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City of Hamilton

## **Response to City of Hamilton New Industrial Zones Hamilton Chamber of Commerce**

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The position of the Hamilton Chamber of Commerce with respect to the new industrial zones is consistent with the approach taken by the Chamber with respect to the new City of Hamilton Official Plan. There are two prime areas of focus. The first is to consider those who have already made an investment in our community. It is recognized that approximately 80% of new employment growth in the City comes from existing businesses. Therefore, it is important that the by-law recognize the needs of existing business owners.

Secondly, the by-law must be structured in such a fashion as to be one of the important tools the City can use to attract new business investment, recognizing the competing interests of other municipal jurisdictions. The ability to attract new investment is particularly acute in Hamilton where we have experienced both job and assessment losses over the past decade.

The new zoning regulations reflect the fact that the City has made a conscious effort to simplify zoning provisions and consolidate all of the various Industrial zones from each area municipality into one comprehensive document. As noted in our comments on the Urban Official Plan, this consolidation is necessary, helpful and a progressive step for the City for both new businesses and for those considering new business opportunities on employment lands.

While the Chamber is not in a position to examine the implications of the by-law for individual properties, our review of the by-law has identified some areas in which permitted uses in specific zoning designations have been increased. The Chamber would applaud and support that initiative, as it would increase the range of alternatives available to existing business owners and operators. It also makes individual properties or employment areas more attractive to those seeking to locate within our community.

However, we are also aware of some cases where the proposed by-law will remove uses that are currently permitted within existing zoning designations.

The Chamber is opposed to any such change that would take away existing development rights from owners of employment lands. This could affect the ability of existing uses to properly expand within their property. It may also encourage potential new investors to seek locations outside the municipality where restrictions are less onerous.

In particular, we are concerned about restrictions on office space. As noted in our presentation to the City regarding the draft official plan for the Urban Area, the Chamber feels that office uses are an important part of any Employment Area and should not be limited in any fashion beyond the already overly restrictive policies imposed upon the City by the Province.

While the Chamber encourages and supports the primary focus of growth being directed to the downtown area, and the need to establish policies to attract major offices to the downtown, we believe the City must be careful not to be overly restrictive so as to discourage office development that is not interested in the downtown area, and would prefer to locate to other competing jurisdictions rather than be faced with the restrictions in the proposed new official plan. The loss of these employment opportunities would hinder the ability of the City to establish a sustainable economic growth, and would be contrary to the intent of Policy B.3.1 of the new Urban Official Plan, which seeks to put the City at a positive competitive advantage with other surrounding jurisdictions.

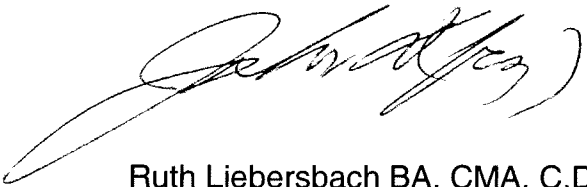
It would be the preference of the Chamber not to have any restrictions on office uses. However, if restrictions are required, it is recommended that the limitation imposed by the Growth Plan of 10,000 square meters be included in the by-law for those zones where office uses are permitted.

The Chamber is also concerned about how information regarding this new document is being disseminated among the public. We recognize and appreciate the great effort staff has gone to, to make themselves available to answer questions and be available to the Chamber for consultation. However, there should be some mechanism whereby the City can notify individual owners of changes to the zoning that affect their property, particularly in instances where existing development rights are proposed to be deleted. Our experience is that individual property owners are not aware of these changes until it is time to redevelop and/or market their property. While individual owners may not have specific input to change in general policy directions, they would certainly want to participate in any discussion where existing development rights on their lands were being proposed to be removed.

The Chamber has not done a thorough investigation of which properties, or even which designations would add to or lose some of their existing uses. However, we would be willing to co-operate with the City to engage in a notification process that would attempt to clarify the specific impacts of the proposed zoning on individual properties.

The Chamber thanks the City of Hamilton for the opportunity to participate in this process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ruth Liebersbach', written in a cursive style.

Ruth Liebersbach BA, CMA, C.Dir, FCMA,  
President, Hamilton Chamber of Commerce

CC: J. Strutt & B. Janssen, and All members of City Council, City of Hamilton  
Chamber's Board of Directors, including Chairs of our Ancaster, Dundas &  
Glanbrook Divisions  
All members of Chamber's Business Development Committee

