



July 5, 2010

Mr. William Forward, Deputy Minister  
Ministry of Municipal Affairs & Housing  
777 Bay Street  
Toronto, ON M5G 2E5

Dear Mr. Forward:

**Re: Long Range Planning for Municipalities**

It was a pleasure to meet you at the Ontario Chamber of Commerce "Evening With Deputy Ministers" event and have the opportunity to review with you the issue of long range land use planning at the local level.

The Hamilton Chamber of Commerce has consistently supported the long range planning initiatives of the Province, including the planning principles behind the Provincial Policy Statement and the Provincial Growth Plan as well as the Greenbelt Plan.

We applaud the government for taking the initiative to prepare and implement long range planning programs to properly manage growth and to create healthy communities. In that regard, the Province has done an effective job of establishing a regional growth pattern through the Greenbelt Plan and preparing an implementing growth strategy through the Provincial Growth Plan.

With these broad planning parameters in place, the Chamber feels that local municipalities should then be able to plan their own communities to reflect individual, distinct community character within the overall Provincial urban structure. Having regard to intensification policies and implementing proper staging programs, municipalities should be given flexibility and freedom to create complete communities within their boundaries, including areas between the existing urban boundary and the Greenbelt.

The difficulty that we have found in Hamilton is that given the restriction explicitly in the Provincial Policy Statement, municipalities are limited to only being able to look forward to a 20-year planning horizon. This is inconsistent with Provincial strategy which has embarked on a much longer range vision. We note that planning horizons for other municipal planning initiatives such as infrastructure planning (including not only municipal services such as municipal water and sewer, but also infrastructure planning) are set for time period well beyond 20 years. It seems odd and incongruous that the only ones that cannot engage in a long range planning process are municipal land use planners.

While any land use exercise must recognize and respect concerns with respect to urban sprawl, intensification, and preservation of farmland, the appropriate use of staging policies can be an effective tool to allow municipalities to be able to plan the proper evolution of complete communities in a responsible manner within the overall urban structure set by the Province.

Our experience in Hamilton has been that the limitation in being able to plan for more than 20 years, coupled with the mandatory 5 year review, has meant that urban boundary expansions have taken place on an incremental basis. Current legislation, which limits urban boundary expansion to municipally initiated reviews, will perpetuate an incremental approach to community planning with limited ability to develop a broader vision for distinct urban communities within the City.

More recently, with respect to the establishment of a significant new employment area around Hamilton Airport, we are finding extraordinary and persistent Provincial resistance to an intent by the City to engage in long range planning. The Province, through the imposition of standard, and often inappropriate measures, is pushing the City to develop the business park on an incremental basis using standards which are not appropriate for the City of Hamilton. We have seen, for example, the use of questionable assumptions which include such errors as disregarding land use constraints such as property ownership, presence of pipelines, hydro rights of way, etc., use of employment density projections which do not reflect current or projected expectations of Hamilton, and unprecedented and unrealistic expectations of office growth in the downtown area.

While it is understood that targets and guidelines have their role in providing guidance and direction for the implementation of long term vision for the community, it is improper and unproductive when they become impediments to achieving desired results.

Our concern is that after years of study and millions of dollars in consulting fees and reports, the limitations on the amount of employment land area to be considered will severely fetter our community's ability to provide the range of choices necessary to attract the employment growth that the City of Hamilton needs. This need is based not only on meeting Provincial targets, but also to address the desperate need for new jobs in Hamilton. This failure to achieve job growth will undermine the objectives of the entire exercise.

As we discussed, the challenge is to properly integrate the implementation of growth strategies at the local grass roots level in a manner which is consistent and helps achieve the broader planning policy objectives of the Province.

At present, we believe there is a bit of a disconnect between these two jurisdictional levels, and the Chamber would like to play a role in stimulating more dialogue between ourselves and planning officials at the local and Provincial levels. We feel that a better understanding of the needs and resources of each of these two levels could assist in ensuring that local planning initiatives can be left to local jurisdictions who are best equipped to ensure that local needs and community character can be created at the local level.

We have attempted in the past to initiate dialogue and invite staff from your ministry to meet with us in Hamilton. To date, the invitation has not been accepted. We would certainly welcome the opportunity to meet with you and your staff, and join you on a tour of the City and the airport lands, and review the very special needs of the City of Hamilton, which we feel is on the verge of achieving a renaissance in terms of job creation and community sustainability.

The timing for the emergence of a strong new urban community within Hamilton has come. We readily acknowledge that the Province has been of great assistance to the evolution of our great City. Too often in the past, this assistance has come in the form of ad hoc, one-time payments. We believe the Province shares a vision we have of the City becoming a self-sufficient and self-sustaining community in terms of jobs and assessment. We feel very passionate that the employment lands around the Airport are a fundamental prerequisite for this to occur. We look forward to continuing to work in a co-operative manner with the Province in developing local plans to meet local needs within a long-term planning horizon which more closely mirrors the framework used in other local planning initiatives and at the Province.

We look forward to hearing from you.

Sincerely,

**HAMILTON CHAMBER OF COMMERCE**



E.J. Fothergill, MCIP, RPP  
Past President

c. c. Mr. Richard Koroscil, President, Hamilton Chamber of Commerce  
Mr. John Dolbec, Chief Executive Officer, Hamilton Chamber of Commerce