

GRIDS 2 / MCR – Public (Engage Hamilton) Comment Summary (May 2021)

Evaluation Framework and Phasing Criteria

Engage Hamilton Responses

Survey 1 – Criteria for ‘Whitebelt’ expansion lands		
#	Comment:	Staff Response / Action Required
1.	I think a study of the GHG emissions that will be created with a boundary expansion to each area should be included. Also a detailed account of exactly what public transportation will be available in each new neighbourhood. In order to avoid building on Prime Ag land, show the soil maps for each area, available on the Ontario Ministry of Ag, Food and Rural affairs.	<p>Staff concur with the comment on the importance of modelling and evaluating GHG emissions.</p> <p>Regarding public transit, the evaluation criteria are structured to assess existing and planned transit provision.</p> <p>Regarding soil maps, staff note that the City completed a comprehensive LEAR Study in 2006 which mapped the City’s rural lands and identified lands to be considered as Prime agricultural or rural. This mapping is reflected in the City’s Rural Hamilton Official Plan which is publicly available.</p> <p><i>Action: amend the Part 2 Phasing Criteria related to the Climate Change theme to include GHG emissions analysis.</i></p>
2.	This is a thorough list of considerations. You may want to create a weighting matrix. For instance, Municipal Finance, climate change and existing infrastructure may be more important than cultural or heritage considerations.	The framework is intended to be used as a method for documenting a wide range of information considered in the development of the planning recommendation. The information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given dataset. The phasing component will include the results of more detailed technical analysis related to

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		<p>agriculture, municipal finance, transportation, water, wastewater and stormwater management.</p> <p><i>Action: Revisions to the framework document will include an expanded explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario.</i></p>
3.	The alternative to growth should be considered.	<p>The evaluation framework will be modified to include consideration of the no urban boundary expansion option.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p>
4.	I believe agricultural should be second after climate change. In the 7th slot, the City is positing its lack of interest and care for protecting our prime agricultural lands.	<p>The order of the criteria does not imply an importance or ranking to the criteria.</p> <p><i>Action: Revisions to the framework document will include an expanded explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario, and to add a note that the order of the criteria does not imply a ranking or priority.</i></p>
5.	This is a premature question. Most everyone I know wants a "no boundary expansion" including myself. Any other approach is folly. We need to preserve our precious agricultural lands. We need to grow within our existing urban boundary. Population forecasts have been wrong in the past. We don't have transit to Elfrida. Let's develop Eastgate and other transit corridors	<p>Comment noted.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p>

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6.	It should prioritize high density developments, because urban sprawl-out taking up large amounts of land will have a much more severe carbon footprint. The days of everyone being able to have a ground-level house are over. We need to minimize land utilization as much as is humanly possible.	Comment noted.
7.	I don't think we need to expand into the White belt areas at all, our growth can be absorbed within our urban boundary including many empty buildings, parking lots, and brown spaces within the city. We need to grow up and not out. There are so many different options of types of living spaces we can add within the existing urban boundary in these empty unutilized spaces using existing infrastructure. We can even build on top of one-story existing buildings and we can build higher density affordable residences. The price of single-detached homes has gone up astronomically and most families cannot even afford them. Building out requires new roads, water lines, sewers, other utilities plus it destroys prime agricultural land, green spaces, wetlands and diminishes biodiversity. There is a cost to all of this and Hamilton already has a large deficit and there is a maintenance cost to all of this new infrastructure that ultimately the residents will pay for with constantly increasing property taxes. We cannot be expanding into agricultural areas if we are in a climate crisis. We need to be able to grow our own food and not import food from other countries. The transport of these products to us has a large carbon footprint which is contributing factor to the climate crisis. Some of the soil in the White belt is prime agricultural soil so why would we want to pave them over. We need to become self-sufficient with our food production if climate change is creating weather extremes that are affecting food production negatively worldwide. There should never be an expansion into the Greenbelt, these should be preserved and valued.	<p>Comment noted. As per Council direction, staff will model and evaluate a ‘no urban boundary expansion’ growth option.</p> <p>The evaluation framework includes financial analysis, and the evaluation will include a fiscal impact assessment which will evaluate the costs of growth including the no urban boundary expansion option.</p> <p>Impact on agricultural lands is addressed in the draft evaluation framework. Modification of Agricultural System theme criteria will address food security.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p> <p><i>Action: The Part 1 Evaluation Criteria and Part 2 Phasing Criteria related to the Agricultural System theme has been revised to include food security.</i></p>
8.	I don't think you should be expanding the urban boundary into the Whitebelt lands.	Noted.

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9	Not just affordable housing but low-income housing. More community needs Inc. like shelters safe injection sites and domestic violence shelters.	<p>Staff concur and note that under the Complete Communities Theme, the draft framework had included as a key consideration the ability of a candidate area to provide a diverse range and mix of housing including affordable housing. This consideration should be more broadly defined to also address low-income housing and housing with supports.</p> <p><i>Action: Complete Communities Theme criteria amended to address a broader range of housing types.</i></p>
10.	I think the criteria are relevant and result in an acceptable evaluation framework. But regardless of the criteria, the conclusion from the evaluation must be to keep the urban boundary where it is now. Hamilton has been sprawling for many, many years. We must not continue to expand our urban area. We have reached the limits - in my opinion - of how much agricultural land and natural ecosystems we can sacrifice to development. Climate change is real and we must address it now. While I'm glad to see listed as the first theme - sorry but it should be the only theme. We can accommodate whatever growth is coming in the next 30 years within the existing urban boundary. Sure - the development over the next 30 years will look different than the sprawling suburbs we have now. But let's please exhaust all opportunities to think and act differently to accommodate the growth targets. Let's prove to ourselves first that we cannot accommodate the growth with the existing urban boundary. Thank you.	<p>Comment noted. As per Council direction, staff will model and evaluate a 'no urban boundary expansion' growth option.</p> <p><i>Action: Addition of the "How Should Hamilton Grow?" Framework to include the No Urban Boundary Expansion option.</i></p>
11	A rigorous Evaluation Framework & Planning Criteria should have been applied in an assessment of whether we should be expanding the urban boundary at all! Instead, staff are recommending the urban expansion and the application of their evaluation framework and planning criteria to the expansion area! This is all backwards! I want to see a rigorous evaluation framework and planning criteria applied from the start – so that we are assessing the	<p>Comment noted. As per Council direction, staff will model and evaluate a 'no urban boundary expansion' growth option.</p> <p>Regarding the comments on the Waterdown / Binbrook evaluation tool, it is noted that no expansions into the</p>

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	implications of urban sprawl on the climate emergency, municipal finances, our local agricultural system, natural heritage and water resources. I think it is inappropriate to be consulting on this framework and associated criteria now, given that public input is pending regarding what community members prefer and support where urban growth management in our city is concerned. I say NO to urban expansions into the Greenbelt! The city is under no obligation to even consider urban expansion into protected Greenbelt lands. While the provincial Greenbelt Plan does, under very specific circumstances, allow for 10ha expansions of towns & villages into the Greenbelt, we do not need to be contemplating such expansions in Hamilton!	Greenbelt Plan are permitted with the exception of a minor 10 ha expansion from a Town / Village. Staff note that the tool has been drafted to allow staff to review and evaluate any requests for expansion in these areas as per the criteria of the Growth Plan so that the City is prepared to properly respond to requests that are received. <i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i>
12	I would like to offer the following comments: - Why are we not applying this sort of criteria to the "missing option" i.e. the option to work within our current urban boundaries. Any sort of proper assessment process begins with a "do nothing" option. - Another criterion needed: each option (including no boundary expansion) should also be evaluated on the basis of its alignment with approved Council policies and strategies. This would address not only Planning Act related policies but also other initiatives such as the Hamilton Food Strategy and the Hamilton Climate Change Plan. How many times do citizens have to put time and energy into these planning and strategic processes before staff and council apply them to decisions? - How are you going to incorporate consideration for post-pandemic land use changes into the evaluation? Many urban experts are already predicting that changes in employment patterns and consumer behaviour will have a major impact on commercial land uses. We may see vacancies in former office and retail spaces. It is absurd to consider expanding boundaries when we may have opportunities for redevelopment and adaptation of these lands. They are already serviced and in many cases supported by transit. - This municipality has been making commitments to stop boundary expansions, protect	Comment noted. A ‘no urban boundary expansion’ growth option is being modelled and evaluated in the revised framework. Considerations related to climate change including an assessment of GHG emissions has been included in the framework. Staff concur regarding the opportunities to broadly address food security and local food production. Regarding comments on post-pandemic impacts, the City is required to plan for the growth mandated by the Province. The potential short, medium and long term impacts of Covid on employment, commercial activities and housing preferences is addressed in the March 2021 LNA and related reports.

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	agricultural lands and farming and preserve what little natural areas remain. When will we finally do it?	<p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option as an evaluation scenario.</i></p> <p><i>Action: amend the Part 1 Evaluation Criteria and Part 2 Phasing Criteria related to the Agricultural System theme to include food security.</i></p>
13	Glen Schnarr & Associates Inc. (GSAI) represents Hamilton Country Properties Ltd. (c/o Country Homes), who own lands within the northwest corner of the Elfrida Whitebelt area which are municipally known as 420 and 646 Henderson Road. Our office has been actively monitoring the City of Hamilton’s GRIDS 2 and Municipal Comprehensive Review. On behalf of our client, we would like to continue to provide our professional planning opinion that the Elfrida area remains a logical and viable option to expand the City’s urban boundary to accommodate growth and development. It is understood the City’s preferred growth option is the “Ambitious Density” scenario, which identified a “Community Area” land need of 1,340 gross developable hectares to 2051. The land need of 1,340 gross developable hectares is based on a planned intensification target which increases, over time, from 50% between 2021 and 2031, to 60% between 2031 and 2041 and to 70% between 2041 and 2051, and a density of 77 persons and jobs per hectare (pjh) in new growth areas. It is also understood that, through the City’s GRIDS and Land Needs Assessment, four Community Areas have been identified for a possible urban expansion (Twenty Road West, Twenty Road East, Elfrida and Whitechurch). As part of the next phase of determining where to grow, the City will evaluate growth scenarios through the evaluation framework and phasing criteria themes. As part of the City’s ongoing consultation for the ‘Whitebelt Land Evaluation Framework and Phasing Criteria’, we are pleased to provide	(Reviewed in summary of emailed comments)

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	<p>these comments. Please note that our commentary is provided to supplement staff’s evaluation of the Elfrida Whitebelt area.</p> <p>1. Climate Change – Adapting to climate change through urban development requires cooperation across all levels of government and the development community. Planning and development practices continue to evolve to minimize the impacts of climate change on our communities. In the context of Elfrida, a greenfield community, the City of Hamilton has an opportunity to implement policies and collaboratively work with the development industry to implement a community wide district energy strategy/green energy standards that relies on solar and/or geothermal infrastructure. Developers including Country Homes actively participate in discussions with Municipal Staff to implement innovative energy conservation practices within their projects. A community-wide climate change strategy and program could become a successful footprint for the City to exemplify to other municipalities how greenfield community planning could effectively implemented partnering with the development industry.</p> <p>2. Municipal Finance – Elfrida represents a gross developable area of approximately 1,200 hectares. The redevelopment of Elfrida as a complete community that is walkable and accessible allows the City of Hamilton to collect Development Charges, which are instrumental in financing and implementing public infrastructure such as transit and community services for other areas of the City. Regional and local governments have implemented unique financing and growth management tools to ensure that the development industry contributes its share of the costs required to support growth and development.</p> <p>3. Servicing Infrastructure – Through the City’s GRIDS 1 process, the Elfrida area was identified as Hamilton’s next urban expansion area, planned to accommodate growth to 2031, in conjunction with the planned intensification of</p>	

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	<p>Hamilton’s downtown and other built-up areas. It is understood that the City of Hamilton has already invested in the oversizing of infrastructure along Highway 56 to accommodate this growth and development. Recognizing Elfrida as a preferred growth option will utilize existing and invested infrastructure to accommodate growth. Furthermore, building on the principles of complete communities and the key considerations for the ‘Servicing Infrastructure’ theme, Elfrida represents an opportunity to plan for and develop a comprehensively integrated water and wastewater infrastructure strategy.</p> <p>4. Transportation – B-L-A-S-T is a rapid transit network and forms part of the \$17.5 Billion MoveOntario capital investment program. The ‘S-Line’ connects Centennial and the Ancaster Business Park. The route is planned along Upper Centennial Parkway and Rymal Road E. Elfrida offers an opportunity to extend the B-L-A-S-T network and to provide an active transit network to service a broader community. The extension of the B-L-A-S-T network builds on the 2006 endorsement of the “Nodes and Corridors” growth scenario provided through the GRIDS 1 process.</p> <p>5. Natural Heritage and Water Resources – As part of the Elfrida Growth Area Study, the City initiated a Subwatershed Study (SWS). The Study is well advanced and provides a detailed analysis of the natural heritage and water resources in the Elfrida area. The SWS establishes a hierarchy of natural heritage features, each requiring different levels of conservation. The SWS also provides further direction as to the extent of the Natural Heritage System (NHS) to be conserved. It is our opinion that the City should leverage the work undertaken to-date and rely upon the information presented through the SWS, which demonstrates that Elfrida can continue to be planned as a complete community while preserving significant Natural Heritage and Water Resources.</p> <p>6. Complete Communities – The Elfrida Growth Area Study identified a ‘Nodes and Corridors’ growth and land use scenario that builds on the principles of</p>	

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	<p>complete communities. Elfrida offers a unique opportunity to plan for a new community that builds on these principles and provides convenient access to an appropriate mix of jobs, local services, affordable housing, a full range of other housing options, public services and recreational and educational facilities. Through the Elfrida Growth Area Study, the City acknowledged that the preferred Community Structure will provide for a mix and diversity of housing types that includes low-rise, mid-rise, and high-rise development. The high-rise development will be concentrated within the Mixed-Use Centres and Corridors, with density filtering out into the low-rise residential neighbourhoods.</p> <p>7. Agricultural System – It is recognized that, through a future Secondary Plan process, an Agricultural Impact Assessment will be required. GRIDS 1 resulted in a ‘Nodes and Corridors’ land use structure, which was described as follows in the Growth Related Integrated Development Strategy: Growth Report (May 2006): “this option concentrates growth in essentially on new growth area to facilitate mixed use, higher density, transit friendly development that optimizes existing infrastructure. Some prime agricultural land is lost by this option. Although agriculture is highly valued in the City, it was found that it was impossible to identify a concentrated new growth area without impacting prime agricultural land because of the extent of such land in the City.” Furthermore, in the Staff Report (PED17010(j)), dated March 29, 2021, it notes that “...the City’s options for expanding the urban boundary to accommodate population growth are limited. The majority of Rural Hamilton (94%) is within the Greenbelt Plan area.”</p> <p>8. Natural Resource – As previously noted, through the Elfrida Growth Area Study, the City initiated a Subwatershed Study (SWS). The Study is well advanced and provides a detailed analysis of the natural heritage and water resources in the Elfrida area. 9. Cultural Heritage – It is recognized that cultural heritage and archaeological resources will be studied as part of a Stage 1 evaluation that will consider the presences of significant cultural</p>	

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	<p>heritage resources. Based on our review of Schedule F (Rural Cultural Heritage Resource) and F-1 (Rural Area Specific Cultural Heritage Resources), no cultural resources have been identified within the Elfrida area.</p> <p>(note: also submitted through email)</p>	
14	<p>At the present time I feel that the planners have not addressed, early enough, whether the urban boundary should, or needs to be, expanded. All aspects should be addressed: climate change, our current disastrous infrastructure budget situation, the fact that our farmland in these areas is some of the best in Ontario etc. It is not fair to send out a survey to citizens on a subject you obviously support without explaining the implications. Please allow more time to educate the citizens of the impact of such expansion. A no expansion option is essential. I would also like to see a total moratorium on Greenbelt expansion - regardless of the push by developers and the use of MZO's by the current provincial government. A recent documentary on Montreal as part of the TVO 'Life-sized cities' showed what can be done to make a city so much more attractive - from mid-densification options (no hi-rise ant heaps), wider pedestrian sidewalks, more bicycle lanes and limiting car speeds. These alone would make Hamilton more pleasant to live in and increase density to the level forecast. Why, for example is Limeridge Mall a wasteland of parking when there could be residential units over the parking lot? Income for the city, less water runoff and a walkable area. Please consider the above comments.</p>	<p>A 'no urban boundary expansion' growth option is being modelled and evaluated.</p> <p><i>Action: Addition of the "How Should Hamilton Grow?" Framework to include the No Urban Boundary Expansion option as an evaluation scenario.</i></p>
15	<p>On behalf of the Bay Area Climate Change Council, we would like to thank the members of the GRIDS 2/MCR team of hard-working staff for their time and consideration. The Bay Area Climate Change Council represents a collaborative voice for climate action in the Hamilton-Burlington region. Members of the Council and our implementation teams span the two cities and represent organizations in the municipal, non-profit, education and private sectors, and include citizen representatives. Buildings and transportation</p>	<p>Staff are working with Sustainability Solutions Group (SSG) to evaluate the GHG emissions impacts of the No Urban Boundary Expansion option and the Ambitious Density option. In addition, the impact of the phasing of the white belt areas on GHG emissions will be evaluated, including describing the energy and GHG profiles of the areas when built out and</p>

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	<p>account for 28% of Hamilton’s overall greenhouse gas emissions (GHG). Any evaluation framework put forward by the City of Hamilton to determine urban growth needs to account for the impact growth would have on these two sources of emissions. Much like a fiscal budget, the City of Hamilton is bound by a GHG budget. Meeting our target of 50% emission reductions by 2030 and net zero by 2050 requires that we weigh long term planning decisions through the lens of what we can ‘afford’ to emit. In its current form, the draft evaluation framework for urban growth includes criteria that speak to limiting greenhouse gas (GHG) emissions in a number of ways, but it fails to provide safeguards that would prevent emissions from exceeding our carbon budget. To account for this gap, we strongly recommend that staff include criteria that determine the impact development will have on the city’s carbon budget, measured by GHG projections and accounting. We thank staff for their efforts to improve Hamilton’s emissions profile so far. The Bay Area Climate Change Council continues to support the region’s transition to a low carbon future.</p> <p>(note: also submitted through email)</p>	<p>whether or not a specific sequence will aid the City’s ability to achieve GHG emissions reductions.</p> <p><i>Action: Amend the Whitebelt Lands Part 2 Phasing Criteria related to the Climate Change theme to include GHG emissions analysis and include GHG emissions analysis in the How Should Hamilton Grow Framework.</i></p>
16	<p>The theme areas appear reasonably comprehensive. I have two areas of concern 1. The whole document assumes that the white belt lands must be used (See Part 2 Phasing Criteria statement - "It is anticipated that the City will require all or a portion of its white belt lands to accommodate forecast community growth to 2051" 2. There is no way to understand the relative importance of the Phasing Criteria themes. Will you apply some form of weighting to asses? Will some areas override others?</p> <p>(note: also submitted through email)</p>	<p>A ‘no urban boundary expansion’ growth option is being modelled and evaluated.</p> <p>Regarding weighting of criteria, the framework is intended to be used as a method for documenting a wide range of information considered in the development of the planning recommendation. The information in the evaluation framework will include a mix of qualitative and quantitative data. No weighting is assigned to any given dataset. The phasing component will include the results of more detailed technical analysis related to agriculture, municipal finance, transportation, water, wastewater and stormwater management.</p>

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		<p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option as an evaluation scenario.</i></p> <p><i>Action: Revisions to the framework document will include a more detailed explanation of how the information collected in the evaluation and phasing analysis will be used to inform the development of the planning rationale for a preferred growth scenario.</i></p>
17	<p>Good environmental assessment practice including in Ontario is to always evaluate the NULL option. Your approach seems to ignore this. You can't properly evaluate any proposed action including any boundary expansion without comparing it thoroughly to NOT doing it. For example, the first criteria you list is climate change and the first aspect is GHG emissions. This is particularly critical when the City has declared a climate emergency and recognized the urgent requirement to rapidly reduce emissions. The appropriate question is will the proposed expansion REDUCE emissions? This is not a comparison question. It is an absolute one. If the proposed expansion does not REDUCE emissions is should not be approved. And note that the numbers are demanding. The IPCC and the United Nations have determined we must reduce emissions by half in the next nine years. So will the expansion get us to that target? This question can't be limited to the expected emissions AFTER the change occurs (i.e. after the 'development'). It must include ALL the emissions generated as a result of the proposed change including embedded carbon emissions. It is also not limited to the emissions that the city currently measures. For example, it fails to measure embedded emissions in consumed products manufactured outside of Hamilton. If the proposed lands currently generate significant emissions, those of course would be compared against the ones resulting from the proposal (both during and after completion). The City has also committed to net zero emissions by 2050 (a quite inadequate target) so any proposal must meet that target, and it should</p>	<p>A 'no urban boundary expansion' growth option is being modelled and evaluated.</p> <p>Staff concur with the comment on the importance of modelling and evaluating GHG emissions.</p> <p>Staff note that the criteria considers the ability of an expansion area to accommodate transit (existing and planned).</p> <p>The Fiscal Impact Assessment will asses the costs of growth in both the no Urban Boundary Expansion scenario as well as the Ambitious Density scenarios.</p> <p>Impacts on agricultural lands and the natural heritage system are included in the evaluation criteria and the phasing criteria.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option as an evaluation scenario.</i></p>

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	<p>do so in way that is as certain as possible. I suspect the above considerations are not part of framework, because it ASSUMES that an urban boundary expansion will take place. But the above illustrates that this is a very climate unfriendly assumption. For example we can reduce emissions by shifting private transportation to public transit and active transportation. But any new residents on the whitebelt lands will not be able to use existing public transit, and will be challenged to increase their use of active transportation. Adding population to areas already served by public transit could be a good way to increase the use of public transit. Adding them in a new area at minimum requires adding more transit routes. Even if the density of the new areas is at least 80 per hectare, that falls well below the densities already in existence in many parts of Hamilton, or at least the densities that existed in the past. With respect to financial impacts, we already know these will be severe. It is well established that greenfield growth does NOT pay for itself. That's in part because provincial development charges legislation does NOT allow municipalities to collect the full costs. That's exacerbated by Hamilton's long standing practice of discounting and exempting significant amounts of development from growth fees. We see the results in EVERY capital budget of the city. We are a cumulative \$3.8 billion (with a B) behind in maintenance of existing infrastructure. That's partly because the older parts of the city (north of Mohawk) have seen steady reductions in population as growth has occurred south of Mohawk and in other suburban areas. So we have infrastructure built for far more people than live in those older parts of the city, and therefore an inability of those residents to pay the maintenance costs. I think if you fairly examine the record across Ontario, you will conclude that the more a city expands its urban footprint, the worse its infrastructure maintenance shortfall becomes. The simplest answer to this problem is to increase the density of existing built-up areas so there are more taxpayers to cover the costs of the already existing infrastructure. Building new infrastructure makes the problem worse. In addition, you properly advocate consideration of municipal financial risks, but urban expansion is incapable of avoiding these risks as your general</p>	<p><i>Action: amend the Part 2 Phasing Criteria related to the Climate Change theme to include GHG emissions analysis and include within the “How Should Hamilton Grow?” Framework.</i></p>

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	<p>manager of finance has repeatedly pointed out. The municipal servicing infrastructure in greenfields must be built BEFORE development occurs. And the decision on when, how much and even whether that development takes place is in private hands. So the city can't avoid these risks. Your stated objectives respecting agricultural land are laudable but again impossible to achieve. It is already established that the white belt lands are overwhelmingly prime agricultural land. Expansion onto them is a death sentence for the agricultural system. The same is true of natural heritage lands. It's nice that there is some buffering required, but those features will necessarily be degraded, many species will no longer occur there, and the increased impervious surface will further ensure that natural heritage protection is impossible. Other stated objectives suffer from the same fundamental problems. Urbanization degrades them, and you seem to understand that so instead of actual preservation you talk about "prioritization", "minimize", "mitigate" and "efficient". They are all weasel words to hide the plain fact that urbanization is bad news for living things, and both very risky and very costly. It is also disturbing that this survey has been issued not only BEFORE a decision has been made on boundary expansion, but also immediately before a mail-in survey on that subject. Your evaluation criteria survey clearly biases the latter survey. It offers NO direct opportunity to support the no boundary expansion option. Instead it assumes that will be chosen. That loudly declares that 'the fix is in', and whatever the views of the public, an expansion is inevitable. You might have lessened this message (which is destructive of democracy) by actually examining the evaluation criteria for intensification. But instead you assume that growth means urban boundary expansion. You seem incapable of thinking otherwise. How many people will look at this evaluation survey and conclude that filling out the mail in one is a waste of time?</p>	
18	<p>Based on the Evaluation Framework/Themes outlined above... I am strongly opposed to expansion of Hamilton's urban boundary. If the population is forecasted to grow substantially, rural land will be required even more than it is currently, for agricultural land and recreational use, especially in light of the</p>	<p>Comment noted that no urban boundary expansion is preferred.</p>

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	climate emergency. Expansion should be delayed indefinitely to prevent urban sprawl, conserve municipal finances associated with infrastructure, conserve farm land and recreational green space. The focus should be on intensification within the urban boundary. Expansion of the urban boundary should be considered only after intensification within the urban boundary has been thoroughly exhausted and only after rigorous evaluation of the costs of urban expansion (outlined above) have been studied. Thank you, Margot Carnahan, Dundas, On	
19	I am very confused by this request for input at this stage. I understand that there will be a survey mailed out to every household in Hamilton next month concerning boundary expansion. Why are you asking for input now? Please wait for the results of the survey before going ahead with your plans. That survey is a much more democratic source of information than the challenging method it has taken to get to this stage on this website. Thank you. Now, concerning each of your nine themes, ANY boundary expansion will be detrimental to each and every one of them: 1) Climate change: Expanding onto white belt lands will mean that greenhouse gases are increased in both the building of all the roads and other services, and in the transportation impacts if people were to live further away from the city. 2) Municipal finance: Boundary expansion only increases the massive infrastructure debt the city already carries. Development charges never cover the cost of providing services to new developments. Increase the tax base within the current city boundaries and you will begin to make a dent in this. 3) Servicing infrastructure: The most efficient infrastructure servicing is within the current urban boundary, where roads and water services already exist 4) Transportation Services: There would be no public transit that would be reasonable to far flung subdivisions, hence the car culture only increases. 5) Natural Heritage and Water Resources: These will only be negatively impacted by urban sprawl. You cannot 'replace' natural features with artificial ones and expect the same carrying capacity, the same carbon sinks, and the same biodiversity protection. 6. Complete Communities: Please build complete communities where they	<p>Comment noted that no urban boundary expansion is preferred.</p> <p>Comments are appreciated and staff note that the revised framework will include the no urban boundary expansion scenario and will address the nine themes as noted in the comments.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p>

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	make sense, within the urban boundaries where schools, libraries, bike trails, corner stores, coffee shops, grocery stores and other amenities that make living in a community pleasurable already exist, or can be added within the structure that exists. 7. Agricultural System: This is a no-brainer. Virtually all white belt lands are prime agricultural lands, and are already in short supply. This will only be exacerbated when the climate crisis deepens, and food security becomes more severe. Do not build on agricultural land. There is plenty of land in the city. 9. Cultural Heritage: All development must be made in consultation with Indigenous peoples, whose lands we occupy	
20	Expanding the urban boundary is terrible for the city government, the environment and the people of Hamilton for the following reasons. 1. FINANCIAL Suburban housing is the least dense form of housing that demands the most infrastructure. It also yields much lower realty tax per acre than rental, medium or high-rise or commercial/industrial. It also puts additional load on regional roads that lead to more demands for road construction. Using vacant land and increasing density in existing neighbourhoods uses existing infrastructure more effectively, saves capital and operating budgets and increases the tax yield from existing land and infrastructure. 2. STORM WATER Hamilton has a huge problem with the discharge of sewage tainted storm water into Cootes and Red Hill Creek. We also have flooding problems in low lying areas of the lower city. Climate change is forecast to make storms more intense. To avoid further damaging the environment and avoid costly lawsuits and remediation projects, we must preserve the open land that we have and continue to improve our ability to manage storm water. Paving over 3000 acres of open land on the mountain would be a disaster in the making for Hamilton. 3. TYPE AND LOCATION OF HOUSING. Hamilton has a desperate shortage of all types of rental housing which has led to renovictions, skyrocketing rental rates and tenant strikes. We must focus on building at least 10,000 units of rental housing (not subsidized). These are best located on existing transit lines to increase their ridership and be convenient for renters. In additions, because rental building are both more dense and have a higher mil	<p>Comments noted. Preference for no urban boundary expansion scenario.</p> <p>Response to numbered comments:</p> <ol style="list-style-type: none"> 1. Financial considerations of both the no urban boundary expansion option and the Ambitious Density scenario will be examined through the Fiscal Impact Assessment 2. Staff concur regarding the importance of preserving open space lands as part of the stormwater management solution, particularly in light of extreme weather events.. Prior to any development of whitebelt lands, a Subwatershed Study would be completed. Maintenance and protection of natural features will be prioritized. 3. Staff concur that type and location of housing is critical and the ability to provide for a range of housing types is key to the development of complete communities. 4. The evaluation of growth options will include assessment of GHG emissions from each growth scenario.

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	<p>rate, the tax yield from existing land will skyrocket. Building large quantities of well priced rental units will also take some of the load from the subsidized housing stock. 4. CARBON EMISSIONS Because the proposed new suburb will be located far from most shopping and employment, it adds enormous carbon load when all levels of government are trying to reduce carbon emitted. 5. LOCAL FOOD PRODUCTION as climate conditions worsen in California and Florida, the cost and availability of their food will get worse. Local food production addresses this problem.</p>	<p>5. Local food production is an important issue and will be added as an area of assessment to the framework.</p> <p><i>Action: amend the Part 2 Phasing Criteria related to the Climate Change theme to include GHG emissions analysis.</i></p> <p><i>Action: amend the Part 1 Evaluation Criteria and Part 2 Phasing Criteria related to the Agricultural System theme to include food security.</i></p>
21	<p>I previously supported the Ambitious Density scenario, but after participating in meetings with numerous environmental groups, I support a scenario of No Expansion to the Urban Boundary, an option which wasn't presented in the previous consultation. If urban growth were to proceed in the Whitebelt lands, I would urge less development than proposed in the Ambitious Density option. Critics say that scenario would consume nearly all of the Whitebelt lands that we have. These lands should be protected, as much as possible, to preserve agricultural land, promote the growth of local agriculture and be included in an expanded Greenbelt.</p>	<p>Comments noted. Preference for no urban boundary expansion scenario.</p>
22	<p>The fact that so many of these criteria require the process to evaluate solely ‘Candidate Expansion Areas’ renders this process myopic and critically flawed. There is a biased assumption that additional land is required to accommodate human population growth and a total dismissal of doing so within the existing urban boundary. If the City is to put the best interests of current and, more importantly, future citizens at the forefront, then the planning process needs to include the option of increasing population density and maintaining the existing urban boundary. That option would most certainly rate higher on all criteria that currently include the language ‘Candidate Expansion Area’ Examples: The section on Transportation systems does not have required population density as a criteria. This is referenced obliquely by the term ‘financial viability’ but that</p>	<p>Comment noted. A ‘no urban boundary expansion’ growth option will be modelled and evaluated.</p> <p>Re the comments on the Transportation System, staff confirm that the future potential population density will be a consideration regarding the ability of a candidate area to support transit. An amendment to the framework will make this consideration explicit.</p> <p>Regarding cost effectiveness, staff note that financial considerations of both the no urban boundary expansion</p>

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	<p>is not a high enough bar. Further, low density suburban areas do not currently receive adequate public transit service (i.e. frequency) to be effective or viable, so expanding suburbia to build more homes cannot expect to have a different result. Missing for the evaluation is a relative ranking of cost effectiveness vs. intensifying population density within the existing urban boundaries. If such a relative ranking were to be done, increasing population density within the existing urban boundaries and on existing public transportation routes would be far more fiscally responsible (financially viable) than any option that expands the urban boundary. How is it possible to rank candidate expansion areas for ‘Mitigate Impact on Natural Heritage’? By expanding human settlement into any of the whitebelt areas, there is negative impact to longterm ecological function and biodiversity. And again, if measured up against using existing urban space to grow, expanding into the whitebelt would not be ranked as a sensible option. When considering the ‘Complete Community’ criteria, evaluation against an increase of population density within the existing urban boundary would very easily show that expansion is not a sensible option. The opportunity to build more housing within our existing communities is a much better option. In summary, the criteria themselves are sensible and sufficient, but the problem is the narrow scope of what they are intended to evaluate: they must also be used to evaluate the option to accommodate growth within the existing urban boundary.</p>	<p>option and the Ambitious Density scenario will be examined through the Fiscal Impact Assessment</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p> <p><i>Action: identify the population density of future growth area as a measurement factor in the ability of a candidate area to support transit.</i></p>
23	<p>Why invest so much effort and resources into this process when it's not a given that Hamilton needs to expand in to whitebelt or Greenbelt areas? With the LRT revived, recent support for Secondary Dwelling Units (SDUs), increasing vacant properties downtown and other downtown core revitalization efforts much if not all of the projected growth can be accommodated within the current urban boundary. If Climate Change is #1 then why are CEEP and future growth planning so out of step with one another? CEEP has set targets which seem to be independent from some of the growth scenarios staff is</p>	<p>Climate change is an important consideration in the evaluation framework. The climate change criteria should be amended in Phase 2 to better reflect the measurement.</p> <p>Staff note that the order of the theme areas should not be construed as a weighting or importance of theme areas. All areas are considered equally.</p>

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	considering. The order of how all of these very important pieces are coming together feels to be very jumbled, and rushed. Too important to rush. Aggregate and Petroleum resources should not be more important than Cultural Heritage.	<i>Action: amend the Part 2 Phasing Criteria related to the Climate Change theme to include GHG emissions analysis.</i>
24	I'm not sure why you are setting up an evaluation framework when it hasn't been decided that we are going into the Whitebelt. The criteria listed should be used to evaluate that it is not a good decision to build in the Whitebelt.	Comment noted. A ‘no urban boundary expansion’ growth option will be modelled and evaluated. <i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i>
25	The boundary should not be expanded. If council actually believes their motion declaring a climate emergency, then we need to work within the existing boundary.	Comment noted. No urban boundary option preferred.
26	This seems very adequate.	Noted.
27	No further farmlands should be used for activities other than agricultural. Although we currently are transporting vast amounts of food from elsewhere, those sources are not sustainable in growing those foods. Further the transportation of those foods is increasing the greenhouse gases in our atmosphere. There should NOT be an assumption that the urban boundary will be expanded beyond the current limits and probably should be reduced already.	Comments are noted. Local food production is an important issue and will be added as an area of assessment to the framework. <i>Action: Part 1 Evaluation Criteria and Part 2 Phasing Criteria related to the Agricultural System theme amended to include food security.</i>
28.	There should be no encroachment or impact on Greenbelt Plan Protected Countryside. Light pollution is a growing problem and encroachment in our communities and the lack of hindsight, understanding the current problem or foresight on the part of the City of Hamilton is apparent. The public standards for the mitigation of light pollution are inadequate and do not cross over into	Comments addressed in email submission.

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	private standards. Our by-laws our woefully out of date and do not address the issue of light pollution. Light does not have any boundaries and impacts communities and the the environment. Our lands and skies are part of our natural heritage and we should be able to look up and see the stars at night and walk the night without blinding lights in our path. I can't even open my curtains in the evening (12th floor apartment) building because of light pollution from City of Hamilton managed parks and facilities; efforts to address this with councilors have failed. I respectfully ask that you address this problem wit any expansion into Whitebelt lands for current and future residents including our natural flora and fauna. There should be no expansion into Greenbelt lands... it will never end and has to stop now.	
29.	This framework is mostly fine for deciding how to develop WITHIN the existing urban boundary. (I will explain why I say "mostly" in a minute.) I oppose any expansion of the urban boundary, for many reasons. An expansion would eat up farm land; make our infrastructure less efficient and more costly; require more vehicle use; make the city less climate resilient. An expansion would make Hamilton's and Canada's 2050 climate goals harder to achieve. It would make all of those nine criteria in your framework harder to achieve. We simply cannot keep spreading outward. Hamilton's prime housing need is for much more rental housing, which we are losing at a rapid rate as investors big and small, but mostly big, buy up existing lower-rent buildings to "reposition" at higher rents. We need both new market and new non-market rental units. We need help from seniors governments for laws to prevent the loss of these units and much greater investments to upgrade existing stock and add new units. The city needs to tighten rules on condominium conversions to protect the existing rental stock, as well as introduce a renoviction bylaw. The current provincial government apparently wants urban expansion and has set its criteria, including a 30-year (instead of 20) population target and the requirement for a market test, to force cities to "agree" to expand outward. We should refuse and set our density and intensification targets to meet a fixed boundary. Much will change in 30 years. Population projections in particular	<p>Comment noted. A 'no urban boundary expansion' growth option will be modelled and evaluated.</p> <p>Comments on the need for affordable housing, and low income housing, rental housing, are noted. The framework reflects the importance of the provision of a range of housing types including affordable housing within the Complete Communities theme.</p> <p>Comments on the market based approach are noted, but the City is required to plan in accordance with the provincial methodology.</p> <p>Comments on the natural resources theme are noted. The criteria reflect provincial policy direction.</p> <p><i>Action: Addition of the "How Should Hamilton Grow?" Framework to include the No Urban Boundary Expansion option.</i></p>

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	<p>are likely to become increasingly less predictable. But once boundary expansion is in our official plan, developers and land owners will act on it. We need to set a hard "no expansion" policy and then all planning staff work should be focused on how to accommodate that density within the existing urban boundaries. Doing so will frustrate builders and buyers who want big lots with one house each; it will take real guts for cities, the provinces and the federal governments to say that's going to be limited in future. But it will also take creating attractive alternatives, discussed below, to single-family and low-density homes. The climate challenge is real and urgent. Resiliency in the face of climate change requires protection of all good farm land, with which Hamilton is blessed in abundance. Increasingly, the housing market is responding to investors' desires for rich returns, not to households' housing needs. Only the latter should concern governments and planners. This mis-focus is even distorting the economy, giving undue influence to finance at the expense of production and real services, as well as at the expense of those who would like someplace to live. Specifically on the nine-point framework, which as I said should apply to how we grow within the urban boundary, not to whether we expand, I would add a specific requirement under complete communities--walkability and bike-ability. My prime focus would be on walkability. Specifically, we should aim for "15-minute cities" and 15-minute neighbourhoods We should work to ensure that opportunities to work, shop for basics and enjoy leisure all are within a 15-minute walk of where people live. This will reduce demand for any form of fuel-using transportation and will provide a quality-of-life benefit that will be a tradeoff for the deliberate and intentional reduction in single-family housing that we need to accept. Achieving 15-minute walkability will require greater density and make it attractive. The city's analysis showed some projections with "too many" apartment units. In market terms, "too many" would tend to mean lower rents which is desirable both to help house the tens of thousands of existing Hamiltonians paying more than 30 per cent of their income for rent, but also to add a further inducement for households to accept apartment living instead of single family or even</p>	

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	duplex or townhouse. One more item on the nine-point framework. Under natural resources, I would not include protection or aggregate or petroleum resources as one of the prime criteria; I would include only that new residential development not be allowed near EXISTING petroleum or quarry sites. Encouragement for including opportunities for solar heating and solar generation of electricity should be part of city planning requirements.	
30.	The criteria for boundary expansion is comprehensive, but I am not clear how planners are evaluating the need to expand. The better option from a climate change and resource perspective would be to increase density within the current boundaries before expanding. How is this being addressed?	<p>Comment noted. A ‘no urban boundary expansion’ growth option will be modelled and evaluated.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p>
31.	There should be no expansion of Hamilton's urban boundary to include Whitebelt Lands and prime agricultural lands should be protected. Since the climate crisis is affecting our food supply, land use planning should use a climate lens and climate crisis framework to promote food sustainability.	<p>Comment noted that no urban boundary expansion scenario is preferred.</p> <p>Food production/security implications of growth options should be considered.</p> <p><i>Action: Part 1 Evaluation Criteria and Part 2 Phasing Criteria related to the Agricultural System theme amended to include food security.</i></p>
32.	Acceptable.	Noted.
33.	These appear to be excellent assessment criteria. Additional assessment criteria could/should include accessibility for persons with disabilities (sprawling growth rarely provides accessible units, crossing are often less accessible as well, many streets lack basic infrastructure like sidewalks) as well as biodiversity.	<p>Comment about accessibility is noted. Consideration of accessible design is an important component of Secondary Planning.</p> <p>Implications for biodiversity is considered under the Natural Heritage and Water Resources theme.</p>

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34.	Parcel size needs to be considered. Most of the lands being considered are too small and require land assembly to make developable for modern warehouse and employment land needs.	<p>Comment noted. Staff note that land fragmentation can be an issue or constraint on development. A criteria is proposed for the Part 2 Phasing criteria to address readiness of lands for development.</p> <p><i>Action: Part 2 Phasing Criteria amended to add a criteria related to implementation and readiness of lands for development.</i></p>
35.	<p>I am writing to express my strong opposition to any urban expansion into the Greenbelt. I understand that city planning staff are seeking input on an evaluation framework and planning criteria to guide two scenarios – urban expansion into rural whitebelt lands, and expansion of urban Waterdown and Binbrook into the provincially protected Greenbelt. City planning staff are asking for input on an evaluation framework and planning criteria that should have been applied in a rigorous assessment of whether we should be expanding the urban boundary at all! Instead, staff are recommending the urban expansion and the application of their evaluation framework and planning criteria to the expansion area! This is all backwards! The city is putting the cart before the horse – It is more than a bit disingenuous to be proceeding with a public consultation that assumes urban boundary expansion is going to happen when you are just about to send out a survey asking people which urban growth management scenario – including a no boundary expansion option - they support. I think it is inappropriate that city planners are consulting on this framework and associated criteria now, given that public input is pending regarding what community members prefer and support where urban growth management in our city is concerned. The city is under no obligation to even consider urban expansion into protected Greenbelt lands. While the provincial Greenbelt Plan does, under very specific circumstances, allow for 10ha expansions of towns & villages into the Greenbelt, we do not need to be contemplating such expansions in Hamilton! I want to see a</p>	<p>Comment noted. A ‘no urban boundary expansion’ growth option will be modelled and evaluated.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p>

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	rigorous evaluation framework and planning criteria applied from the start – so that we are assessing the implications of urban sprawl on the climate emergency, municipal finances, our local agricultural system, natural heritage and water resources, to name a few. Finally, I am strongly opposed to any urban expansion into the Greenbelt. Thank you. Yours, Edward Reece	
36.	I am writing to express my strong opposition to any urban expansion into the Greenbelt. I understand that city planning staff are seeking input on an evaluation framework and planning criteria to guide two scenarios – urban expansion into rural whitebelt lands, and expansion of urban Waterdown and Binbrook into the provincially protected Greenbelt. City planning staff are asking for input on an evaluation framework and planning criteria that should have been applied in a rigorous assessment of whether we should be expanding the urban boundary at all! Instead, staff are recommending the urban expansion and the application of their evaluation framework and planning criteria to the expansion area! This is all backwards! The city is putting the cart before the horse – It is more than a bit disingenuous to be proceeding with a public consultation that assumes urban boundary expansion is going to happen when you are just about to send out a survey asking people which urban growth management scenario – including a no boundary expansion option - they support. I think it is inappropriate that city planners are consulting on this framework and associated criteria now, given that public input is pending regarding what community members prefer and support where urban growth management in our city is concerned. The city is under no obligation to even consider urban expansion into protected Greenbelt lands. While the provincial Greenbelt Plan does, under very specific circumstances, allow for 10ha expansions of towns & villages into the Greenbelt, we do not need to be contemplating such expansions in Hamilton! I want to see a rigorous evaluation framework and planning criteria applied from the start – so that we are assessing the implications of urban sprawl on the climate emergency, municipal finances, our local agricultural system, natural heritage	<p>Comment noted. A ‘no urban boundary expansion’ growth option will be modelled and evaluated.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p>

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	and water resources, to name a few. Finally, I am strongly opposed to any urban expansion into the Greenbelt. Thank you. Yours, Joanna Sargent	
37.	<p>Climate Lens: I don't see how boundary expansion onto whitebelt lands can possibly be taking the climate lens (transportation, air quality) into consideration. Our current infrastructure is not able to handle the storms that are already hitting us. Protecting the trees that we already have is important and planting new trees at a HIGHER density than is found in many new single-family subdivisions is a part of dealing with the inadequacies of the stormwater management system. The paving of land for new roads means that there is less opportunity for the stormwater to soak into the ground. Municipal Finance: As I understand it developers cover only 80% of the costs of the infrastructure (roads, water/wastewater, electricity, etc.) with current taxpayers (residents AND businesses) covering the other 20%. Unless the density is high enough there will be no regular and dependable public transportation, which brings us back to that climate lens! This expansion is designed to accommodate the wishes of the developers and not what Hamilton needs. Seniors will NOT all age in their current homes. Many will move into smaller homes, freeing up single family homes for younger families. Hamilton needs MIDDLE density homes, which will bring in more tax dollars than large single family houses. Servicing Infrastructure: Our CSOs are already overflowing during heavy storm events. We need to fix what we already have. Transportation Systems: Public transportation only happens when the housing density is high enough. What guarantee do we have that BLAST will ever be built with council voting yes and then delaying the project numerous times. Let's build housing in areas already serviced by a reliable transportation system. Don't put the cart before the horse, by building subdivisions hoping that the population density will increase to support the public transportation. Natural Heritage and Water Resources: Keep the natural lands as they are. Don't even attempt to duplicate the efficient stormwater management systems that nature has created. Do NOT relocate them!! Complete Communities: My definition of a complete community is one that is walkable: to stores, schools and if possible work. If you look at</p>	<p>Comments are noted. Climate change is an important consideration in both Part 1 and 2 of the evaluation framework, and will be applied to the no urban boundary expansion option as well. Clarity on the phasing criteria will be provided.</p> <p>Fiscal impact assessment will be undertaken which will include analysis of options to finance growth.</p> <p>Servicing and transportation infrastructure implications are examined as part of the evaluation framework, integrated with updates to the Water/Wastewater and Stormwater Master Plans, and transportation network review.</p> <p>Staff concur on the importance of walkable complete communities, as evidenced in the criteria within the framework.</p> <p>Protection of the agricultural system, and minimization and mitigation of impacts is evaluated within parts 1 and 2 of the framework.</p> <p><i>Action: amend the Part 2 Phasing Criteria related to the Climate Change theme to include GHG emissions analysis and include within the "How Should Hamilton Grow" Framework.</i></p>

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	<p>the older neighbourhoods in Hamilton these are desirable because they are walkable. Back again to that climate lens. Agricultural System: You need to look at the soil map by OMAFRA to know that the whitebelt in the proposed boundary expansion includes high quality soil that should be kept for farming. The City of Hamilton declared a climate emergency in 2019 with a promise that a climate lens be “incorporated into routine work across all City departments”. I don't believe that the lens has been applied to ANY city work done to date! We need to address the drought in areas where too much of our food comes from and become more food independent. That means holding onto our farmland, not paving over it. Food security is a growing concern and we need to be sure we can feed our own people.</p>	
38.	<p>The above themes listed are important, but that being said, expansion into the Whitebelt lands should never happen, there needs to be an alternate plan that talks about building up our city, not out.</p>	<p>Comments noted that no urban boundary expansion scenario preferred.</p>
39.	<p>NO EXPANSION into WHITE BELT LANDS. Use the old space in Hamilton, warehouses, etc along Burlington St E , This area has already been destroyed DO NOT DESTROY prime land while large areas in Hamilton remain vacant, parking lots, derelict sites. People need to live and have amenities within a 10-15 minute walk. I hate big box stores that I have to drive to each one, build them up on levels and let people live with green space. We need to save the heritage buildings in Hamilton and revitalize them,. Way too many of the new residential blocks in downtown Hamilton have no style to them, they look like concrete blocks nobody wants to live in them, they are on top of main roads literally no where to drop someone off. Hamilton is not making the best of a the great City it has the potential to be. Many houses in Hamilton sit vacant as well for far too long. I cannot believe the number of places that are sold and then left empty. This creates unofficial need for more houses to be built. THIS IS ALL ABOUT the BIG DEVELEPORS being greedy. Quicker and easier to build on new prime land - this has to stop NOW, You must develop communities that help the environment, more urban sprawl does not do this it just increases the sprawl and time spent in automobiles.</p>	<p>Comments noted that no urban boundary expansion scenario preferred.</p>

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40.	I think there are very useful themes in the framework thus far. I believe that good implementation will need individuals throughout the community to be continually engaged and committed so that the ideals of this framework are not lost. (climate change for example wouldn't necessarily be the initial thing to consider but a thing that constantly needs consideration with any future designs; to be ""woven" into the process). A theme I feel is missing is related to consultation and communion with indigenous laws/treaties/ways of being.	<p>Comments noted.</p> <p>Consultation with indigenous communities is an important aspect of GRIDS 2 / MCR process and will be noted in the assessment of the cultural heritage theme.</p> <p>In addition, consultation with indigenous communities has been ongoing through the GRIDS 2 / MCR process and will continue throughout the project.</p>
7.	I'm very concerned about development in the Elfrida area, especially because of the loss of agricultural land --- at a time when local food production is becoming increasingly important --- and the detrimental environmental impact. The fields, streams and woodlots of Elfrida host a significant population of year-round resident birds and support a large number of migratory bird species on their journey from Central and South America to the boreal forest and tundra. They also support winter resident bird species. A strategy to substantially reduce, if not eliminate, the extent of proposed development in Elfrida would be a significant step in promoting financially and environmentally sustainable planning.	Staff note that implications on biodiversity is addressed in the Natural Heritage and Water Resources theme.

Survey 2 – Criteria for 10ha Greenbelt expansion lands (Waterdown/Binbrook)		
#	Comment:	Staff Response / Action Required
1.	Firstly I would say do not build in the greenbelt. Add avoidance of loss of habitat and biodiversity	Staff note that implications on biodiversity is addressed in the Natural Heritage and Water Resources theme.

Survey 2 – Criteria for 10ha Greenbelt expansion lands (Waterdown/Binbrook)		
#	Comment:	Staff Response / Action Required
2.	The 10 hectare (25 acres) expansion is insufficient for Waterdown to 2051. I would like the urban boundary to expand to hard boundaries complete communities.	The limitation on size of 10 ha is a requirement of the Growth Plan and cannot be modified.
3.	I am in favour of the Waterdown urban boundary expansion. I feel the expansion of 10 hectares is too small. The expansion should be much larger to accommodate the growth in Waterdown. The population of Waterdown is projected to double in the next 5-10 years.	The limitation on size of 10 ha is a requirement of the Growth Plan and cannot be modified.
4.	I don't think you should be expanding settlement areas in the Greenbelt.	Noted.
5.	I definitely am opposed to building on the Greenbelt Protected Countryside area within Binbrook and Waterdown. There is no need for urban expansion on protected Greenbelt land no matter how small the proposed area is. We have declared a climate crisis and we cannot lose the protected farmland, forest, wetlands, rivers, and lakes protected in the Greenbelt. We need to keep all of our farmland so that we can be self-sustainable when it comes to food production, we need to protect our waterways so that our drinking water is clean, we need to protect all of our wetlands to help control flooding plus many are the headwaters of our streams and rivers and our natural areas need to be full of biodiversity to have a healthy ecosystem. All of this need to be protected to combat climate change. Why are we proposing to sacrifice this for expansion? We can grow within our urban boundary, there is no need to expand out. There are many unutilized empty lands that can be built on including, brownfields, empty parking lots in the city, we can build up on top of one storey buildings, and there are so many empty buildings within the city as well. If we are going to fight climate change we cannot build on the Greenbelt.	Comment noted. No urban boundary expansion is the respondent's preference.
6.	Binbrook does not have the infrastructure to build more houses. There are people who are moving into this town and their kids do not have a school to go to locally because they are at capacity. We also have no gas station and only single lane country roads taking us into Hamilton. Greenbelt needs to remain.	Noted.

Survey 2 – Criteria for 10ha Greenbelt expansion lands (Waterdown/Binbrook)		
#	Comment:	Staff Response / Action Required
7.	Waterdown is already a bottle neck to get into and out of, minimal public transit, not well designed new urban areas, you have to drive to reach, schools, playing fields, downtown Waterdown itself, library in another location. No bike paths incorporated along the roads, downtown Water down has not been preserved, divided by Hwy #5, as no bypass except in fragments, I find that Waterdown has been all about build build build but not about community. I have not been to Binbrook so I have no idea I just hope that it has been better planned. Much better to in fill in the City of Hamilton. Plans to allow family dwellings to accommodate extra rental accommodation should be encouraged but not for them to become AirBnB type rentals. Fully address all the considerations listed above, do not reduce farm land we have seen how important in this pandemic it is to have local food supplies	<p>Comment noted. No urban boundary expansion is the respondent's preference.</p> <p>Importance of local food / security acknowledged.</p> <p><i>Action: Part 1 Evaluation Criteria and Part 2 Phasing Criteria related to the Agricultural System theme amended to include food security.</i></p>
8.	No expansion into Greenbelt! These are protected lands and must remain so. They are irreplaceable lands. It doesn't make sense to be seeking public input now on criteria when staff have already presented their preferred growth options to committee. Fulsome criteria should have been used to assess and compare options - including No Boundary Expansion option - before any recommendations went before committee/councillors. The sequence of how this is unfolding feels rushed and backwards. "Avoidance" of natural features is unacceptable. "Must not" is the wording that should be adopted.	Comment noted. No urban boundary expansion is the respondent's preference.
9.	I don't support a 10 hectare expansion of these regions.	Noted
10.	I don't support any expansion of the existing urban boundary. Council declared a climate emergency; let's act like it an preserve our farmland and green space.	Noted
11.	Both of those settlement areas should be limited to current boundaries. Both of those have sufficient area to accommodate the stated requirements.	Noted
12.	There should be no expansion or encroachment on the Greenbelt Plan Protected Countryside.	Noted
13.	I oppose any expansion of the urban boundary, for many reasons. And expansion into Greenbelt lands specifically should never be allowed, anywhere.	Comment noted. No urban boundary expansion is the respondent's preference.

Survey 2 – Criteria for 10ha Greenbelt expansion lands (Waterdown/Binbrook)		
#	Comment:	Staff Response / Action Required
	<p>An expansion would eat up farm land; make our infrastructure less efficient and more costly; require more vehicle use; make the city less climate resilient. An expansion would make Hamilton's and Canada's 2050 climate goals harder to achieve. It would make all of those nine criteria in your framework harder to achieve. We simply cannot keep spreading outward. The current provincial government apparently wants urban expansion and has set its criteria, including a 30-year (instead of 20) population target and the requirement for a market test, to force cities to "agree" to expand outward. We should refuse and set our density and intensification targets to meet a fixed boundary. Much will change in 30 years. Population projections in particular are likely to become increasingly less predictable. But once boundary expansion is in our official plan, developers and land owners will act on it. We need to set a hard "no expansion" policy and then all planning staff work should be focused on how to accommodate that density within the existing urban boundaries. Doing so will frustrate builders and buyers who want big lots with one house each; it will take real guts for cities, the provinces and the federal governments to say that's going to be limited in future. But it will also take creating attractive alternatives, discussed below, to single-family and low-density homes. The climate challenge is real and urgent. Resiliency in the face of climate change requires protection of all good farm land, with which Hamilton is blessed in abundance. Increasingly, the housing market is responding to investors' desires for rich returns, not to households' housing needs. Only the latter should concern governments and planners. This mis-focus is even distorting the economy, giving undue influence to finance at the expense of production and real services, as well as at the expense of those who would like someplace to live. Specifically on the nine-point framework, which as I said should apply to how we grow within the urban boundary, not to whether we expand, I would add a specific requirement under complete communities--walkability and bike-ability. My prime focus would be on walkability. Specifically, we should aim for "15-minute cities" and 15-minute neighbourhoods We should work to ensure that opportunities to work, shop for basics and enjoy leisure all are within a 15-minute walk of where people live.</p>	<p>Comments on the need for affordable housing, and low income housing, rental housing, are noted. The framework reflects the importance of the provision of a range of housing types including affordable housing within the Complete Communities theme.</p> <p>Comments on the market based approach are noted, but the City is required to plan in accordance with the provincial methodology.</p> <p>The comments on the 15 minute community are noted. Staff note that the goal of planning for complete communities is reflected in the framework.</p>

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	This will reduce demand for any form of fuel-using transportation and will provide a quality-of-life benefit that will be a tradeoff for the deliberate and intentional reduction in single-family housing that we need to accept. Achieving 15-minute walkability will require greater density and make it attractive. The city's analysis showed some projections with "too many" apartment units. In market terms, "too many" would tend to mean lower rents which is desirable both to help house the tens of thousands of existing Hamiltonians paying more than 30 per cent of their income for rent, but also to add a further inducement for households to accept apartment living instead of single family or even duplex or townhouse.	
14.	It is not clear that the city has exhausted the current boundaries before expanding. Is there a plan for increasing current density? What are the criteria by which you determined the next to expand the boundaries?	<p>The City has completed a Land Needs Assessment in accordance with the provincial methodology which has identified the requirement for expansion.</p> <p>No decision has been made as to whether or not expansion from Binbrook or Waterdown is required.</p>
15.	I am writing to express my strong opposition to any urban expansion into the Greenbelt. I understand that city planning staff are seeking input on an evaluation framework and planning criteria to guide two scenarios – urban expansion into rural whitebelt lands, and expansion of urban Waterdown and Binbrook into the provincially protected Greenbelt. City planning staff are asking for input on an evaluation framework and planning criteria that should have been applied in a rigorous assessment of whether we should be expanding the urban boundary at all! Instead, staff are recommending the urban expansion and the application of their evaluation framework and planning criteria to the expansion area! This is all backwards! The city is putting the cart before the horse – It is more than a bit disingenuous to be proceeding with a public consultation that assumes urban boundary expansion is going to happen when you are just about to send out a survey asking people which urban growth management scenario – including a no boundary expansion option - they support. I think it is	<p>Comment noted. A 'no urban boundary expansion' growth option will be modelled and evaluated.</p> <p>Staff note that no decision has been made as to whether or not expansion from Binbrook or Waterdown is required.</p> <p><i>Action: Addition of the "How Should Hamilton Grow?" Framework to include the No Urban Boundary Expansion option.</i></p>

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	<p>inappropriate that city planners are consulting on this framework and associated criteria now, given that public input is pending regarding what community members prefer and support where urban growth management in our city is concerned. The city is under no obligation to even consider urban expansion into protected Greenbelt lands. While the provincial Greenbelt Plan does, under very specific circumstances, allow for 10ha expansions of towns & villages into the Greenbelt, we do not need to be contemplating such expansions in Hamilton! I want to see a rigorous evaluation framework and planning criteria applied from the start – so that we are assessing the implications of urban sprawl on the climate emergency, municipal finances, our local agricultural system, natural heritage and water resources, to name a few. Finally, I am strongly opposed to any urban expansion into the Greenbelt. Thank you. Yours, Edward Reece</p>	
16.	<p>I am writing to express my strong opposition to any urban expansion into the Greenbelt. I understand that city planning staff are seeking input on an evaluation framework and planning criteria to guide two scenarios – urban expansion into rural whitebelt lands, and expansion of urban Waterdown and Binbrook into the provincially protected Greenbelt. City planning staff are asking for input on an evaluation framework and planning criteria that should have been applied in a rigorous assessment of whether we should be expanding the urban boundary at all! Instead, staff are recommending the urban expansion and the application of their evaluation framework and planning criteria to the expansion area! This is all backwards! The city is putting the cart before the horse – It is more than a bit disingenuous to be proceeding with a public consultation that assumes urban boundary expansion is going to happen when you are just about to send out a survey asking people which urban growth management scenario – including a no boundary expansion option - they support. I think it is inappropriate that city planners are consulting on this framework and associated criteria now, given that public input is pending regarding what community members prefer and support where urban growth management in our city is concerned. The city is under no obligation to even consider urban expansion</p>	<p>Comment noted. A ‘no urban boundary expansion’ growth option will be modelled and evaluated.</p> <p>Staff note that no decision has been made as to whether or not expansion from Binbrook or Waterdown is required.</p> <p><i>Action: Addition of the “How Should Hamilton Grow?” Framework to include the No Urban Boundary Expansion option.</i></p>

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17.	I feel expansion into Greenbelt lands should never happen, I thought the Greenbelt is protected lands? There needs to be an alternate plan that talks about building up our city, not out.	Noted.