



March 11, 2025

**Sent Via e-mail:** [Dave.Heyworth@hamilton.ca](mailto:Dave.Heyworth@hamilton.ca)

Dave Heyworth  
Manager, Sustainable Communities  
City of Hamilton  
71 Main Street West  
Hamilton, ON L8P 4Y5

Dear Mr. Heyworth,

**Re: Official Plan Amendment – Urban Boundary Expansion – Elfrida Lands Resubmission in Response to Notice of Incomplete Application**

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We are the planning consultants for the Elfrida Community Builders Group Inc. (“**ECBG**”), being a group of landowners that represent over 70% of the lands within the Elfrida area of the City of Hamilton.

On November 20, 2024, on behalf of ECBG, we filed an Official Plan Amendment application to expand the Urban Boundary of the City of Hamilton to include the Elfrida lands (the “**Application**”). Subsequently on December 19, 2024, the City of Hamilton (the “**City**”) issued a ‘Notice of Incomplete Application’ which we understand followed its review of the Application against the City’s applicable Urban and Regional Hamilton Official Plan policies, Official Plan Amendments No. 221 and 42 (which came into effect on November 27, 2024 after the subject applications were filed), and the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.

Following receipt of the Notice of Incomplete Application (the “**Notice**”), Bousfields met with City staff on multiple occasions and exchanged email correspondence to discuss the approach to addressing the requested outstanding items and to confirm the scope of work for each item to allow the Application to be deemed complete, and ultimately to be processed by the City in accordance with the *Planning Act*.

Accordingly, we are pleased to provide the enclosed information in response to the Notice and, as such, we respectfully request that the City deem the subject Application complete.

Complete Application Compliance Summary

As noted, the City identified through the Notice a list of plans, reports and studies that must be provided to address the submission requirements described in Official Plan Amendments No. 221 and 42, the City’s Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications and the applicable Urban and Rural Hamilton Official Plan policies. Notably, Official Plan Amendments No. 221 and 42 came into force on November 27, 2024, after the Application was submitted.

The table below is provided to address the need for a ‘Complete Application Compliance Summary’ which the Notice describes as being required in the absence of a Formal Consultation to identify how the application addresses the submission requirements of the City’s Draft Framework for Processing & Evaluating Urban Boundary Expansion Applications and applicable Urban and Rural Hamilton Official Plan Policies:

Report/Study	Provided Scope of Work
<b>Urban and Rural Official Plan Policies</b>	
<b>Public Consultation Summary and Comment Response Report</b>	<ul style="list-style-type: none"> <li>• A virtual Open House has been scheduled for April 15, 2025.</li> <li>• Other public consultation approaches include a website and informational mailout material which will be implemented prior to the virtual Open House being held.</li> <li>• A Public Consultation Summary and Comment Response Report will be submitted to City Staff within two weeks of the virtual Open House occurring.</li> <li>• As agreed, the completion of the Virtual Open House and associated report will not be a pre-requisite for the application to be deemed complete.</li> </ul>
<b>Odour Impact Study</b>	<ul style="list-style-type: none"> <li>• Terms of Reference for the required Odour Impact Study was discussed with the City.</li> <li>• The submitted Odour Impact Study includes:               <ul style="list-style-type: none"> <li>○ a preliminary monitoring program and assessment of the Stoney Creek Landfill and recommended minimum separation distances and areas of influence.</li> <li>○ Assessment of information from the Stoney Creek Landfill operator regarding odour testing at different times of the year has been included in the study and assessment, if available.</li> </ul> </li> </ul>

Report/Study	Provided Scope of Work
	<ul style="list-style-type: none"> <li>○ Recommendations for Elfrida areas that could require further assessment at the secondary plan stage have been identified.</li> </ul>
<b>General Vegetation Inventory</b>	<ul style="list-style-type: none"> <li>• Ecological Land Classification mapping has been supplemented to map additional vegetation on site outside of Natural Heritage System Areas, including clusters of trees, prepared by Stantec.               <ul style="list-style-type: none"> <li>○ As agreed, individual trees within 3m of all existing rights-of-way have been identified through a desktop exercise.</li> </ul> </li> </ul>
<b>Survey Plan</b>	<ul style="list-style-type: none"> <li>• A Signed Survey plan covering the full Elfrida lands has been provided, prepared by A.T. McLaren.</li> </ul>
<b>Environmental Site Assessment</b>	<ul style="list-style-type: none"> <li>• A Memorandum that describes the active gas and/or petroleum wells on or adjacent to the subject site, and general decommissioning procedures has been prepared by Landtek.</li> <li>• Information on the timing of well decommissioning has also been provided.</li> </ul>
<b>Official Plan Amendment No. 221 and No. 42 – Required Submission Deliverables</b>	
<b>Complete Application Compliance Summary</b>	(This table)
<b>Cycling Route Analysis</b>	<ul style="list-style-type: none"> <li>• The Transportation Assessment, prepared by Crozier, includes additional detail that describes existing cycling routes in the vicinity of the subject site and how the Subject Site can integrate with existing cycling routes.</li> <li>• The Transportation Assessment also includes a Pedestrian Route Analysis that illustrates existing public pedestrian routes adjacent to the subject site and how the site has integrated them.</li> </ul>
<b>Elevations (Conceptual)</b>	<ul style="list-style-type: none"> <li>• Conceptual precedent images for each land use category in the Concept Plan has been provided with written summary of all the different building typologies in each concept plan component, prepared by Bousfields Inc.</li> </ul>
<b>Limit of Core Areas or Limit of Conservation Authority Regulated Area</b>	<ul style="list-style-type: none"> <li>• A Plan showing the limits of Conservation Authority Regulation has been provided within the Preliminary Constraints Memo (see Figure 3), prepared by Stantec.</li> </ul>
<b>A Tree Management Plan / Study (City-Owned Trees and/or Within 3 metres of ROW)</b>	<ul style="list-style-type: none"> <li>• A General Vegetation Inventory and Tree Management Plan Technical Memorandum has been provided that speaks to how the proposal responds to the City’s applicable tree management policies, prepared by Stantec.</li> </ul>

Report/Study	Provided Scope of Work
	<ul style="list-style-type: none"> <li>• A preliminary Tree Inventory Plan that identifies vegetation/trees within 3m of all existing rights-of-way (desktop exercise) has also been provided, prepared by Stantec.</li> </ul>

We note that the Notice also provides a list of reports / assessments that are identified as ‘encourages’ to be submitted to allow a more comprehensive review. While we appreciate Staff’s attention to this matter, we are of the opinion that these items are more appropriately addressed through the required Secondary Plan process and as such, will be provided at the appropriate time.

Materials Submitted to Address Notice of Incomplete Application

In accordance with the Complete Application Compliance Summary and associated scopes of work above, we are pleased to provide the following materials to address the Notice of Incomplete Application:

1. Complete Application Compliance Summary (this letter), prepared by Bousfields Inc., dated March 11, 2025;
2. Odour Impact Study, prepared by SLR, dated March 11, 2025;
3. Preliminary General Vegetation Inventory and Tree Management Plan, prepared by Stantec, dated February 28, 2025;
4. Preliminary Constraints Memo (including Limit of Conservation Authority Regulation), prepared by Stantec, GeoProcess Research Associates and Palmer, dated February 28, 2025;
5. Survey Plan, prepared by A.T. McLaren., dated January 16, 2025;
6. Decommissioning of Active Gas Well Located at 3150 Golf Club Road in Hamilton Ontario Memo, prepared by Landtek, dated March 5, 2025;
7. Transportation Assessment including Cycling Route Analysis and Pedestrian Route Analysis, prepared by Crozier, dated March 2025;
8. Conceptual Elevations – Precedents Package, prepared by Bousfields Inc., dated March 2025; and,
9. Notice of Incomplete Application, City of Hamilton, dated December 19, 2024.

We trust that the foregoing is sufficient to address the Notice and ultimately, we request that the City deem the Application complete in accordance with the *Planning Act*. Should you require any additional information or clarification, please feel free to contact the undersigned.

Respectfully submitted,  
**Bousfields Inc.**



David Falletta, MCIP, RPP



Emma West, MCIP, RPP

Cc. *Mustafa Ghassan, Myron Pestaluky & Hatim Jafferjee, Delta Urban Inc.  
Elfrida Community Builders Group Inc.*