

**EVALUATING RADIAL SEPARATION DISTANCES
FOR RESIDENTIAL CARE FACILITIES IN HAMILTON**

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Summary

Residential care facilities play an important role in offering various housing types. They also promote well-being by offering care services in a non-institutional setting. Radial separation zoning is used by many Ontario municipalities, including the City of Hamilton, to discourage the overconcentration of residential care facilities.

This report evaluates the zoning regulations on residential care facilities in the City of Hamilton, taking into account the history and justification behind radial separation; the effectiveness of minimum separation distances; and the typical impacts of facilities on the surrounding neighbourhood.

Much of the discussion is based on a master list of residential care facilities prepared by City of Hamilton staff. Information about the number, size, and location of facilities was compared with a similar set of data from 1999.

The findings show that RCFs are fewer in number and more dispersed than in 1999, though a significant proportion of new facilities are in violation of the radial separation distance.

It is also revealed that an authoritative, complete, and up-to-date source of information about facilities in Hamilton does not exist, due to the fragmented nature of the licensing and regulation of facilities.

The report finds that residential care facilities typically have neutral or positive land use impacts on the surrounding neighbourhood, not unlike other residential uses.

From these findings, it is recommended that the radial separation distance bylaw be eliminated; that a central registry of facilities be established for licensing and by-law enforcement purposes; that the capacity limits on facilities be maintained; and that the City facilitate positive incentives for the dispersion of facilities.

1.0 Introduction

The availability of appropriate accommodation for all residents is important for a community's social well-being. Residential care facilities (RCFs) fill this need by providing housing options for those who require physical or emotional support beyond what their families can provide.

Hamilton's regulations surrounding RCFs began in the late 1970s, following the policies of deinstitutionalisation at the provincial level. It was the intent of these policies that RCFs "should be akin to 'family like settings' and they should integrate into the community." (Community Planning and Development, 2000)

In Hamilton, many RCFs are located in the downtown area. These dense urban neighbourhoods are ideal locations for RCFs due to relatively inexpensive land values and convenient access to community services, among other benefits. (Community Planning and Development, 2000) However, the over-saturation of these facilities in a concentrated area can institutionalise a neighbourhood's residential character. It is the opinion of City staff that the dispersion of RCFs throughout the city as a whole is desirable so that the residents in these facilities can live in a relatively calm residential atmosphere with a mix of housing types rather than an overly institutional environment.

To address the issue of overconcentration, Hamilton has implemented radial separation in its zoning bylaw – a restrictive regulation that requires RCFs to be located at least 300 metres from each other. This does not affect pre-existing facilities, but ensures any new RCFs will be dispersed throughout the city.

The chief limitations of radial separation are twofold: first, the regulation does not take into account the population density of the surrounding neighbourhood – the 300-metre buffer is in place whether in downtown Hamilton or the rural area. Secondly, the bylaw treats RCFs as disruptive institutions, rather than a residential use.

The objectives of this report are: 1) to analyze the rationale for Hamilton's radial separation bylaw; 2) to identify its limitations; and 3) to put forward alternative methods of regulating Residential care facilities that may be beneficial for Hamilton.

2.0 History of RCF regulation in Hamilton

2.1 Provincial policies

The Government of Ontario has recognised since the 1970s that overly institutional settings can be detrimental to the health and well-being of individuals. This led to a policy of deinstitutionalisation, directing municipalities to allow a range of housing types and forms for community-based residential care. (Community Planning and Development, 2000)

In 1975, the *Report of the Interministry Committee on Residential Services* was published, outlining broad policy directions for the regulation of RCFs. This document affirmed the province's support for deinstitutionalisation: "The contemporary philosophy of treatment of the mentally ill encourages their removal from mental hospitals to active treatment hospitals and other community facilities." (Anderson, 1975, p. 76)

Specific guidelines were established, with a preference for "existing family residences housing 6-8 residents" as opposed to the replication of institutional settings in residential neighbourhoods. The dispersion of facilities was also acknowledged as a good way to maintain a family-like atmosphere and was deemed a "major therapeutic advantage." (Anderson, 1975, p. 82)

The report was very clear, however, that the policy of dispersion does not imply that RCFs have negative land use impacts on the neighbourhood.

"There has always been neighbourhood and municipal opposition to the establishment of community based residences and indeed to institutions. Understandable, though largely uninformed concerns about personal safety, property damage and property values were the reasons generally given. [...] However, a decade or more of experience with both types of care has shown all of these concerns to be much exaggerated or groundless. In fact, communities and neighbourhoods hosting established family-type residences expressed much more positive than negative attitudes toward them." (Anderson, 1975, p. 83)

Following the report, working groups were established to develop ways to implement the new policies. In 1978, a model zoning by-law was created to guide the development of municipal zoning for

RCFs. It established the concepts of radial separation and maximum resident capacities as tools to promote the dispersion of facilities. (Community Planning and Development, 2000)

2.2 Social Planning and Research Council

In April 1978, the Social Planning and Research Council (SPRC) published a report intended to inform the development of bylaws regarding RCFs in Hamilton. The report recommended a minimum separation distance of 100 feet per resident, rather than a single distance for facilities of all sizes. It also advocated for stringent licensing requirements to ensure the responsible operation of RCFs. (Social Planning and Research Council, 1978)

2.3 City of Hamilton By-Law No. 81-27

In 1981, the City of Hamilton introduced By-Law No. 81-27, which established zoning regulations for RCFs, short-term care facilities, and lodging houses. The bylaw introduced the following distance separation policies for RCFs:

*“(5) Except as provided in subsection 6, every residential care facility shall be situated on a lot having a **minimum radial separation distance of 180.0 metres** from the lot line to the lot line of any other lot occupied or as may be occupied by a residential care facility or a short-term care facility.*

*“(6) Where the radial separation distance from the lot line of an existing residential care facility is less than 180.0 metres to the lot line of any other lot occupied by a residential care facility or short-term care facility, the existing residential care facility **may be expanded or redeveloped** to accommodate not more than the permitted number of residents.”*

(City of Hamilton, 1981, p. 57)

In addition to the distance separation policies, limits on the number of residents in an RCF were established. Depending on the zone, a maximum of either 6 or 20 residents were permitted in each facility.

2.4 City of Hamilton Discussion Papers

City of Hamilton staff published two discussion papers, in 2000 and 2001, reviewing the regulation of RCFs and other alternative housing facilities in the City. One of the final recommendations of these papers was to increase the minimum separation distance from 180 metres to 300 metres. This change was “intended to

reduce the possibility of new facilities locating where there are several existing facilities”. (Long Range Planning and Design, 2001, p. 17)

The radial separation distance of 300m was decided upon after reviewing the standards used by 18 other municipalities in Ontario. A range of distances were observed, from 100m (Kitchener) to 1600m (Glanbrook). City of Hamilton staff recommended updating the minimum separation distance to the median measure of the 18 municipalities, which was 300 metres. There was no other justification presented in the report for this shift to 300 metres. (Long Range Planning and Design, 2001)

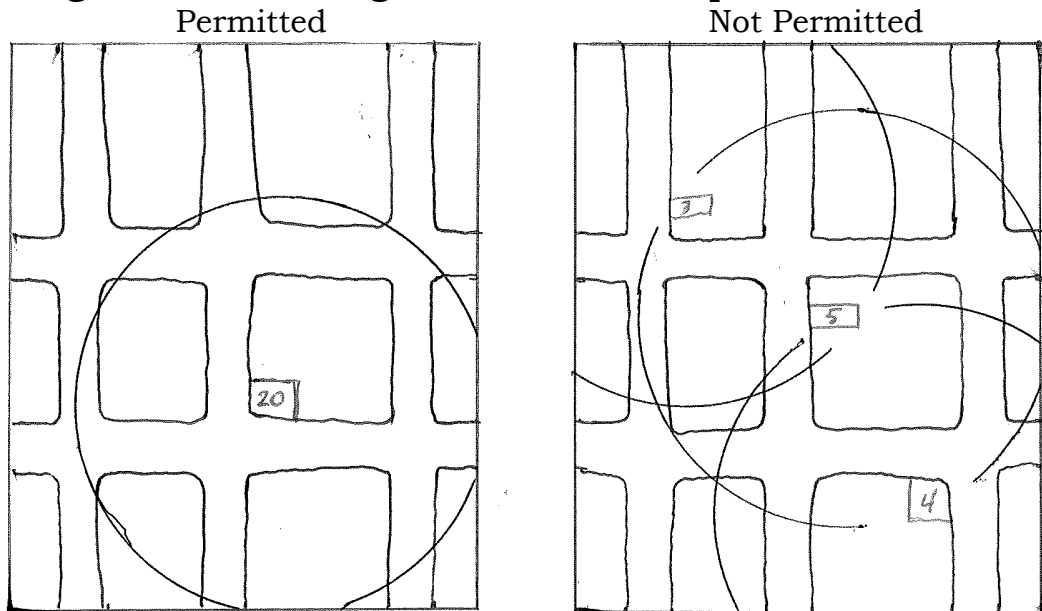
In addition to the increase in the city-wide minimum separation distance, two moratorium areas were established to prevent any establishment or expansion of facilities. These areas had the highest density of RCFs in the city at the time. This policy “supports the philosophy of spreading these facilities equitably across the City.” (Planning and Development Department, 2001, p. 3). A map showing the moratorium areas can be found in Appendix A.

3.0 Discussion

Radial distance separation is an unambiguous tool for controlling development. The boundaries are well-defined, the restrictions are clear, and any exemption from the rules must go through a public process and be approved by City Council.

However, Hamilton's radial separation bylaw upholds clarity by sacrificing regard for neighbourhood context and true land use impacts. The current distance separation bylaw does not account for population density, facility size, or residential character. A separation distance of 300m would apply equally to a 20-bed facility in downtown Hamilton or a 5-bed facility in a rural area.

Fig. 1: Concentrating Effect of Radial Separation Distances



In a perverse way, the current radial separation bylaw can encourage concentration rather than dispersion at the local neighbourhood level (see Fig. 1). For example, if a 5-bed RCF were to locate less than 300 metres from an existing 4-bed RCF, it would require a variance from the zoning bylaw. However, the 4-bed facility would be allowed to expand to accommodate 9 beds without seeking any relief from the bylaw. Because the bylaw only regulates the number of facilities, and not the number of beds, RCFs are encouraged to be as large as possible, rather than dispersing their beds into multiple smaller-scale buildings.

Using the number of facilities as a proxy for overconcentration fails to account for population density and is a major flaw of the current bylaw. The Delta West neighbourhood, which had 3 facilities in

1999, housed more RCF beds per capita than Durand, which had 13 facilities.

3.1 Lack of dependable information

Despite repeated staff recommendations for the creation of a comprehensive central registry of RCFs, the City of Hamilton lacks a reliable source of information about the numbers and types of facilities located in the City. This is a consequence of the fragmented regulation of RCFs – it is difficult to coordinate a shared central registry between various City departments, provincial regulators, federal regulators, and RCF operators. (Long Term Planning and Design, 2001)

Without complete and up-to-date data, it is impossible to effectively enforce the radial separation bylaw and requires City Council to make decisions without being adequately informed. When faced with such uncertainty, it is imprudent to regulate RCFs with such an inflexible tool as radial separation distances.

Past attempts to compile a definitive list of the City's RCFs were done on an infrequent, ad-hoc basis. Master lists of one form or another were prepared by City staff in 1978, 1999, 2007, and 2012. There does not seem to be a consistent method for gathering the required information, nor is it clear who was consulted to create each list.

The analysis in this report is based on a master list of facilities compiled in April 2012 by City staff in the Zoning By-Law Reform team. The information was gathered through consultation with the Community Services, Licensing, and Bylaw Enforcement departments. Some RCF operators were also contacted directly to verify information. Despite the author's best attempts to obtain the most complete, accurate, and up-to-date information, there may be some errors or omissions in the data.

3.2 Concentration of RCFs downtown has abated

The intent of the radial separation bylaw was to encourage the dispersion of facilities throughout the City. Over the past decade, facilities have indeed dispersed to neighbourhoods beyond the downtown, though it is questionable whether or not the radial separation bylaw was the primary cause of this dispersion.

In 1999, the ten neighbourhoods with the most facilities were all located downtown or in the east end. In 2012, 6 of these neighbourhoods remain on the “top 10” list, with the remaining 4 neighbourhoods – Kirkendall North, Westcliffe East, Buchanan, and Butler – representing other areas of the City. Over the past decade, many RCFs have chosen to locate on the west mountain in particular. A neighbourhood-level analysis of current facilities can be found in Appendix B.

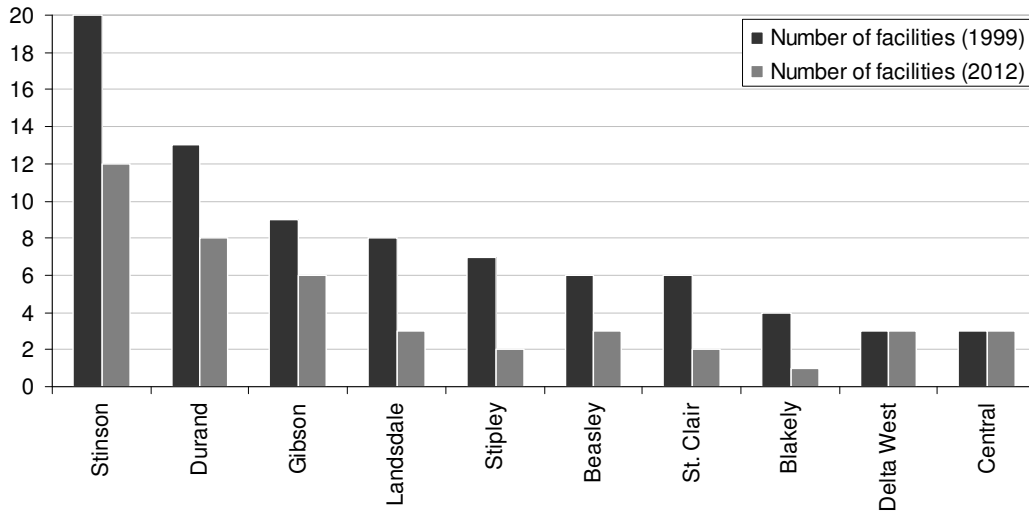
Despite the very real dispersion of RCFs over the past decade, many of these facilities do not conform to the 300 metre separation distance. 14 of the 50 facilities in Wards 6, 7, and 8; and 2 of 3 facilities in Ward 13, do not comply with the bylaw. A map showing the distribution of facilities can be found in Appendix C.

The high concentration of RCFs in the downtown area has been attributed to the legal non-conforming status of facilities that precede the bylaw. However, there are also examples of facilities that have established recently in downtown Hamilton. In 2010, a 10-bed RCF was allowed to locate within 300 metres of two other RCFs and a corrections residence, without obtaining a variance from the zoning bylaw (corrections residences are also covered by the separation distance). (Good Shepherd, 2010)

As a significant number of facilities have managed to contravene the bylaw (whether through the variance process or because of the City’s incomplete records), it is questionable whether the radial separation distance is an effective or even a necessary tool.

While further research must be done to determine why RCFs have clustered in new neighbourhoods such as Buchanan and Westcliffe East, it is clear that there are factors other than zoning that influence the location of RCFs. Some potential causes could be the establishment of new social services or better transit infrastructure in these neighbourhoods.

Fig. 2: Change in number of facilities, 1999-2012



Sources: Discussion Paper 1, 2000; Zoning Bylaw Reform, 2012

As the distribution of RCFs has shifted over the past decade, their absolute numbers in the downtown area have decreased dramatically. The amount of facilities existing currently is significantly less than the levels of the late 20th century in many downtown neighbourhoods (see Fig. 2). With such a large reduction in the number of facilities, it is appropriate to reassess the perception of overconcentration in Hamilton.

3.3 Radial separation does not address land use impacts

The impact of a particular use on the surrounding area depends on many factors, including the size, bulk, massing, and design of the built form; traffic and noise generated by the use; and the density of the area. The current bylaw does not take into account any of these factors.

The wording of the radial separation bylaw in Hamilton makes reference to minimum distances between *lots*, regardless of the actual or permitted capacity of the RCFs on those lots. Furthermore, the language of the bylaw does not take into account the density of the surrounding area. A 300-metre radial separation distance is in effect whether an RCF wishes to locate in a neighbourhood of predominantly single-detached homes, or in a higher-density area.

The bylaw's overly broad language presents a significant drawback in its ability to ensure that RCFs are compatible with the surrounding neighbourhood. The radial separation distance

applies to the mere existence of a facility, rather than to the intensity of the use.

3.4 Typical land use impacts of RCFs

Radial separation bylaws imply that RCFs are, by their nature, more disruptive than other residential uses. Past research and examples from other jurisdictions in Ontario indicate that this is not necessarily the case.

In a comprehensive review of its bylaws regulating group homes (a type of RCF), the City of Sarnia ultimately concluded that:

“[T]he imposition of separation distances between group homes should not be necessary as they are considered to be residential uses and the impact should be similar to that of a dwelling. Also, from a purely practical standpoint it is difficult to implement the separation distance requirement with any degree of certainty because a record of group home locations is not maintained by the City.” (City of Sarnia, 2010, p. 12)

The neighbourhood impacts that many residents fear (e.g. loitering, increased police presence, vandalism, reduced property values) are not valid planning concerns. These objections are not rooted in the nature of the land use, but in concerns about the particular residents in a facility at any given time.

Nevertheless, the fears of reduced property values should be assuaged by numerous case studies in the U.S. and Canada that have shown a continued increase in property values when RCFs are established. (de Wolff, 2008, pp. 4-5)

In Toronto, a study about the neighbourhood impacts of two established RCFs found that less than half of the surrounding residents were aware that the facilities existed. Between 35% and 45% of neighbours knew that the facilities were operated by supportive housing agencies. (de Wolff, 2008)

Unlike other residences, some RCFs employ staff that do not reside at the facility, and must drive there from their homes. On the surface, this suggests that RCFs may present negative parking and traffic impacts. However, no evidence was found in the literature to support this assumption. It is notable that in the process of amending its bylaws for group homes, the City of Sarnia saw no difference in the parking requirements between these facilities and other residences. (City of Sarnia, 2010) The City of Hamilton has

also found that RCFs do not typically require additional parking compared to other residential dwellings. (Community Planning and Development, 2000)

The aforementioned study in Toronto found that the RCFs had a positive presence. The facilities were found to “contribute to the collective efficacy of their neighbourhoods through actions around noise and speed, tidiness, and crime.” (de Wolff, 2008)

Decades after the policies of deinstitutionalisation were established, it is evident that RCFs have evolved as a type of land use that integrates well into established neighbourhoods. Facilities should therefore be regulated based on factors such as built form, scale, design, and number of residents, rather than being treated like disruptive institutional uses.

3.5 Proximity to services

In order for RCFs to be fully integrated into a neighbourhood, the appropriate services and infrastructure are required to meet their needs. Like any family with children that have special needs, RCFs may prefer to locate close to a school with specialized educational programs, or close to a doctor’s office that performs specialized procedures. Indiscriminate radial separation regulations hamper these facilities’ abilities to provide the best possible care for their residents, and arbitrarily limit choices in the real estate market.

The observations of the 1975 Ontario Interministry Report indicate that decisions about where to locate new RCFs were largely the same then as they are today. The report identified the following as three major factors in determining the locations of new facilities: 1) cost of land; 2) zoning restrictions; and 3) proximity to schools that offer special teaching programs. (Anderson, 1975, p. 91) In 2000, City of Hamilton staff conducted a survey of RCF operators and found that two criteria had particular importance: 1) access to community services and 2) municipal policies. (Community Planning and Development, 2000, Appendix “A”)

3.6 Human rights concerns

In February 2012, the Ontario Human Rights Commission (OHRC) released a report advising against the use of radial separation distances in municipal zoning bylaws. The OHRC concluded that minimum separation requirements have negative impacts for residents by limiting housing options and can be interpreted as a form of “people zoning”. The OHRC recommends that instead of using restrictive measures like radial separation distances,

municipalities should encourage dispersion by providing incentives in other areas of the municipality. (Ontario Human Rights Commission, 2012)

A number of human rights challenges are currently underway, challenging the RCF regulations in various municipalities including, Toronto, Kitchener, and Smiths Falls. The City of Hamilton should pay close attention to these cases to identify aspects of these challenges that may be applicable to Hamilton's regulations.

4.0 Conclusions

The concentration of RCFs in downtown Hamilton has dramatically decreased over the last decade.

Radial separation distances were established in Hamilton to combat overconcentration. Recent data shows that the concentration of RCFs in most downtown neighbourhoods has decreased, and that more facilities are locating in other parts of the City.

Access to specialized services is an important factor in the location of RCFs

The dispersion patterns of RCFs in Hamilton in the last decade show that facilities are indeed moving to areas outside of the downtown. However, many are doing so in contravention of the 300m separation distance. RCF operators in Hamilton have indicated that access to community services is the most important factor in deciding where to locate, and it appears that this factor has taken precedence over zoning in some cases.

Radial separation distances are very difficult to properly enforce.

The lack of a coordinated, dependable source of information on RCFs weakens the City of Hamilton's ability to enforce zoning. Poor communication between City departments and between different levels of government has greatly reduced the effectiveness of the radial separation bylaw.

RCFs have neutral or positive land use impacts in established neighbourhoods.

Concerns about RCFs relating to noise, traffic, parking, and other land use issues are not supported by case studies. Facilities tend to support their neighbourhoods and have impacts similar to other residential uses. Negative impacts are often not land use-related, but are a result of incompatible built form or poor property management of individual facilities.

5.0 Recommendations

The deinstitutionalisation and dispersion of care facilities is a worthy goal that promotes complete communities. However, radial separation distances are an ineffective and unfair tool to achieve dispersion. The following recommendations encourage the regulation of RCFs in a less restrictive way:

1. Establish and maintain a central registry

Policy decisions should be based on complete and accurate information. A central registry of RCFs should be created through the collaboration of various city departments and other levels of government. Also, the license renewal process should require RCF operators to update their information in the registry, and it should be mandatory for City staff to be notified when a facility closes.

2. Maintain maximum resident capacities

The current capacity limits for RCFs are dependent on the zoning of the site and ensure that the size of a facility is compatible with the surrounding area. This is an appropriate planning tool and should be preserved to prevent the institutionalisation of stable neighbourhoods.

3. Eliminate radial separation requirements for RCFs

RCFs are typically found to have neutral or positive impacts on established neighbourhoods and should not be regulated as if they are a disruptive institutional use. Negative impacts of specific facilities should be addressed through stricter licensing and by-law enforcement rather than zoning.

4. Create incentives for RCFs to locate in other areas

There are opportunities for the City to partner with school boards, community organisations, healthcare providers, and RCF operators to identify areas of the city that are currently underserved by the kinds of services and amenities that RCFs require. Encouraging these various actors to work together in filling these gaps would promote dispersion in a positive way.

References

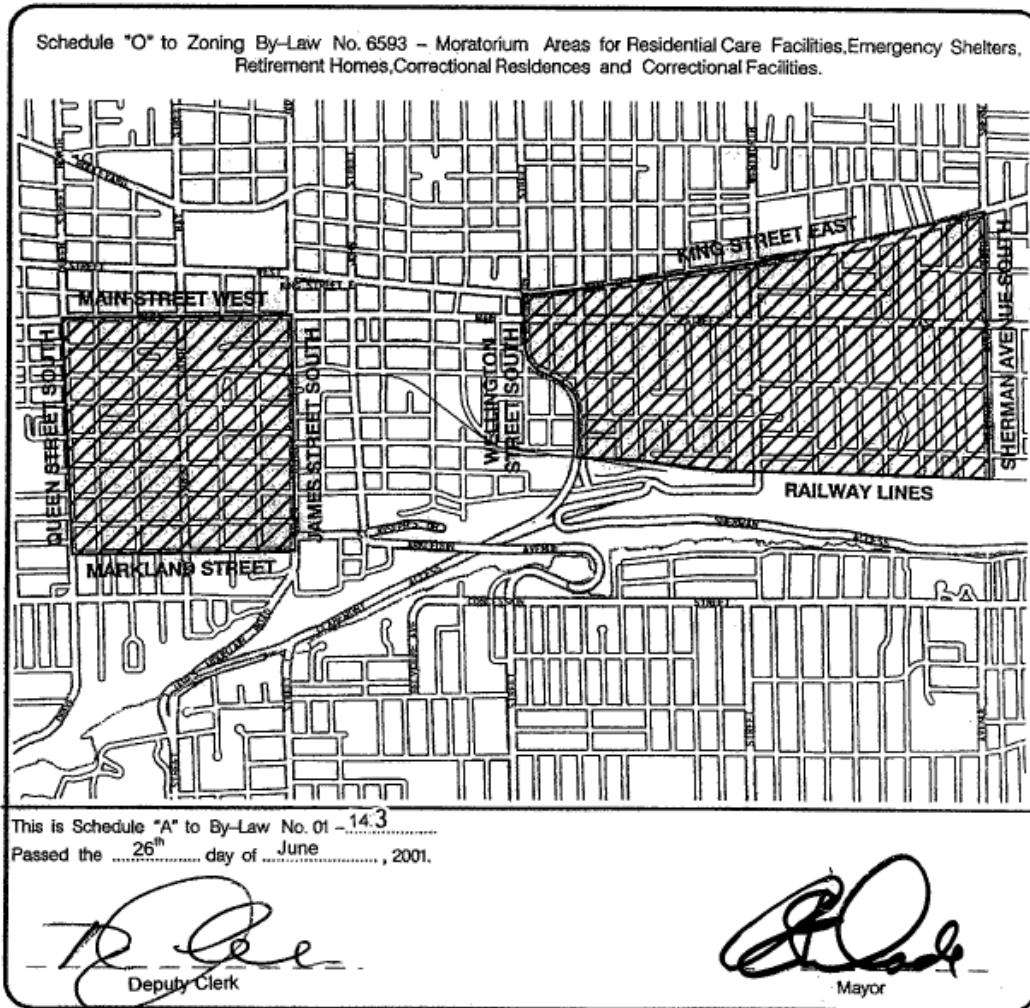
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Appendix A: Moratorium Areas

Appendix "A" to PD00102(A)
 Hearings Sub-Committee
 June 26, 2001




City of Hamilton


Schedule "A"

Map Forming Part of
 By-Law No. 01-143
 to Amend By-Law No. 6593

Planning and Development Department

Legend

 Moratorium Areas for Residential Care Facilities, Emergency Shelters, Retirement Homes, Correctional Residences and Correctional Facilities.

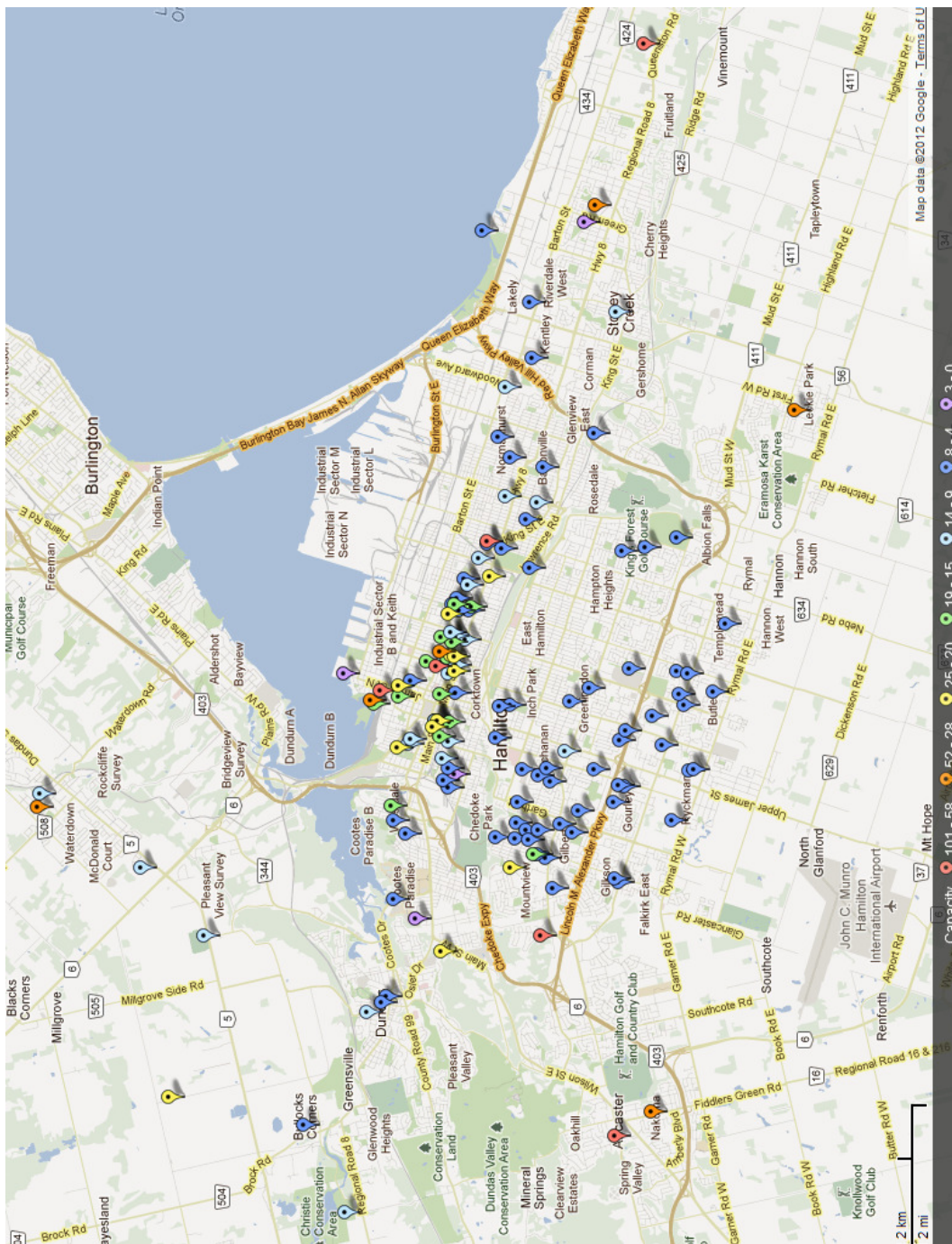
North 	Scale NOT TO SCALE	Reference File No. C199A
	Date June 8, 2001	Drawn By PB

Appendix B: Neighbourhood distribution of RCFs, 2012

Neighbourhood	Facilities	Beds
Stinson	12	171
Durand	8	114
Gibson	6	64
Westcliffe East	6	36
Kirkendall North	4	32
Buchanan	4	24
Butler	4	24
Landsdale	3	122
Central	3	102
Beasley	3	45
Westdale South	3	30
Fessenden	3	29
Gilbert	3	16
Delta West	2	76
Waterdown	2	62
Strathcona	2	31
St. Clair	2	24
Corktown	2	21
Stipley	2	20
Yeoville	2	18
Delta East	2	15
Normanhurst	2	15
Ryckmans	2	13
Centremount	2	12
Dundas CBD	2	12
Gourley	2	12
Jerome	2	12
Rolston	2	12
Ainslie Wood North	2	9
Kirkendall South	2	7
Scenic Woods	1	101
Fruitland	1	78
Spring Valley	1	64

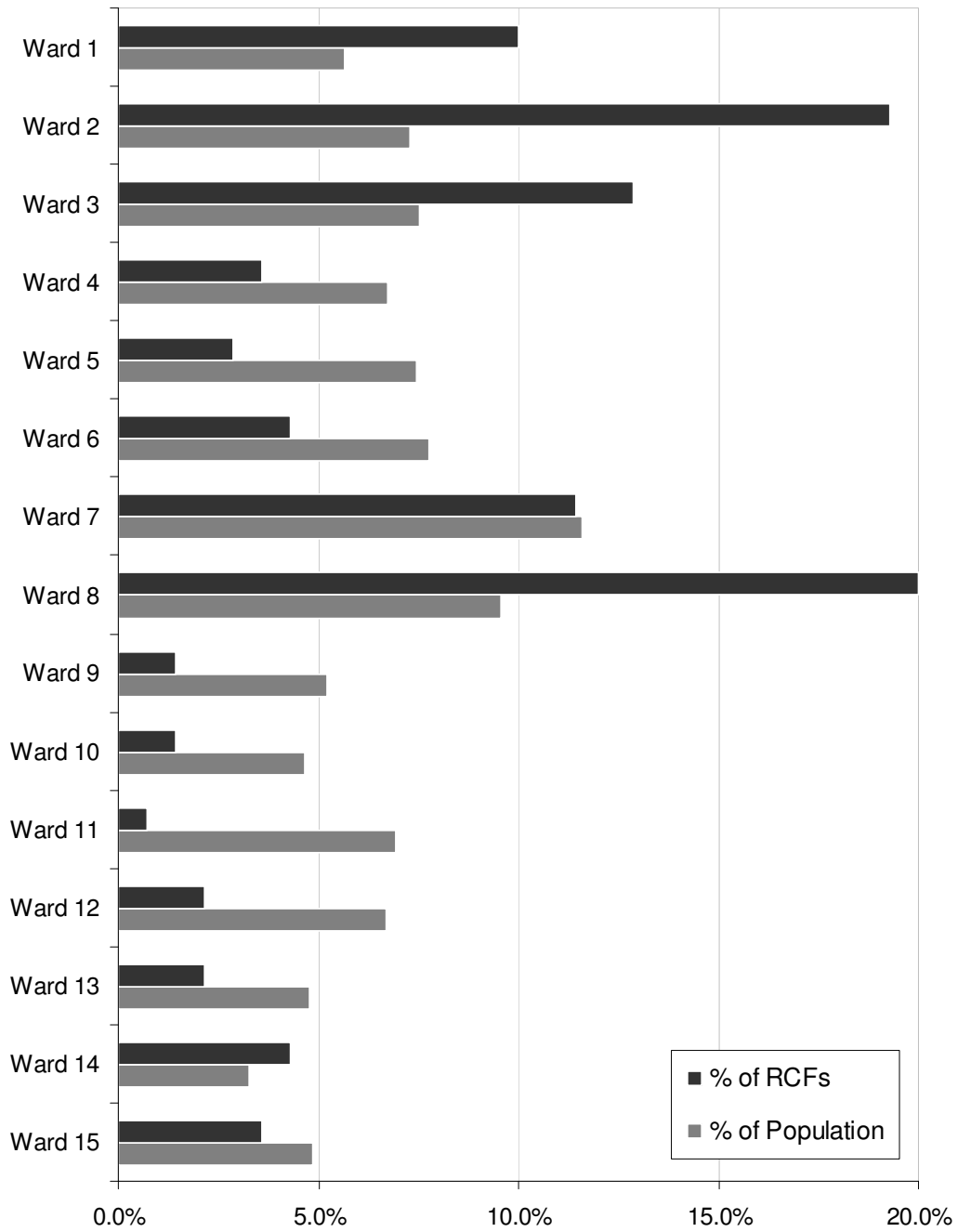
Leeming	1	40
Highland	1	31
Ainslie Wood West	1	24
Blakely	1	23
Westcliffe West	1	20
Bartonville	1	12
McQuesten East	1	12
Sydenham	1	12
Battlefield	1	10
Crown Point West	1	9
Hill Park	1	8
Huntington	1	8
Kentley	1	7
Albion Falls	1	6
Allison	1	6
Bruleville	1	6
Confederation Park	1	6
Crerar	1	6
Falkirk East	1	6
Falkirk West	1	6
Glenview West	1	6
Kennedy East	1	6
Kernighan	1	6
Lisger	1	6
Red Hill	1	6
Riverdale West	1	6
Rushdale	1	6
Southam	1	6
Sunninghill	1	6
Templemead	1	6
Thorner	1	6
North End East	1	3

Appendix C: Map of RCF locations



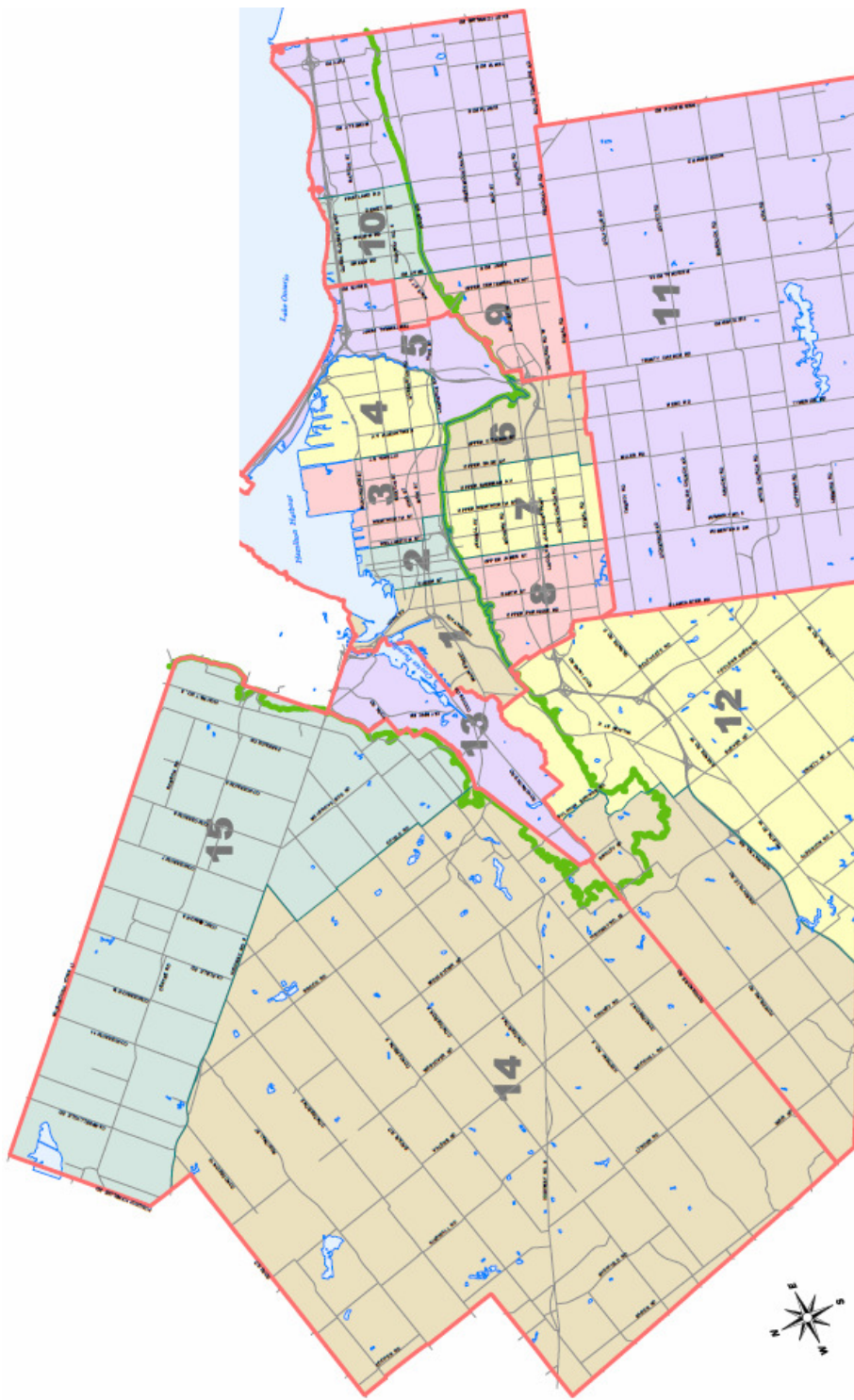
Source: Zoning By-Law Reform, 2012

Appendix D: Distribution of RCFs by ward



Sources: Zoning By-Law Review, 2012; Statistics Canada, 2011

Appendix E: Map of ward boundaries



Source: City of Hamilton Corporate Services, 2012

Appendix F: Map of Neighbourhoods