Elfrieda Growth Option #5, Nodes and Corridors, “development has the largest potential for impact on downstream flood hazards, wetlands and geological features in the Twenty Mile Creek Watershed. Some impacts on other watersheds also possible.” With all of the Provincial Guidelines and Directives of the Province of Ontario to guide municipalities to develop suitable areas, and away from natural areas, surface water features and ground water features, why would the city planners recommend development in Elfrieda?

4) Under the heading of KEY DISADVANTAGES of Option #5 Nodes and Corridors, as to Ecological Well Being, the city planners state “some impacts on other watersheds possible”. Instead of making this general statement, why didn’t the city planners identify the SINKHOLE CREEK? This watershed is centred in Elfrieda, has a drainage of 17 kilometres, and is identified in the Twenty Mile Creek Watershed Plan as an important watershed of the PROVINCIALLY SIGNIFICANT NATURAL AREA the Twenty Mile Creek Watershed. The SINKHOLE CREEK WATERSHED is also significant because it has been identified as an area of KARST TOPOGRAPHY (hazardous sites PPS) by the Niagara Peninsula Conservation Authority. I found it incredulous that the city of Hamilton’s planning and development department would not be aware of the Sinkhole Creek and the Karst Topography associated with the Sinkhole Creek Watershed. These facts should have been part of the GRIDS TRIPLE BOTTOM LINE ASSESSMENTS, they would certainly would have affected the Final GRIDS Results.

5) The Growth Option #2 Distributed Development, was rejected by the GRIDS TBL Evaluation Process. The reason given by the evaluators, was that this Growth Option centred in Elfrieda and Upper Stoney Creek, would remove 2,500 acres of Prime Agricultural lands for development. The GRIDS Final Report on page #67, under the heading REFINEMENT OF PREFERRED GROWTH OPTION states “following the TBL evaluation city staff met to review the outcomes and recommendations to refine the Preferred Growth Option”. The planning and development department met after the TBL Evaluations of the GRIDS Growth Process and added 420 acres to option #5, Nodes and Corridors, to refine the Preferred Growth Option. A comparison of the maps of option #2 and the Preferred Growth Option reveals that they are EXACTLY THE SAME LANDS. Option #2 was rejected during the Grids Growth Process because it would remove 2,500 acres of Prime Agricultural lands for development, the city planners simply RE-LABELLED THESE LANDS AND CALLED THEM THE PREFERRED GROWTH OPTION.

6) The city planners also added approximately 250 acres of lands that were not part of the GRIDS Process, these lands were UNEVALUATED. These 250 acres are located between
First Road East and Second road East and Mud Street East and Highland Road East. City staff added these lands after the TBL Evaluation Process. What was the purpose of the three year Growth Related Integrated Development Strategy (GRIDS) when at the end of that study, lands that were not part of that study and were completely unevaluated are included for development? What was the purpose of the TRIPLE BOTTOM LINE ASSESSMENTS of the GRIDS Growth Study when 250 unevaluated acres are recommended for future development? What are the Community Well Being, Ecological Well Being, and Economic Well Being Assessments of the future Growth area, Second Road East and Mud Street East of Upper Stoney Creek?

7) The city of Hamilton’s Planning and Development Department completely ignored the strategic location of the Twenty Road East lands. They are connected to the Upper James Primary Corridor, Hamilton International Airport and future Mobility Hub and the city of Hamilton’s future employment lands centred around the Hamilton International Airport in their Growth Considerations. All of the Province of Ontario’s Directives and Guidelines outlined in the PROVINCIAL POLICY STATEMENT, THE PLACES TO GROW ACT AND THEIR OTHER PLANS AND POLICIES direct municipalities to build residential development in close proximity to employment lands (LIVE/WORK LIFESTYLES).

8) The Planning and Development Department of the city of Hamilton, demonstrated in their August 18th, 2006 Information Report, are unwilling to admit to the serious flaws of the GRIDS Growth Process. They have not only tried to rationalize but actually misrepresented the facts of the GRIDS Growth Process in their Information Report. On page #3 of their Information Report, they state that the Twenty Road East lands were identified as being Agricultural. This statement is not true. The 2005 LEAR STUDY identifies the Twenty Road East lands as “NON-PRIME AGRICULTURAL”. On page #7 of their Information Report they try to rationalize the inclusion of the Greenbelt lands of Pleasantview in Dundas in the Twenty Road East growth Option by stating “the Greenbelt Plan has retained the Parkway Belt West Plan” as the reason that it was appropriate to include these lands. The fact is that the Parkway Belt West Plan proposed to protect Pleasantview and not develop it. They also state that the Greenbelt lands of Pleasantview could somehow permit limited development is not only unrealistic but impossible. They also try to infer in their Information Report that the Twenty Road East area is not appropriate for development because of two key natural features and woodlots. They fail to mention that the GRIDS TBL ASSESSMENTS stated that the Twenty Road East area had moderate impacts on watersheds and the environment. They also fail to mention that the Elfrida Growth Option had the LARGEST impact of all the Growth Options on watersheds and the environment (GRIDS TBL ASSESSMENTS). In my previous report of October 27th, 2008, to the city of Hamilton, concerning their Information Report, also discussed their interpretation of compact urban form. The Planning and Development Department stated that “growth dispersed along the urban edge was rejected by the community as being inconsistent with VISION 2020 and the NINE STRATEGIC DIRECTIONS”. They were referring
to the fact that the Twenty Road East lands are adjacent and in close proximity to the existing central mountain urban development and was not an appropriate location for future growth. Their interpretation of COMPACT URBAN FORM was to build a new community, at a distance, a complete community (Satellite City) where people would have the opportunity to live, work and play.

Vision 2020, under the heading LAND USE IN THE URBAN AREA states “SMART GROWTH encourages the efficient use of existing infrastructure and encourages higher densities near urban centres”. Vision 2020 (SMART GROWTH) and the NINE STRATEGIC DIRECTIONS are not referring to a new complete community at a distance to the existing urban development but are referring to the existing city of Hamilton.

Their other statements in their Information Report about the Twenty Road East area are not true and misleading eg: The Twenty Road East lands would be difficult to integrate to the existing urban development to the north. There are not enough lands in the Twenty Road East area to accommodate all of the city of Hamilton’s future growth (if this is the case than all of the vacant lands in the Urban boundary would be unsuitable ). Twenty Road East residential development in close proximity to industrial lands (N.G.I.B.P.) would be difficult to achieve and should be discouraged.

The August 18th, 2006 Information Report about the opportunities of developing the Twenty Road East area made it absolutely clear that no matter how flawed the Grids Growth Process was, no matter that development of Elfrida does not conform to the Province of Ontario’s guidelines and directives for future development GRIDS WILL NOT BE CHANGED. The Twenty Road East lands are strategically positioned, ARE NON PRIME AGRICULTURAL and have moderate impacts on the environment as a result of development, GRIDS WILL NOT BE CHANGED. The city of Hamilton’s Planning and Development Department has a bunker mentality concerning the Grids Growth Process and the Grids results no matter how many flaws are pointed out they will try to rationalize and in many instances actually misrepresent the facts to justify Grids.

9) Under the current Provincial Policy Statement issued under the Planning Act, land use patterns must provide for industrial, commercial, residential, recreational, open space and institutional uses, promote employment opportunities and the appropriate range and mix of housing to accommodate growth projected for a time horizon of up to 20 years. The current policy framework also requires the municipalities maintain at all times at least a 10 year supply of land designated and available for new residential development and residential intensification. The city of Hamilton has 58,400 units of residential capacity within the urban boundary. The Urban Structure Plan states that there is not a need for an urban boundary expansion in the near or the mid term. In fact the city of Hamilton has a 14 – 16 year supply of development land within the existing urban boundary. There is no need for an urban boundary expansion at this time so GRIDS cannot be incorporated into the city of Hamilton’s new Urban Official Plan.
The recent correspondence of November 4, 2008 to the city of Hamilton from the ministry of municipal affairs states "changes have been made to the PLANNING ACT – VIA BILL 51 – which require councils to update their Official Plans every five years to ensure consistency / conformity with the Provincial framework of planning policy". The city of Hamilton included Special Policy area B (FUTURE URBAN GROWTH DISTRICT) in their RURAL OFFICIAL PLAN. These lands of Special Policy Area B are located in Elfrida and Upper Stoney Creek, the Preferred Growth Option. The recent letter from the Province of Ontario directs the municipalities to review their Official Plans every five years and they are saying that things could change within the municipality and the province and that a five year review would ensure conformity of planning across the Province. The city of Hamilton already has a 14–16 year supply of intensification and vacant land growth potential, why do we need a large designated future urban growth district that will direct development exclusively to Elfrida and Upper Stoney Creek for the next 40-50 years?

The city of Hamilton’s approach to land use planning and future urban expansion is hard to understand. I thought that the RURAL OFFICIAL PLAN dealt with the rural country side, agricultural and environmental and ecological systems. The Province of Ontario had stated clearly in the early stages of development of Hamilton’s Official Rural Plan that they were against the inclusion of Special Policy Area B. The city of Hamilton’s Urban Structure Report has numerous references to the Rural Official Plan.

Eg: Page # 3 “the Urban Structure Amendment will build upon the RURAL OFFICIAL PLAN”.
Page # 4 the report states “the Rural Official Plan represents the first part of the City’s New Official Plan”.
Page # 4 the report states “land use designations, housing policies etc. will be approved through individual amendments to the Rural O.P.”.

The City of Hamilton seems to be putting the cart before the horse and seems to engage in “backwards” planning policies. The backwards planning policy of the City of Hamilton is dramatically emphasized by the fact that the city has based the Urban Structure Plan on the Rural Official Plan. HAMILTON’S RURAL OFFICIAL PLAN HAS NOT YET BEEN APPROVED BY THE PROVINCE OF ONTARIO AND THE RURAL OFFICIAL PLAN MAY NEVER BE APPROVED IN ITS PRESENT FORM BY THE PROVINCE OF ONTARIO.

10) Hamilton City Council voted to adopt GRIDS on May 24th, 2006. Before and after May 24th, 2006, there have been numerous reports, letters, and verbal submissions regarding the serious flaws of the GRIDS Growth Process. Some of the City Councilors have been very sympathetic and supportive, and believe that the GRIDS Growth Process erred in not including the Twenty Road East area to the Preferred Growth Option but in general the rest of City Council have ignored the realities of the flawed GRIDS Growth Process. The August 18th, 2006 Information Report by the Planning and Development Department, made it absolutely clear that GRIDS would not be changed, no matter how many serious flaws and serious omissions were identified in the Growth Process. There was a motion in Council on September 13th, 2006, motion 7.8, that required that the Twenty Road East lands be incorporated for a five year review of the Official Plan. This
motion also proposed to size the future sewer on Dickenson Road East to allow for development of the Twenty Road East lands. This motion in Council sounds very encouraging, except that the Twenty Road East area like Elfrida, is outside the city boundary. If we do our math correctly, there are 14-16 years of available development lands still available within the existing urban boundary. If Elfrida is approved as a Special Policy Area, “FUTURE URBAN GROWTH DISTRICT”, when there is a need for an urban expansion, then this Special Policy Area is where the urban expansion will occur. The city planners have guaranteed this by basing the Urban Structure Plan in the new Official Plan, on the Rural Official Plan (SPECIAL POLICY AREA B). The Preferred Growth Option and Special Policy area B has an area of 1,455 hectares (3,600 acres of land). In other words, the only development outside the existing urban boundary, will occur exclusively in Elfrida and Upper Stoney Creek for the next 40 to 50 years. The Twenty Road East lands would be outside the urban boundary and would not be considered for development. The inaction of the mayor and the Hamilton City Council has been a puzzle to myself and to others. The serious flaws regarding GRIDS, should have raised many serious red flags over the last two and half years. The following are some of the serious flaws:

- Developing PRIME AGRICULTURAL lands when lower priority NON- PRIME AGRICULTURAL lands are available
- The inclusion of the Greenbelt lands of Pleasantview in the Twenty Road East Growth Option
- Developing lands with the largest potential for impact on downstream watersheds, PSW’s, ESA’s, ANSI’s (TBL EVALUATION OF OPTION #5 ELFIDA, NODES AND CORRIDORS)
- Not developing lands that have only moderate impact on downstream watersheds (TBL EVALUATION OF TWENTY ROAD EAST)
- The proposed future residential development (PREFERRED GROWTH OPTION) at a great distance from the city of Hamilton’s future employment lands (49,000 future jobs centred around Hamilton International Airport)
- Not developing the lands adjacent to and directly connected by the Upper James Primary Corridor to these same employment lands
- Option #2, Distributed Development Option, was rejected through the GRIDS Growth Evaluation Process, because it would remove 2,500 acres of PRIME AGRICULTURAL lands for development. These same 2,500 acres of land were conveniently RE-LABELLED THE PREFERRED GROWTH OPTION which Council voted and approved on May 24th, 2006.
- Inclusion of 250 acres of completely unevaluated lands that were not part of the GRIDS Growth Process to the Preferred Growth Option (Second Road East and Mud Street East in Upper Stoney Creek)

To summarize, I believe that GRIDS was structured to direct development to only one location, Elfrida and Upper Stoney Creek. I have outlined all of the reasons why I believe this. The question is why is there such a great reluctance to alter or refine GRIDS? City staff had a great
opportunity to avoid future challenges and future controversy. On page #67 of the GRIDS Final Growth Report, it states “FOLLOWING THE TBL EVALUATION, CITY STAFF MET TO REVIEW THE OUTCOMES AND RECOMMENDATIONS TO REFINE THE PREFERRED OPTION”. The result of that refinement, was the addition of 670 acres of land to the original Option #5, Nodes and Corridors, Growth Option. The addition of these lands are highly controversial.

a) 420 acres were from Growth Option #2, which was rejected by the GRIDS Process and the Planning and Development Department simply re-labeled these lands to formulate the Preferred Growth Option

b) The addition of 250 acres of lands that were not part of the GRIDS Process and were unevaluated

The Twenty Road East lands were part of the Process, the Planning Department on page #64 of the Final Grids Report in February 2006 stated “that because Option #3 considered future development in Pleasantview as a base case for analysis the results of the analysis show that future development in Pleasantview IS NOT A RATIONAL OPTION”. The Final GRIDS Growth Report was unveiled in the middle of May 2006. It was determined in February of 2006, that development of Pleasantview was not a rational option. City staff refined the Preferred Growth Option after February 2006 (following the TBL EVALUATION, city staff met). Why weren’t the Twenty Road East lands incorporated into the Preferred Growth Option instead of incorporating more PRIME AGRICULTURAL and the completely unevaluated lands of Second Road East and Mud Street East in Upper Stoney Creek. This would have avoided future controversy and future challenges. The Twenty Road East area has the distinction of being the only area in the Regional Municipality of Hamilton-Wentworth that is NOT GREENBELT and is NOT PROPOSED to be developed by the city of Hamilton. No other areas could have challenged GRIDS at this time, all of the other areas of the city of Hamilton are Greenbelt lands. The Second Road East area in Upper Stoney Creek and Hendershot Road lands of Elfrida could have been phased in at a later date.

The Airport employment lands, I whole-heartedly believe, are very important to the future development and prosperity of the city of Hamilton. It is no secret that to service these Airport lands, at a great distance, massive amounts of infrastructure and huge amounts of capital will be required. The infrastructure to service the future employment lands will be built along Upper Centennial, Golf Club Road, and Dickenson Road. It makes good planning and economic sense to develop future residential lands in close proximity to utilize these servicing infrastructures along Upper Centennial Parkway. These same servicing infrastructures run along Dickenson Road East and can gravity service all of the Twenty Road East lands. One of the main reasons I feel that the Planning and Development Department and City Council have shown, not only, a reluctance but a cast in stone policy of “GRIDS will not be changed”, is a general feeling that by changing GRIDS, it might jeopardize the servicing of the city of Hamilton’s future employment lands. The original Option #5, Nodes and Corridors Growth Option, proposed to develop 2,080 acres in Elfrida and Upper Stoney Creek. This would have resulted in a large contiguous area of land to build the Planning and Development Department’s vision of a GRIDS complete community. The addition of a further 670 acres to the
original Option #5 Growth Option, has resulted in unnecessary controversy to the fairness and motives of GRIDS. City staff should have rounded out development of the Twenty Road East area of Hamilton’s central mountain instead GRIDS completely by-passed the Twenty Road East lands. **As I stated earlier, I believe that GRIDS was structured in a way that directed growth to only one location, Elfrida and Upper Stoney Creek. I will qualify this statement and add that the RURAL OFFICIAL PLAN, THE URBAN STRUCTURE PLAN, and the new OFFICIAL URBAN PLAN are also structured in a way to direct growth to only one location, Elfrida and Upper Stoney Creek.**

As I noted earlier, there is an abundance of intensification and vacant land opportunities within the existing urban boundary. The city also states in their November 14th, 2008, Public Information Announcement, “in spring 2009, the city will adopt a new urban official plan which will shape the city’s future until 2031”. The Urban Structure Report is also careful to mention, on numerous occasions, “that the Urban Structure Plan only addresses the recommendations from GRIDS and other foundation studies that apply within the existing urban boundaries”. The reality is that GRIDS was originally designed to address the city of Hamilton’s Growth Projections and Growth Direction only until the year 2031. The city of Hamilton’s Planning and Development Department and Hamilton City Council have demonstrated that even with the numerous reports, letters, and verbal submissions of the serious flaws associated with the GRIDS Growth Process, they will not change GRIDS. The adopted GRIDS Growth Strategy by Hamilton City Council will ensure development exclusively in Elfrida and Upper Stoney Creek for the next 40-50 years or more. The inclusion of SPECIAL Policy Area B, in the Rural Official Plan, will guarantee it. The Urban Structure Plan states it clearly, on page #2 of the Urban Structure Report, that “the Urban Structure Plan will formally implement the GRIDS Growth Strategy”. They further state on page #4, “the Rural Official Plan represents the first part of the city’s new Official Plan”. The Urban Structure Plan also demonstrates that future growth is directed exclusively to Special Policy Area B, by designating the existing Elfrida area as a Community Node. This existing Elfrida Node is a density challenged area, which falls dismally short of the 100 persons and jobs per hectare required for Node Status. Serious environmental and ecological constraints will limit the amount of intensification possible in the Elfrida Community Node.

I am including the Rapid Transit Feasibility Study Map that illustrates the proposed Rapid Transit S Line. The labels are blurry but the Special Policy Area B is clearly visible and defined on this map and the label reads either Future Urban Growth Area or Future Urban Growth District. This map is yet another example of the foundation studies and planning initiatives of the city of Hamilton are not only directed within the existing urban boundary but directed to only one direction Special Policy Area B. Why did the City of Hamilton even bother to include Special Policy Area B in the Rural Official Plan for approval by the Province of Ontario. The Elfrida Upper Stoney Creek Special Policy Area B is already a foregone conclusion, the city of Hamilton has already Rubber-Stamped Special Policy Area B as the only direction where future growth will occur in the city of Hamilton. I am also including the Potential Rapid Transit System “BLAST” map in this report. The purpose of this map by the Rapid Transit Feasibility Team is to demonstrate to Metrolinx that a Rapid Transit Line is necessary to connect the Elfrida
community node to the Ancaster industrial lands and to the future Airport employment lands. The only thing this map illustrates is the strategic location and importance of the Twenty Road East lands and the Upper James Primary Corridor. This map indicates that the Twenty Road East lands are highly connected to and are central to all of the city of Hamilton’s major infrastructures. This same map also illustrates the remoteness of Elfilda and Upper Stoney Creek, Special Policy Area B.

The Provincial Policy Statement and the Places to Grow Plan and the other Provincial Directives and Guidelines for development were developed over a long period of time by the Province of Ontario. These Provincial Plans and Acts were developed for the simple reason that planning mistakes have been made in the past that affected the economic and environmental well being of the citizens of the Province of Ontario. Some of these Provincial Directives and Guidelines deal with the protection of the environment, the ecology and the protection of Prime Agricultural lands for future generations. The other Directives and Guidelines deal with directing growth to appropriate locations. “SMART GROWTH”, “promotes compact urban form, use of existing infrastructure to reduce the need for large, costly investments and maximize the value of the public investment that has already been made” (THE PLACES TO GROW PLAN). The exclusion of the Twenty Road East lands for future development by the city of Hamilton does not make any environmental or economic sense. GRIDS SHOULD BE CHANGED.

Yours Truly,

[Signature]

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NOTE: Map to be provided in a more legible format (on a presentation board) at the October 20, 2008, Public Works Committee Meeting.