



**VIA EMAIL**

December 2, 2022

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Ministry of Municipal Affairs and Housing  
Municipal Services Office – Central Ontario  
16<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON M7A 2J3

To Whom It May Concern:

**Re: Proposed Amendments to the Greenbelt Area Boundary Regulation  
Proposed Amendments to the Greenbelt Plan  
ERO Number 019-6217 and 019-6216  
Ministry Reference Number 25-OP-229116  
Urban Boundary Expansion Request – 347 Parkside Drive, Waterdown, ON  
Our File No.: 1556**

We are counsel to 2441066 Ontario Inc. (“**244**”). Our client owns lands known municipally as 347 Parkside Drive in Waterdown, ON (the “**Property**”). That Property is located on the edge of, but at present slightly outside, the City of Hamilton urban boundary. It is currently located within the Greenbelt Plan and designated “Protected Countryside” thereunder, and is designated “Rural” in the Rural Hamilton Official Plan, 2012.

The Province is currently undertaking a consultation process seeking stakeholder input into potential changes to the Greenbelt Plan. That consultation is found through ERO posting 019-6216. We write to request, as part of that consultation process, that 244’s Property be considered for removal from the Greenbelt Plan or re-designation under it. A brief summary of the reasons and support for our client’s request is set out in this letter. We enclose with this correspondence a more comprehensive justification for the request prepared by our client’s planning consultants, IBI Group.

**Background and Context**

The Property is located on the north side of Parkside Drive, between Victoria Street and Boulding Avenue. The lands requested for removal from the Greenbelt Plan, or re-designation under it, are 13.5 hectares in size (6.9 hectares of which is our client’s Property). The Property is bounded to the south by Parkside Drive, the edge of the City’s existing Urban Boundary, and an existing low-density residential neighbourhood; to the east by a large nursery; and to the west by natural heritage features. To the north the Property is bisected by a right-of-way for a proposed by-pass corridor, and agricultural and natural heritage lands to the north.

Currently the Property is cultivated for agricultural purposes. It is low quality agricultural land, given that it has not been identified as Prime Agricultural lands; is quite fragmented; and contains a

mixture of only Class 2 and Class 3 soils. This low quality will be further reduced by the proposed by-pass corridor, which will fracture the lands further once built.

The broader surrounding area includes residential lands further to the south and west of the Property. The residential lands to the south are within the City of Hamilton's Urban Boundary and currently designated "Towns/Villages" in the Greenbelt Plan. Commercial and retail uses are located to the southwest of the expansion request area, and several natural and recreational amenities are located in the surrounding area.

The lands are ideally situated for future urban residential development. Developed urban areas exist immediately to the south and west of the Property. Development of our client's Property will round out the existing communities surrounding it and fill in, through further urban infill development, what is otherwise a pocket of constrained lands that is too small for productive agricultural use. Such development will have the effect of contributing positively to the fulfillment of the City's projected housing needs, without negative impacts on the surrounding urban and rural character or infringement on hazard lands.

### **Justification for 244's Request**

The enclosed report by IBI Group presents a detailed description of our client's request for removal or re-designation under the Greenbelt Plan and sets out a comprehensive planning justification for same. The report evaluates the request within the context of the overall policy framework. We commend that analysis to you in full for review.

We provide the following summary points for your convenience, in justification of 244's request. As noted above, the Property is ideally situated for future residential development. It would be good planning to allow the lands to be used productively, instead of remaining as remnant low-quality agricultural land. This is especially the case given the future development of the City's by-pass corridor, which will enhance transportation access to the Property.

Removal of the Property from the Greenbelt Plan, or re-designation of it to "Towns/Villages", would not compromise the effectiveness or objectives of that Plan. The requested removal is relatively modest in size. The Property is not covered by the Greenbelt Plan's Natural Heritage System. Its removal from the Greenbelt Plan (or re-designation) would in fact harmonize the Property's designations with the lands surrounding it. The existing residential development abutting the Property immediately to the south is already designated "Towns/Villages", as is a portion of the request lands identified by IBI Group. The Property already abuts the City's Urban Boundary, and will very likely be the subject of a further request for inclusion in an expansion of that Boundary pursuant to the Province's changes to the City's proposed Official Plan Amendments.

244's Property can be efficiently served by municipal water, wastewater, storm sewers, and access by existing or proposed public roads. Residential development of the Property would contribute to alleviating the demonstrated need for housing in the City of Hamilton, and it would assist with

housing form and tenure diversification. This meets the Provincial directives of encouraging development of complete communities, particularly when considered in the context of the retirement home that exists on the lands adjacent to 244's Property.

### **Conclusion**

Based on the reasons set out above, as well as the additional justification included within the attached documentation, 244 requests that the Province consider removal of its Property from the Greenbelt Plan through its current consultation process. Even if not removed, our client urges the Province to re-designate its Property as "Towns/Villages" under the Plan. That outcome represents good planning that is consistent with Provincial policies and aims.

We would welcome an opportunity to meet with you and your staff to further explain the request and provide any further information that may be required in this regard.

Sincerely,

**RAYMAN HARRIS LLP**



Conner Harris

CH/rf

Encls.