

# GRIDS 2 / MCR – Stakeholder Comment Summary (May 2021)

## Evaluation Framework and Phasing Criteria

### Email/Mail Comments

#	Date Received:	Name:	Comment:	Staff Response / Action Required
1.	May 26, 2021	Scott Peck, HCA	<p>Thank you for discussing the evaluation framework and phasing criteria and answering my questions, much appreciated.</p> <p>In general terms, we are satisfied with the evaluation framework and phasing criteria as proposed. For Evaluation Criteria, we do note that Natural Hazards are considered under Climate Change. While we appreciate that this has been included, given the potential for natural hazards to pose restrictions for expansion and development, we would suggest that Natural Hazards be included as a stand alone criteria to ensure that the issues associated with natural hazards (floodplain, slope stability, meander belt and erosion allowances, karst) are given key consideration and not part of a broader topic area. We would also suggest that natural hazard considerations as part of the evaluation must also be related to natural heritage criteria as these features are often associated.</p> <p>The potential expansion of Waterdown does also raise concerns. Given there is no defined area for expansion, there are significant natural hazard and natural heritage issues associated with Borer’s Creek and its headwaters. Any proposed expansion in the Waterdown area would need to consider the restrictions associated with the known natural hazards and natural features in this area and, directed away from these features.</p> <p>Thank you for the opportunity to comment on this proposal. Please let me know if you have any questions.</p>	<p>Staff concur that natural hazards pose restrictions for expansion and development and it is appropriate to identify natural hazards as a stand-alone criteria.</p> <p>The proposed evaluation framework for Waterdown / Binbrook includes criteria related to Natural Heritage and Water Resources. Natural Hazards has not been addressed and should be added.</p> <p><i>Action: Identify Natural Hazards as a stand-alone criteria within Whitebelt Lands Phase 1 – Evaluation Framework.</i></p> <p><i>Action: Add Natural Hazards as a Theme Area in the Evaluation Criteria for Waterdown / Binbrook.</i></p>
2	May 26, 2021	Leah Smith, Conservation Halton	<p>We have reviewed the criteria for the Evaluation Framework and Phasing Criteria (Whitebelt Lands) and the draft Screening Criteria and Evaluation Tool for Waterdown and Binbrook. Waterdown is the only geographic area located within Conservation Halton’s watershed, so we have focused our review on the Waterdown and Binbrook Criteria and Evaluation Tool.</p>	<p>With regards to the Waterdown / Binbrook Phase 2 Criteria, staff note the following in response:</p> <ul style="list-style-type: none"> <li>• Staff concur that Hazard Lands, and avoidance of development</li> </ul>

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			<p>Waterdown and Binbrook Phase 2 Screening Criteria:</p> <ul style="list-style-type: none"> <li>• Recommend incorporating criteria to avoid hazardous lands, like the criteria identified for whitebelt lands. Since greenfield areas should have no new development in hazard lands, these lands become a “take out” when identified/confirmed during the Subwatershed Study/Secondary Planning process, which can then impact the developable area, proposed land uses and/or density targets.</li> <li>• Recommend the criteria addressing natural features be expanded to also address the natural heritage system more broadly, like the criteria identified for whitebelt lands.</li> <li>• Consider criteria to assess if the Natural Heritage System can be enhanced (e.g. through the potential for linkages). This could also be applied to the whitebelt criteria.</li> <li>• Support the criteria that address watershed conditions and hydrologic areas.</li> </ul> <p>Phasing Criteria</p> <ul style="list-style-type: none"> <li>• Recommend including criteria to evaluate if a subwatershed study (or other supporting technical work) has been completed. These studies often take several years to complete so ensuring the appropriate studies are in place or underway will ensure development phasing is accurate.</li> </ul> <p>Thanks for the opportunity to provide feedback.</p>	<p>within these areas, should be added as a theme area;</p> <ul style="list-style-type: none"> <li>• Staff note that the Phase 1: Screening Criteria for Waterdown / Binbrook includes the requirement that the proposed expansion area avoids the natural heritage system. Therefore, it is not necessary to add this criteria to Phase 2.</li> <li>• Staff concur that the opportunity to enhance the natural heritage system can be added to the Waterdown / Binbrook Phase 2 criteria to be consistent with the criterial identified for the Whitebelt lands.</li> </ul> <p>With regards to the comment on the Phasing criteria, staff concur with the inclusion of a criteria to evaluate if a subwatershed study has been completed.</p> <p><i>Action: Add Natural Hazards as a Theme Area in the Evaluation Criteria for Waterdown / Binbrook.</i></p> <p><i>Action: Amend Natural Heritage and Water Resources Criteria in the Evaluation Criteria for Waterdown / Binbrook as follows: Does the expansion area maintain, restore or improve the functions and features of the area including</i></p>

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				<p><i>diversity and connectivity of natural features, the long term ecological function of natural heritage systems?</i></p> <p><i>Action: Add criteria to the Part 2 Phasing Criteria for the whitebelt lands to evaluate if a subwatershed study has been completed as well as other information requirements.</i></p>
3.	May 27, 2021	Bianca Caramento (Bay Area Climate Change Council)	<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.</p> <p>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.</p> <p>Buildings and transportation 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.</p> <p>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.</p> <p>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. <b>To account for this gap, we strongly</b></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 whether or not a specific sequence will aid the City’s ability to achieve GHG emissions reductions.</p> <p><i>Action: Whitebelt Lands Part 2 Phasing Criteria related to the Climate Change theme amended to include GHG emissions analysis and included GHG emissions analysis in the How Should Hamilton Grow Framework.</i></p>

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			<p><b>recommend that staff include criteria that determine the impact development will have on the city’s carbon budget, measured by GHG projections and accounting.</b></p> <p>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>	
4	May 28, 2021	Nancy Mott (NEC)	<p>Staff of the Niagara Escarpment Commission has reviewed the draft evaluation tools contained in City of Hamilton Staff Report PED17010 for potential Whitebelt expansion lands and potential urban boundary expansions for Binbrook and Waterdown. We offer the following comments.</p> <p>As you are aware, urban boundary expansions for lands within the Niagara Escarpment Plan (NEP) Area can only be considered during a review of the NEP in accordance with Section 6.1(2.3) of the <i>Niagara Escarpment Planning and Development Act</i>. The next Plan review would begin in 2027.</p> <p><u>Whitebelt expansion criteria</u> According to the mapping provided, none of the Whitebelt lands are within the NEP Area. Therefore we have no comment on the evaluation framework for this area.</p> <p><u>Waterdown/Binbrook expansion criteria (City to reply)</u> The screening criteria include an analysis of whether the proposed urban expansion would avoid the natural heritage system. The Growth Plan NHS may not coincide with the natural heritage system in the NEP. If the proposed urban expansion involved lands in the NEP Area, the impact to the natural heritage system in the NEP 2017, based on Escarpment Natural and Protection Areas, might not be taken into consideration. The criteria should ensure that the analysis of impacted natural heritage features is broadly defined and not limited to the Growth Plan NHS. Development within Urban Areas “shall not encroach into Escarpment Natural, Protection, Rural or Mineral Resource Extraction Areas” according to NEP policy in Part 1.7.5.4. This should be a screening criterion.</p>	<p>Regarding the Phase One Screening Criteria for Waterdown / Binbrook, Staff concur that the natural heritage system is to be broadly defined and include consideration of the natural heritage system in all provincial plans (Greenbelt, Growth Plan and Niagara Escarpment Plan). It is not necessary to revise the criteria to explicitly state this interpretation as the natural heritage system broadly includes all systems.</p> <p>Staff concur that with regards to an expansion request for lands in the Waterdown area, the consideration of the impact on scenic resources of the Niagara Escarpment must be considered. This consideration could be included in the complete communities theme.</p> <p>Staff concur that consideration of cultural heritage resources should be added to the Phase 2 Evaluation Criteria for Waterdown / Binbrook.</p>

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			<p>Further, in consideration of the NEP, Part 1.7.5.1, Development Objectives for Urban Areas, consideration should be given to whether the proposed urban area would impact the scenic resources of the Niagara Escarpment.</p> <p>Missing from the screening criteria is any consideration of cultural heritage resources (built form, cultural heritage landscapes and archaeological resources) and the impact of possible urban expansion of lands that may be of interest to First Nation and Métis communities, although it is mentioned in the staff report. This is a consideration of the NEP in Part 1.7.5.9.d and should be added to the screening criteria.</p>	<p>Consultation with indigenous communities will be undertaken.</p> <p><i>Action: Add criteria under the Complete Communities theme in the Waterdown / Binbrook evaluation tool to address impact on scenic resources of the Niagara Escarpment, to be applicable only to certain lands in the Waterdown area.</i></p> <p><i>Action: Add Cultural Heritage as an evaluation criteria to Phase 2 of the Waterdown / Binbrook evaluation tool.</i></p>
5	May 28, 2021	Keanin Loomis (Hamilton Chamber of Commerce)	<p>Thank you to the City of Hamilton Planning and Economic Development Department for your ongoing work on the GRIDS 2 / MCR process. We appreciate the opportunity to provide comments on the Draft Evaluation and Phasing Criteria for the 'Whitebelt' expansion lands, and the 10ha expansions to Binbrook and/or Waterdown.</p> <p>As President &amp; CEO of the Hamilton Chamber of Commerce, Hamilton's oldest institution at 175 years old, I have the privilege of speaking for our 1,000+ members that employ over 75,000 people in our community. The Chamber has consistently supported and promoted long term municipal land use planning in the city. Having a clear sense of purpose and direction is critically important for a community to prosper and grow in an orderly and predictable fashion.</p> <p>The Chamber has taken the position that the long-term investment opportunities for new growth within the City are properly defined by eligible lands inside the Greenbelt Plan.</p> <p>This plan provides certainty and clear expectations for both developers and the farming community that these lands are intended to remain as agricultural lands for a</p>	Comments are noted.

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			<p>period well beyond 20-30 years. The Chamber has always supported the Greenbelt Plan and believes it is an effective defining limit of urban growth.</p> <p>By undertaking long term planning, proper staging of development can take place within an overall predictable, understandable and comprehensive structure that is defined more by reasonable expectations than artificial, pre-set timing parameters. This will allow for a stable and controlled unfolding of the plan that ensures planning and infrastructure investment is properly coordinated.</p> <p>Carefully designed staging mechanisms must be put in place to ensure orderly growth takes place and proper planning principles are followed, including the protection of significant environmental features, proper plans for roads, transit, community facilities, open spaces and employment needs. In this fashion, each stage of development will need to meet intensification objectives and can undergo a thorough secondary planning process to design complete communities within the broader context of the entire city.</p> <p>A long-range planning strategy can be properly phased to allow the City to meet intensification targets within the existing built-up area, and to ensure that future development within the Whitebelt takes place in an orderly and pre-determined fashion. By undertaking proper land use planning, greater effort can be spent on designing complete communities rather than time and energy being spent on determining who is next. We can also then ensure that decisions about our future are not made by an outside arbitrator but are truly a 'made in Hamilton' solution.</p> <p>In light of this, the Chamber endorses the Evaluation and Phasing Criteria for the 'Whitebelt' expansion lands, and the 10ha expansions to Binbrook and/or Waterdown. Particularly, the Chamber commends the city for its robust evaluation approach for assessing Candidate Expansion Areas that is organized around nine major themes.</p> <p>This evaluation approach includes considerations on climate change, complete communities, transportation and natural resources, and the interplay of each in considering where and when growth will occur.</p>	

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			<p>This is a progressive approach to municipal land use planning that takes into account the multitude of stakeholder considerations surrounding decisions on how our community will grow over the next 30 years and beyond. The Draft Evaluation and Phasing Criteria presented will ensure that Hamilton’s future neighbourhoods are designed according to modern land-use planning principles that will inform sustainable and prudential development.</p> <p>The Chamber strongly supports the establishment of a long-term plan for urban growth in the City of Hamilton that will produce a clear, staged approach to the future development of our community.</p> <p>Thank you for this opportunity to provide comments and we look forward to future consultations.</p>	
6	May 30, 2021	Linda Lukasic (Environment Hamilton)	<p>&lt;&lt;Correspondence regarding Whitebelt Lands Evaluation Framework and Phasing Criteria&gt;&gt;</p> <p>Comments from Lynda Lukasic on behalf of Environment Hamilton: At the most fundamental level, we do not support the city’s decision to move forward with a consultation on criteria designed to evaluate urban expansion areas prior to the conclusion of the public consultation process designed to gather input from residents regarding their perspectives on whether Hamilton’s urban area should be expanded at all. Whether intended or not, this approach comes across as being very disingenuous. City planning staff explain, in the explanations provided with this on-line survey that: ‘(T)o determine if a certain area of the Whitebelt is feasible for urban boundary expansion, the area will be evaluated based on how it preforms (sic) across all of the theme areas. The most appropriate areas will advance to Part 2: Phasing Criteria.’ We believe that this approach is fundamentally flawed. The city should be evaluating performance across all theme areas at the decision-making stage that includes consideration of a ‘no boundary expansion’ option. This is the most reasonable approach to take given the nature of the themes included in the performance evaluation process. Other jurisdictions have undertaken assessments that do this - that consider the different urban growth management scenarios by subjecting these scenarios to a performance evaluation. This must be done for Hamilton and the evaluation should be centered around the climate emergency. The</p>	<p>Staff acknowledge the comment on the City’s process and the inclusion of the ‘no urban boundary expansion’ option as part of the evaluation. Staff note that the ‘no urban boundary expansion’ option is being modelled and considered and will be evaluated as part of the growth options consideration.</p> <p>Staff are working with Sustainability Solutions Group (SSG) to evaluate the impacts of the phasing of the white belt areas on GHG emissions, including describing the energy and GHG profiles of the areas when built out and whether or not a specific sequence will aid the City’s ability to achieve GHG emissions reductions.</p>

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			<p>is essential that these features be protected in any expansion areas. But we know that expansion means more hard surfaces and the associated impacts on natural heritage and water systems. The city must prioritize LID in these areas, if the choice is made to continue the outward march into rural Hamilton. We also wonder - why are there no 'when' questions in the framework when it comes to this category?</p> <p>Complete Communities - We continue to be concerned that most of Hamilton's existing suburban area does not contain complete communities. How will this shortcoming be addressed and what hope do we have that any expansion areas will be able to effectively function as complete communities if there is a span of the city in between the more urban area and expansion areas that is significantly lacking where 'completeness' is concerned? Ideally, you would want to expand complete communities on the urban/rural edge where they exist. But they don't exist on the urban/rural edge in Hamilton.</p> <p>Agricultural System - We must avoid urban expansion into prime agricultural land. This means that the majority of the existing whitebelt land should be left as rural land. Remaining land likely contains natural heritage features and water resources that need protection too. We do not support any decision to expand urban Hamilton into prime agricultural land - period.</p> <p>Natural Resources - Do any of our whitebelt lands include petrochemical resources? Even if they do, given the climate emergency, are we not better to leave these resources in the ground? Consideration also needs to be given to the reality that aggregate resources often sit below prime agricultural land. Ontario needs to do a better job on the aggregate policy side of things - including updated rules that allow for more aggregate recycling.</p> <p>Cultural Heritage - Shouldn't there be some reference here to Indigenous culture and history?</p> <p>&lt;&lt;Correspondence regarding 10ha expansion into Greenbelt (Waterdown / Binbrook&gt;&gt;</p> <p>Comments from Lynda Lukasik on behalf of Environment Hamilton With respect to the 10 ha expansions to Binbrook and Waterdown, we are saddened and dismayed that the public is even being consulted on these areas as potential expansion options. We are not aware of any pressing agricultural need that would even warrant moving in the direction of utilizing the 10ha expansion option set out in the Greenbelt plan. Further, Waterdown is a predominantly suburban area of Hamilton, and more recent development in Binbrook is also best described as suburban leapfrog</p>	<p>amendment to the framework will make this consideration explicit.</p> <p>Staff concur with the comment on the protection of Natural Heritage and Water Resources. Further, LID considerations are included in the climate change theme.</p> <p>Staff acknowledge the comment re Complete Communities and the status of the City's existing neighbourhoods as 'complete'. Staff note that many initiatives have already been undertaken, notable permissive and flexible zoning regulations, to encourage mixed uses and housing options within the City's existing neighbourhoods.</p> <p>The comments re the Agricultural System are noted. The criteria as drafted reflect the criteria of the Provincial Growth Plan to avoid expansion into prime agricultural land, and where avoidance is not possible, to evaluate alternative and minimize / mitigate impacts.</p> <p>Staff concur with the importance and recognition of indigenous culture and note that consultation with indigenous communities is an important component of GRIDS 2 /</p>

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			development. Why would the city want to even contemplate expansion into the Greenbelt for these areas? Is there something we are missing here?	<p>MCR and any future planning studies for urban growth areas.</p> <p>Regarding the comments on the Waterdown / Binbrook evaluation tool, 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.</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: Part 2 Phasing Criteria related to the Climate Change theme amended to include GHG emissions analysis. Included GHG emissions modelling in the evaluation of the ‘no urban boundary expansion option’.</i></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> <p><i>Action: identified the population density of future growth area as a measurement factor in the ability of a candidate area to support transit.</i></p>

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7	May 31	Mike Collins – Williams (WE HBA)	<p>The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Halton Region. The WE HBA represents nearly 300 member companies made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. The residential construction industry employed over 27,300 people, paying \$1.7 billion in wages, and contributed over \$3.0 billion in investment value within the Hamilton Census Metropolitan Area in 2019.</p> <p>Our industry has faced significant challenges affecting our ability to build the necessary supply of new housing to meet growing demand for a variety of housing options in Hamilton. Today, during a global pandemic, this has become even more challenging with housing of all types and tenures becoming more expensive, making home ownership less attainable. The WE HBA strongly believes that a healthy housing system only exists when all levels of government work together with the private sector to ensure the right mix of housing choices and supply that provide all residents' shelter needs through their full life cycle. The current method of planning for growth in the Greater Golden Horseshoe has not kept pace with the growing demand for housing our region has seen in the last 10 years. This can be seen in the following data published by Michael Moffatt with the Smart Prosperity institute.</p> <p>Within this context, the WE HBA appreciates the opportunity to provide feedback on the MCR Phasing Criteria, as part of the GRIDS 2 and MCR process. We recognize Hamilton—as required by the Schedule #3 Growth Plan population forecasts and the Land Needs Assessment methodology—must rapidly advance the creation of new housing units both within the City through a more permissive zoning framework and through an urban boundary expansion.</p> <p>The WE HBA is offering our feedback on the phasing criteria that has been put forward for consultation by the City of Hamilton. Furthermore, the WE HBA is providing some commentary regarding our significant concerns about the ramifications of planning for a potential intensification target of 81% to 2051, which will not be achievable. It will have significant public policy implications on housing affordability,</p>	<p>Staff provide the following response to the comments, provided by theme area:</p> <p>Climate Change: the comments are acknowledged. In particular, the comments on the recognition of the length of time between urban boundary expansion and development within the expansion areas is accurate, and the potential for new communities to develop as net zero as per future Ontario Building Code (OBC) changes is acknowledged.</p> <p>Staff acknowledge the comment re climate change related concerns and the National Code and OBC. Recommendation will be added to final report that the most up-to-date standards must be considered at the time of development.</p> <p>Municipal Finance: staff acknowledge the comments and note that the Fiscal Impact Assessment being completed by Watson &amp; Associates will examine the financial implications of growth options, including options for how to pay for growth.</p>

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			<p>housing suitability for different household formations and for the economic competitiveness of the City of Hamilton in terms of attracting and retaining talent for diverse industries. Simply put, the housing policy we create today will have direct implications on our long-term economic development and the location/expansion decisions for private capital through both the allocation of new development and the decisions businesses make to operate in Hamilton.</p> <p>Evaluation Approach for Urban Expansion</p> <p>The WE HBA would like to reiterate our appreciation that professional planning staff at the City of Hamilton <b>recognize an urban boundary expansion is in the public interest and will be required to accommodate population growth to the year 2051.</b> However, WE HBA is significantly concerned that the City is now consulting the public on an option for growth that staff has identified as not feasible and will likely not be accepted by the Province given such an option does not conform with provincial policy. Despite this, WE HBA would like to provide the following comments on the phasing criteria put forward for consultation.</p> <p><i>Climate Change</i></p> <p>WE HBA appreciates the significant impacts climate change will have on our community and recognizes that action to address climate mitigation and adaptation is necessary. WE HBA encourages the city to adopt a wholistic approach to climate change mitigation, recognizing that meaningful climate action in our community does not involve displacing our climate impacts to neighbouring communities. Through not permitting an urban boundary expansion, this would effectively limit the available land for residential and employment development in our community, displacing growth and climate impacts to other neighbouring communities.</p> <p>Through the climate change lens provided in the expansion criteria, WE HBA notes that by allowing new expansion areas to proceed in a housing form that is desired by the market, residents will be able to live closer to where they work, thereby reducing transportation GHG's for those who would otherwise commute long distances. As a result, consideration for reducing the number of people who "drive</p>	<p>Transportation Systems: comments are acknowledged. Staff note that reduced parking minimums are beyond the scope of the evaluation and phasing criteria.</p> <p>Agricultural System: comments are acknowledged. The Agricultural System criteria in the draft framework have been drafted in accordance with provincial policy direction.</p> <p>Consultation, Community Impacts and Education – the comments are acknowledged With particular regard to the comments on Community Impacts, staff note that the forthcoming Official Plan Review and new residential Zoning By-law offer opportunities to further support and facilitate intensification through policy and zoning as described in the letter.</p>

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			<p>until they qualify” for a mortgage should be considered when evaluating the climate impacts of urban expansion in Hamilton.</p> <p>Furthermore, as part of these climate impacts, it is also important to understand the significant environmental and social costs of driving this type of growth and development to other communities in smaller towns and cities beyond the Greenbelt, into the “outer ring” of the Greater Golden Horseshoe, and even further afield. Given these towns and cities often do not have the same infrastructure capacity to accommodate growth as communities do within the Greater Golden Horseshoe, we should ensure that Hamilton is maximizing the amount of growth we plan to accommodate.</p> <p>Any new communities built as part of an urban boundary expansion would be the most energy efficient communities in the City of Hamilton. Due to long planning processes and timelines, when the urban boundary expansion occurs, it will likely be five to ten years before the first building permits are being pulled for new homes in the boundary expansion area. Such a timeframe would put these new homes one to two National Building Code cycle reviews from now. Currently the Ontario Building Code and National Code have some of the most stringent energy efficient requirements in North America and the code has advanced significantly over the past two code cycles. Prior to 2010, energy efficiency was not a code priority, but significant changes to the building code are being made to support net-zero development.</p> <p>The homes built under the Ontario Building Code today are vastly more efficient than a decade ago, let alone the Hamilton suburbs built in the 70s, 80s and 90s. Looking forward – the National Code is targeting Net Zero Ready homes to be the minimum standard as we enter the 2030s. Despite climate related concerns being levied by those whom politically oppose a well planned urban expansion, the reality is that any new communities built as part of an urban expansion will be the most energy efficient in Hamilton. They may in fact be carbon neutral (net zero) housing. The WE HBA strongly recommends that any evaluation framework notes that the National Code and OBC as they currently exist in 2021, will not be the standards by which permits will be evaluated against in 2030, and recognize that new communities built a decade from now will be two code cycles into the future.</p>	

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			<p><i>Municipal Finance</i></p> <p>To the WE HBA, municipal finance is a key consideration in determining the need for an urban boundary expansion. WE HBA notes that popular discourse surrounding the GRIDS process assumes that an urban boundary freeze is by default the most financially sustainable outcome of the GRIDS/MCR process. However, this assumption ignores the significant infrastructure upgrades required within the existing built boundary to accommodate growth. The WE HBA notes that while the City of Hamilton’s downtown is prime for intensification (which we strongly support), the lower city is also home to aging infrastructure that does not meet modern environmental standards. In particular, there are areas of the city that have near century old, combined sewers that require modernization. The sheer volume of new intensification units in the downtown core will require newly built and vastly expanded water capacity. The WE HBA also notes that unlike greenfield development in which 100% of the growth can be allocated to “new residents” and thus paid for through development charges, that all infrastructure upgrades within existing communities must (as required by the Development Charges Act) allocate a percentage of the costs of such infrastructure costs as a “benefit to existing” residents. Thus a potentially a significant portion of infrastructure upgrades for aging downtown infrastructure will have to be paid for from the property tax base. The WE HBA supports the concept of growth paying for growth – our members are proud to support and fund infrastructure required in our communities, but that does not mean that development charges can pay for entirely for replacing and upgrading aging infrastructure that will, in part, service existing residents. The allocation of growth-related financing through development charges and financing for infrastructure upgrades from existing ratepayers through property taxes will require significant studies that the WE HBA intends to carefully review.</p> <p>Additionally, WE HBA notes the significant financial risk of planning for growth and intensification at a rate that may not occur. What do we mean by this? If the City is planning for a high rate of intensification, such as through the Ambitious Density Scenario, it will have to front end finance infrastructure improvements in areas of the city that may not have a strong enough market for the anticipated level of density, to attract the necessary volume of new housing to meet the Schedule #3 targets. However, if that rate of intensification is unrealistic, the development charges revenue for which those infrastructure improvements were financed on may</p>	

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			<p>never materialize. This could leave Hamilton taxpayers on the hook for hundreds of millions of dollars through a misguided attempt to manipulate the market.</p> <p>Hamilton is already seeing the effects of people leaving our City in favour of smaller cities and towns so they can afford lower density ground-oriented housing. This means our City's tax base is not growing at the rate it could be. The City must also recognize that market distortions where demand for ground-oriented housing continues to exceed supply will continue to cause significant increases in the cost of ground-oriented housing and the displacement of existing residents. We must plan our City in a way that does not continue this trend of economic displacement. Allowing for the small urban boundary expansion in a planned way is one option to help the municipality offset the risks associated with planning for growth as there is significant demand for ground oriented residential housing opportunities.</p> <p><i>Transportation Systems</i></p> <p>In terms of transportation systems, WE HBA supports expansion criteria that considers future infrastructure planning based on planned transportation infrastructure. In addition to this, WE HBA recommends the City implement immediate reductions in parking minimums which will help reduce car dependency throughout the city, consistent with the Climate Change Action Plan.</p> <p><i>Agricultural System</i></p> <p>WE HBA appreciates that the Greenbelt Plan was brought into effect to mitigate the impacts of growth on the Agricultural System on the scale of the Greater Golden Horseshoe, and more broadly the Province of Ontario. WE HBA maintains that since the inception of the Greenbelt Plan and the Growth Plan, the Whitebelt lands have been for a buffer between community greenfield areas and the greenbelt for future urban expansion, provided the municipality meets the foundational considerations. The City of Hamilton is forecast by 2051 to grow by 326,000 people, while continuing to protect 83,674 hectares (836 km<sup>2</sup>) of land designated in the City boundaries within the existing provincial <i>Greenbelt</i>. Any consideration for an urban boundary expansion is a fraction of this permanently protected Greenbelt. Additionally, impacts to farmland outside of both the Hamilton boundary and the Greater Golden Horseshoe created through leapfrog development should be a</p>	

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			<p>consideration given rural towns not bounded by the greenbelt are experiencing significant growth pressures.</p> <p>WE HBA notes that the intention of the Greenbelt plan is to create a permanent reserve of productive farmland province wide, and so urban expansion into agricultural lands outside of the Greenbelt in Hamilton cannot be viewed in isolation. WE HBA reiterates the draft phasing criteria emphasizes that the provincial direction as set out in the Growth Plan policies pertaining to urban expansion, is to avoid prime agricultural lands where possible and to minimize and mitigate the impact on the agricultural system where prime agricultural lands cannot be avoided. Through the GRIDS 2 / MCR process, professional planning staff have identified that these impacts to agricultural lands cannot be avoided, and as such a boundary expansion into the agricultural system is necessary and must take precedent.</p> <p>Consultation, Community Impacts, and Education</p> <p><i>Consultation</i></p> <p>WE HBA has concerns that the public consultation being done on the GRIDS 2/MCR process has been monopolized by special interest groups, some of which are not based in Hamilton with the intention of disrupting the orderly development of new housing in accordance with the policies of the Growth Plan and the Provincial Policy Statement. In fact, WE HBA would be so bold as to state some of these groups do not advocate for a balanced approach and are motivated to stop growth planning altogether. The City should be aware of this when creating policy, recognizing that these interests do not represent the broader public interest, especially amidst the growing housing crisis. While there are many factors that contribute to housing prices, the effects of supply and demand in one of the fastest growing regions in North America cannot be understated. The rapid population growth Hamilton has experienced has created a shortage of family housing, which needs to be addressed in a thoughtful, balanced and rationale manner.</p> <p>Furthermore, WE HBA notes that the COVID-19 pandemic has emphasized the importance of a home coupled with access to a yard or greenspace. While downtown living in higher density communities has been the focus of our planning</p>	

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			<p>framework, that has resulted in a clear divergence in the types of housing we are building versus the types of housing the market and the public is demanding. This is having a direct impact on housing affordability and is contributing to growth patterns that were never contemplated by the Growth Plan as more people drive out of the Greater Golden Horseshoe to communities that never planned to grow like they are today to access housing that meets their family needs. It is expected that this trend has been accelerated by the COVID-19 Pandemic and will likely continue as post pandemic immigration ramps up, in combination with a lack of affordable housing options for families in the GTA and Hamilton. The WE HBA strongly recommends that the City of Hamilton contribute towards solving the housing crisis rather than contributing to it. Consultation on the GRIDS 2/MCR phasing should maintain a primary focus on bringing land forward for development in an environmentally, socially, and economically sustainable way and not ignore the significant housing crisis our City is facing. The only way out of this crisis is to build more housing to catch up with our growing population.</p> <p><i>Community Impacts</i>  WE HBA notes that there are significant community impacts associated with intensification projects that cause significant delays for our membership. With the continued drive to intensify our communities within the existing urban boundary, the City must do significant work to educate residents on the benefits of growth and intensification in our community. The City must also invest in transportation and urban amenities for residents to continue their efforts to shift preferences towards a higher density forms of living in both the urban area and new greenfield development. Additionally, existing neighbourhoods will need to shoulder a significant amount of growth, through new housing types in their communities. As such, with the upcoming Official Plan update emerging from the GRIDS2/MCR process, policies that emphasize the stability of existing neighbourhoods will need to be removed. This must be coupled with the introduction of updated residential zoning that removes parking requirements city-wide and enables higher density forms of housing to be permitted as of right. The impacts and rationale for these changes will need to be communicated broadly with Hamilton residents.</p> <p><i>Education</i></p>	

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			<p>Emerging and recovering from the pandemic, Hamilton needs to address the housing crisis in our community to begin to build back better for future generations. Without addressing and educating residents on the need to address this crisis, Hamilton runs the risk of continuing to exacerbate income inequality, further contributing to problems of social and civic unrest. To begin with, WE HBA recommends that the City enable the planning and construction of housing that meets public demand and rapidly advance all opportunities for new housing units. This can help mitigate the dramatic price increases we have seen. Finally, opposition to all forms of residential development in our community continues to delay much needed housing supply. Providing education to all residents that the addition of new housing supply to our community is a crucial part of Hamilton's pandemic recovery will be of utmost importance.</p> <p>Conclusion</p> <p>The COVID-19 Pandemic has further emphasized the importance of having a safe, adequate, and affordable home to Hamiltonians. Through restricting housing supply and not building new homes within the range of what the market demands we have created significant price distortions for ground-related units. Additionally, opposition to the construction of higher density forms of development has made many of these projects significantly more difficult to construct. The result is we have not been building enough housing. There has been renewed interest and funding for mitigating climate impacts, and the biggest threat to Canada not meeting our climate targets remains a shortage of skilled labour and a lack of adequate housing supply.</p> <p>The WE HBA believes strongly that an urban boundary expansion is necessary and is in the public interest given the significant housing supply shortage our City and economic region is facing. Without addressing this, our City will continue to see significant displacement of our residents. WE HBA believes that by working together with the right public policy framework, our members are well positioned to help contribute to the COVID-19 economic recovery through the provision of both housing and local employment opportunities.</p>	