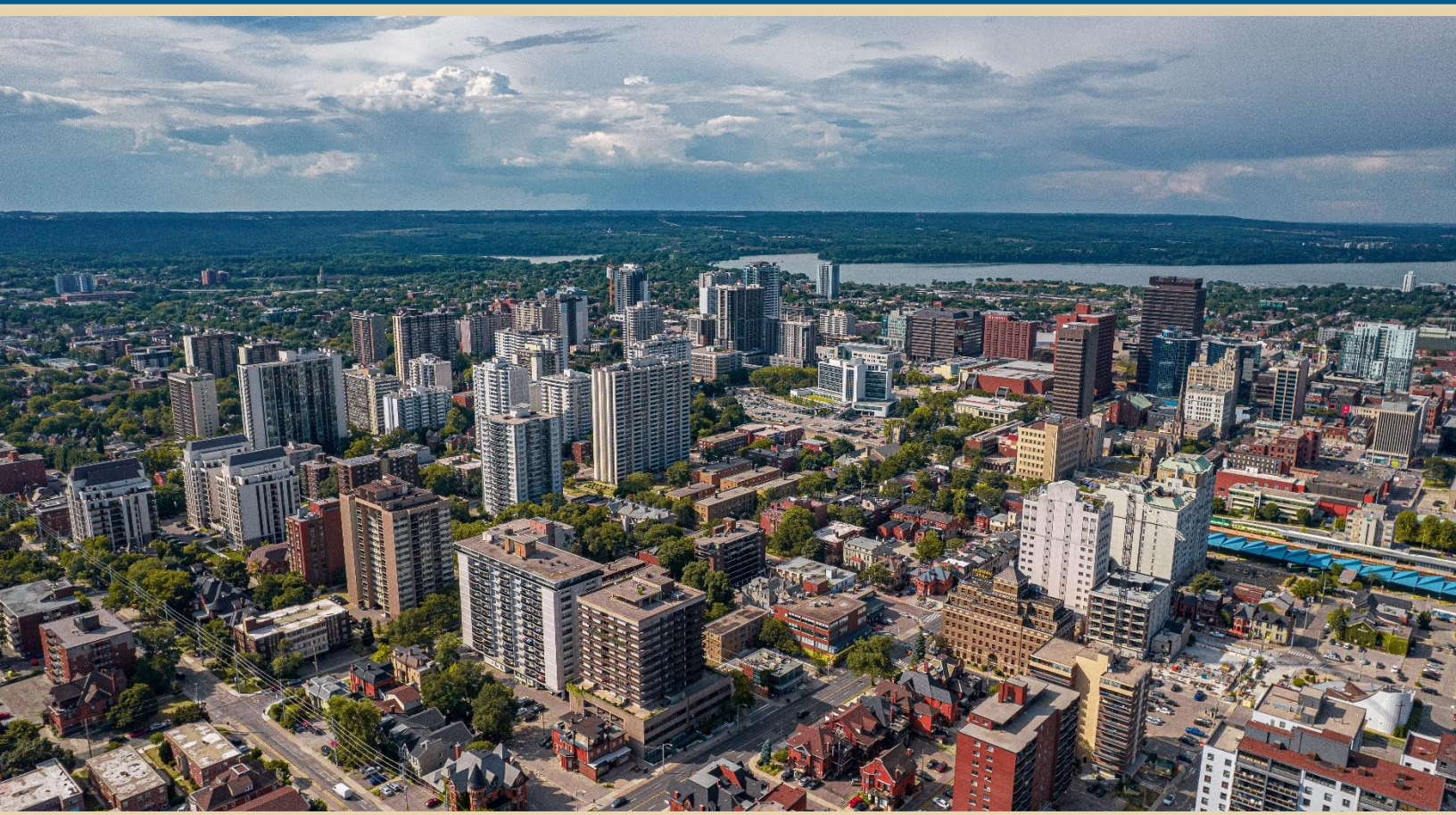


City of Hamilton Proposed Framework for Processing and Evaluating Urban Boundary Expansion

What We Heard Report

January 2025



Acknowledgements

This report reflects the valuable time, effort, and insights shared by hundreds of Hamiltonians during the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications public engagement process. Participants offered a wide range of perspectives, providing valuable insights that will be instrumental in shaping the final Framework for Processing and Evaluating Urban Boundary Expansion Applications.

The City of Hamilton sincerely thanks everyone who contributed by participating in open houses, public meetings, online forums, and written submissions. Your feedback and expertise have provided essential guidance as we work to address the challenges and opportunities of managing Hamilton's growth in a way that reflects the needs and values of the community.

How to Read This Report

This report provides a summary of the key themes and insights shared by participants during the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications public engagement process. It highlights areas of alignment while acknowledging the diversity of perspectives shared. The report is not intended to serve as a verbatim record of discussions, prioritize any viewpoint, or diminish the importance of perspectives that may not be fully detailed here.

It is also important to note that this document does not evaluate the accuracy or validity of the feedback provided during the engagement process, nor does it imply the City of Hamilton's endorsement of any specific perspective. For questions about this report, please email urbanboundary@hamilton.ca.

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Acronyms, Abbreviations, and Definitions

Acronym or Abbreviation	Definition
Bill 185	<i>Cutting Red Tape to Build More Homes Act, 2024</i>
City	City of Hamilton
Draft Framework	Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications
FCM	Federation of Canadian Municipalities
GHG	Greenhouse gases
Greenbelt	Protected Countryside and Niagara Escarpment
GRIDS 2	Growth Related Integrated Development Strategy
IDEA	Inclusion, Diversity, Equity, and Accessibility
OLT	Ontario Land Tribunal

Executive Summary

The City of Hamilton initiated a public engagement process to gather community feedback on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications (Draft Framework). This report summarizes the engagement activities undertaken, the feedback received from the community, and the next steps in the process.

What we did: The City of Hamilton held a variety of engagement activities to solicit feedback from the community on the Draft Framework. These activities included in-person open houses, a virtual open house, meetings with advisory committees, direct mailouts to potentially affected landowners, a dedicated project email address, and an online engagement hub hosted on the Engage Hamilton platform.

Who we talked to: The City engaged a variety of internal and external interested persons, including residents, community partners, and City Council members. The City also sought the input of a variety of external agencies and organizations, including utilities (e.g. Bell Canada), conservation authorities, school boards, and community groups. Engagement with Indigenous communities (First Nations, Métis, and Inuit) included providing information to potentially affected Indigenous communities and meeting with staff from Six Nations Elected Council and Mississaugas of the Credit First Nation.

What we heard: There was broad support for a transparent and robust process for evaluating urban boundary expansion applications, with an emphasis on the need to uphold the City's commitment to a firm urban boundary. Participants also highlighted the importance of prioritizing environmental protection, responsible development, and infrastructure considerations. Some participants expressed concerns that the Draft Framework could hinder growth opportunities or add unnecessary barriers to development.

What's next: The City will consider the feedback received through the engagement process and refine the Draft Framework accordingly. An updated Draft Framework will be posted on Engage Hamilton, with a target for incorporating the Framework into Official Plan Policy in Q1 2025.

1.0 Introduction

1.1 Responding to Provincial Policy Changes

How growth is managed in Ontario cities is changing. The provincial government, which sets the planning rules for Ontario municipalities, has recently made changes to those rules, impacting how cities can plan at the local level.

Previously, Ontario had strict regulations for how cities could expand their urban boundaries – the line that separates urban areas from farmland and countryside. These regulations helped manage growth responsibly by protecting green spaces and farmland while focusing development within existing infrastructure. However, under new legislation, including Bill 185, the *Cutting Red Tape to Build More Homes Act, 2024*, and the new *Provincial Planning Statement (PPS)*, the Province of Ontario has introduced new rules that grant developers more freedom to propose expansions of municipal urban areas.

The City of Hamilton has a no urban boundary expansion policy. But, because of provincial planning policy changes, some areas outside of Hamilton’s urban boundary can now be subject to urban boundary expansion applications. These areas, referred to as the “White Belt”, include land outside the established urban boundary and outside the Greenbelt (Protected Countryside and Niagara Escarpment), encompassing approximately 4,320 hectares.

Despite the provincial planning policy changes, the City of Hamilton remains committed to its urban boundary plan, which was developed through extensive community consultation. This means prioritizing growth within the existing urban area, focusing on intensification and making the best use of existing infrastructure and services.

1.2 The Draft Framework

In response to the new provincial rules and in anticipation of new applications to expand the urban boundary, the City of Hamilton has developed the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications (Draft Framework). The Draft Framework aims to provide a transparent and rigorous process for reviewing any proposed urban boundary expansions. The goal is to comprehensively assess all proposals against the City’s priorities by:

- **Establishing clear submission requirements** by outlining the required technical plans and studies that must accompany any urban boundary expansion application.
- **Prioritizing key considerations that matter to Hamilton** by establishing a set of considerations to guide the City’s rigorous review process, addressing issues such as impacts on farmland, infrastructure capacity and costs, and financial viability.
- **Outlining a clear process** for submission, review, and public and Indigenous engagement for any urban boundary expansion application, going beyond the minimum requirements of the Planning Act.

To support a comprehensive and transparent review process, the Draft Framework is structured into three parts: defining submission requirements, outlining key assessment criteria, and detailing a clear application review process that supports community involvement. These components collectively establish a clear and systematic approach to evaluating applications under the new provincial rules.

Part A: Establish Submission Requirements

The Draft Framework outlines the specific plans and studies that developers must submit as part of any urban boundary expansion application. These include both existing requirements found in the City’s Official Plans, such as a Subwatershed Impact Study and an Energy and Climate Change Assessment Report, and new requirements specifically designed for urban boundary expansion applications, like a Housing Needs Assessment and an Emergency Services Assessment.

Part B: Prioritize Key Considerations

The Draft Framework also establishes a set of considerations that the City will use to assess any proposed urban boundary expansion. These considerations go beyond the requirements outlined in the Provincial Planning Statement, reflecting the City’s commitment to a more comprehensive and rigorous review process.

Part C: Outline a Clear Process for Submission, Review, and Public Engagement

Finally, the Draft Framework sets out a detailed process for Indigenous (First Nations, Métis, and Inuit) community consultation and public engagement throughout the review of any urban boundary expansion application. This process includes several steps that go beyond the minimum requirements of the *Planning Act*.

2.0 The Engagement Process

The City of Hamilton firmly believes in the value of public input in shaping a thriving and sustainable future for the community. Council directed staff to prepare both a public engagement plan and a plan for engaging Indigenous communities in contributing to the Draft Framework (see [Report Number PED24109a](#) and Appendix A of this report). The engagement process was designed to inform the community about the role of the provincial government in planning and to highlight how recent shifts in provincial planning directions require changes in how land use is managed at the local level. Using the Consult Level from Hamilton's Public Engagement Policy, community members, interested parties, review agencies, and Indigenous community rightsholders were invited to share their feedback on the Draft Framework.

The City of Hamilton shared information and invited community input through various methods from November 5 to December 15, 2024.

2.1 Goals and Objectives of Engagement

The goals and objectives of the engagement activities, as specified in the Urban Boundary Expansion Framework - Public Engagement Plan (Appendix A) are summarized below.

Goal #1: Inform the community about recent provincial changes that impact Hamilton.

Specific Objectives:

- Clearly outline recent provincial changes that impact planning decisions in Hamilton.
- Clearly outline decision making powers/authority at the municipal and provincial levels.

Goal #2: Consult with the community on specific aspects of the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.

Specific Objectives:

- Clearly outline what the Draft Framework is, how it will be used and why it is important.

- Seek input from the community on the three main aspects in the Draft Framework, gathering feedback on:
 - What information or additional studies should be required as part of the urban boundary expansion applications;
 - How and when the community wants to be notified when an application for urban boundary expansion is made; and
 - How and when the community wants to provide their input on urban boundary expansion applications once received.

2.2 Communications and Engagement Techniques

Communications and engagement techniques were selected to meet the goals and objectives of the process while reducing barriers to community participation by incorporating the principles of IDEA (Inclusion, Diversity, Equity, and Accessibility). Information and engagement materials were designed using plain language; project details were communicated through a variety of mediums; public meetings were accessible, held in different geographic locations, and included family-friendly activities; and community members were offered numerous opportunities to participate online.

2.2.1 Communications

Social Media

The City of Hamilton shared invitations to participate in the Draft Framework engagement across its social media channels. **A total of 8 social media posts were published between November and December 2024, resulting in 8,926 impressions and 44 engagements.** An example of a social media post is included in Appendix B.

Newspaper Advertisements

Two paid newspaper advertisements in the Hamilton Spectator were taken out on **November 12th and 19th, 2024** to advertise the information open house events. Project Information Sheet (Appendix B).

Project Information Sheet

A project information sheet (Appendix C) was created to outline the provincial policy changes, their impact on Hamilton, and how people could provide input. This document was distributed online, mailed to landowners in the areas in and around the White Belt, and made available at in-person open house events.

2.0 The Engagement Process

Mailers

On August 2, 2024, **6,365 letters** were mailed to all landowners within and near the White Belt lands, informing them of the provincial changes. The project information sheet was included within the mailer to provide detailed information.

Emails

The City of Hamilton promoted and monitored a dedicated project email (urbanboundary@hamilton.ca), which received **three emails from the public**. Project information and an invitation to participate was also shared with over **2,200 subscribers** to the Our Future Hamilton email distribution list.

Phone Calls

The City of Hamilton provided a phone number for interested persons to call with questions about the Provincial policy changes or the Draft Framework. The project team **received ten phone calls**.

2.2.2 Correspondence with External Agencies, Community Groups, and Other Interested Parties

Formal requests for comments were sent to numerous external review and approval agencies as well as community groups, nongovernmental organizations, and interested parties (see Appendix D for the letter, full circulation list, and the responses received). Responses were received from:

External Agencies:

- Alectra
- Bell Canada
- Enbridge
- Grand River Conservation Authority
- Hamilton Conservation Authority
- Hamilton International Airport
- Hamilton-Wentworth Catholic District School Board
- Hamilton-Wentworth District School Board
- Niagara Escarpment Commission
- TransCanada Pipelines Limited

Community and Stakeholder Groups:

- Clean Air Partnership
- Hamilton Naturalists' Club
- West End Home Builders' Association

2.2.3 Project Information Materials**Infographics**

Three detailed infographics were created (Appendix E) and shared online and at in-person events to explain various aspects of the project:

1. Timeline of growth management policy changes and their impacts on Hamilton.
2. Components of the Draft Framework for Processing and Evaluating Urban Boundary Applications.
3. Responsibilities of the province and the City for urban boundary expansion applications.

Video

A 4-minute video (<https://youtu.be/pAvYqWZwoOA>) was produced to explain the provincial policy changes, their impact on Hamilton, and the Draft Framework for Processing and Evaluating Urban Boundary Applications. The video, posted on Engage Hamilton, YouTube, and played during in-person open houses, also outlined how interested persons could provide feedback and get involved. **The video had 474 views on YouTube as of December 15, 2024.**

2.2.4 Engage Hamilton Website

The webpage (engage.hamilton.ca/ubeapplicationframework) contained detailed information about the project, additional resources such as the infographics and resources, a project timeline, and avenues for feedback. During the project engagement period, the engagement webpage received **1,125 unique visitors** and **one question** was submitted via the question form.

A PDF of the full Draft Framework for Processing and Evaluating Urban Boundary Applications was also uploaded to the Engage Hamilton website, and through a digital engagement tool participants were able to ask questions and provide comments directly in the document. **The PDF was viewed approximately 6,910**

times, receiving 132 comments from an estimated 26 different commenters on various sections of the Draft Framework.

2.2.5 Information Open Houses

In-Person Open Houses

Three open houses were held in Hamilton to share project information and provide community members and other interested parties with the opportunity to have one-on-one conversations with the project team. Each open house was a drop-in format, featuring boards with detailed information about the project and opportunities to provide feedback.

The open houses were held on the following dates:

- November 26, 2024, at the Hamilton Convention Centre (**81 attendees**).
- November 28, 2024, at Ancaster High School (**60 attendees**).
- December 3, 2024, at Gatestone Elementary School (**51 attendees**).

A total of 77 comments were left on post-its, 22 comment cards were submitted, and project team members recorded 74 verbal comments and questions.

Virtual Open House

A virtual open house was held on December 5, 2024, via Zoom Webinar to present project information through a formal presentation and to engage attendees in dialogue and the Question and Answer (Q&A) tool through the webinar platform. **100 attendees joined the virtual open house. Participants asked 93 questions, with 19 answered live. A survey was available to attendees after leaving the meeting and distributed through email, receiving 31 responses. Survey respondents rated their Virtual Open House experience an average of 4.2 out of 5.**

Following the virtual open house, an accessible version of the presentation slide deck (see Appendix F) was posted on the Engage Hamilton website. A full recording of the virtual open house was also made available on Engage Hamilton, hosted on YouTube (https://youtu.be/mP_Eo-0eFXI). The recording had **80 views** by December 15, 2024.

2.2.6 Advisory Committee Meetings

Formal presentations describing details about the provincial policy changes and the Draft Framework were presented to three advisory committees by City staff:

2.0 The Engagement Process

- **Climate Change Committee:** October 29, 2024, at Hamilton City Hall
- **Development Industry Liaison Group:** November 18, 2024, virtually via Webex
- **Rural and Agricultural Affairs Committee:** November 21, 2024, at Hamilton City Hall

2.2.7 Indigenous Community Consultation

The City of Hamilton sent project information, invited comments, and offered to meet in-person or virtually to discuss the Draft Framework in detail with potentially affected Indigenous Communities, including:

- Six Nations Elected Council
- Mississaugas of the Credit First Nation
- Haudenosaunee Development Institute
- Huron Wendat First Nation
- Métis Nation of Ontario

Information and invitations to comment were also sent to:

- Hamilton Regional Indian Centre
- Niwasa Kendaawsin Teg

Haudenosaunee Development Institute requested a meeting, which has yet to be scheduled by the date of this report. Huron Wendat First Nation indicated that they do not have capacity to participate in the initiative at this time and requested to be kept updated. Métis Nation of Ontario indicated that they do not have concerns or comments at this time.

Meetings were held with staff of Six Nations Elected Council on December 4, 2024, and Mississaugas of the Credit First Nation on December 11, 2024, to discuss the Draft Framework and provide an opportunity for questions. Comments were received on aspects of the Draft Framework and considerations of treaty rights within the process.

3.0 What We Heard – Key Themes and Findings

All comments recorded and transcriptions from engagement events were analyzed using thematic analysis, involving a review of nearly **550 separate comments submitted through online platforms, letters, open houses, public events, and meeting minutes**. A trained team member assigned each comment to one or more themes to identify patterns and priorities in the feedback. These themes are summarized below and will inform the finalization of the Draft Framework.

Throughout the engagement process, participants posed numerous questions. The engagement team reviewed all comments tagged as questions, creating a consolidated list presented in Section 4.0 of this report.

The themes and summaries provided below reflect both shared priorities and areas of disagreement among participants. While this section offers a high-level overview of key insights, it necessarily simplifies the breadth and nuance of the diverse perspectives gathered during the engagement process. Representative quotes chosen from the comments received are included at various points throughout to illustrate the themes. A full record of comments received is included in Appendix G.

To help clarify the prevalence and significance of the key themes, we have used specific terms to describe how frequently certain feedback appeared and its overall importance. These terms reflect qualitative judgments rather than numerical counts, ensuring that the full context and meaning of the responses are preserved:

- **Notable Portion:** Refers to a theme or idea that was mentioned meaningfully by multiple respondents, but not frequently enough to dominate the overall feedback.
- **Large Portion:** Describes a theme that was raised by a significant number of participants and is consistently observed throughout the feedback, indicating its importance.
- **Broad Consensus:** Represents a theme that was widely agreed upon or supported by the majority of respondents, or respondents to that particular question, indicating a collective or dominant viewpoint.

3.0 What We Heard – Key Themes and Findings

- **Key Insight:** Refers to feedback provided by a small number of respondents that is highlighted due to its significance, relevance, or potential impact on the project or decision-making.

3.1 Theme 1: Concerns about Provincial Policy Changes

Feedback from the public engagement process highlighted concern about recent provincial changes to urban boundary expansion policies. A large portion of participants felt these changes undermined the City of Hamilton's ability to manage growth and maintain a firm urban boundary. Others expressed distrust in the Ontario Land Tribunal (OLT) appeals process, fearing it would prioritize developers' interests over those of the City and its residents. Key concerns included:

- **Uncoordinated urban expansion:** Participants worried that haphazard urban boundary expansions could lead to the loss of valuable farmland and greenspaces, undermining Hamilton's carefully planned growth strategy. These concerns included questions about whether the Greenbelt Plan would be reviewed in the future and could be amended to allow further urban expansions, and requests to be included in any consultations regarding that policy.
- **Environmental and agricultural risks:** A notable portion raised concerns about the potential destruction or degradation of farmland, wetlands, woodlots, and watercourses to accommodate new development. These comments reflected a strong commitment to protecting Hamilton's natural and agricultural heritage.
- **Financial and infrastructure burdens:** Participants were concerned about the financial implications of unplanned urban expansion. They noted that while developers would bear initial infrastructure costs, long-term maintenance, operational expenses, and lifecycle replacement would fall on taxpayers. Concerns also included the cost of defending City decisions at the OLT, which could further strain municipal resources.

"I strongly oppose the province's ability to override city decisions. We (citizens of Hamilton) have no voice. And the city has to pay for all this urban expansion even though the city (citizens) oppose all urban expansion." - Written comment from public open house.

3.0 What We Heard – Key Themes and Findings

3.2 Theme 2: Support for a Robust and Transparent Review Process

There was strong support for the City's proactive approach to developing a rigorous framework for the review of urban boundary expansion applications. Specific aspects of the Draft Framework that received positive feedback included:

- **Detailed submission requirements:** A key insight was participant appreciation of the inclusion of the numerous technical studies and reports required for urban boundary expansion applications. Those respondents valued the focus on examining environmental, social, economic, and infrastructure impacts before decisions are made.
- **Broad thematic considerations:** A notable portion supported the emphasis on agricultural impacts, climate change, and community well-being in the Draft Framework.
- **Prioritization of public and Indigenous engagement:** Participants strongly emphasized the importance of meaningful and accessible public involvement throughout the urban boundary expansion review process. They appreciated the City's commitment to transparency and called for robust communication strategies, diverse engagement formats, and opportunities for ongoing dialogue. The significance of early and continuous engagement with Indigenous communities was repeatedly highlighted, reflecting a shared understanding of the need to uphold the City's reconciliation commitments.

While the Draft Framework was generally well-received, a key insight included suggestions for stronger language in certain areas to ensure accountability. For example, there were suggestions to replace “encourage” with “must” regarding applicant engagement with Indigenous communities, reflecting a desire for more prescriptive requirements.

“I completely agree that Hamilton should maintain the no boundary expansion at all costs. We need to consider the impact of climate change, natural hazards, and heritage, water resources, land use and agricultural needs. There is plenty of non-used land within our current boundary to accommodate growth.” - Written comment from public open house.

“I strongly support this plan of action. Please raise awareness on every possible platform; every citizen of Hamilton has a stake in this. Thank you for your commitment to get it right.” - Comment received online.

3.0 What We Heard – Key Themes and Findings

3.3 Theme 3: Balancing Growth and Preservation

The engagement process highlighted a tension between accommodating future growth and preserving Hamilton’s natural and agricultural resources. Participants expressed a range of opinions, reflecting the complexity of balancing these competing priorities:

- **Advocacy for maintaining the current urban boundary:** Of those expressing an opinion about a firm urban boundary, most emphasized the need to prioritize infill development and revitalization within the existing boundary before expanding outward. They highlighted the importance of protecting prime agricultural land and natural areas for future generations while encouraging efficient use of existing infrastructure.
- **Support for strategic expansions:** A few commenters supported carefully planned urban boundary expansions to address housing affordability and population growth. They argued that restricting growth to the current urban area could limit housing supply, while well-managed expansions could meet future housing needs and help Hamilton remain a desirable city.
- **Calls for responsible planning:** If urban boundary expansion was to occur, a key insight included calls for well-planned developments that prioritize connectivity, sustainability, and fiscal responsibility, ensuring that long-term infrastructure costs are minimized, and growth fairly contributes to the tax base.

“I strongly support the City's efforts to defend the urban boundary as established by the city. Development in the White Belt lands would destroy as much as 4,000 acres of wetlands, woodlots, watercourses and prime farmland. It would also saddle municipal taxpayers with the heavy costs of maintaining all the additional infrastructure.” - Written comment from public open house.

“I support expansion provided studies are done, which it appears to be” - Written comment from public open house.

“‘Yes and’ isn't a real option here. Hamilton can't plan for **both** densification of existing neighbourhoods AND development of Greenfield sprawl neighbourhoods outside the existing [urban boundary] without saddling itself with a white elephant.” - Comment received online.

3.0 What We Heard – Key Themes and Findings

3.4 Theme 4: The Role of Housing Affordability in Urban Growth

Housing affordability emerged as a recurring theme, with participants expressing diverse views on how urban boundary expansion might contribute to the housing crisis.

- **Concerns about restricting boundary expansions:** This key insight argued that limiting urban boundary expansions could constrain housing supply, worsening affordability challenges and making it harder for families to find homes.
- **Counterarguments about urban sprawl:** Others contended that sprawl-driven development would result in higher long-term infrastructure costs, such as roads and water systems, and fail to provide genuinely affordable housing options.
- **A focus on affordability:** Where urban expansion might occur, a notable portion of respondents stressed that such developments must prioritize affordable, inclusive housing rather than catering to luxury markets.

“More cutting of red tape is required to make affordable homes. This entire plan slows down the process, adds costs, adds time and [is] making Canada the slowest Country to issue building permits where [we] have the most land.” - Comment received online.

“If the City is being forced into expanding its urban boundary, it’s important to build intelligently. Encouraging dense, mix-used neighbourhoods should be the priority, not adding more low-density housing.” - Comment received online.

3.5 Theme 5: Environment and Climate Resilience

Environmental sustainability and climate resilience were major priorities for a large portion participants. Feedback focused on the following:

- **Protecting greenspaces and natural areas:** Participants advocated for safeguarding wetlands, woodlands, and other greenspaces, emphasizing their role in supporting biodiversity, improving air quality, and mitigating climate change impacts.

3.0 What We Heard – Key Themes and Findings

- **Preserving farmland:** Protecting Hamilton’s prime agricultural land was a recurring theme, with participants highlighting the importance of local food security and resilient food systems.
- **Mitigating environmental impacts of expansion:** Those supporting strategic expansions stressed the need for comprehensive environmental impact assessments, mitigation strategies, and the adoption of green infrastructure to minimize harm to ecosystems and water resources.
- **Integrating climate-forward design:** Participants called for renewable energy use, energy-efficient building designs, and water conservation measures to ensure new developments align with climate resilience goals.
- **Addressing climate change risks:** Concerns about increased flooding, extreme heat, and biodiversity loss prompted calls for the City to integrate climate change risks into all growth-related decisions.

“The citizens of Hamilton and Ontario value the surrounding Greenspace provided by rural farms and communities as a component of our Cultural Heritage. Sprawl has been destroying the economic and social fabric of rural communities for decades, as well as the destruction of soil, wetlands and biodiversity.” - Comment received online.

3.6 Theme 6: Equity and Accessibility in Public Engagement

Participants emphasized the importance of equitable and accessible public engagement in decisions regarding urban boundary expansion. Feedback highlighted several key areas for improvement:

- **Inclusive and clear communication:** A key insight that emerged referenced the difficulty understanding the technical aspects of urban boundary expansion due to complex language and inaccessible presentation formats. Some called for plain-language materials and visually engaging formats to make information more accessible. Suggestions included creating a dedicated, user-friendly website separate from the City’s main site to better explain proposals.
- **Diverse engagement formats:** Residents appreciated virtual options like online surveys and open houses but also stressed the importance of in-person opportunities. Requests included town hall meetings, open houses in specific neighborhoods, and ward-specific engagement to address local concerns.

3.0 What We Heard – Key Themes and Findings

- **Engagement with equity-deserving and traditionally underrepresented communities:** A key insight included calls for targeted efforts to engage marginalized communities and ensure their voices are heard. Comments included requests to prioritize outreach to groups often excluded from planning discussions, such as low-income residents and newcomers.
- **Strengthened Indigenous engagement:** Feedback throughout the engagement underscored the importance of Indigenous community involvement. Another key insight included a suggestion to mandate Indigenous input for all expansion proposals.

“The public must be given enough notice of any planned community meetings. We must be allowed to ask questions, to challenge and to oppose plans, not just sit and listen to some proposal.” - Comment received online.

3.7 Theme 7: Perspectives Challenging the Firm Urban Boundary and Draft Framework

Not all feedback supported the rigorous process outlined in the Draft Framework or the City’s efforts to maintain a firm urban boundary. A notable portion of participants expressed concerns that the Draft Framework could hinder growth opportunities, create unnecessary barriers to development, or fail to address Hamilton’s housing and economic needs. Key points included:

- **Criticism of the firm urban boundary policy:** Participants expressed concerns that restricting urban boundary expansions could limit housing supply, increase costs, and push development beyond Hamilton’s limits. A key insight included the view that the firm boundary as a contributing factor to affordability challenges and a barrier to meeting housing demand.
- **Frustration with process complexity:** A key insight included that the Draft Framework could make applications overly difficult for developers, potentially discouraging responsible growth.
- **Preference for managed expansion over intensification:** This key insight reveals a preference for well-planned expansions that address housing demand while balancing environmental and infrastructure considerations. Specific areas, such as locations with existing infrastructure capacity, were identified as potential candidates for strategic growth.
- **Concerns about overemphasis on environmental goals:** A few participants expressed concerns that prioritizing environmental preservation and farmland

3.0 What We Heard – Key Themes and Findings

protection might come at the expense of addressing urgent housing and economic needs. They felt a more balanced approach could better support Hamilton’s long-term growth objectives.

“We need to expand the urban boundary to alleviate homelessness.”

– Verbal comment recorded at open house.

“More comments, more studies, just add more costs and overall prolonging the development of homes and businesses. Low supply, high demand, creates high housing prices.” - Comment received online.

3.8 Specific Feedback on Draft Framework Components

The following includes feedback on the required submission information, the draft evaluation and locational considerations, and the process for application submission and review.

3.8.1 Part A - Urban Boundary Expansion Submission Requirements

Part A of the Draft Framework outlines the specific plans and technical studies required for urban boundary expansion applications. Participants were asked to consider if there were additional studies that should be required in the application process. Public feedback emphasized the need for comprehensive assessments that address environmental, infrastructure, social, and economic impacts, reflecting strong concerns for sustainability and community well-being. Key themes included:

- **Environmental studies:** The need for detailed and independent environmental impact studies was a recurring theme in the feedback. Participants called for a thorough examination of the potential effects of expansion on various environmental factors, including:
 - **Air and water quality:** Concerns about pollution and traffic led to requests for thorough analysis of air and water quality impacts, with one participant requesting peer review of subwatershed studies impact assessment findings.
 - **Biodiversity and wildlife:** Protecting habitats and wildlife corridors was emphasized. Recommendations included restoration plans and consideration of Species at Risk.

3.0 What We Heard – Key Themes and Findings

- **Climate change:** Participants highlighted the need to evaluate greenhouse gas emissions and to have alignment with the City's climate strategy.

“First report should be contribution to or reduction of greenhouse gas emissions over the long term.” - Comment received online.

- **Impact on existing infrastructure and services:** A large portion of participants emphasized the importance of assessing potential strain on existing infrastructure and services, including:
 - **Transportation networks:** Concerns included traffic flow, road capacity, and public transit integration.
 - **Water and sewer capacity:** Participants suggested development in areas where capacity exists, such as near the airport to address concerns about reliable infrastructure.
 - **Emergency services:** Feedback called for a detailed evaluation of how expansion would impact response times and resources for police, fire, and ambulance services.
 - **Schools and community facilities:** Participants expressed concerns about overcrowding and requested assessments to determine the need for additional facilities.
- **Social and economic impacts:** Participants called for a comprehensive understanding of the potential social and economic impacts of a proposed expansion, requesting studies addressing:
 - **Housing needs:** Participants advocated for analysis beyond unit counts to address affordability and housing diversity.
 - **Community well-being:** Participants highlighted concerns about the potential impacts on community character, social cohesion, and quality of life.
 - **Economic impacts:** Suggestions included assessing long-term costs and benefits, such as job creation and tax revenue.
- **Impact on agriculture:** Concerns about the loss of farmland and conflicts between urban and rural land uses prompted requests for studies examining the economic viability of local farms and agricultural systems.

3.0 What We Heard – Key Themes and Findings

“[Assess] how local neighbouring farm operations will be impacted - traffic, stormwater runoff onto fields, complaints from new UBE neighbours about farming noise, smells, slow moving farm equipment, etc.” - Comment received during virtual open house.

3.8.2 Part B - Urban Boundary Expansion Application - Draft Evaluation and Locational Considerations

Part B of the Draft Framework outlines the considerations the City would use to assess proposed urban boundary expansion applications. Input highlighted diverse perspectives, reflecting both support for the framework’s rigor and concerns about its complexity and focus areas. While a notable portion of participants supported the considerations presented, some identified factors that should be emphasized or other considerations that should be integrated into the framework. Key contributions here included:

- **Support for comprehensive evaluation:** A notable portion of participants commended the comprehensive approach to assessing urban boundary applications. Some emphasized the need for a multi-departmental approach in examining applications, involving municipal finance, technical experts, and committees (e.g., adding the Agriculture and Rural Affairs Sub-committee as a reviewer) to inform decision-making.

“I think Hamilton did a great job on considering what needs to be part of a complete urban expansion application. My only one suggestion is to provide [applicants] with tools/suggestions/guidance for how they can complete these requirements if there are resources that can provide consistency in considerations across criteria.” - Comment received via email.

- **Concerns about bias against applications:** While there was significant support for the robust process outlined in the Draft Framework, a key insight included concerns that the process is overly restrictive, potentially discouraging necessary development. They called for balancing rigorous evaluation with support for housing affordability and addressing the growing demand for homes.

“The proposed submission requirements and City proposed criteria to be satisfied are very onerous and are unfairly geared to discouraging applications. There is a shortage of affordable housing in Hamilton and the areas that are eligible either have services or are in close proximity to services.” - Comment received during virtual open house.

3.0 What We Heard – Key Themes and Findings

- **Housing affordability:** A large portion of participants explicitly urged the City to include housing affordability as a core evaluation factor. They stressed that the framework should not only assess the quantity of housing units proposed but also prioritize diverse housing types and tenures that meet the needs of various households and income levels.

“Affordable housing should be part of any proposal. If there’s no affordable housing, it shouldn’t be permitted.” - Verbal comment recorded at open house.

“I suggest adding the following theme: does the development support affordable housing? The weighting of this theme should trump all other themes.” - Comment received online.

- **Transparency in decision-making:** Concerns were raised about the transparency of assessment criteria. Respondents requested clear prioritization of criteria, with a key insight including a proposed “top-down” assessment approach to eliminate applications that fail critical initial considerations, thereby saving time and resources.
- **Environmental and agricultural concerns:** Strong support emerged for prioritizing environmental sustainability and farmland protection. Respondents advocated for stricter measures to safeguard wetlands, biodiversity, and agricultural land, emphasizing that these resources are irreplaceable and vital for climate resilience and food security.
- **Climate change as a priority:** Participants highlighted the importance of aligning application assessments with Hamilton’s climate change goals, including carbon neutrality and resilience to extreme weather events. They suggested stronger measures for flood management and urban tree canopy preservation.
- **Complete communities and livability:** Respondents advocated for developments that promote walkability, access to public transit and inclusion of amenities such as schools, healthcare, and grocery stores.

“It is imperative that developers who want to expand our boundaries provide a full range of services, such as parks, recreation centres, libraries, schools, long-term care homes, medical offices as well as grocery and hardware stores... Create complete communities so people don’t have to drive for recreation, shopping, school, etc.” - Comment received online.

3.0 What We Heard – Key Themes and Findings

- **Focus on infrastructure and financial sustainability:** Feedback highlighted the need for a thorough analysis of the long-term costs of infrastructure maintenance and operational expenses. Participants questioned whether new developments would exacerbate Hamilton’s existing infrastructure deficit.

“Missing [consideration]: How does the Urban Boundary Expansion impact the City’s ability to reduce and eliminate its current \$3.8B infrastructure deficit? Adding more infrastructure will only worsen that deficit, leaving the City to maintain the new infrastructure over its lifetime.” - Comment received online.

- **Cumulative impacts:** A few respondents recommended assessing cumulative impacts of development on ecosystems, water quality, and community infrastructure to avoid piecemeal decision-making.

3.8.3 Part C - Application Submission & Review Process

At the in-person and virtual open house events, participants were asked key questions related to notification and participation in the urban boundary expansion application review process. Responses highlighted diverse preferences for how the public would like to be informed and engaged in the process. This section summarizes feedback received, organized around the key questions posed, as well as additional themes that emerged.

How would you like to be notified of a new urban boundary expansion proposal?

- **Email notifications:** There was broad consensus among participants preferring email as their primary notification method. A notable portion emphasized the importance of leveraging existing mailing lists, such as the Growth Related Integrated Development Strategy (GRIDS 2) survey list and Engage Hamilton participants.
- **Multiple methods:** A large portion supported combining email notifications with updates on the City of Hamilton webpage, Engage Hamilton, and public notice boards at the subject property. Other suggestions included: text message alerts, notices in the Hamilton Spectator, and a dedicated webpage for urban boundary expansion applications.
- **Public notice boards:** A notable portion suggested improvements to public notice boards, such as QR codes linking to project information, larger text, and clear identification of the proposal as an urban boundary expansion application.

3.0 What We Heard – Key Themes and Findings

When would you like to be notified of a new urban boundary expansion proposal?

- **At every stage of the process:** Of those who responded to this question, a large portion indicated that they would like to be notified of a new urban boundary expansion proposal upon receipt of the application. Many wanted to be notified at every stage of the process, including prior to the Council meeting, after the Council meeting, and any time the application status changes.
- **Legislative changes:** Participants also suggested notifying the public about any new planning legislation that could impact urban boundary decisions.

How would you like to provide feedback on a new urban boundary expansion proposal?

- **Email and online platforms:** Email remained the most popular method for providing feedback, followed closely by the Engage Hamilton platform.
- **In-person engagement:** Respondents valued opportunities for face-to-face input, including community open houses and public meetings held in neighborhoods directly affected by proposals.
- **Virtual public meetings and surveys:** Virtual meetings and city-wide surveys were highlighted as inclusive and accessible options.

“I want to provide feedback in person!” - Comment submitted during virtual public meeting.

Additional Feedback Themes

- **Indigenous engagement:** Strong feedback underscored the importance of meaningful dialogue with potentially affected Indigenous communities.
- **Inclusive consultation and notification:** Feedback emphasized the importance of broadening consultation efforts, including one suggestion to engage with tenant farmers, in addition to landowners. Participants also debated the adequacy of the 400-meter notification boundary, with a key insight being a suggestion for broader notification to include the entire city or at least one kilometre from proposed sites.
- **Simplification and accessibility:** Respondents emphasized the need for accessible and clear communication in public notices and the overall process.
- **Transparency and accountability:** Participants requested clear timelines for review processes, transparency in decisions, and detailed updates at each stage.

4.0 Questions Received

This section lists key questions raised by community members during the consultation process. These questions were distilled from the many inquiries and comments received, reflecting a consolidation of frequently asked questions and recurring concerns. City staff will be answering these questions in a separate report to help clarify the City's position, outline procedural details, and provide more detailed responses to community priorities.

Provincial Authority and Local Decision-Making

- Why is the Province overriding the City's decision on the urban boundary expansion?
- Can the Province force Hamilton to service lands outside the urban boundary?
- How does Bill 212 and the proposed Highway 413 impact urban boundary expansion?
- How do the Strong Mayor powers affect the Mayor's ability to represent the City and Councillors in this process?
- Does the City have recourse if the Ontario Land Tribunal (OLT) overrules its decision?
- What is the point of this review process if a decision will just be appealed to the OLT?
- Are new staff being hired to manage these applications and address the OLT cases that will be brought forward in these areas?

Development Applications and Processes

- How many applications have been submitted for development in the White Belt? How many urban boundary expansion proposals does the City anticipate receiving each year?
- How can I register my opposition to a specific development application? What feedback opportunities will residents have?
- What is the cost range for studies and assessments if paid for by applicants?
- How will "island" development applications not adjacent to built-up areas be reviewed?

- Can a developer submit an incomplete application and still go to the OLT?
- What's the new third-party appeal rule? Can I / how can I be involved in the OLT/appeal process?
- Can the City set timelines for new proposals to prevent stalled projects?

Environmental Impacts and Protections

- Will developers have to adhere to environmental regulations and pay for potential environmental impacts (e.g., flooding)?
- How might urban boundary expansion impact flooding?
- Will the loss of rural areas and their carbon sequestration capacity be considered in climate impact assessments?
- Can the City advocate for adding the White Belt areas to the Greenbelt or protecting them as animal corridors?
- Have any submission requirements incorporated the new work on the Biodiversity Action Plan for the city?

Infrastructure and Services

- Will tax from new developments revenue cover the costs of utility maintenance and replacement?
- Can developers be charged for future transit development (feasibility studies, new transportation staff)?
- Will you examine the impact of additional traffic on already busy roads?
- Historically, housing development has taken place prior to road development. How does Hamilton plan to prioritize this?
- Will you be considering school capacity and the impacts on education boards?

Affordable Housing and Social Impacts

- How does potential urban boundary expansion impact the housing crisis in the city center?
- Does expansion contribute to more affordable housing, or does it facilitate taking up green space with larger homes?
- Is there a plan to explicitly address social impacts and hold developers (and the City) accountable for quality of life, health, and local economic & social well-being?
- Have studies included densification vs. expansion in regard to effects on homelessness?
- Please define what is meant by “affordable housing.”

5.0 Conclusion

5.1 Summary of Key Findings

The engagement process surrounding the Draft Framework for Processing and Evaluating Urban Boundary Expansion applications revealed a complex and nuanced set of perspectives from the Hamilton community. While a large portion of participants expressed support for the City's proactive approach in developing a rigorous framework, particularly its focus on transparency, environmental protection, and infrastructure considerations, there were also concerns regarding potential barriers to development and housing affordability. A significant takeaway was the widespread apprehension about the provincial policy changes, with a large portion feeling that they undermine the City's control over its urban boundary and future growth.

5.2 Implications for the Draft Framework

The feedback gathered through the engagement process has important implications for the Draft Framework. The City must carefully consider the balance between establishing a robust evaluation process that protects Hamilton's environmental assets and addresses infrastructure needs, while ensuring the framework supports responsible planning decisions that address housing affordability concerns. The City will need to clearly articulate how the framework addresses community concerns and demonstrates its commitment to achieving a sustainable and balanced approach to growth management.

5.3 What's Next?

In response to the valuable input received, the City will refine the Draft Framework to better reflect the community's priorities and address the questions raised during the engagement process. The updated Framework will be published on Engage Hamilton, along with answers to the questions listed in Section 4.0 of this report. The City aims to incorporate the finalized framework into Official Plan Policy in Q1 2025, providing a clear and consistent approach to evaluating future urban boundary expansion applications.

5.4 Commitment to Continued Community Engagement

Recognizing the significance of this issue for the Hamilton community, the City reaffirms its commitment to continued communication and meaningful engagement throughout any urban boundary expansion application process. The City will proactively provide the community with updates on urban boundary expansion applications, inform residents, interested parties, and potentially affected Indigenous communities about the application of the Framework and its implications, and facilitate ongoing dialogue to include community voices in all future decisions related to urban boundary management.

Appendix A

Urban Boundary Expansion Framework – Consultation & Engagement Plan



Urban Boundary Expansion Framework – Public Engagement Plan



Background

The Province of Ontario approved the Provincial Planning Statement (PPS) on August 16, 2024, replacing both the Provincial Policy Statement and Growth Plan for the Greater Golden Horseshoe. The new PPS removes the requirement for a Municipal Comprehensive Review before a municipality or landowner can expand the urban boundary. The impact to the City of Hamilton is that a landowner can now apply to expand the urban boundary at any time and without a limitation on expansion size. Additional changes through provincial legislation, through Bill 185, *Cutting Red Tape to Build More Homes Act, 2024* (Bill 185), that impact urban boundary expansion include:

- allowing landowners to appeal Council's decision on urban boundary expansion applications to the Ontario Land Tribunal (OLT); and,
- removing the requirement for applicants to consult with the municipality (previously referred to as Formal Consultation) which would determine application submission requirements.

These Provincial changes undermine Council's position of maintaining a firm urban boundary. In anticipation of the Provincial Planning Statement being approved by the Province and the City receiving private urban boundary expansion applications in the near future, staff developed the Draft Framework for Processing and Evaluating Urban Boundary Expansion applications which was approved by Council on August 16, 2024.

Context

The City of Hamilton has established and planned for a firm urban boundary. Recent Provincial planning changes have undermined Hamilton's position to maintain this stance by allowing for new privately initiated urban boundary expansion applications.

To effectively plan for engagement on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications, it is important to consider the broader context in which this work is occurring.


- 2018-2021: The City undertakes extensive public engagement as part of the Municipal Comprehensive Review and Growth-Related Integrated Development Strategy workplan to allocate forecasted population and employment growth to 2051. This included a city wide survey that received 18,387 responses. 90.4% of residents supported a no urban boundary expansion growth strategy.
- November 2021: Council votes to adopt a no urban boundary expansion growth strategy. The Official Plan Amendments are approved by Council and the Province.
- November 2022: The Province revises the City's Official Plan Amendments to remove Council's approval of a no urban boundary expansion growth strategy. Approximately 2,200 hectares of land are added to Hamilton's urban boundary. At the same time the Province removes lands from the Greenbelt Plan area.
- 2023: In response to the Provincial decision to add lands to the urban boundary, Council approves Secondary Planning Guidelines for Urban Expansion Areas.
- September 2023: The City undertakes public engagement and holds a Special Meeting of Planning Committee to discuss lands removed from the Greenbelt. There is significant public interest/participation in this engagement. Majority of residents express opposition the Greenbelt changes. Shortly after this meeting, the Province reverses its changes to the Greenbelt Plan through Bill 136.
 - Challenges to meaningful engagement experienced during the public consultation phase included: location of the meeting, size of venue (too small), transportation (requiring HSR shuttle bus), planning for safety and security of staff at the meeting, date and time of meeting.
- October 2023: The Province announces its intent to reverse the November 2022 decision to revise municipal Official Plans, including Hamilton's urban boundary expansion. City Council supports the reversal.
- December 2023: Bill 150 is passed and removed 2,200 hectares of land from Hamilton's Urban Boundary.
- August 2023: The Province approves the new Provincial Planning Statement (PPS). The PPS and Bill 185 (2024) opens the door for new privately initiated urban boundary expansion applications to be submitted. Local decisions can be appealed to the Ontario Land Tribunal for final decision. Council submits multiple comments to the Province not supporting these changes.
- August 2024: In anticipation of receiving new privately initiated urban boundary expansion applications, Council approves the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.

These facts will be used to inform the public engagement plan for the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.



Purpose

The purpose of this engagement plan is to outline the City’s strategy for soliciting community input on specific aspects of the Draft Framework and to better inform the community and interested participants on both the recent provincial planning decisions and their impacts to local decision-making authority.

Goals	Objectives
<p>INFORM the community about recent provincial changes that impact Hamilton.</p>	<ul style="list-style-type: none"> ● Clearly outline recent provincial changes that impact planning decisions in Hamilton. ● Clearly outline decision making powers/authority at the municipal and provincial levels. ● Using the INFORM process (outlined in Hamilton’s Public Engagement Policy), ensure community has the appropriate information and knowledge in order to provide meaningful input to the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.
<p>CONSULT with the community on specific aspects of the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.</p>  <p>Consult Level: staff will get your feedback on a project or initiative.</p> <p>We promise to:</p> <ul style="list-style-type: none"> ● keep you informed ● listen to and acknowledge your concerns or hopes for the project ● provide feedback to you on how the input received was used to inform the project 	<ul style="list-style-type: none"> ● Clearly outline what the Draft Framework is, how it will be used and why it is important. ● Using the CONSULT level, seek input from community on three main aspects in the Framework: <ul style="list-style-type: none"> ○ How and when the community wants to be notified when an application for urban boundary expansion is made; ○ How and when the community will provide their input on urban boundary expansion applications once received; and, ○ Identify what information or additional studies should be required as part of the urban boundary expansion applications.

Scope

The public engagement plan is focused on gathering input on three specific components of the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications. A separate engagement plan will be developed for specialized engagement with the Indigenous Community, supported by Hamilton's Indigenous Relations Team.

IN SCOPE

Input on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications related to:

- **Notice:** how and when the community will be notified when an application for urban boundary expansion is made;
- **Public Notice Signs:** Identify what information should be included on any [public notice signs and/or application webpage](#) posted on the proposed UBE lands and/or application webpage;
- **Public Engagement:** how and when the community will provide their input on urban boundary expansion applications;
- **Required Studies/Other Information**
 - **General Community:** In addition to the proposed study requirements, what other studies or information should a proponent be required to submit as part of the application process;
 - **External Review Agencies:** Identification of the minimum submission requirements for urban boundary expansion applications and what is in scope/out of scope as part of required technical plans and studies.

OUT OF SCOPE

Decisions made by the Provincial Government: comments can be directed to councillor, mayor, member of provincial parliament, minister of municipal affairs and housing.

Prohibition of applications for urban boundary expansions.

Engagement Methods & Audiences

Note: Indigenous Engagement will be defined and planned as a separate engagement plan and may consider a level of engagement that differs from those outlined below.

Decision: What will community influence through participation?	Target Audience: Who will influence the decision?	Engagement Level	Engagement Method(s) and Tool(s)
<p>How and when the community wants to be notified when an application for urban boundary expansion is made.</p>	<p>General Public:</p> <p>Landowners within and near lands that may be subject to UBEs</p> <p>Individuals on the GRIDS2 email list</p>	<p>Consult</p>	<p>Engage Hamilton IDEAS tool: Allows community to post their ideas in a creative way.</p> <p>In-person open house: set-up will allow community to:</p>
<p>How and when the community will provide their input on urban boundary expansion applications once received.</p>	<p>Individuals who are interested in advocacy related to UBE</p> <p>Individuals who value intensification</p> <p>Specialized Committees:</p> <p>Agricultural and Rural Affairs Sub-Committee</p> <p>Community Climate Change Advisory Committee</p>	<p>Consult</p>	<ul style="list-style-type: none"> ● Understand the background ● Rotate to three focus areas offering opportunities to provide input into the Drafte Framework <p>Focus Discussions: scoped to specialized committees.</p> <p>Individual Agency Outreach: input requested through direct contact</p>
<p>Identify what information or additional studies should be required as part of the urban boundary expansion applications.</p>	<p>Development Industrial Liaison Group</p> <p>External Review Agencies and Government Agencies:</p> <p>Niagara Escarpment Commission</p> <p>Conservation Authorities</p>	<p>Consult</p>	<p>Engage Hamilton FORUM tool - engage on controversial issues through (moderated) open discussion. Invites two-way communication (public shares input and staff offer visible comment).</p> <p>In-person open house: set-up will allow community to:</p> <ul style="list-style-type: none"> ● Understand the background

	<p>School Boards</p> <p>Hamilton International Airport</p> <p>Provincial Ministries</p> <p>Public Utilities</p>	<ul style="list-style-type: none"> ● Rotate to three focus areas offering opportunities to provide input into the Drafte Framework <p>Focus Discussions: scoped to specialized committees.</p> <p>Individual Agency Outreach: input requested through direct contact</p>
Decision: What will community influence through participation?	Target Audience: Who will influence the decision?	Engagement Method(s) and Tool(s)
<p>INFORM the community about recent provincial changes that impact Hamilton</p>	<p>General Public: same as audience identified above.</p> <p>Specialized Committees: same as audience identified above.</p> <p>External Review Agencies and Government Agencies: same as audience identified above.</p>	<p>Engage Hamilton QUESTIONS tool: offers space for the public to ask questions and get answers publicly. Project lead can provide answers and provide additional resources in a moderated process. Contributes to project FAQ page.</p> <p>Engage Hamilton FAQ ensures the public has the right information to be able to participate in a meaningful way to the engagement.</p> <p>In-person open house: set-up will allow community to understand the background and scope of engagement.</p>

Deliverables

- Promotion of public engagement opportunities via direct and indirect communication channels.
- Improved understanding and awareness of recent provincial changes that impact Hamilton's firm urban boundary position and other local planning decisions.
- Implementation of multiple engagement methods that supports meaningful engagement opportunities:
 - Engage Hamilton project page, incorporating multiple EngagementHQ Tools;
 - In-person open house-style public meetings.
- Reduced barriers to community participation, supporting an engagement process that incorporates the principles of IDEA (Inclusion, Diversity, Equity and Accessibility) and results in meaningful engagement on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.
- Engagement of the Indigenous Community that is specifically designed to better meet the needs of the Indigenous Community in contributing to the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications and to foster and build improved relationships for ongoing and future projects.
- Report back to community by developing and sharing a "What We Heard Summary Report" that outlines the engagement process, the input received and how the engagement contributed to an updated Draft Framework.
- Updated Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications that has been informed by meaningful public engagement.
- Meaningful engagement results that will inform City-initiated amendments to the Urban and Rural Hamilton Official Plans.



Risks and Alternatives

Risks	Alternatives
<p>Participants wanting to express their opposition to decisions that are made by the province.</p>	<p>Provide clear and proactive communications in advance of the planned engagement.</p> <p>Retain a consultant to support and facilitate the in-person engagement activities.</p> <p>Provide community members with a list of contacts with whom to direct their concerns about the impacts from recent provincial decisions.</p> <p>Leverage EngageHamilton tools that allow for interactive questions and answers prior to attending in-person engagement event(s).</p>
<p>Lack of trust by the community related to urban boundary decisions.</p>	<p>Increase transparency and accessibility through:</p> <p>Established Communication Strategy using a variety of communications channels / methods, dedicated staff who can respond to inquiries in a timely manner, information that is clear and easy to understand, sustained communication, multiple methods to communicate and inform community.</p> <p>Ensure adequate staff are available to support in-person engagement.</p> <p>Ensure City of Hamilton' Corporate Security team is involved in the planning of this event.</p> <p>Close the loop and report back on how participation and input informed the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.</p>
<p>Community perception that their participation will not be used to inform the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.</p>	<p>Report back on how input was used to inform the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.</p> <p>Outlining the scope in a clear manner through proactive communication and timely</p>



Timeline

Action	Status	Timeline
Present Public Engagement Plan to Planning Committee	On track	October 14, 2024
Activate the Engage Hamilton Page and allow for on-line engagement	In progress	October 15 - November 15 2024
Host in-person open houses (minimum 2)	In progress	November 2024
Revise the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications, based on input received through the public participation process		December 2024
Report Back to community through “What We Heard Summary Report” on the engagement findings and next steps		February 2025
Bring Recommendation Report to Planning Committee		February 2025



Engagement Resourcing

PE BUDGET - to be shared by Charlie



Who's Listening

Planning and Economic Development Staff

Charlie Toman	Dave Heyworth
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Attachments

- City of Hamilton Public Engagement Policy
- City of Hamilton Public Engagement Levels
- City of Hamilton Public Engagement Principles

Appendix B

Newspaper and Social Media Advertisements



'I don't want something bad to happen'

Brant County parent calls for safer roundabouts after son almost hit by car

CELESTE PERCY-BEAUREGARD
LOCAL JOURNALISM INITIATIVE
REPORTER

Alicia Hassan witnessed a car almost hit her 13-year-old son as he crossed Rest Acres Road in Paris.

Her son was riding his scooter home from basketball practice, and she was giving his friend a ride in the car. She just happened to be stopped at the roundabout when her son was crossing and watched in horror as he was almost struck.

"It was very, very scary," she said, noting the approaching vehicle stopped at the last minute.

"People do not pay attention. And it was nighttime too, which makes it even worse," she told The Spectator on a call.

Now, Hassan is asking the County of Brant to implement more safety measures to protect pedestrians crossing the busy road.

The roundabouts on Rest Acres Road are "built to today's engineering standards for both pedestrian and vehicular safety" with "signs



and pavement markings to indicate a pedestrian crossing. These signs and pavement markings are very visible for both the pedestrian and road users," Greg Demers, director of roads for the county, told The Spectator in an email.

But Hassan says there might be "too much going on" at the four roundabouts between Powerline Road and Laurie Ann Lane with all the other signage.

"There needs to be lights there. There are so many families, there are so many kids" with "not hundreds, but thousands more people

coming in this area" with all the development, she said.

There is "a signalized crossing on Rest Acres Road for pedestrians that are not comfortable crossing at a roundabout," Demers said.

But it's at Laurie Ann Lane and Hanlon Place, two kilometres from Brant Sports Complex and around a kilometre from the shopping plaza, where Hassan said her son and his friends like to hang out.

When he's going to meet friends it's "a constant worry until I know that they're (at the plaza), and then it's a constant worry until I know

A concerned parent is asking the County of Brant to implement more safety measures to protect pedestrians crossing at busy Rest Acres Road roundabouts.

CELESTE PERCY-BEAUREGARD
THE HAMILTON
SPECTATOR

that they're back home safely," she said.

While Hassan also wondered if the mound in the middle of the roundabout could be flattened for better visibility, Demers said it's an engineered safety feature and reducing it "would lead to unsafe vehicle use within the roundabout."

Of the seven traffic circles in the county, Demers said there haven't been any crashes related to pedestrians crossing.

Still, the municipality is open to increased safety measures like crosswalk lights when the conditions of an analysis are met, he said.

"The County of Brant reviews all concerns that are submitted, and upgrades are made to the road and sidewalk network when warranted," Demers said.

The county also continues to share "public education" on "pedestrians' safety when using roundabouts," he said. Hassan thinks something needs to be changed. She has reached out to neighbours for support and said she plans to present to council as a delegate later this month because, "I don't want something bad to happen."

CELESTE PERCY-BEAUREGARD'S REPORTING IS FUNDED BY THE CANADIAN GOVERNMENT THROUGH ITS LOCAL JOURNALISM INITIATIVE. CPERCYBEAUREGARD@TORSTAR.CA.

Ousted trustee wins court case against Grand Erie District School Board

Elected official 'unfairly targeted' by trustees, divisional court judge rules

CELESTE PERCY-BEAUREGARD
LOCAL JOURNALISM INITIATIVE
REPORTER

A divisional court has overturned four decisions made by the Grand Erie District School Board against longtime trustee Carol Ann Sloat.

Sloat was "unfairly dealt with and unfairly targeted," Justice Nancy Backhouse wrote in her 31-page verdict dated Nov. 15.

"I have found that (Sloat's) transgressions, if any, were minor, and the sanctions imposed in their totality to be unreasonable," she continued.

Sloat asked the panel of three justices to consider the complaints brought against her — each by a different trustee — over a one-year period, triggering her year-long ban from board and committee meetings.

Few details had been shared by the board or Sloat.

But the one-day virtual trial on Oct. 29 revealed that the alleged transgressions included:

- Sloat telling Ontario's ombudsman that the board passed new by-laws and policies in private, and the board said in doing so, she shared in

camera information.

- Sloat allegedly waiting in the wrong spot during in camera portions of meetings.

- The board said Sloat exposed a staff member to in camera materials they weren't privy to when her lawyer served papers to the board marked for director JoAnna Roberto.

- Sloat allegedly sighing while watching a meeting as a member of the public, and potentially being able to hear parts of an in camera meeting she wasn't part of, even though she was sitting in the designated waiting area.

The supposed breaches were "at most, minor or technical," but the consequence — barring Sloat from attending board meetings from May 16, 2023, to May 2024, and from attending committee meetings for more than two years — was "very harsh" and had "a significant impact" on Sloat, Backhouse wrote.

She went on to say the punishment was "excessive and punitive," considering the sanctions had "no rational connection" to Sloat's conduct.

Backhouse pointed to sanctions imposed by other boards in "argua-

bly more egregious school trustee cases" that were "not more than a single general board meeting, if that."

Sloat had no prior code of conduct violations in her 20 years as a trustee, and her case marks the first time GEDSB has found any trustee guilty of breaching their code of conduct, and barred a trustee from meetings as a sanction.

Typically, the divisional court would send the decision back to the school board and let them determine how to move forward, but given the minor transgressions and "unreasonable" sanctions, it wouldn't be "an efficient use of public resources to send these matters back to the Board to be started over again," Backhouse said.

"These matters have obviously taken an inordinate amount of time and expense and have no doubt diverted the Board's attention from its primary responsibility of promoting student achievement and well-being," she said.

The board will be required to pay Sloat \$10,000 for court costs related to the four applications, as well as an additional \$5,000 deferred from an earlier hearing to stay her sanc-

Brantford trustee Carol Ann Sloat was "unfairly dealt with and unfairly targeted," Justice Nancy Backhouse wrote in her divisional court verdict.

GRAND ERIE
DISTRICT
SCHOOL BOARD
PHOTO



tions while awaiting the judicial review.

It's a drop in the bucket considering the close to \$100,000 Sloat said she has spent on legal fees.

The Spectator reached out to GEDSB, which said in an emailed statement: "We have received the decision by the divisional court which is currently being reviewed by our legal counsel. The Board of Trustees will determine next steps. The Board has no further comment at this time."

The decision was welcome news for Sloat after two years of "uncertainty," she told The Spectator in a call Friday.

"I've worked hard as a trustee for over 20 years and I'm very pleased with the decision of the court," she said.

CELESTE PERCY-BEAUREGARD'S REPORTING IS FUNDED BY THE CANADIAN GOVERNMENT THROUGH ITS LOCAL JOURNALISM INITIATIVE. CPERCYBEAUREGARD@TORSTAR.CA.

WE WANT TO HEAR FROM YOU!

The City of Hamilton is seeking feedback on the Urban Boundary Expansion Framework

HOW YOU CAN PARTICIPATE

Attend an In-Person or Virtual Open House

IN-PERSON:
Tuesday November 26, 2024 / 12-9pm
 Hamilton Convention Centre, Chedoke Ballroom
 1 Summers Lane, Hamilton

Thursday November 28, 2024 / 6-9pm
 Ancaster High Secondary School, Main Gym
 374 Jerseyville Rd W, Ancaster

Tuesday December 3, 2024 / 6-9pm
 Gatestone Elementary School
 127 Gateston Dr, Hamilton

VIRTUAL:
Thursday December 5, 2024 / 7-8:30pm
 To register please visit:
<https://engage.hamilton.ca/ubeapplicationframework>

Residents in need of accessibility requirements to be able to review the material and provide input are asked to contact Urbanboundary@hamilton.ca or at 905-546-2424 Ext. 5863

The City of Hamilton supports a firm urban boundary and responsible growth. However, the Ontario government has introduced significant changes to municipal planning rules (Bill 185). These changes pose a direct challenge to the City's existing, provincially approved, Official Plan.

In response to these Provincial changes, the City of Hamilton has developed a Draft Framework for processing and evaluating Urban Boundary Expansion applications. We are actively seeking public input to shape the final version of the Urban Boundary Expansion Framework.

engage.hamilton.ca

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City of Hamilton ✓
@cityofhamilton



The Province has changed city planning rules that allow landowners to propose urban boundary expansions at any time. We want your voice in shaping how the City responds to expansion proposals. Visit engage.hamilton.ca/ubeapplication... to learn more and have your say.

WE WANT TO HEAR FROM YOU!



Framework for Processing and Evaluating Urban Boundary Expansion Applications

Comment Period: Oct 21 - Dec 31
Open houses in November and December



engage.hamilton.ca



12:32 PM · Nov 14, 2024 · **1,481** Views



Appendix C

Project Information Sheet





Responding to Provincial Policy Changes

Proposed Framework for Urban Boundary Expansion

The Ontario government has introduced significant changes to planning rules, including new permissions for private landowners to propose urban boundary expansions. The new rules pose a direct challenge to a firm urban boundary and our existing, provincially approved Official Plans.

How Have Provincial Rules Changed?

Recent changes to provincial planning rules allow proponents to propose urban boundary expansions of any size and appeal directly to the Ontario Land Tribunal if Council's decision on those proposals are rejected or delayed, as long as they are outside the Greenbelt Plan area.

This new process, established by Bill 185 and the new Provincial Planning Statement, diminishes the City's ability to manage growth according to its established plans.

Didn't We Decide on No Urban Boundary Expansion?

Yes! In 2021, Hamilton City Council, supported by many residents, voted to contain urban growth within the existing boundary until 2051. This decision, a key part of the City's growth strategy, aimed to limit sprawl, protect farmland, and use existing infrastructure more efficiently.

But, new provincial rules enable proponents to bypass the City and potentially expand the urban boundary through direct appeals to the Ontario Land Tribunal. This means that even though Hamilton has a firm urban boundary policy in place, the City can't simply reject expansion proposals. The City will need to respond to and assess applications for urban boundary expansions.

Hamilton's Response

A Draft Framework for Processing & Evaluating Urban Boundary Expansion Applications

In response to the provincial changes, the City of Hamilton has developed a Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications. This framework aims to ensure that any proposed urban boundary expansions are carefully assessed against the City's priorities by:



Establishing clear submission requirements by outlining the required technical plans and studies that must accompany any urban boundary expansion application.



Prioritizing key considerations that matter to Hamilton by establishing a set of considerations for the City's rigorous review process, addressing issues such as impacts on farmland, infrastructure capacity and costs, and financial viability.



Outlining a clear process for submission, review, and public and Indigenous engagement for any urban boundary expansion application, going beyond the minimum requirements of the *Planning Act*.

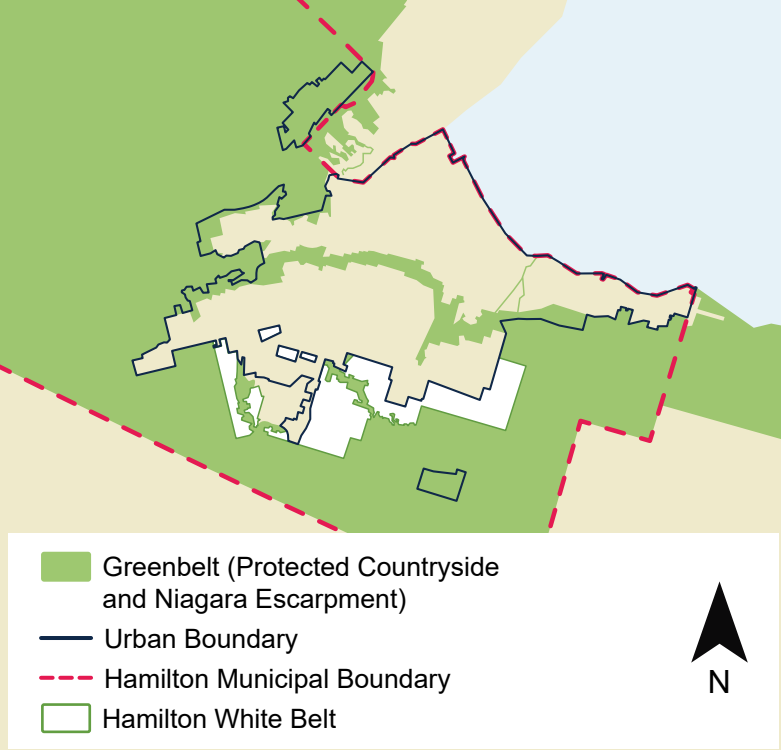


A Look at Hamilton's Current Urban Boundary

Why is the Urban Boundary So Important?

The urban boundary is the line that defines the edge of Hamilton's urban areas, separating it from surrounding rural areas and farmland. It isn't just a line on a map — it helps manage Hamilton's growth responsibly by protecting green spaces, preserving farmland, and focusing on using existing infrastructure more efficiently.

The "White Belt" refers to the land outside the established urban boundary and the Greenbelt (Protected Countryside and Niagara Escarpment) encompassing approximately 4,320 hectares and representing a potential target for urban expansion applications.



- Greenbelt (Protected Countryside and Niagara Escarpment)
- Urban Boundary
- - - Hamilton Municipal Boundary
- Hamilton White Belt



What Happens Next?

The Draft Framework and the City's process for reviewing urban boundary expansion applications are not yet finalized, and the City of Hamilton is actively seeking public input to shape the final version. The City recognizes the importance of public feedback and wants to understand your priorities and concerns regarding the urban boundary expansion process in Hamilton. We encourage you to get involved and help shape the future of our city.

How You Can Participate

In-Person Open House:

Tuesday November 26, 2024: Hamilton Convention Centre, between 12:00pm and 9:00pm

Thursday November 28, 2024: Ancaster High Secondary School, between 6:00pm and 9:00pm

Tuesday, December 3, 2024: Gatestone Elementary School, between 6:00pm and 9:00pm

Participate Online:

Visit engage.hamilton.ca/UBApplicationframework or scan the QR Code to learn more:

Virtual Open House:

Thursday, December 5, 2024, 7:00pm to 8:30pm



The City of Hamilton is dedicated to ensuring that all engagement activities are accessible and inclusive, providing opportunities for all residents to share their voices and help shape a thriving and sustainable future for our community.

More questions? Contact Charlie Toman, Program Lead - Policy Planning for the City of Hamilton, at: urbanboundary@hamilton.ca or call (905) 546-2424 Ext. 5863

Concerns about the provincial policy? If you have concerns about recent changes to urban boundary expansion management in Ontario, please contact the Provincial Minister of Municipal Affairs and Housing at minister.mah@ontario.ca, or your local Member of Provincial Parliament.

Appendix D

**Correspondence with External Agencies,
Community Groups, and Other Stakeholders**



Organization

Hamilton Naturalists Club

Cootes to Escarpment
Enviornment Hamilton
Enviornment Defence
Greenbelt Foundation
Ontario Federation of Agriculture
Realtors Association of Hamilton-Burlington (RAHB)
Christian Farmers of Ontario
West End Home Builders Association
Rural Ontario Institute
Hamilton Chamber of Commerce

Bruce Trail Conservancy
HRIC Hamilon
NIWASA Hamilton
Hamilton Community Foundation
Social Planning and Research Council of Hamilton (SPRC)
Federation of Rental-housing Providers of Ontario (FRPO)
Hamilton and District Apartment Association
Indwell
Hamilton Housing

Contact Person

Jen Baker
Tomasz Wiercioch
Jodi Crawford
Ian Borsuk
Susan Lloyd Swail
Kevin Beaulieu
Conor Warren

Tom Tavani
Michelle Diplock
info@ruralontarioinstitute.ca
hcc@hamiltonchamber.ca

E-mail Address

land@hamiltonnature.org
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
info@rahb.ca
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
info@hamiltoncommunityfounda
sprc@sprc.hamilton.on.ca
info@frpo.org
info@hamiltonapartmentassocia
info@indwell.ca
info@housinghelpcentre.ca
[REDACTED]
[REDACTED]
[REDACTED]



P.O. Box 89052
HAMILTON, ONTARIO L8S 4R5

Charlie Toman
Program Lead - Policy Planning & MCR
City of Hamilton
urbanboundary@hamilton.ca

December 11, 2024

Re: Comments on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications

Dear Charlie,

On behalf of the Hamilton Naturalists' Club (HNC) I am pleased to submit comments on the *Draft Framework for Processing and Evaluating Urban Boundary Expansion Application*. HNC supports the City's no urban boundary expansion (UBE) growth strategy that was approved in 2022. HNC would like to see the white belt protected through the Greenbelt Plan so that the natural lands are benefitting the whole community, not just a few large homes. We would like to see Hamilton continue to build homes through infill within the current urban boundary, including granny suites and density increases along transit lines. We also feel that Hamilton's policies need to align with policies that have been adopted with the community, including the Biodiversity Action Plan. This means no UBE, particularly in areas like the white belt which provide important ecosystem services such as flood management. But HNC recognizes the need to prepare for potential privately initiated UBE applications that may be submitted due to recent changes to the Planning Act through Bill 185, and is submitting these comments in response to the draft Framework.

HNC feels that the City's 2022 growth strategy should be followed before any development happens in greenfield areas, particularly in areas that have not been planned for development and therefore do not have services (road, water, sewer). It is far more efficient and cost effective in terms of resources and construction capacity to build new homes in already built up areas. This means it is more affordable for new owners or tenants. Increased efficiency also means more homes can be built faster. Hamilton already has a lot of planned development and we do not feel there is enough construction capacity for new, unplanned development.

HNC suggests allowing for more mid-rise development within the current urban boundary which will increase efficiency and cost-effectiveness while providing a range of housing opportunities. In order to support mid-rise development, minimum parking requirements could be eliminated and the mandatory step back requirements could be removed for buildings six stories or less. In addition, establishing a dedicated staff team to work with mid-rise developers would increase the appeal of this type of development.

There are a number of warehouses being proposed in Hamilton's white belt and HNC suggests that developers should follow the vertical warehouse model being implemented in several other countries.

Hamilton Naturalists' Club is a non-profit organization dedicated to the study, appreciation and conservation of our wild plants and animals.

This type of warehouse helps with automation which is the goal for a number of the warehouse companies.

The planning justification must show that expansion is required for the City to meet housing targets and that no other sites within the urban boundary (including underutilized spaces like brownfield, parking lots, vacant former commercial lots, etc.) could be a viable alternative site for the development of similar mix of units, taking into account not only housing price point but also lifetime cost to the municipality of providing services.

Hamilton has made positive strides in protecting and enhancing biodiversity, and HNC is concerned that UBE applications will negate the positive steps that have been made. We would like to know how the proposed developments will help to grow the urban tree canopy, and how they will contribute to the protection and enhancement goals in the Biodiversity Action Plan (BAP). The BAP has not been mentioned in the Draft Framework and we are wondering how the City plans to meet its commitments to protect and restore biodiversity if random developments are permitted outside of the urban boundary? We feel the BAP should be included in the Natural Heritage and Water Resources section.

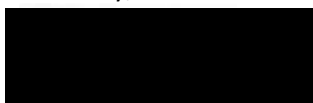
Urban boundary expansion applications need to submit an Environmental Impact Statement to demonstrate how it will not impact our important natural heritage. This should include mapping Ecological Restoration Zones (ERZs) that describe how Significant Woodlands will be expanded through substantive plantings and that linkages to adjacent Core Areas will be rebuilt. This would be a new designation in the Official Plan but can easily be supported by existing Natural Heritage policies and/or Natural Heritage sections of the Provincial Policy Statement such as Significant Wildlife Habitat - i.e., bat maternity areas or significant bird species. Wood Thrush and Eastern Wood Peewee are often identified around development areas, opening the door to requiring a larger forest, required by identifying a ERZ area.

We are concerned about the increased pressure from urban boundary expansion development to existing infrastructure throughout the rest of the city such as the increased stormwater runoff from the larger impermeable surface area. We noticed there is no mention of the upcoming Green Building Standards and suggest that any proposed development needs to exceed the standards and that all rainwater needs to be managed on-site to not impact the rest of the city.

The public consultation area for urban boundary expansion applications should be all Hamilton residents as it was Hamilton residents who pushed for the firm urban boundary in 2022. Residents need to be made aware of what's happening through this process and of the applications that come in. HNC looks forward to seeing what the process will be.

HNC looks forward to hearing your response to our comments. HNC also asks to be notified of applications so that we can ensure BAP goals are being met and that important natural heritage values are not impacted.

Sincerely,

A solid black rectangular box redacting the signature of Jen Baker.

Jen Baker
General Manager

Hamilton Naturalists' Club is a non-profit organization dedicated to the study, appreciation and conservation of our wild plants and animals.

Re: Bill 185 urban expansion requests

2024-12-06 4:33:38 p.m. 

From [Gaby Kalapos](#) >

To [Toman, Charlie](#) > [Imhoff, Trevor](#) >

Cc [Urban Boundary](#) >

 [image001.png](#)

External Email: Use caution with links and attachments

Hi there Charlie,

I think Hamilton did a great job on considering what needs to be part of a complete urban expansion application. My only one suggestion to provide them with tools/suggestions/guidance for how they can complete these requirements if there are resources that can provide consistency in considerations across criteria for what it is worth it would be good to highlight that to them to be able to inform council decisions in a more apples to apples manner. This idea came up for the GHG implications and infrastructure costs because there is a FCM tool that was developed that would enable them to do some of that analysis that may be good to use because it looks at GHG emissions and municipal infrastructure costs. Think this tool would be great to test out to see if it can provide the climate and infrastructure costs comparison to within the urban boundary versus way beyond urban boundary and what that means re infrastructure capital costs (it doesn't look at operational costs). I believe Trevor already is working with you on this effort re integrating that tool/infrastructure costing in a consistent way. Thanks again so much for sharing Hamilton's Urban Expansion process and requirements with other municipalities next year. Really appreciate that. Thanks, Gaby

<https://greenmunicipalfund.ca/resources/toolkit-making-sustainable-land-use-decisions-your-municipality>

From: Gaby Kalapos <[REDACTED]g>

Sent: November 20, 2024 5:07 PM

To: Toman, Charlie <[REDACTED]>; Imhoff, Trevor <[REDACTED]>; Jort-Conway, Melissa <[REDACTED]>

Cc: Ezzio, Sarah <[REDACTED]>; Lauren Patterson <[REDACTED]>; Lukasik, Lynda <[REDACTED]>; Turnbull, Scott <[REDACTED]>; Urban Boundary <urbanboundary@hamilton.ca>

Subject: Re: Bill 185 urban expansion requests

Hi there All, and thanks for looping all folks together Trevor. and thanks for sharing all that great work that Hamilton has done on this effort with the Ottawa team Charlie, much appreciated. Charlie I will provide some input via the engage Hamilton portal, I don't have a lot as it looks very comprehensive.

Just wanted to reach out and see if the Hamilton and Ottawa teams may be willing to share what they have done with the Clean Air Council network so that this work can be shared with others and it can hopefully reduce duplication of work across municipalities.

I can easily share the resources developed thus far with the network but we have found that getting them together and getting one or two leading municipalities to share their stories and then getting the others on the webinar to provide an update on their efforts on this topic via a roundtable format following the presentation works the best for learnings/sharings across the network.

If this sounds reasonable to you all was wondering if sometime in late January may be possible.

Here are some dates if you can let me know if which of these may work for you would be great.

Tuesday January 21 st from 11 AM - 12 PM or from 1 - 2 PM

Thursday January 23rd from 11 - 12 or from 1 - 2

Tuesday January 28th from 11 - 12 or 1 - 2 PM

Thursday the 30th from 11 - 12 or 1 - 2

Thanks for considering this all, appreciate it! gaby

From: Toman, Charlie <[REDACTED]>
Sent: November 18, 2024 11:06 AM
To: Imhoff, Trevor <[REDACTED]>; Gaby Kalapos <[REDACTED]>; Jort-Conway, Melissa <[REDACTED]>
Cc: Ezzio, Sarah <[REDACTED]>; Lauren Patterson <[REDACTED]>; Lukasik, Lynda <[REDACTED]>; Turnbull, Scott <[REDACTED]>; Urban Boundary <urbanboundary@hamilton.ca>
Subject: RE: Bill 185 urban expansion requests

You don't often get email from [REDACTED]. [Learn why this is important](#)

Good morning,

Thanks for looping us in Trevor,

We have an engage page up now which has all of our materials on the City's Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications. Visit [Framework for Processing & Evaluating Urban Boundary Expansion Applications | Engage Hamilton](#)

With respect to Energy and Climate Change, we retained Dillon Consulting to prepare guidance on what would be in scope for an Energy and Climate Change Assessment Report, a new submission requirement specific for urban boundary expansion applications. The Dillon technical memo is posted on the engage Hamilton page.

Our plan is to take that Dillon work, incorporate input from our consultation, then finalize the requirements into Official Plan policy along with a formal Terms of Reference document.

Happy to join any conversations on this. Gaby – we welcome any input that the Clean Air Partnership has on the Draft Framework but note that we'd need comments by December 6th.

Best regards,

Charlie Toman, MCIP, RPP

Program Lead – Policy Planning and Municipal Comprehensive Review
Sustainable Communities Section
Planning and Economic Development Department
Planning Division
[REDACTED]



From: Imhoff, Trevor <[REDACTED]>
Sent: Friday, November 15, 2024 4:24 PM
To: Gaby Kalapos <[REDACTED]>; Jort-Conway, Melissa <[REDACTED]>
Cc: Ezzio, Sarah <[REDACTED]>; Lauren Patterson <[REDACTED]>; Lukasik, Lynda <[REDACTED]>; Toman, Charlie <[REDACTED]>; Turnbull, Scott <[REDACTED]>
Subject: RE: Bill 185 urban expansion requests

Hi Gaby, Melissa and All – thanks for the email and bringing starting this important conversation.

I'm copying my Planning colleagues Charlie and Scott into this conversation, as well as my Director Lynda.

Thanks and let's plan to touch base next week about setting up a specific time that ideally works for all.

Cheers,
Trevor

From: Gaby Kalapos <[REDACTED]>
Sent: Friday, November 15, 2024 12:45 PM
To: Jort-Conway, Melissa <[REDACTED]>; Imhoff, Trevor <[REDACTED]>
Cc: Ezzio, Sarah <[REDACTED]>; Lauren Patterson <[REDACTED]>
Subject: Re: Bill 185 urban expansion requests

External Email: Use caution with links and attachments

Hi there Trevor, I wanted to introduce you to Melissa from the City of Ottawa. they are working on what emissions/climate considerations reports they will be seeking as part of any urban expansion request and I thought it would be good for Ottawa and Hamilton to chat since both of you are working on pulling together the requirements for urban expansion requests that come to the City. <https://pub-hamilton.escribemeetings.com/filestream.ashx?DocumentId=424549>

Trevor can you loop Melissa in with the planning folks who are leading tis work?

And i was thinking this would be a good discussion to have across the CAC network. I am guessing this will be an issue in particular for Ottawa and Hamilton but others are also likely to encounter some expansion requests for additional greenfields developers want to see get opened up.

I was thinking that it would be great for the Hamilton planning folks to share what they did re the research and requirements. then have Ottawa share how you are approaching this.

Then we can hear from others on what discussion are taking place internally. There may be the ability for them to follow in your footsteps re urban expansion report requirements.

If that would be possible I was thinking this would be good to do in January and was wondering if you thought that would be doable?

If so we can provide some date in mid to late January 2025. thanks, gaby

From: Jort-Conway, Melissa <[REDACTED]>
Sent: November 14, 2024 9:03 AM
To: Gaby Kalapos <[REDACTED]>
Cc: Ezzio, Sarah <[REDACTED]>
Subject: RE: Bill 185 urban expansion requests

Hi Gaby,

I would appreciate an introduction, yes, to ask them how the climate / emissions piece will be a factor in considering urban expansion. It's a bit of an oxymoron to suggest that sprawl can be achieved without adding emissions from transportation, let alone the embodied emissions associated with new streets and pipes in the ground.

Many thanks!

Melissa Jort-Conway, MCIP, RPP
Planner III, Climate Change and Resiliency
Strategic Initiatives Department
City of Ottawa

T: 6 [REDACTED]

I am working from the office Mondays and Tuesdays.

From: Gaby Kalapos <[REDACTED]>
Sent: November 13, 2024 6:13 PM
To: Jort-Conway, Melissa <[REDACTED]>
Cc: Ezzio, Sarah <[REDACTED]>
Subject: Re: Bill 185 urban expansion requests

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Hi there, Just found out City of Hamilton is working on what they are going to require as part of their requirements for urban expansion requests. Is a discussion with them still of value? If so ill do an intro to the Hamilton climate and planning team working on this.

From: Jort-Conway, Melissa <[REDACTED]>
Sent: October 7, 2024 10:29 AM
To: Gaby Kalapos <[REDACTED]>
Cc: Ezzio, Sarah <[REDACTED]>
Subject: Bill 185 urban expansion requests

Hi Gaby,

You may have seen that Ottawa is contemplating a new application process for urban expansion requests.

We want part of the evaluation of expansion requests to consider GHG's.

Do you know if any other municipalities are looking into this?

Thanks,

Melissa Jort-Conway, MCIP, RPP
Planner III, Climate Change and Resiliency
Strategic Initiatives Department
City of Ottawa

[REDACTED]
[REDACTED]
I am working from the office Mondays and Tuesdays.

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December 6, 2024

From:
West End Home Builders' Association
1112 Rymal Road East
Hamilton, Ontario L8W 3N7

To:
Charlie Toman
Program Lead - Policy Planning & MCR
City of Hamilton
71 Main Street West
Hamilton, ON L8P 4Y5

CC: Steve Robichaud, Anita Fabac

WE HBA Letter: Framework for Processing & Evaluating Urban Boundary Expansion Applications

The West End Home Builders' Association ("WE HBA") is the voice of the land development, new housing and professional renovation industries in Hamilton, Burlington, and Grimsby. WE HBA represents 320 member companies made up of all disciplines involved in land development and residential construction.

WE HBA understands that City Council has approved in principle a Draft Framework for Processing & Evaluating Urban Boundary Expansion ("UBE") Applications ("Framework") and is engaging in consultation with the public to gather feedback before the final report and statutory meeting, on the Official Plan Amendment ("OPA") in Q1 2025. WE HBA also understands that City staff have been directed to utilize the Framework prior to the formal adoption of it into the Urban and Rural Hamilton Official Plans ("UHOP", "RHOP") as an interim measure. WE HBA appreciates the opportunity to provide feedback and comment on the Draft Framework prior to the formal adoption to provide input on behalf of our membership on the impact of the Framework on process and our collective ability to meet our housing needs. Please see below for comments and recommendations from the residential construction industry.

Previously Submitted and Unaddressed Comments

Many of WE HBA's previous concerns remain since we provided comments on the Framework last August, including concerns related to requiring that Financial Impact Assessment ("FIA") "be prepared by a qualified urban land economist or municipal finance practitioner with clearly demonstrable experience in fiscal impact analyses prepared for public sector clients"; the quantification of ecological service value for the FIA; a lack of TORs for many of the required studies; the additional requirement for a Secondary Plan after the OPA is decided upon; and that the FIA consider "that the time horizon assessed in any analysis extend past the lifecycle replacement costs of new infrastructure". WE HBA encourages the previously submitted comments be considered before the final adoption of the Framework. Our submission from August has been attached as Appendix A.

Terms of Reference

It is noted in the report that "UBE applications are unique and the submission requirements may differ than what is submitted as part of a typical development application". This raises serious concerns for the industry, as clearly laying out study requirements prior to submission for any Formal Consultation



is paramount for community builders to make property decisions and come to the City fully informed. The City must prepare detailed Terms of Reference for all potential studies that may be required for accountability and transparency. WE HBA was engaged in the first phase of the City's Terms of Reference consultation in 2022. We encourage the City to initiate phase two of the Terms of Reference, and would like to participate in a fulsome review of each document.

Study Requirements

There are several elements within the Dillon Memo that present concerns.

- 1) "the proponent should be required to demonstrate support the need to provide additional supply for 'ground-related' housing, at the time of application, and show that this type of supply cannot reasonably be provided within the existing urban area";
- 2) "proponents should be required to show that the proposed expansion would not adversely affect City-wide intensification objectives including demand for higher-density apartment forms within the downtown UGC and other priority nodes and corridors, notably the Major Transit Station Areas (MTSA) along the planned Light Rail Transit (LRT) and other transit lines";
- 3) "at a minimum, any new expansion areas should be required to achieve the planned greenfield density of new urban areas proposed as part of the Ambitious Density Scenario (approximately 77 residents and jobs per ha) ... without planning for significant greenfield apartment units".

WE HBA provides the following comment:

- 1) As per the City's previous Lands Need Assessment and opinion of professional planning staff at the City of Hamilton, additional land is required to accommodate Hamilton's projected growth. Those initial projections were based on the Growth Plan Schedule #3 forecasts, which are now out of date and have been replaced by Ministry of Finance projections based on the much higher levels of growth that Canada and Ontario have experienced these past few years. Demographic pressures have only increased with the gap between housing supply and population demand having grown further. According to the Financial Accountability Office of Ontario, single detached housing starts are at a 69-year low across the Province¹. There has been a decline in starts of ground-related housing at a time where there is escalating demand for family-friendly housing typologies. The Dillon memo notes that "work undertaken as part of the March 2021 LNA concluded that delivering the necessary number of larger, family-sized apartments and ground-related units within existing areas would be a challenge." Requiring developers to provide additional study to demonstrate the need for additional housing is superfluous.
- 2) Demand for ground-related housing such as townhomes and singles is largely unrelated to demand for studio, one- and two-bedroom apartments in Downtown towers. Between 2016 and 2021, Hamilton built 5,990 3+ bedroom dwellings, while rural-exurban areas such as County of Brant built 2,815, at a much higher per capita rate². Families are increasingly leaving the GTHA to find attainable, family-friendly housing that meets their needs³ in the form of ground-related housing, and are typically not looking for units in tower apartments. There

¹ *Ontario Economic Monitor: April to September 2024*, Financial Accountability Office of Ontario [https://fao-on.org/en/report/oem-2024-q3/](https://fao.on.org/en/report/oem-2024-q3/)

² *Inside the crisis facing Canada's dysfunctional housing market*. Globe and Mail, Statistics Canada.

³ *Who Will Swing the Hammer*, Smart Prosperity Institute. <https://institute.smartprosperity.ca/WhoWillSwingTheHammer>



should be an explicit recognition that ground oriented housing types will be displaced to neighbouring communities (such as Brant County) if they are not accommodated in Hamilton. Additionally, due to the location and distance from Downtown and Intensification Corridor of any potential UBE areas, it will be difficult to determine impacts of UBE on these areas.

- 3) The City should adhere to the new Provincial Planning Statement requirements for minimum Greenfield Density. Achieving ground-related ambitious densities while limiting form and function presents a challenge to community builders.

Growth Allocation

In Part B, the Framework notes the following consideration: “A comprehensive review and land budget analysis is required to determine the need for an urban boundary expansion, which includes an assessment of occupied and vacant urban land, brownfield availability, greenfield densities, and intensification targets to determine if sufficient opportunities to accommodate forecasted growth contained in the UHOP are not available. (Former UHOP Policy deleted by OPA 167)”. As previously stated, the need for a UBE is clear; population projections have risen dramatically since the March 2021 staff recommendation to adopt the Ambitious Density Scenario, “which included an urban expansion of approximately 1,300 net ha combined with aggressive targets for residential intensification and greenfield density” (Dillon Memo). The City’s Land Needs Assessment and a third-party review of that Land Needs Assessment clearly demonstrated the City requires a boundary expansion to accommodate the forecasted population growth and projections in the City’s Official Plan. Again, the City’s in force Official Plan is based on outdated Schedule 3 Growth Plan population projections which identified Hamilton growing at a significantly slower rate than the region is ultimately experiencing. UBE Applications should be received and analyzed based on the Ministry of Finance 2046 population projection for Hamilton.

Relation to Green Building Standards

In October 2024, Hamilton Council adopted the Green Building Standards (GBS) which will apply to all new residential and non-residential development in the City. It is understood that the City is currently consulting internally regarding the implementation of the Standards and will be bringing a report forward in February 2025 to Planning Committee regarding implementation, as per Update on Green Building Standards Consultation (Report PED24228). It is noted in Appendix "A" to Report PED24114 that “there may be an opportunity to require GBS as a component of” the submission of an Energy and Environmental Assessment report. WE HBA strongly encourages the City prevent the duplication of study and review, and ensure that the requested information within the Energy and Environmental Assessment are aligned with and not extraneous to GBS requirements.

Part C Application Submission and Review Process

WE HBA requests clarification regarding the statement “acceptance by City Departments and/or External Review agencies of technical plans and studies as part of the urban boundary expansion application does not imply or constitute a positive staff recommendation of the application”. While we understand local political opposition to boundary expansion, the province of Ontario is ultimately responsible for land use planning in Hamilton – and has identified that urban boundary expansions will occur in accordance with the provincial direction to allow for appeals to the OLT.



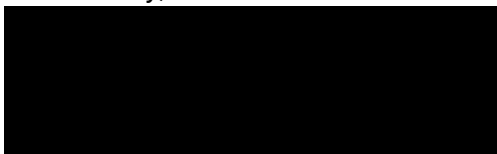
Conclusion

WE HBA is increasingly concerned and alarmed by a shifting political landscape in the City of Hamilton that caters to local political concerns of existing incumbent homeowners at the expense of younger generations, families, and those desperately trying to get into the housing market. The housing crisis will only get worse if we don't legalize more housing options of all types and tenures in both in existing and new communities. To put it bluntly - there is no pathway to middle class housing affordability with lengthy, costly and uncertain planning processes designed to prevent needed housing from being constructed.

The City of Hamilton is increasingly debating and passing policies that are both anti-housing and anti-intensification which despite political commentary to the contrary further supports planning and demographic justification for UBE. The City's stated preference for a no-UBE scenario stands in stark contrast to the City's own public and political policy, including the phase-out of Downtown CIP incentives, a 30-storey height limit city-wide, the rejection of many intensification projects and subsequent OLT cases, and the need to use Strong Mayor powers to move forward affordable housing projects.

As widely cited by many politicians, "Don't tell me what you value, show me your budget, and I'll tell you what you value." – the City cannot simply state it values intensification over boundary expansion, while devaluing opportunities for intensification and housing supply through planning and fiscal policy. All levels of government and industry should be working together to spur construction of desperately needed housing of all types and tenures to close Canada's housing deficit. WE HBA looks forward to continuing to work in partnership with the City of Hamilton to achieve the City's housing targets through a variety of forms of growth.

Sincerely,



Mike Collins-Williams
Chief Executive Officer
West End Home Builders' Association



Appendix A:

WE HBA Submission on Draft Framework for Processing and
Evaluating Urban Boundary Expansion Applications – August 15, 2024

August 15, 2024

Mayor and Members of Council
City of Hamilton
71 Main Street West

West End Home Builder's Association | Submission on Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications under the proposed Provincial Planning Statement (PED24109) (City Wide)

The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Burlington. The WE HBA represents approximately 300 member companies made up of all disciplines involved in land development and residential construction, including: community builders, developers, professional renovators, trade contractors, consultants, and suppliers.

The WE HBA supports the newly permitted ability for landowners to privately initiate urban boundary expansions. While our organization understands the City had adopted a "No Urban Boundary Expansion" position in their Official Plan, **the City of Hamilton's initial Staff Recommendation in 2021 was that an urban boundary expansion is necessary to accommodate the City's forecasted population growth.** Additionally, both the City's Land Needs Assessment and a third-party review of that Land Needs Assessment clearly demonstrated the City requires a boundary expansion to accommodate the forecasted population growth and projections in the City's Official Plan. Furthermore, the City's in force Official Plan is based on outdated Schedule 3 Growth Plan population projections which identified Hamilton growing at a significantly slower rate than the region is ultimately experiencing.

To put our region's rapid growth into context, Ontario experienced a decade's worth of population growth in the past three years. Hamilton cannot support that growth without building significantly more homes of all types. To quote economist Dr. Mike Moffatt's [August 7th, Toronto Star Article](#), "[i]n the first six months of the year alone, Ontario's population grew by nearly 200,000" people. How this impacts Hamilton is that when the "No Urban Boundary Expansion" decision was made, it was based on Hamilton's population growing at a stable forecasted rate, which is not occurring. Instead, Hamilton's supply of housing is lagging far behind Ontario's population growth. As a result, Hamilton is displacing tens of thousands of residents annually to neighbouring communities. Bill 185 enables new home and community builders to access expansion area lands by applying for an Urban Boundary Expansions in the City of Hamilton as necessary. This ability provides the City with an additional opportunity to set a framework for collaborative discussions to work together and move more quickly towards building more attainable housing supply in new complete communities.

Finally, WE HBA would like to identify that a proposed annual expense of \$1.5 million to oppose boundary expansions at the Ontario Land Tribunal is a significant cost taxpayers will incur. Council may wish to consider this expense if the City seeks to defend its refusal or failure to make decisions on urban boundary expansion applications within the context of our regional housing crisis.

Appended to this letter are our organization's initial comments on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications. WE HBA looks forward to participating in the upcoming consultation.

Sincerely,

Michelle Diplock, RPP, Manager of Planning and Government Relations, West End Home Builders' Association



West End Home Builder's Association's Initial Comments: Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications under the proposed Provincial Planning Statement

- Given the critical need for housing in the City of Hamilton, the end result of an applicant pursuing an Official Plan Amendment for an Urban Boundary Expansion should be the inclusion of the subject area into the Urban Boundary **with** a Secondary Plan implemented. Since many of the supporting studies require the applicant to evaluate the subject lands at a Secondary Plan-level of detail, implementation of a Secondary Plan at the conclusion is reasonable.
- There is concern with the number of supporting materials required which do not have a Terms of Reference authored by the City at this time. This may create a scenario where applicants are unable to submit plans and reports to constitute a complete application until the City has drafted and approved Terms of Reference for each study. WE HBA looks forward to participating in the City's next phase of consultation on the Development Application Terms of Reference project.
- The Staff Report sets out that the framework for the Financial Impact Analysis set out as a requirement of an Urban Boundary Expansion recommends "that the time horizon assess in any analysis extend past the lifecycle replacement costs of new infrastructure". It is unclear to what end a proponent is expected to provide analysis on costs of infrastructure beyond the lifecycle of said infrastructure.
- The Staff Report notes that the removal of any open space and natural heritage features would have additional costs due to the ecological services value these natural features provide. As a result, the City states that the Financial Impact Analysis should include this in the municipal finance considerations. It is unclear how the ecological services value associated with natural heritage features could be quantified for the purposes of a report like a Financial Impact Analysis.
- The Dillon Report states "It is recommended that the City require that the assessment be prepared by a qualified urban land economist or municipal finance practitioner with clearly demonstrable experience in fiscal impact analyses prepared for public sector clients". Limiting consultant teams to only those with experience preparing analyses for public sector clients creates high potential for conflicts in qualified consultants due to their engagement with the public sector. Ultimately, this expectation may limit the ability to find objective consultants which can provide expert analysis.



December 13, 2024

Via Email

Charlie Toman
Program Lead - Policy Planning & MCR
Sustainable Communities, Planning Division
City of Hamilton
71 Main Street West, 4th Floor
Hamilton, Ontario, L8P 4Y5

Dear Mr. Toman,

RE: SUBMISSION ON THE DRAFT FRAMEWORK FOR PROCESSING AND EVALUATING URBAN BOUNDARY EXPANSION APPLICATIONS ON BEHALF OF 2113522 ONTARIO INC. (RELATED TO VANTAGE GROUP)

Landwise has been retained by 2113522 Ontario Inc. (related to Vantage Group), to prepare a submission for the on-going consultation of the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications on their behalf. 2113522 Ontario Inc. owns approximately 23 hectares (57 acres) of land south of the Hamilton International Airport lands and east of the newly leased lands. The lands are located to the west of the southernmost boundary of the Airport Employment Growth District Secondary Plan boundaries in the Rural area. The purpose of this letter is to formally request consideration on establishing priorities for the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications and to highlight the strategic importance of the subject lands and their contribution to the overall economic growth objectives of the City of Hamilton.

DESCRIPTION OF SUBJECT LANDS

The subject lands are located in the south portion of Hamilton in the former Township of Glanbrook immediately adjacent to the south of Hamilton International Airport. The lot is irregularly shaped and has an area of ± 23 hectares (57 acres). The subject lands have ± 250.6 metres of frontage onto the Highway No. 6 northbound access ramp, ± 604.5 metres of frontage onto the ramp to and from the airport, and ± 506.6 metres of frontage onto Airport Road West (see Figure 1). The subject lands are surrounded by recently approved warehousing uses to the east, the Hamilton International Airport to the north, agricultural lands to the west, and Highway No. 6 and agricultural lands to the south. There is currently one vacant silo on the subject lands as well as remnants of a previous agricultural operation but no complete structures. The subject lands have gentle changes in topography, with many of them being former agricultural areas and several more naturalized portions existing.



Figure 1: Vantage Group Lands

PLANNING STATUS:

1. Rural Hamilton Official Plan (RHOP)

The subject lands are designated “Rural” on Schedule “D” - Rural Land Use Designations of the Rural Hamilton Official Plan. Additionally, a portion of the lands are identified as “Core Areas” on Schedule “B” - Natural Heritage System, “Significant Woodlands” on Schedule “B-2”, “Wetlands” on Schedule “B-4” and containing “Streams” on Schedule “B-8”.

The subject lands have frontage on Airport Road West, and Arterial Road and Hwy No. 6 a Provincial Highway (Controlled Access) as identified on Schedule “C” - Rural Functional Road Classification.

Finally, the subject lands are also identified as “Airport Influence Area” on Schedule “F” - Airport Influence Area and within an area of “Overall Archeology Potential” on Appendix “F-2”.

The Natural Heritage features are currently protected with the Conservation/Hazard Land - Rural (P7) Zone. The policies of the Rural Designation acknowledge lands that have lower capability for agriculture uses due to a range of factors, with the intent of the Plan being to maintain and protect agricultural uses as the primary and predominant land use and to protect farm operations from incompatible forms of development to preserve these lands for agricultural use.

2. City of Hamilton Zoning By-law No. 05-200

The subject lands are subject to two zoning categories in the City of Hamilton Zoning By-law No. 05-200. These include the Conservation / Hazard Land - Rural (P7) Zone and the Rural (A2, 272) Zone. The Rural A2 Zone permits agricultural operations as well as a variety of other farm supportive service commercial uses and storage facilities. Single detached dwellings and residential care facilities are also permitted. Special Exception 272 allows for additional permitted uses including: airport, airport storage, maintenance, and operation facilities, as well as previously existing uses.

The P7 Zone applies to a portion of the property which is recognized in the RHOP as a Natural Heritage feature. The P7 Zone permits agriculture, conservation, existing single detached dwellings, flood and erosion control facilities, and passive recreation opportunities.

STRATEGIC SUPPORT FOR REDEVELOPMENT

1. Location and Accessibility

The subject lands are strategically located adjacent to the leased lands for the Hamilton International Airport and the southern boundaries of the Airport Employment Growth District (AEGD). With the recent lease of the lands south and west of the Airport the subject lands have been left as a remnant piece of Rural lands.

The subject lands benefit from direct access to the City’s transportation network specifically Highway No.6 and Upper James Street. The location makes the subject lands ideal for the goods movement sector and uses that support the operational requirements of the Hamilton International Airport. The lands are within the Airport Influence Area which limits the options for development of any sensitive land uses.

2. Alignment with the City’s Strategic Goals

The subject lands are conveniently located between the boundaries of the AEGD boundaries and the Hamilton International Airport lands. The parcel offers significant options for providing a range of lands uses that would directly support the Hamilton International Airport and enhance the AEGD, including:

**Employment related uses:**

- Warehousing, advanced manufacturing, and logistics operations that capitalize on proximity and access to the airport freight and distribution networks.

Airport Related Services:

- Hotels, car rental facilities, and commercial parking lots to support airport operations, travelers, and employees.

Ancillary Commercial Development:

- Restaurants, retail, and service commercial uses that would cater to airport passengers, employees, and business park employees.

The incorporation of these lands into the AEGD would establish a land use framework that prioritizes strategic and cohesive development options that complements the Hamilton International Airport operations and the overall goals of the AEGD. Road and servicing infrastructure exists to support the surrounding lands, including the Hamilton International Airport. A comprehensive policy framework that incorporates the subject lands would generate significant economic benefits, including job creation across multiple sectors, increased municipal revenues, and strengthened regional competitiveness.

3. Contribution to Economic Growth and Employment

The Hamilton International Airport and surrounding lands, designated as part of the AEGD, play a critical role in the City's economic development strategy. Permitting the expansion and development of the subject lands for employment and airport related land uses would strengthen the AEGD by creating a logical extension of compatible land uses, making efficient use of remnant lands, and supporting the City's vision for this strategic growth area.

The City's Economic Development Strategy reinforces the importance of the AEGD lands and the significant investment that will occur to service and support the employment lands around the Airport. The future development of the subject lands aligns with the City's priority for employment growth in the AEGD.

4. Prioritization

The Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications should address the importance of creating, supporting, and promoting the logical expansion of employment areas. Urban Boundary Expansions that aim to close gaps and create more cohesive employment area boundaries should be recognized as when it can be demonstrated that they support the long-term objectives of employment areas and more specifically the success of the Hamilton International Airport.



CONCLUSION

With consideration of the subject lands and the strategic location adjacent to the Hamilton International Airport lands and between the additional leased lands and the boundary of the AEGD it is our opinion that the Draft Framework for Processing and Evaluating Urban Boundary Applications should reflect priority areas that strengthen the City of Hamilton's position as a regional economic leader and support the long term viability of the AEGD.

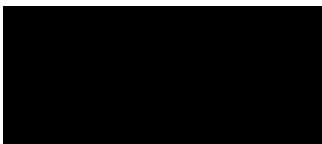
As it relates to the subject lands, it is important to consider the significance of the ongoing consultation on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications, AEGD Secondary Plan Review and the Implementation Plan for Area of Employment changes Under the Planning Act and Provincial Planning Statement, 2024.

We respectfully request that this submission be given full consideration and look forward to continuing discussions through this and other ongoing City consultation processes to reinforce our goal of supporting the City of Hamilton's strategic and economic goals for the AEGD.

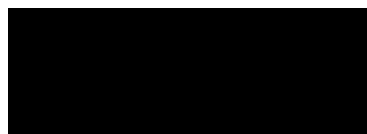
Should you have any questions or require additional information, please do not hesitate to contact Shannon McKie at (905) 574-1993 ext. 209 or shannon.mckie@landwise.ca.

Respectfully Submitted,

LANDWISE



Terri Johns, MCIP RPP
Founder / Principal Planner



Shannon McKie, MCIP RPP
Associate / Principal Planner

- cc. C. Puckering, Vice President, Head of Canada, Vantage Group (via email)
D. Grant, Director, Asset Management & Corporate Finance, Vantage Group (via email)
A. Fabac, Acting Director of Planning and Chief Planner (via email)
D. Heyworth, Manager, Sustainable Communities (via email)

Appendix E

Explainer Infographics



Hamilton's Urban Boundary



A Timeline of Growth Management Policy Changes

City Actions

2018

Planning For Growth: The City launches the Growth Related Integrated Development Strategy (GRIDS) 2 process to plan for growth to 2041 (eventually updated to 2051).

November 2021

- **Review of Growth Scenarios:** Using the Province's methodology for land needs assessments, the City reviewed and assessed two alternative growth scenarios (Ambitious Density and No Urban Boundary Expansion).
- **No Boundary Expansion:** Hamilton City Council votes to adopt a "no urban boundary expansion" growth strategy.

June 2022

Council Adopts Official Plan Amendment (OPA) 167: The amendment implements the No Boundary Expansion growth strategy to the Hamilton Urban Official Plan and Rural Hamilton Official Plan.

September 2023

Hamilton Opposes Greenbelt Development: Through City-led public engagement, majority of residents express opposition to Greenbelt changes.

November 2023

Hamilton Supports Reversals: City Council supports the reversals of Greenbelt development and urban boundary expansion policies.

April 2024

Council Recommits to Firm Urban Boundary: Hamilton City Council opposes Bill 185 and the undermining of its "no expansion" policy.

August 2024

Draft Framework Developed: Anticipating privately initiated urban boundary expansion applications, Council approves the Draft Urban Boundary Expansion Application Framework.

October to November 2024

City of Hamilton engages the community and stakeholder groups on the Draft Urban Boundary Expansion Application Framework.

Provincial Actions

November 2021

Updated Growth Projections: Ontario mandates updated official plans; Hamilton's population forecasted to reach 820,000 by 2051.

November 2022

No Boundary Expansion Overruled, Greenbelt Lands Opened Up: The Province approves OPA 167 with a series of modifications, including the addition of an over 2,200 hectare expansion.

September 2023

Greenbelt Decision Reversed: Premier Ford reverses proposed changes to the Greenbelt Plan.

October to December 2023

Urban Boundary Expansion Reversed: Province announces reversal of November 2022 decision to modify municipal urban plans, including Hamilton's urban boundary expansion. This is put into force by passing of Bill 150, removing the 2,200 hectares of land previously added to Hamilton's urban boundary.

April 2024

Urban Boundary Expansion Reopened: Province introduces Bill 185, Cutting Red Tape to Build More Homes Act, 2024, opening the door for new privately initiated urban boundary expansion applications to be appealed to the Ontario Land Tribunal.

August 2024

New Provincial Planning Statement Approved: Province approves new Provincial Planning Statement, removing the requirement for a Municipal Comprehensive Review for boundary expansions.

October 2024

New Provincial Planning Statement In Effect: New provincial policies in effect, opening the door for urban boundary expansion applications.

The Impacts of Recent Policy Changes on Hamilton's Growth Management

The City of Hamilton, guided by extensive community engagement and its 2051 Growth Management Strategy, remains committed to accommodating growth within its existing urban boundary. However, recent provincial policy changes, including the removal of mandatory Municipal Comprehensive Reviews (MCRs) and the introduction of Bill 185, have empowered landowners and proponents to propose urban boundary expansions of any size at any time, challenging the City's ability to manage growth.

Here's how the new Provincial rules affect Hamilton

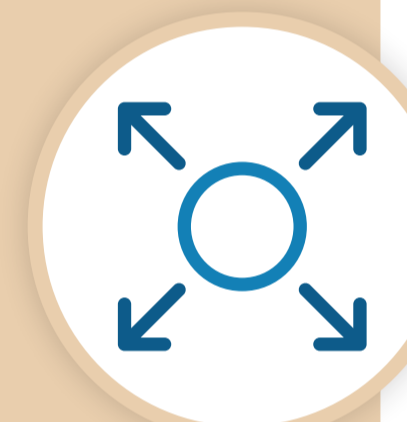
Influx of Urban Boundary Expansion Applications:



The new policies are likely to trigger urban boundary expansion requests from proponents, potentially leading to conflicts with the City's existing growth management strategy, which prioritizes intensification within the current urban boundary.

Challenges in Maintaining a Firm Urban Boundary:

The City's commitment to a firm urban boundary is challenged by recent changes to the Provincial Planning Statement and Bill 185. The new provincial rules enable proponents to bypass the City and potentially expand the urban boundary through direct appeals to the Ontario Land Tribunal.



Green Space and Farmland Preservation:



With less emphasis on comprehensive planning and more focus on individual development applications, the City might face challenges in preserving its green spaces and farmland.

Financial Implications:

Defending against Ontario Land Tribunal appeals on urban boundary expansions poses significant financial burdens for the City.



The City Cannot Control Provincial Policy Changes:

Planning policy changes made by the Provincial Government are out of the City's control. Comments and concerns regarding Provincial policy changes can be directed to your Member of Provincial Parliament, or to the Provincial Minister of Municipal Affairs and Housing.

Managing Provincial Policy Changes to Urban Boundary Expansion

Hamilton's Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications

What is the Draft Framework?

The Draft Framework guides how the City of Hamilton will handle applications to expand its urban boundary. Currently, the Urban Hamilton Official Plan and Rural Hamilton Official Plan do not provide guidance for how to assess urban boundary expansion proposals. The Framework will establish a clear and rigorous process for reviewing these requests, ensuring transparency and providing opportunities for public input. The Framework is critical because recent provincial policy changes now allow urban boundary expansion applications to be made at any time, despite the City's commitment to a firm urban boundary until 2051. The Framework is divided into Parts A, B, and C:

Navigating the Framework: Three Key Parts

A Establishes Urban Boundary Expansion Submission Requirements

Part A outlines the specific plans and technical studies required for any urban boundary expansion application. These include existing requirements found in the City's Official Plans and new requirements specifically designed for urban boundary expansion applications, like a Housing Needs Assessment and an Emergency Services Assessment.

Required Submissions:

- Growth Allocation - Housing Assessment Report
- Fiscal Impact Assessment
- Energy and Climate Change Assessment Submission
- Public Engagement
- Subwatershed Study
- Concept Plan

B Key Considerations

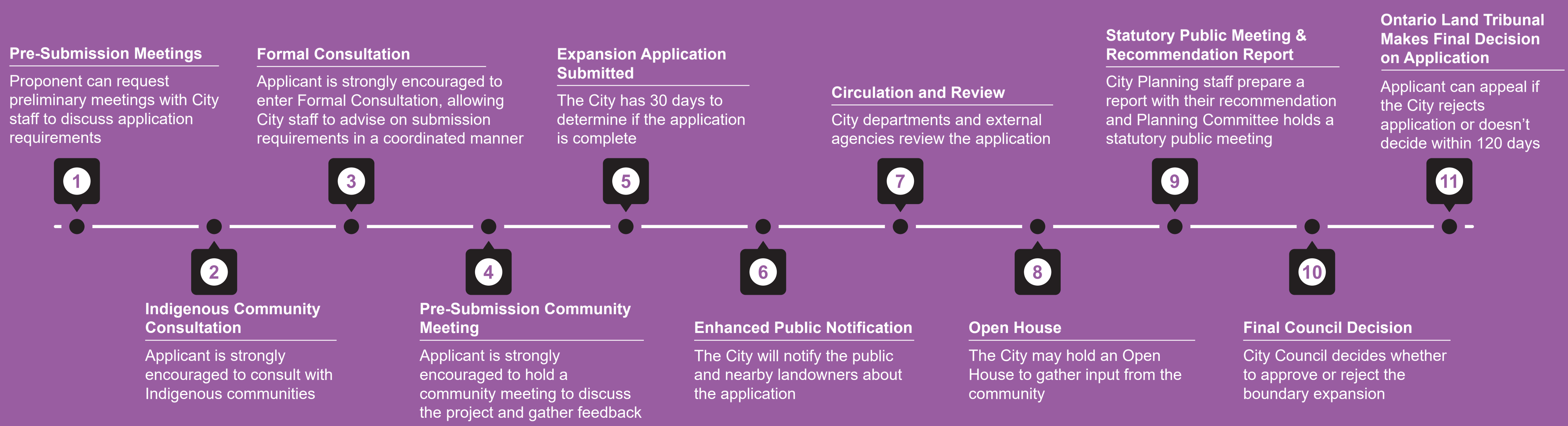
Part B outlines the factors the City will consider when evaluating urban boundary expansion applications to ensure a comprehensive and rigorous review process. The key considerations are informed by the Planning Act, the Provincial Planning Statement and the goals and objectives of the Urban Hamilton Official Plan and Rural Official Plan.

Considerations for Assessing Applications:

- Growth Allocation**
Does the expansion application contribute to sustainable urban growth? Does it impact the City's planned intensification within the built up area?
- Climate Change**
How does the application address the City's climate change objectives? What strategies are included to promote sustainable transportation, energy-efficient buildings, and climate resilience?
- Natural Hazards**
Are potential natural hazards such as flooding sufficiently addressed to ensure the safety of future residents?
- Transportation Systems**
Are there plans to connect the development to the city's existing and planned transportation infrastructure? Do these plans prioritize active transportation, public transit, and efficient road networks?
- Natural Heritage and Water Resources**
What measures are proposed to protect and enhance natural heritage features and water resources?
- Cultural Heritage Resources**
What is the plan to identify and protect cultural heritage resources in the area?
- Land Use Compatibility**
How will the proposed land uses in the application avoid and protect nearby sensitive land uses, such as prime agricultural land, significant wildlife habitat, or wetlands? Will the application create any land use conflict with existing or planned uses?
- Infrastructure and Public Service Facilities**
How will the proposal's infrastructure and public services requirements impact the city's current servicing capacity, transportation networks, and emergency services?
- Municipal Finance**
How does the application ensure financial sustainability for the City of Hamilton, taking into account the costs of infrastructure, public services, and the overall impact on the City's finances?
- Complete Communities**
What is the vision for creating a complete community within the proposed development area? What mix of land uses, housing options, community facilities, and public spaces are proposed to promote social equity, quality of life, and a sense of belonging?
- Agricultural System**
Does the expansion application prioritize development on non-prime agricultural lands, minimizing impacts on prime agricultural areas and specialty crop areas?

C Outlines a Clear Process for Submission, Review, and Public Engagement

Part C details the process for submitting an urban boundary expansion application for review. Importantly, it outlines the enhanced public and Indigenous community consultation requirements the City has added beyond the minimum legal requirements, including notification methods, and ways to review the applications. It sets out a process in which the City would consider urban boundary expansion applications within the **120 day time frame** required by the Province.



Urban Boundary Expansion Applications

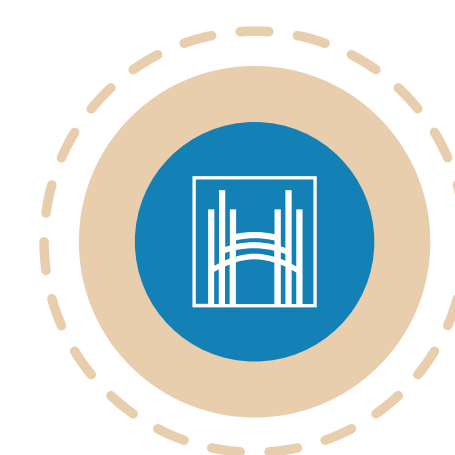
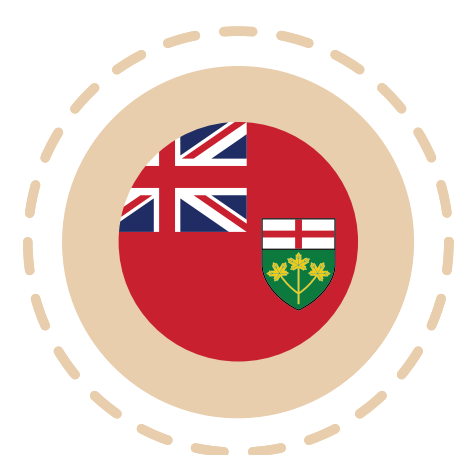
Responsibilities of the Province and the City



The Province of Ontario sets rules and regulations for municipal growth under the Planning Act, allowing municipalities to create Official Plans and Zoning By-laws. Recent legislation, including Bill 185 (Cutting Red Tape to Build More Homes Act, 2024) and the new Provincial Planning Statement (2024), has changed how urban growth is managed. These enable urban boundary expansion proposals of any size, at any time.

The table below outlines recent Provincial policy changes regarding urban boundary expansion proposals and the actions the City can take in response, based on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.

Provincial Policy Changes



Hamilton's Response

Topic	Provincial Policy Changes	Hamilton's Response
Consideration of Urban Boundary Expansion Applications	<ul style="list-style-type: none"> New Provincial Planning Statement (2024) permits urban boundary expansion applications to occur at any time Allows proponents to submit Official Plan Amendments for settlement area expansions Sets out the minimum criteria for settlement area expansions 	<ul style="list-style-type: none"> Determines strategic growth areas, identifying the parts of the City that are to be focus for development Current Official Plan maintains a firm boundary, where growth is expected to occur in nodes, corridors and elsewhere within existing greenfield areas and built up areas Complete applications are accepted for processing City can establish criteria for decision-making around settlement area expansion given the unique characteristics of the City
Early Consultation Requirements	<ul style="list-style-type: none"> Bill 185 allows proponents to opt out of formal consultation requirements and public consultation before submitting an application 	<ul style="list-style-type: none"> Establish policies that strongly encourage pre-application consultation with municipalities, community residents, and Indigenous Communities
Required Information	<ul style="list-style-type: none"> Proponents can appeal municipal submission requirements (e.g. Sub-Watershed Studies) requirements to the Ontario Land Tribunal (OLT) 	<ul style="list-style-type: none"> The City can identify specific plans and studies, defensible based on land use policy, that must be submitted as part of a complete application
Application Fees	<ul style="list-style-type: none"> Proponents can appeal fees to the Ontario Land Tribunal (OLT) 	<ul style="list-style-type: none"> Able to establish the fees for submitting a planning application that cover the cost of processing the application
Public Notification	<ul style="list-style-type: none"> Minimum notification requirements for Official Plan Amendment Applications are established 	<ul style="list-style-type: none"> Can establish enhanced notification requirements for members of the public and interested parties
Public Access to Information	<ul style="list-style-type: none"> Requires all information associated with an application to be made public 	<ul style="list-style-type: none"> Can share all information on the City's website
Public Meetings	<ul style="list-style-type: none"> Requires at least one statutory public meeting 	<ul style="list-style-type: none"> Can hold additional community meetings in advance of and in addition to the statutory public meeting and can request proponents do the same
Decision Timeline	<ul style="list-style-type: none"> Proponents can appeal to the Ontario Land Tribunal (OLT) if no decision is made within 120 days 	<ul style="list-style-type: none"> No ability to request the Province extend the 120 day review timeline
Approval Decisions	<ul style="list-style-type: none"> Applicants can appeal Council's refusal of an application to the Ontario Land Tribunal (OLT) 	<ul style="list-style-type: none"> City Council can approve or deny an application, subject to appeal
Refusal of Applications	<ul style="list-style-type: none"> Proponents can appeal to the Ontario Land Tribunal (OLT) if the City fails to review an application within 120 days or deems an application as incomplete 	<ul style="list-style-type: none"> Can refuse applications that are missing certain required information (i.e. incomplete applications)
Appeals on Council's Decision to the Ontario Land Tribunal (OLT)	<ul style="list-style-type: none"> Through Bill 185, the Province eliminated 'third party appeals,' meaning only registered landowners within the area subject to the application can appeal 	<ul style="list-style-type: none"> Similar to other planning decisions, the City would be responsible for defending Council decisions on matters appealed to the Ontario Land Tribunal (OLT)
Attendance at OLT Hearings	<ul style="list-style-type: none"> The Province has legislation that determines who can participate in and attend Ontario Land Tribunal (OLT) hearings 	<ul style="list-style-type: none"> The City has no control over who attends Ontario Land Tribunal (OLT) hearings
Approved Urban Boundary Expansion Areas	<ul style="list-style-type: none"> The applicant can appeal a Secondary Plan Official Plan Amendment based on policy or mapping discrepancies 	<ul style="list-style-type: none"> Before development can proceed, long-term land use must be approved using the City's approved Framework for establishing urban boundary expansion area Secondary Plans

Appendix F

Virtual Open House Presentation Slides





Hamilton

Responding to Provincial Policy Changes:

Proposed Framework for Processing & Evaluating Urban
Boundary Expansion Applications

Welcome

Thank you for participating in the
Framework for Processing & Evaluating
Urban Boundary Expansion Applications
Virtual Open House!

Housekeeping



This meeting will be **recorded**.



Use the **Q&A function** to ask questions. They will be answered at **specific points throughout the presentation**.




Today, you can provide feedback using the **polls** and **chat** during this meeting or the **survey** at the end of the presentation.

Land and Water Acknowledgement

Meeting Agenda

1. Short Video
2. Introductions
3. Recent Provincial Policy Changes
4. Rationale for Establishing a Framework
5. The Draft Framework
6. How You Can Participate More
7. What Happens Next?
8. Q&A
9. Closing Remarks

1 Video

An aerial photograph of a city, likely Hamilton, with a white outline tracing an urban boundary. The background is a dark blue, textured map of the city and surrounding areas.

Hamilton's Urban Boundary

Navigating Provincial Changes

2 Staff Introduction

Charlie Toman

City of Hamilton
Program Lead - Policy
Planning & Municipal
Comprehensive Review

Morgan Boyco

Dillon Consulting
Associate

Laura Swyers

Dillon Consulting
Planner

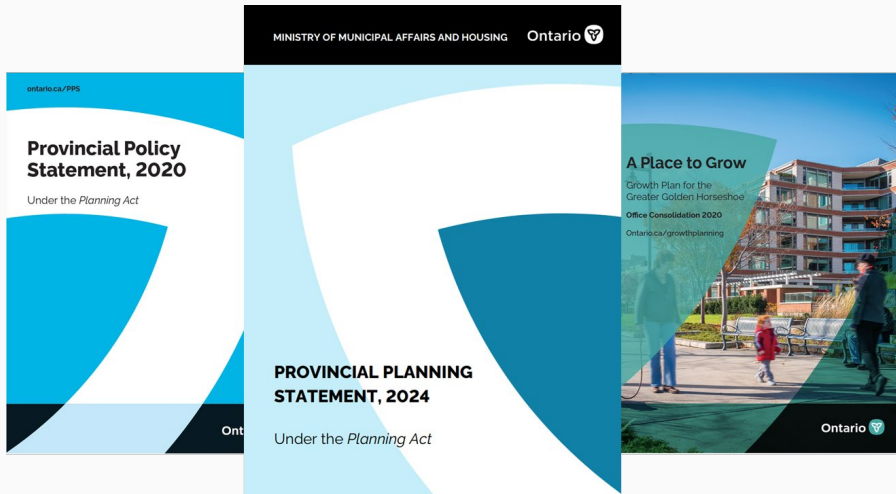


Poll:

What part of Hamilton do you live in?

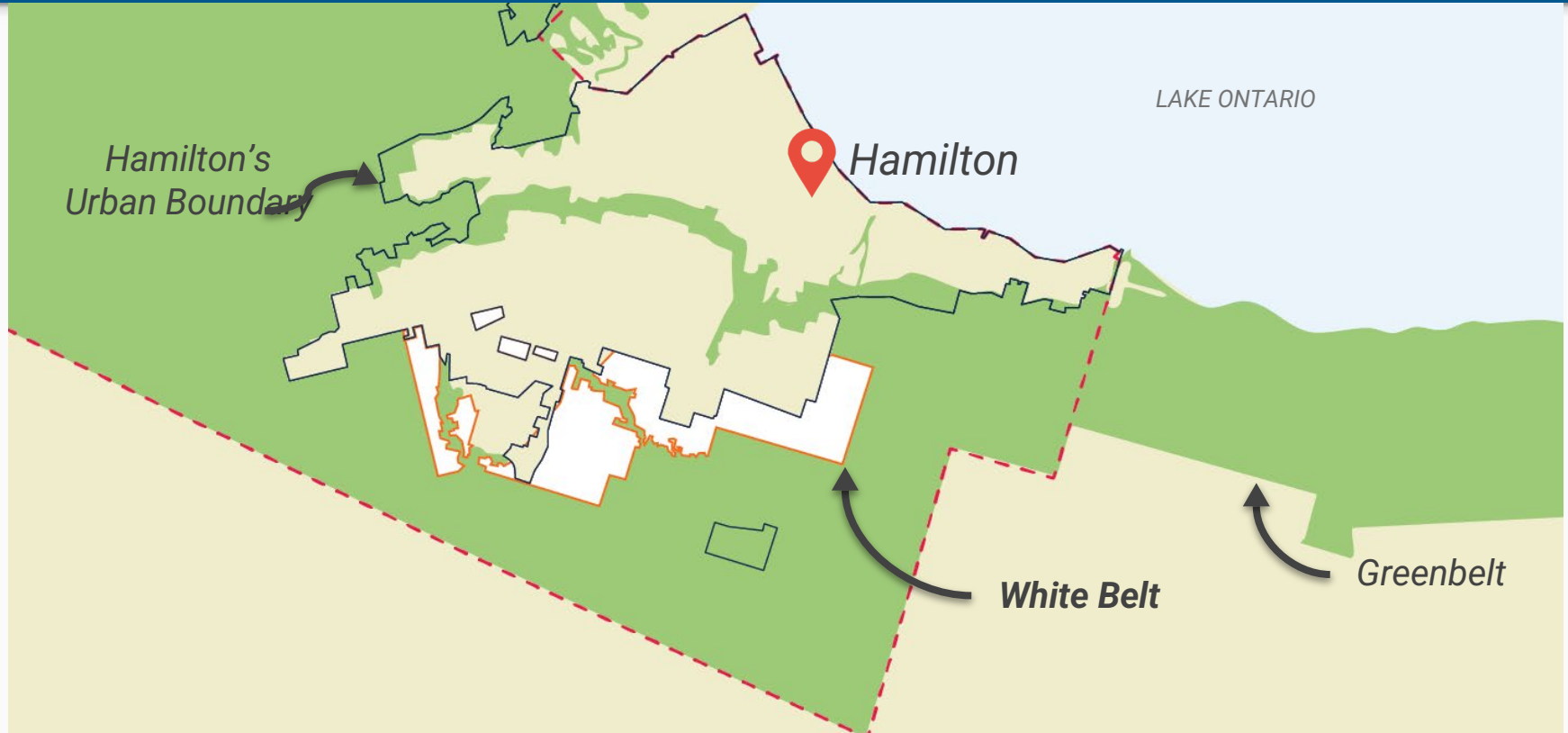
Let us know in the **chat** if you live **outside of Hamilton**.

3 Recent Provincial Policy Changes



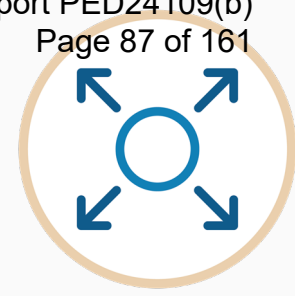
- New Provincial Policy Statement came into effect **October 20, 2024**
- New rules allow landowners to propose urban boundary expansions **at any time.**
- Proponents can appeal directly to the Ontario Land Tribunal if **Council's decisions are rejected or delayed.**
- Challenges Hamilton's **firm urban boundary** and existing Official Plans.

Potential Urban Expansion Areas under the Provincial Planning Statement





Anticipated Urban
Boundary Expansion
Applications



Challenges in
Maintaining a Firm
Urban Boundary



Green Space and Farmland
Preservation



Financial
Implications

How do the New Provincial rules affect Hamilton?

Q&A Break

4 Rationale for Establishing a Framework

- Bill 185 and the Provincial Planning Statement **challenge Hamilton's no urban expansion policy.**

Rationale for Establishing a Framework

- Urban boundary expansion applications will be come in **despite policies in Hamilton's Official Plans.**
- Hamilton's Official Plans don't specify requirements for these applications.

5 The Draft Framework

What is the Framework?

- Council-Approved **Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.**
- Relates to **application completeness and quality**
- Establishes a **clear, transparent process** for receiving and processing applications.
- Made up of **Parts A, B, and C**

Part A

Submission Requirements

Outlines the **specific plans and technical studies** required for any urban boundary expansion application.

Standard Submission Requirements



Draft Official Plan
Amendment



Planning
Justification Report



Geotechnical
Study



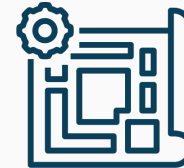
Cultural Heritage
Impact Study



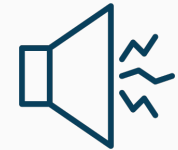
Archaeological
Assessment



Karst
(Land Stability)
Assessment



Minimum
Distance
Separation
Formulae



Noise Impact
Study

Enhanced Submission Requirements



Concept Plan



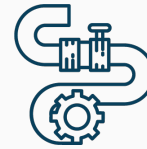
Energy and Climate Change Assessment Submission



Financial Impact Analysis and Financial Strategy



Phasing Plan



Functional Servicing Feasibility Report



Subwatershed Study (Phase 1)



Agricultural Impact Assessment



Pedestrian Route and Sidewalk Analysis



Public Consultation Summary



Noise Impact Study



Transportation Impact Study



Transit Assessment



Odour Impact Study

New Submission Requirements



Employment Needs
Assessment



Housing
Assessment



Emergency Service
Assessment
(Police, Fire,
Ambulance)



Tell Us:

Are there any **additional studies** that should be required in a urban boundary expansion application?

Part B

Key

Considerations

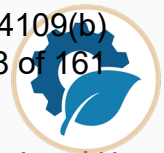
Part B outlines the **factors** the City will consider when **evaluating** urban boundary expansion applications.



Growth Allocation



Transportation Systems



Land Use Compatibility



Natural Hazards



Municipal Finance



Cultural Heritage Resources



Natural Heritage & Water Resources



Climate Change



Agricultural System



Infrastructure & Public Service Facilities



Complete Communities



Tell Us:

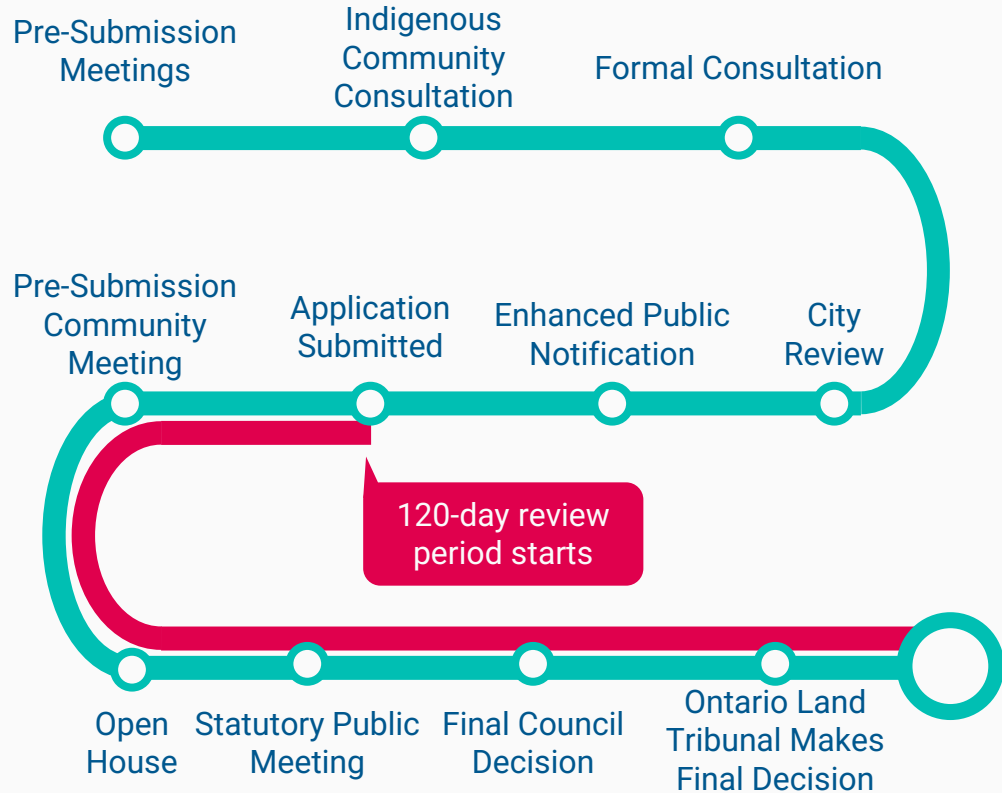
What other '**Considerations**' should the City include in the **evaluation Framework**?

Do you have any **questions about these key considerations**?

Part C

Submission and Review Process

Part C: Outlines a clear process for **submission, review, and public engagement** within the **120 day** time frame.





Poll:

How would you like to be notified when an application for an urban boundary expansion is made?

Let us know in the **chat** if there are other options you would prefer.



Poll:

When would you like to be notified of a new urban boundary expansion proposal?

Let us know in the **chat** if there are other options you would prefer.



Poll:

How would you like to provide feedback on a new urban boundary expansion proposal?

Let us know in the **chat** if there are other options you would prefer.



Tell Us:

Does the **example notice** in the next slide provide all of the information you would need to understand the urban boundary expansion application?

Let us know in the **chat** if there is something missing.

Information about **who** is submitting, the **affected lands**, and **purpose**

Map of the affected land

Public meeting details (in-person and virtual)

File number and Planner Contact Information

CITY OF HAMILTON
PUBLIC NOTICE
 OF COMPLETE APPLICATION(S) FOR AN URBAN BOUNDARY EXPANSION
 AND PUBLIC MEETING OF THE PLANNING COMMITTEE

OWNER / APPLICANT:	
AGENT:	
SUBJECT LANDS:	
PURPOSE AND EFFECT OF THE PROPOSED OFFICIAL PLAN AMENDMENT / ZONING BY-LAW AMENDMENT	

PROVIDE A LOCATION MAP ON SIGN
 (SEE SAMPLE BELOW)



PUBLIC MEETING

DATE: [Enter Target Date]
TIME: [Enter Target Date]
LOCATION: [Enter Target Location]

The City of Hamilton is now conducting meetings in a hybrid format via an in-person and Webex platform. All Hybrid Meetings can be viewed at:

City's Website: www.hamilton.ca/MeetingAgendas

Inquiries Refer to File(s): [File(s)]

For where and when a copy of [the proposed Urban Boundary Expansion and information and material related to it] [additional information and material about the proposed By-law to amend the Zoning By-law] will be available for public inspection; or for a copy of the Notice of Complete Applications which was mailed to all [land owners](#) within 120 metres of the subject lands, please contact [Planner].

For more information about this matter, including information about preserving your appeal rights, contact [Planner].

Collection of Information

Information respecting this application is being collected under the authority of the Planning Act, R.S.O. 1990, c. P.13. All comments and opinions submitted to the City of Hamilton on this matter, including the name, address and contact information of persons submitting comments and/or opinions, will become part of the public record and will be made available to the Applicant and the general public and will appear on the City's website unless you expressly request within your communication that City remove your personal information.

NB: TO SIGN MAKER: ALL WORDING CONTAINED ON THIS SHEET MUST BE INCLUDED ON THE SIGN.

**CITY OF HAMILTON
PUBLIC NOTICE**

OF COMPLETE APPLICATION(S) FOR AN URBAN BOUNDARY EXPANSION
AND PUBLIC MEETING(S) OF THE PLANNING COMMITTEE

OWNER / APPLICANT:	
AGENT:	
SUBJECT LANDS:	
PURPOSE AND EFFECT OF THE PROPOSED OFFICIAL PLAN AMENDMENT / ZONING BY-LAW AMENDMENT	

A

Area of the information about **who** is submitting, the **affected lands**, and **purpose**

PROVIDE A LOCATION MAP ON SIGN
(SEE SAMPLE BELOW)



B

Area of the **Map** of the affected land

PUBLIC MEETING

DATE: [Enter Target Date]
TIME: [Enter Target Date]
LOCATION: [Enter Target Location]

C

Area of the **public meeting details** (in-person and virtual)

The City of Hamilton is now conducting meetings in a hybrid format via an in-person and Webex platform. All Hybrid Meetings can be viewed at:
City's Website: www.hamilton.ca/MeetingAgendas

Inquiries Refer to File(s): [File(s)]

For where and when a copy of [the proposed Urban Boundary Expansion and information and material related to it] [additional information and material about the proposed By-law to amend the Zoning By-law] will be available for public inspection; or for a copy of the Notice of Complete Applications which was mailed to all land owners within 120 metres of the subject lands, please contact [Planner]

D

For more information about this matter, including information about preserving your appeal rights, contact [Planner].

Area of the **file number** and **Planner Contact Information**

Collection of Information

Information respecting this application is being collected under the authority of the Planning Act, R.S.O. 1990, c. P.13. All comments and opinions submitted to the City of Hamilton on this matter, including the name, address and contact information of persons submitting comments and/or opinions, will become part of the public record and will be made available to the Applicant and the general public and will appear on the City's website unless you expressly request within your communication that City remove your personal information.

NB: TO SIGN MAKER: ALL WORDING CONTAINED ON THIS SHEET MUST BE INCLUDED ON THE SIGN.

6

How you can participate more

- You can review the **Draft Framework** and submit questions directly in the document on our Engage Hamilton website:



[engage.hamilton.ca/ UBEapplicationframework](https://engage.hamilton.ca/UBEapplicationframework)

- You can **take a survey** that will be linked at the end of this Virtual Open House.
- You can ask questions online or contact:

Charlie Toman

City of Hamilton

Phone: 905-546-2424 ext 5863

Email:

urbanboundary@hamilton.ca

How can I oppose the new Provincial legislative and policy changes?

Any comments opposing the recent provincial policy changes, including it's approval of the new Provincial Planning Statement and adoption of Bill 185 should be submitted **directly to the Government of Ontario**.

Submit Opposing Comments To:

Hon. Paul Calandra

Minister of Municipal
Affairs and Housing

Address: Ministry of Municipal Affairs and Housing, 17th Floor
777 Bay St. Toronto, ON M7A 2J3

Phone: 416-585-7000 **Email:** Paul.Calandra@pc.ola.org

Hon. Neil Lumsden

MPP – Hamilton East –
Stoney Creek

Address: Constituency Office, Unit 102
115 Hwy. 8 Hamilton, ON L8G 1C1

Phone: 905-662-8755 **Email:** Neil.Lumsden@pc.ola.org

Donna Skelly

MPP – Flamborough –
Glanbrook

Address: Constituency Office, Suite 104
2000 Garth St. Hamilton, L9B 0C1

Phone: 905-679-3770 **Email:** Donna.Skelly@pc.ola.org

7 What Happens Next?

- We are taking **your feedback** and adjusting the Draft Framework
- A **summary of what we heard** will be posted on Engage Hamilton.
- Target for incorporating the Framework into Official Plan policy: **Q1, 2025**

Q&A

You can ask questions later by visiting



[engage.hamilton.ca/ UBEapplicationframework](https://engage.hamilton.ca/UBEapplicationframework)

or contact:

Charlie Toman

City of Hamilton

Phone: 905-546-2424 ext 5863

Email: urbanboundary@hamilton.ca



Hamilton

**Thank you for
Participating!**

**Charlie
Toman**

City of Hamilton

Phone: 905-546-2424 ext 5863

Email: urbanboundary@hamilton.ca



engage.hamilton.ca/UBEapplicationframework

Appendix G

Full Record of Comments



Comment Source: Email

- Asked for designation of the property, whether it is white belt or greenbelt
- Provided a letter requesting that the City re-consider a Stantec environmental report that was submitted back in 2020.
- I think Hamilton did a great job on considering what needs to be part of a complete urban expansion application. My only one suggestion to provide them with tools/suggestions/guidance for how they can complete these requirements if there are resources that can provide consistency in considerations across criteria for what it is worth it would be good to highlight that to them to be able to inform council decisions in a more apples to apples manner.. This idea came up for the Greenhouse gases (GHG) implications and infrastructure costs because there is a Federation of Canadian Municipalities (FCM) tool that was developed that would enable them to do some of that analysis that may be good to use because it looks at GHG emissions and municipal infrastructure costs. Think this tool would be great to test out to see if it can provide the climate and infrastructure costs comparison to within the urban boundary versus way beyond urban boundary and what that means re infrastructure capital costs (it doesn't look at operational costs). I believe **[Redacted]** already is working with you on this effort re integrating that tool/infrastructure costing in a consistent way. thanks again so much for sharing Hamilton's Urban Expansion process and requirements with other municipalities next year. really appreciate that. thanks, ...
<https://greenmunicipalfund.ca/resources/toolkit-making-sustainable-land-use-decisions-your-municipality>

Comment Source: Engage Page Question Form

- How can I oppose to the urban expansion **outside** of the urban boundaries?
There are many reasons why it should not be expanded

Comment Source: Formal Submission

- (summary) The Hamilton Naturalists' Club (HNC) submitted comments on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications. The HNC supports the City's no urban boundary expansion (UBE) growth strategy and would like to see the white belt protected. The HNC recognizes the need to prepare for potential UBE applications and has provided suggestions to help the City meet its commitments to protect and restore biodiversity if development is permitted outside the urban boundary.

Appendix G - Full Record of Comments

- (summary) The West End Home Builders' Association (WE HBA) submitted a letter to the City of Hamilton regarding the Draft Framework for Processing & Evaluating Urban Boundary Expansion (UBE) Applications. The WE HBA disagrees with the City's position that a UBE is not necessary, and believes that an expansion is required to meet the needs of Hamilton's growing population. The WE HBA also disagrees with a number of the study requirements in the Draft Framework, and has provided feedback on those requirements.
- Alectra: Our office has no comment/objection based on the information provided.
- Bell Canada: no comments or concerns at this time
- (summary) Enbridge request that the City of Hamilton include maps, statements, and policies that address development in proximity to pipeline infrastructure. These additions are meant to support understandings in several of the Framework focus areas and ensure that development occurs safely around the pipelines.
- (summary) The Hamilton Conservation Authority recommends that Conservation Authorities be included as an agency responsible for reviewing and assessing submission requirements, and that the framework be revised to indicate that pre-submission discussions should also occur with Conservation Authorities.
- (summary) The Grand River Conservation Authority (GRCA) comments focus on including Conservation Authorities in the review process and ensuring that all necessary studies are completed as part of the application process.
- (summary) The Hamilton-Wentworth District School Board (HWDSB) and Hamilton-Wentworth Catholic District School Board (HWCDSB) have jointly provided feedback on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications. Their primary concern is the inclusion of a School Accommodation Issues Assessment in the initial submission requirements, and they have outlined proposed Terms of Reference for this assessment.
- (summary) The Niagara Escarpment Commission (NEC) main point is that any urban boundary expansion within the Niagara Escarpment planning area requires an amendment to the Niagara Escarpment Plan (NEP), and this can only be considered during the 10-year plan review.

Comment Source: Konveio (Online PDF Commenting Tool)

- As part of any application for settlement boundary expansion, the applicant should be required to demonstrate through independent modeling conducted at the applicant's expense but directed and controlled and contracted or conducted by the City (and the above market and feasibility studies) that every hectare of the subject land that is in fact not permanently maintained as farmland or natural cover (and excluded from any residential or commercial lot) will in fact have an active transportation mode share of no less than 75% and with a public transit farebox recovery ratio of at least 68%.
- I strongly recommend using existing infrastructure and vacant spaces, as well as homeowners' properties within our urban centres for family friendly, Additional Dwelling Units.

The reasons for creating these unique, safe spaces is to revitalize existing neighbourhoods, businesses, schools and social services. People love living in established neighbourhoods and communities where they grew up. Paving over existing farmland and wild spaces are more expensive for young families and dumps the costs onto the rest of us. They choke roads, because everyone needs to drive, adding to the greenhouse effect while taking away our lands that can help offset climate change. Keeping schools, recreational facilities and existing social services populated and protected, encourage healthy, happy families in our communities.

Additionally they are much more affordable, and can increase our city's tax revenue easily. Even so far as to give young people dreams of owning their own properties with ADU's to help support them.

This relieves the burden on our communities and our environment.

Opposingly, adding to gridlock and destroying our greenspaces does nothing to relieve people struggling to find homes.

Do not stoke the builders dreams, stoke the peoples' dreams, Put money back into our pockets. This economy works.

- As part of any application for settlement boundary expansion, the applicant should be required to provide market and feasibility studies, as well as supporting site analysis, showing that with the requested settlement boundary expansion, and OP designation and zoning, and even factoring in the possibility of future rezoning or changes to OP designation, every hectare of the subject land will in fact be developed at and maintain for no less than 30 years density of no less

than 100 residents per hectare (for residential and mixed use land) and at a density of no less than 100 jobs per hectare (for employment or commercial land).

- All residents of the City of Hamilton should be provided with mailed notice of all requests for settlement boundary expansion - there should be no limit or reduction in weighting of input based on physical proximity. This is because greenfield development, by consuming construction capacity (e.g., labour, equipment time, including for infra) impacts the viability of infill housing development throughout the City of Hamilton, and by increasing the area of road and sewer and other infrastructure, undermines the future tax burden and the availability of funds to maintain, replace and upgrade infrastructure elsewhere in the city of Hamilton. However there should be intensive, proactive consultation in the form of in-person interviews with all tenant farmers and owner farmers both on the land where settlement boundary expansion is proposed. Where the farmers in question have a tenant relationship with the applicant or the owner of the subject lands, their identity should be kept confidential from the applicant and owner upon request, but nonetheless factored in.
- Any proponent should be required to demonstrate that there will be no reduction of land available to tenant farmers, and no adverse effects upon agricultural uses and operations elsewhere.
- As part of any application for settlement boundary expansion, the applicant should be required to provide labour and equipment market studies and such other supporting research which demonstrate that there is sufficient unused construction labour within the relevant categories in excess of what would be consumed by build-out of all infill development permitted as-of-right (or which is likely to be permitted as of right upon conclusion of existing or planned city initiatives), assuming that all infill construction of six storeys and under would make use of conventional stick frame construction (and associated labour and equipment). Any proponent should be required to demonstrate that proceeding with greenfield development would not increase construction costs or compete for labour and equipment time with infill development, even assuming construction of six-storey stick-frame mid-rise apartment buildings on all residential and mixed use lots on collectors and arterials, and construction of four-storey fourplexes on every existing residential lot that is sold or conveyed.
- A policy set to 2051 does not give the opportunity for existing rural farmers and their children to sever land and use that money to reinvest in rural operations or expand. Farm equipment, labour and growing crops on any scale using climate change/no till methods are expensive. It's generations to build profit on small margins. The Rural masters plans and Hamilton city planners state there is a negative population growth in the rural zoned areas. That is because it doesn't

pay. Canada is the second largest country and land is our investment. Let farmers sever land so other people in the city can have 0.5 to 1 acre lots so they can homestead on farm land that is too small or not workable.

- agreed!
- This entire frame work is biased and themed towards a firm no urban expansion, eliminating the opportunity for existing farmers, landowners and business persons to sever, sell and develop.

The government is funded by the tax payers and this report does not fairly represent all the tax payers in the City of Hamilton and their opinions.

I suggest this report takes into account the economic benefits of landowners being able to sever, sell and/or develop land, especially land zoned rural but not farmable in any way.

Further comments down in this report suggest that when an expansion is proposed, the entire city should be notified. That is unnecessary. This process will only slow the development which proves this City of Hamilton is biased.

I suggest removing the notification requirements and cutting most of the themes out. This framework process is slowing things down and proves the city is not align with the province.

More comments, more studies, just add most costs and overall prolonging the development of homes and businesses. Low supply, high demand, creates high housing prices. I recommend keeping the notifications, setbacks and requirements to a minimum or even none.

Immigration is not the issues and causing the house crisis. It is this unclear and rigorous process proposed by the City of Hamilton.

To conclude, this framework is clearly biased. It is suggested that for every imposed no expansion theme or requirement added, the City is to provide a positively biased solution that cuts, remove or encourages development expansion. The ultimate solution is to fast track development were possible. It is clear the province has that goal in mind, but the City of Hamilton and those coming here to encourage this framework are here to slow down the process. Ultimately making it harder, and causing the housing crisis.

- I don't think we are considering children's mental health and the fact that not everyone wants to live in the city. I agree with this person's comment. Why can't

the city allow smaller severances for lot construction at the same time while they execute their other agenda items? If climate crisis initiatives are the reasons, it's starting to make me feel guilty I was born!

- I am opposed to enlarging the boundary except on a very limited basis. Grow up not out. I know this may not be popular but i do not want us to end up in guelph and or hagersville. Toronto

Is a good example of urban sprawl.

Thanks for hearing me.

Fortunately I live [REDACTED] and do not

Have to worry.

- I don't understand why both cannot happen? Densify and expand. Is it because the City doesn't have enough staff and too much policy?
- 1.Land Cost: Create As-Of-Right Permission To Build Mid-Rise In Places Where It's Actually Viable To Build
- 2.Construction Cost: Legalize Labour Efficient Designs And Methods For Mid-Rise
- 3.Carrying And Procedural Costs: Simplify And Speed Up Approvals Processes
- 4.Reduce Fees, Taxes And Charges For Midrise
- 5.Spur Competition: Transition Small-Scale Infill Developers And Low-Rise Construction Sub-trades To Mid-Rise Development
- Is there a plan to develop a minimum list of submission requirements or criteria? It would be very useful to have a tight, disciplined set of requirements to determine whether an urban boundary expansion can receive municipal approval. It would save time, effort, and money.
- I agree. And please clarify the purpose and language regarding minimum requirements. Page 1 states that the Framework doe **not** constitute a list of Minimum Requirements , the provides a list in a table on the next page.

A time frame for developing the criteria should be included. Definitions of the criteria are needed.

- Public should be notified through existing methods- sign boards, email newsletters, engage hamilton mailing list. Invite people to submit impact statement. Applicants should have to demonstrate benefits to community and environment as well as sustainability
- Adding this comment (as it appears it was incorrectly left below, in contact with Helpdesk to remove)....I am Counsel and Land Use and Land Development Program Manager for the environmental charity and think tank Environmental Defence. I am not in fact a resident of any Hamilton ward, but I am submitting at the request of multiple Hamilton residents who wish Environmental Defence to contribute technical support for their own submissions on the question of how to respond to requests for settlement area boundary expansion. The ward number reflects that of an individual who made such a request.

(1) All residents of the City of Hamilton should be provided with mailed notice of all requests for settlement boundary expansion - there should be no limit or reduction in weighting of input based on physical proximity. This is because greenfield development, by consuming construction capacity (e.g., labour, equipment time, including for infra) impacts the viability of infill housing development throughout the City of Hamilton, and by increasing the area of road and sewer and other infrastructure, undermines the future tax burden and the availability of funds to maintain, replace and upgrade infrastructure elsewhere in the city of Hamilton. However there should be intensive, proactive consultation in the form of in-person interviews with all tenant farmers and owner farmers both on the land where settlement boundary expansion is proposed. Where the farmers in question have a tenant relationship with the applicant or the owner of the subject lands, their identity should be kept confidential from the applicant and owner upon request, but nonetheless factored in.

(2) As part of any application for settlement boundary expansion, the applicant should be required to provide market and feasibility studies, as well as supporting site analysis, showing that with the requested settlement boundary expansion, and OP designation and zoning, and even factoring in the possibility of future rezoning or changes to OP designation, every hectare of the subject land will in fact be developed at and maintain for no less than 30 years density of no less than 100 residents per hectare (for residential and mixed use land) and at a density of no less than 100 jobs per hectare (for employment or commercial land).

(3) As part of any application for settlement boundary expansion, the applicant should be required to demonstrate through independent modeling conducted at the applicant's expense but directed and controlled and contracted or conducted

by the City (and the above market and feasibility studies) that every hectare of the subject land that is in fact not permanently maintained as farmland or natural cover (and excluded from any residential or commercial lot) will in fact have an active transportation mode share of no less than 75% and with a public transit farebox recovery ratio of at least 68%.

(4) As part of any application for settlement boundary expansion, the applicant should be required to provide labour and equipment market studies and such other supporting research which demonstrate that there is sufficient unused construction labour within the relevant categories in excess of what would be consumed by build-out of all infill development permitted as-of-right (or which is likely to be permitted as of right upon conclusion of existing or planned city initiatives), assuming that all infill construction of six storeys and under would make use of conventional stick frame construction (and associated labour and equipment). Proponent should be required to demonstrate that proceeding with greenfield development would not increase construction costs or compete for labour and equipment time with infill development, even assuming construction of six-storey stick-frame mid-rise apartment buildings on all residential and mixed use lots on collectors and arterials, and construction of four-storey fourplexes on every existing residential lot that is sold or conveyed.

(5) Proponent should be required to demonstrate that there will be no reduction of land available to tenant farmers, and no adverse effects upon agricultural uses and operations elsewhere.

- Adding this comment too (seam reasoning) Please keep me informed if any new boundary expansion applications are received at [REDACTED]
- I don't see an Environmental Impact Statement in this list. Likely too much detail to submit here but working with the Planning Dept I am reviewing 10 example development applications in and around Core Areas part of the Natural Heritage System. Most of the proposed developments are on farmland so areas where ecological features have already been severely compromised. Comments in EISs then just focus on how the remaining habitat pieces do not connect to each other or are poor in quality, while promoting their development schemes. The policy response to this should be a focus on mapping Ecological Restoration Zones (ERZs) or similar name - for example expanding the size of Significant Woodlands through substantive plantings to achieve larger forests, and rebuilding linkages to adjacent Core Areas. This would be a new designation in the OP but can easily be supported by existing OP Natural Heritage policies and/or Natural Heritage sections of the PPS such as Significant Wildlife Habitat - i.e., Bat Maternity areas or Significant bird species such as Wood Thrush or Eastern Wood Pewee are often identified around development areas, opening

the door to requiring a larger forest, required by identifying a ERZ area. This is for areas within the existing OP. This approach could be used by redrawing the NHS for the Whitebelt, adding in ERZs so the area has stronger natural heritage protection. Hard to explain here but fundamentally the current NHS is insufficient and will lead to more biodiversity loss even if protected in full - mapping a NHS that would truly protect and restore ecological function is what is needed. Happy to chat about this idea as it is complex but we have the OP and PPS tools to do it!

- Add Municipal Finance as an additional Reviewing agency. In general, need more checks and balances such that Planning does not have total authority over the Urban Boundary Expansion. It should be wide variety of departments and agencies that work together to determine the legitimacy of the application.
- What about the Waterdown area?
- The citizens of Hamilton and Ontario value the surrounding Greenspace provided by rural farms and communities as a component of our Cultural Heritage. Sprawl has been destroying the economic and social fabric of rural communities for decades, as well as the destruction of soil, wetlands and biodiversity. There is a need to document this loss and to understand the spin-off impacts of the decreased agricultural inputs such as feed companies, veterinary services, and equipment sales. Such jobs maintain rural villages and towns as viable places to work and live. In turn, this supports the survival of local schools, churches and other components of civil society. Constant elimination of family farms for low density housing keeps diminishing the social fabric of southwestern and central Ontario. This benefits only a few developers and builders and homeowners compared to the damage it causes. Consultation is required with the Agriculture Economic Development and Planning Community of Practice of the Ontario Federation of Agriculture, and the Rural Economic Development and the Rural Ontario Municipal Association.
- First report should be contribution to or reduction of greenhouse gas emissions over the long term. Second report should be fiscal impact of UBE.
- A report that evaluates to value to replicate the function of, and replace the loss of natural assets already in place such as wetlands, woodlots, meadows that provide habitat etc.
- Noise Impct Study needs to include the input of citizens who live and work in the surrounding area as they are the people most impacted by Development in more rural areas and the White Belt. In addition to aircraft noise that is 24 hours every day, there is the noise of increased truck traffic, especially if further distribution warehouses are built.

- Too many requirements are driving up the costs of affordable homes. If one was to obtain a quote from consultants for all this work, this adds tens to hundreds of thousands of dollars in consulting fees which business people and developers pass down to buyer; causing unaffordable housing. If these rules were applied today, Hamilton or the GTA would not exist. Less is better, leave it up to the consultants to decide what is the minimum requirement, not the City.
- The Ag and Rural Affairs Committee should be a reviewing agency and should especially be consulted in determining what constitutes prime ag land. Are they being consulted? I don't see them on any lists.
- -Environmental Impact Statement?
 - A Natural Asset Valuation report should be required to be carried out by a reputable firm such as Green Analytics
- LEAR system of land classification should not be used to determine if land is "prime" or not. It allows the downgrading of soils based on proximity to urban areas and other factors, rather than soil composition itself.
- What criteria will be used to Assess applications? Will some criteria have more "weight/value than others? This design making process needs to be transparent. Subjective, private decisions are no longer acceptable to the public.
- Public Works, Office of Climate Management, Growth Management, and Municipal Finance need to have final input to the Draft Official Plan Amendment.
- Add other groups such as Ontario Farmer's Association for more general assessments and background information. By limiting the decision-making to the Planning Division alone, there is less room for varied input and opinions. We need the best in every field to make the right decisions and to ensure only the appropriate applications for UBE are accepted.
- Let's bring in Growth Management and Municipal Finance too for a balanced report.
- Agree. An extensive public consultation should be conducted regarding the total impact of the combined development proposals. Addressing each application individually is not appropriate. The past history of the Planning Department of making piecemeal decisions in isolation of the larger goals of the Official Plan can not continue if sustainable development is the goal.
- Planning Division should have a very minor role in Emergency Services. Again, this is not their area of expertise.

- Again, add Indigenous and cultural/heritage experts who can quickly make an informed decision as to the appropriateness of an application. They need to be considered early in the process such that rejected applications do not waste the time and energy of other groups.
- The subwatershed study should require assessments by qualified engineers, hydrologists, hydrogeologists, etc. i.e. specialists in this field. Failure to properly identify and manage subwatersheds can negatively impact flooding, erosion, and water quality.
- Include Indigenous Groups + historical/cultural departments for an informed decision.
- Surely a different dept. than Planning should judge the Noise Impact Study. It requires engineers who understand decibels and points of origin.
- Who comprises the Growth Management department. Have never previously heard of them in any expansion or application discussions. Under whose umbrella does this group fall>
- Because Hamilton is legalizing wood-frame, labour-efficient mid-rise on the edges of all its urban and suburban neighborhoods, and has already legalized adding an additional family-sized detached house (a detached SDU) behind each existing home, there will be far more homes permitted as of right than can be built using the construction capacity Hamilton has. This that if Hamilton allows any homes to be built beyond our current SABE they will be at the expense of a greater number of infill homes.

(2) "Yes and" isn't a real option here. Hamilton can't plan for **both** densification of existing neighbourhoods AND development of Greenfield sprawl neighbourhoods outside the existing SABE without saddling itself with a white elephant. Hamilton will be proactively planning its future infrastructure to support densification of its existing neighbourhoods through midrise and multiplex and SDUs, and that means that work premised on supporting sprawl sewers and roads would be wasted.

(3) Extending settlement boundaries would undermine the financial viability of upgraded public transit within Hamilton's existing neighborhoods and settlement area. Existing neighbourhoods need all the people and jobs that boundary expansion would divert into greenfield sprawl in order to make all its transit and other plans for existing neighbourhoods viable

- Add timelines of review periods so we can see how long this takes.

- How will the impact of odours from surrounding farmland on residents of the new communities be addressed in such a way that the farmers are not limited in their operations (manure etc) by new neighbours who begin to complain about odours, noise, tractors in their vicinity?
- Housing development near farms and industry require sufficient distance to minimize noise and odors and air pollution. Allowing housing right up to the road, across from a farm, is not adequate and against best practices but has occurred in Ancaster. This situation has resulted in citizens complaining about normal farming practices.

It seems the farmer is often forced to change practices,

sometimes at great cost as the new neighbour doesn't like the smell of manure, or the sound of tractors at 6 a.m.

Air pollution from the airport and proposed increase in roads may damage the health of citizens in nearby housing and workplaces.

- My same general comments apply to this portion of Locational Submission Requirements, i.e. many departments in addition to Planning, should be added, considered, and consulted.
- When will the finalized Terms of Reference for all plans and studies be completed? There is another requirement for a second review at that time.
- The CA has no budget or data, so reduce the study requirements and prolonging the design phase of development. Again, passing on the costs to developers to map every square inch due to the lack of the city's or CA federal budget should not be passed on to everyday people trying to find affordable homes. The CA and City hiring summer students to delineate woods and trees (using Google Maps) as P7, P8 and P9 shackles farmers and potential developers from even building an AirBnB cabin or sheds. Less requirements, equals less costs, which means more affordable homes.
- Another key to this is reductions in permeable surfaces which causes flooding, loss of baseflow in watercourses and wetlands etc. The Environment and Climate Change Canada document, How Much Habitat is Enough contains recommendations including targets for impervious surfaces, noting what to expect as the percentages of impervious surfaces increase. This same document describes targets for % wetlands in watersheds and sub-watershed, % forest cover, % interior forest etc. so it would support identification of ERZ areas noted in my first comment. That is, based on OP and PPS policy and Council-adopted

plans like the Climate Change and Biodiversity Action Plan, a re-mapped NHS would include how much habitat is really needed to achieve ecological function.

- Who would complete this Functional Servicing Report? If the expectation is that the developers will use their own consultants, the City can expect skewed reports.

Could the City hire its own experts to approve the plans because fully trained experts in each field should be the ones to assess the plans for completeness and accuracy.

- Natural hazards assessments need to be top priority.
- ...as well as any projected increases in operational costs and *lifetime infrastructure upkeep and renewal costs to service and maintain* the urban expansion lands. It will cost the City money in perpetuity to maintain and upkeep the new infrastructure along with the added costs to operate it.
- This studies require someone with hydrological/ hydrogeological expertise to assess, not city planners.
- I do not understand these first 2 considerations in the Growth Allocation. I think these are the City's guiding principles and as such, the answers have already been established so is there no need to review this for each application? Could they be stated as Top Criteria and only exceptions will be processed through the application routine?
- I suggest adding the following theme: does the development support affordable housing? The weighting of this theme should trump all other themes.
- Environmental sustainability should trump all themes. You can't reverse land and soil degradation, including agriculture. We need to build up, not out. Don't need land expansion. Need purpose built properties, sustainable population growth, blended multiplexes not just these cookie cutter garb. Have to also change definition of "affordable" housing on federal level for the purposes of developer subsidies. Have to remove some of the red tape and zoning hurdles, but NOT the environmentally relevant ones such as this.
- Affordable housing hinges largely on location. It's not going to be affordable if it's in a sprawl neighbourhood with zero transit, which expansion lands will be for decades. Binbrook still has no transit after all these years. Affordable housing can and is being built within the city boundary close to jobs, transit and amenities and even in existing backyards as ADUs.
- No everyone wants to live in condo, townhouse or apartment

- True, but only wealthy people can afford large single family homes on large lots. These guidelines are for what is best for the entire community of Hamilton, not individual preference. The City is massively in debt because of permitting urban sprawl over the past 60 years. Developers have never paid the entire cost of new infrastructure. Therefore, citizen property taxes have gone up and the City stopped repairing old infrastructure to subsidize the new builds. Thus is not sustainable and must end.
- There is another option and that is the missing middle. Three - four storey walk ups, duplexes, triplexes, quads and laneway suites all contribute to housing. It's not just single family houses or skyscrapers. There is lot in between.
- Missing: How does the Urban Boundary Expansion impact the City's ability to reduce and eliminate its current \$3.8B infrastructure deficit? Adding more infrastructure will only worsen that deficit, leaving the City to maintain the new infrastructure over its lifetime.
- Building in greenfield rural areas allow for new infrastructure to be installed by the subdivision developer or in severed lots residential owners can pay for septic or OBC class 8 sewer, wells. Electric and/or natural gas is also mostly readily available
- There are approximately 70 "Considerations" in Part B. To answer all of them for each application will take a great deal of time, energy, and money. Could I suggest a top-down approach such that the most critical considerations top the list and if the application fails one of the critical considerations, the application process ends. It does not carry on through all the other departments, when it is already a failure.
- Evaluating based on a "former" policy?

Delated?

- Have these deleted items been re-instated through Bill 150?
- Missing: assessment of lands within the built up area that are not 'vacant' but are still ripe for residential intensification eg: single storey strip malls.
- Why is this required, I suggest it be removed. People's opinion will just slow any potential development. One can claim this lower's their real estate value or quality of life. How can this be measured? This is just delay tactic imposed by the city and this entire framework to slow down the process.

When HOPA needs to development anything, do they follow this? No, because

- they are federal and apply logic to build projects within a year or less on larger scales.
- why only watercourses? Also wetlands, hedgerows, woodlots.
 - I suggest removing these climate change requirements. Normal homes that are mostly for sale are not LEED and are very unaffordable if they are. Build normal homes out of renewable trees called timber sourced from Canada like it was since 1950-1980's
 - So just keep doing what we have done since the 50s because it's 'normal'? No thanks. Homes with heat pumps have super low heating and cooling bills which is a great outcome and big consideration if they are to be affordable. Climate is the paramount consideration for everyone on the planet and needs to be a top priority.
 - What is a 'ratting' system? Spelling error?
 - Correction: Carbon neutrality needs to be an immediate, short term goal. Does it add carbon? If not, it fails.
 - floodwater management and stormwater management has not been taken into account concerning the head water in the area of AEGD. Also the predictors of climate change models for floodwater management are predicting 300% increase in floods over next 5-10 years. We must keep our wetlands intact and pristine
 - Hamiltons climate change initiatives have not been put into serious practice in any of the recent commercial spaces such as the Amazon warehouses on upper janes, how can we trust that these areas will see less area covered in impermeable surfaces?
 - Should say 'eliminate' or something stronger than 'reduce'.
 - Heritage trees in all newly built areas must be protected by law. Stop the practice of bull-dozing trees to create these flat, boring neighbourhoods (that usually flood every time there is an extreme rainstorm.) A minimum of at least one tree per property, three trees at corners and a dozen or more at shopping centres or other areas with large parking lots.
 - Remove "significant".
 - over its entire lifetime?
 - The ability of existing emergency services to cover this newly built area is vital for the safety of all residents.

Who wants to wait an extra 10 minutes for police, fire or ambulance?

- the taxpayers will 100% be on the hook for all cost overruns, maintaining the infrastructure long after the development companies have made their massive profits and run. how can taxpayers be guaranteed we will NOT pay a single dime of this proposed expansion and its cost over runs.
- Regardless, there will be an increase of service costs to cover new areas.
- Is the proposed expansion area on or adjacent to an already existing transit stop?

Are there bike lanes planned to connect with the city-wide network?

Will there be sidewalks to make walking safer and more accessible for those who require assistive devices?

- 97% of all southern ontarios wetlands are gone, 2 hectares of wetland can absorb 70 times that areas water. we must protect them forever, no matter what their size is
- Does the expansion area contribute to the City's goal to double our urban tree canopy by protecting existing mature trees as well as planting more?

Does the expansion area contribute to the City's Biodiversity preservation and enhancement goals through the approved Biodiversity Action Plan?

Does the expansion area contribute to the City's signing of the Montreal 30 x 30 pledge for biodiversity to protect 30% of land and water by 2030?

- the headwaters of 3 major watersheds are in this airport area and improving the water quality CANNOT be guaranteed with any more impermeable surfaces, additional contaminated runoff, etc
- Cumulative impacts need to be considered a top priority. Yet there is presently to planning framework that assesses new applications within a particular subwatershed in order that a visual/ and technical record can document changes to flooding, water quality, erosion and any other non point sources of pollution like road salt.
- I meant there is presently NO planning framework....
- Why not have a clear requirement that there will be no further damaging of remaining natural heritage resources, eg. wetlands, meadows, forests. These resources took thousands of years to develop and cannot be replaced in their entirety. Nothing prevents flooding as well as non-paved land and wetlands.

- Change to something stronger like: Is there a clear vision for the UBE lands that reflects the urgent need to dispose of old planning norms and completely revamp expectations in the face of climate change?
- every single wetland, marsh, swamp must be protected in perpetuity, they clean and filter our water and absorb catastrophic rainfall events, which will continue to occur in greater frequency and severity with climate change
- This is very important.
- This is a must. It should not be optional, protection of biodiversity, endangered species etc must be mandated.
- Add the importance of wildlife, specifically Species at Risk in Ontario (SARO). Reports from consultants need to be complete and accurate, conducted over a long period of time to account for seasonal habits, breeding grounds, migratory birds, etc. The report must be from a trusted source/group. I realize you discuss biodiversity and these fit into that overall umbrella but think it worthwhile to actually mention wildlife and their contribution to public health and human welfare.
- Are woodlands with native Carolinian forests being protected? Heritage trees or rare trees must also be protected. We need this biomass to help us mitigate the effects of climate change, extremely hot weather and increases in carbon emissions.
- How will these damages/impacts be assessed? How in the city had the expertise to critically examine the potential for damage to water resources?
- Who NOT how
- Great addition, if the City is being forced into expanding it's urban boundary it's important to build intelligently. Encouraging dense, mix-used neighbourhoods should be the priority, not adding more low density housing.
- There should be NO development on or near wetlands or other low lying areas that flood occasionally and allow water to be absorbed into the ground and into the aquifers. We have huge flooding problems now with extreme weather events becoming more common due to climate change.
- All newly built communities must include semi-detached home, 4 plexes and 6 plexes. This will allow a mix of ages and income groups and ensure that there is housing for all, not just the wealthy. The era of detached homes with expansive lawns are over.

- Change to: Taking into consideration protection of trees, hedgerows, woodlots, wetlands, watercourses, meadows and their associated protective buffers, and other development constraints (e.g. public infrastructure, NEF contours etc.) is there sufficient, consolidated developable land
- It is imperative that developers who want to expand our boundaries provide a full range of services, such as parks, recreation centres, libraries, schools, long-term care homes, medical offices as well as grocery and hardware stores. It is not fair to tax payers to pay for these new services at the expense of neglecting the rec centres etc in their own neighbourhoods. Create complete communities so people don't have to drive for recreation, shopping, school, etc.
- Remove “where avoidance is not possible and alternatives...” Full stop. There should be zero development on Prime 1,2,3, ag land.
- Be specific on land classification system that is to be used and consult with Ag and rural affairs committee on this. According to Drew Spoelstra, president of the Ontario Federation of Agriculture and Chair of Hamilton’s Ag and rural affairs committee, Prime agricultural land is officially defined as classes 1-3 farmland as defined under Canada land inventory (CLI). Ensure the CLI system is clearly indicated as the standard for classifying “Prime farmland” rather than the LEAR classification system.
- There should be no exception to the protection of farmland. Prime agricultural land is a must. We cannot allow it to be paved over. Water and food resources are going to be scarce in a few years and it is imperative that Hamilton have a supply of sufficient farmland to feed its population, and enough clean water for all.
- No development on agricultural lands ever! We need a farm belt as well as a green belt.
- and natural resources.
- Engagement with Indigenous leaders, including traditional leaders as well as elected leaders, is necessary. No development anywhere without it. Reconciliation comes first before anything else.
- I recommend making this an optional requirement. It later states encourage following up which implies it's a requirement.
- 400 meters is only about 5-6 city blocks, so not enough people would be notified. This is a city-wide issue and many more people should be notified.
- It's not a city wide issue and not everyone has the same opinion.

Appendix G - Full Record of Comments

- 1km into the closest urban area at minimum, especially since there will be empty farmland surrounding the area so no one or very few people to advise. Also notice could be sent to anyone on the City's GRIDS email list regardless of location in the city.
- Some people like privacy would not feel very welcome if someone across the city would want them stopped from building a home in the Country.
- Great addition. The notice boards should also include a QR code that links to the City's webpage where all documents pertaining to the expansion will be housed for public review.
- Yes. Also the City Planning department received several thousand emails from Hamilton residents who responded to the urban expansion survey in 2021. Can they be notified?
- I think this relates to a comment at the bottom because too much opinion is not going to help build homes faster. Maybe the frame should be simple question have we met the house demand? Answer = no, then make it a priority to build.
- I would suggest that 400 meters is too small. In a lot of cases, that would equate to only one or perhaps two neighbouring farm properties being notified.
- Good addition. A city webpage with instructions and details on how to participate at the OLT would be better than just a link to the OLT. The OLT website is opaque and difficult to understand. The City can do a better job of explaining how and why residents should apply for Participant Status at the OLT and assist them to do so.
- Great idea to hold two separate statutory public meetings and a joint open house.
- The public must be given enough notice of any planned community meetings. We must be allowed to ask questions, to challenge and to oppose plans, not just sit and listen to some proposal.
- Great addition. Make them pay and plan for any and all subwatershed studies and EIS to be peer reviewed.
- This just passes the costs to you!
- But...don't all of these studies identify literally every single thing that might be needed for a new community? There has to be a second study?
- Yes I agree, what is Secondary Planning in this case.

- More cutting of red tape is required to make affordable homes. This entire plan slows down the process, adds costs, add time and making Canada the slowest Country to issues building permits where have the most land.
- The Consultant did not take into account the publics opinion. As stated earlier in the report they were hired by the City to review and provide comment based on the theme of no expansion strategy. It is recommended and suggested that consultant and city look into options and a key considerations for:
 1. Land owners who have parcels of land in the green belt that that are too small for farming, and would be better development into low density rural/residential lots.
 2. Suggest which types of constructions would increase the supply in the shortest amount of time.
 3. The economic benefits of farm and landowners be able to sever land into lots and able to use those fund to expand grown in Ontario food.
- You advocated above that public opinion shouldn't be taken into consideration since it slows the process down. Now you are saying it should (or at least your should). This should make it clear why public consultation is a necessary step.
- this doesn't make sense
- [REDACTED] Please read my original comments. I believe there might be a miss understanding here.
- I live [REDACTED]. I first saw a draft plan about 2008/9. The area south of Twenty Road was designated for light industrial which made sense due to proximity to the airport, similar to what exists around TO airport. We already experience noise from the airport, this will get worse in time. To put housing south of Twenty road make no sense, it will be a future impediment to airport expansion due to lobbying efforts by neighbouring residents. Also the downtown core is a wasteland, this area needs more apartments, condos and residential housing. To even be considering LRT without a populated downtown is ridiculous. Planners should be using some common sense.
- I fully support this plan of action. Please raise awareness on every possible platform, every citizen of Hamilton has a stake in this. Thank you for your commitment to get it right
- This entire framework is bias towards a no urban boundary expansion theme and does not consider the economic benefits or encourages the young generation to become farmers because it's simply not affordable. As stated in the City's master

rural plans, they see a negative population growth in the farming community because the margins are small in farmer and the kids are going off to secondary education and working in the city.

- A major reason for Farmland being so expensive is the decades of land speculators buying agricultural land then pressuring Councillors to rezone to residential.
- Land is expensive because of supply and demand. They are not making any more of it, and there isn't enough construction to meet the demand or severances allowed. Anyone can go to Onland.ca and see who owns it, and it's not just major developers over decades buying properties up. Land is up for sale all the time around here and trades hands all the time. Go to realtor.ca to see for yourself.

I think you are missing the point that if more homes are built faster than demand, then pricing can be reversed. Plus, its a lifestyle choice to live on lot with a backyard. All this extra policy is contributing to the problem.

Comment Source: Letter

- (letter regarding specific property)

Comment Source: Indigenous Community Meetings

- Six Nations staff expressed opposition to Urban Boundary Expansion
- Question raised by Six Nations staff as to the whether the OLT will accept the draft framework and the City's requirements that these applications go through a separate process from other development applications.
- Question raised by Six Nations staff as to how the OLT will consider these new submission requirements.
- Environmental Levy identified as an example of a potential submission requirement from Six Nations. Includes a fee, and specific benchmarks/requirements (e.g. enhanced offset mitigation). This would be considered a base line requirements and Six Nations would still expect additional consultation.
- Questioned raised by Six Nation staff as to whether the City has to accept studies regardless of quality.
- the Provincial Planning Statement 2024 emphasizes early consultation which should be captured through this process.

language regarding consultation and accommodations to First Nations, in relation to Treaty Rights, should be incorporated into the Framework.

adequate capacity funding should be provided to allow for Six Nations review of Urban boundary Expansion Applications.

Applicants for Urban Boundary Expansion applications should consult with Six Nations early to discuss Terms of Reference for required studies.

- the Mississaugas of the Credit First Nation are the only First Nation with recognized treaty rights within Hamilton (Between the Lakes Purchase, 1792). The City of Hamilton needs to recognize these treaty rights when undertaking engagement as well as in agreements between the City and Mississaugas of the Credit First Nation (including Archaeological agreements) which the City has not done to date. These treaty rights are recognized by Infrastructure Canada.
- It was commented that as stated in the new Provincial Planning Statement, the City's Framework and Official Plan policies need to require early engagement with the Mississaugas of the Credit First Nation. It was discussed how the changes in Bill 185 allow applicants to opt out of Formal Consultation which removes an opportunity for the City to include Indigenous Communities on pre-application discussions with proponents of urban boundary expansions. As a result the Draft Framework strongly encourages proponents to undertake this early engagement prior to submitting an application. The Mississaugas of the Credit recommend that the City include a policy in its Official Plan requiring that applicants be required to submit a consent or closure letter from the Mississaugas of the Credit First Nation as part of their urban boundary expansion application before the City deems that application complete. It was noted Infrastructure Canada already has this requirement.
- Regardless of what early Indigenous Engagement occurs, the Mississaugas of the Credit First Nation want to be circulated on all urban boundary expansion applications (including Formal Consultations). This can be sent via e-mail.
- The Mississaugas of the Credit First Nation is a recognized 'public body' under the Planning Act, meaning that they can participate in Ontario Land Tribunal hearings related to urban boundary expansion applications.

Comment Source: Open House Comment Card

- What municipal bylaws can be implemented in these areas to support green space and farmland preservation?

- What is the relationship (mandated updates to official plan) between election cycles or/and planning act changes?
- Impact of Bill 212?
- Economic impact on local tax payers - now and future world will be signif. impacted. Dense urban form and holding the line on UBE is so important. Fix + improve existing infrastructure before you conservation for paving over much needed farmland, forests.
- Why do you not send mailings to all residents involved
- Building on the whitebelt is much needed the city needs to expand, we need more homes.
- City of Hamilton needs to expand. Save the greenbelt Build every where else you can
- Most of the proposed urban expansion is in the airport area. The airport + the historic planes need to be protected. Hamilton's future economic growth is tied to the airport. You need to account for future increase in plane traffic + airport expansion.
- I strongly support the city's efforts to defend the urban boundary as established by the city. Development in the whitebelt lands would destroy as much as 4,000 acres of wetlands, woodlots, watercourses and prime farmland. It would also saddle municipal taxpayers with the heavy costs of maintaining all the additional infrastructure. The importance of defending Hamilton's urban boundary was underlined at a Nov. 20 webinar which took issue with the provincial government's plans to promote forced urban boundary expansion. In fact, speakers emphasized that every new home in expanded urban boundary areas will come at the expense of a larger number of homes in existing, settled areas that are fully serviced. Organizations like Environmental Defence have urged sustainable policies, such as requiring a building density of 100 people per hectare. A minimum density like this would help to discourage urban sprawl, help to deal with climate change and help to ensure that expanded growth in whitebelt areas won't conflict with existing infill development. I urge the city to support the provincial opposition parties in taking as much action as they can to convince the provincial government to uphold Hamilton's right and responsibility to maintain a strong, firm urban boundary.

- Require an urban design brief as part of a complete application and make sure your urban design standards require (strongly recommend) quality building materials like brick or stone, & architectural excellence.
- The open house format is a good idea, but it should follow a presentation to all attendees by a knowledgeable city representative. Supplement and complement the other, giving a more complete understanding of parameters of framing the application process.
- The 400 m. notification boundary should be increased. In some cases, this could be just one, or two, properties on either side.
- Urban design considerations both for built form and building sustainability and resiliency.
- What finances are being directed to develop our legal approach (new lawyers needed, no more settlements)?
- Chart OPA changes & negative environmental outcomes.
- Could it be seriously considered that the empty spaces above Jackson be developed to house seniors? They could have access to healthy, sustainable amenities e.g. H.P.L., Farmers market, shops, food court. They would also be contributing financially - win-win-win scenario!
- The city can make it easy for residents and community groups to navigate applying to attend OLT hearings.
- The city needs precedents & visions for what good design in these spaces means.
- Why doesn't Hamilton look after the current situation with roads, houses, parks, schools, jobs? Think about what we need now, leave the land alone.
- Sounds like Hamilton council has a good handle on expansion.
- Firm boundary as is. Environmental assessments are needed before any development. We have enough vacant land within the current boundaries: remediate existing land and use the many buildings & properties already available.
- If new housing estates are built in the midst of existing farm properties, what protections will be provided to the farms to protect them from storm run-off etc.?

Also, what protections when new homeowners start complaining about odours, noise, muck on the roads, etc.?

Comment Source: Open House Panel

- If the applicants pay for all the studies and assessments it would be great to know a cost range.
- Expedite infill projects. Put up more hoops for urban boundary app applications.
- Canada Land Inventory (most robust standards)
- Where do the School Accommodations Issues Assessment fit in?
- What about daylighting & wind studies
- Thanks for pursuing a firm boundary. I'm especially pleased to see the agriculture impact study is required. I hope that will be a heavily weighted criteria.
- Cycle paths, care for seniors, access for wheelchairs, costs to the rest of the taxpaying population to build equitable infrastructure.
- Build somewhere else!!!
- The Environment. The most important thing we have.
- emphasis on public transport is necessary to limit car dependence and gridlock. Same for bike paths.
- How will pocket "island" dev. applications not adjacent to built up area be reviewed?
- This is a costly for the city procedure which is meaningless because the Province can override our decision
- Rebuttal: the procedure needs to reflect the values and aims of the city not cave in to the destructive policies of province
- Engage our indigenous people to get involved with assessing all submissions
- We agree the city should strenuously continue to oppose urban expansion. Increased submission fees, require rigorous environmental assessments
- Require indigenous peoples input has said here

- Let's think about the scale of the land and the acreage in the application and scale back the application process for those
- We need better lawyers on staff, we need to go to OLT and defend, not doing so breaks trust.
- Impossible for a small land owner to complete these 11 steps without considerable time and cost. Making it only possible for large developers.
- city wide outreach to update GRIDS 2 notice list
- Renderings & preliminary site plan w landscape & servicing concepts
- can more info be required of the developer to provide / inform local land owners -
- expose & hold accountable the process
- link for info on project
- If you're driving you can't read a PN sign w all this detail... rethink some notices?
- Toronto recently revised how these signs are presented, and they are good. Refer to those for ideas.
- All new applications to be e-mailed to subscribers of the mailing list as soon as they are received, we need to be informed timely!
- visuals
- big QR code
- Why 400m when the planning act only requires 120 m?
- Yes, please notify me and all other email list subscribers of this statutory public meeting in Spring '25
- Diagram how OPA changes are negatively impacting the common goods and climate
- With so many homeless, building on already cleared land is cost effective. Intensification requires cleaning up contaminated land which is costly.
- I strongly oppose the province's ability to override city decisions. We (citizens of Hamilton) have no voice. And the city has to pay for all this urban expansion even though the city (citizens) oppose all urban expansion. How is that fair?? The province is being a bully.

- Understanding the city's position I still want to make clear that I, as a citizen of Hamilton, am firmly opposed to the urban boundary expansion. The city has shown in the past to share this view and it is a shame that the City of Hamilton is now bypassed by this law!
- Formal Consultation or prior to community engagement
- CMCH - local news
- Micro site specific
- All
- Proposal/application specific page (w/RSS)
- city should develop visions for different priority parcels to establish design expectations.
- Social Media
- area should be wider or narrower in proportion to the scale of the application.
- Expansions that are small don't effect the whole city. How many acres require the public's input?
- Will tax revenue cover the costs of utility maintenance and replacement in a 30-year timeframe? (Two others agreed with this)
- Expansions affect the whole city. All residents, not just those nearby geographically, should be notified and invited to offer feedback.
- Support public to navigate applications to attend OLT. No more settlements. Fight for your citizens.
- City-wide survey is best but will only work after full information of the public - newspapers - tv - on-line - open house - town halls etc.
- Air quality is important.
- Proximity to built-up area, proximity to frequent transit, orientation around transit on-site
- I support expansion provided studies are done which it appears to be.
- Can a development be charged that for future transit development (feasibility studies, new transportation staff, service provider water)?

- Applicant's connections to the area.
- Development fees need to be put back onto the buyer of the new home for homes built on expanded lands. Stop subsidizing these new builds.
- Development fees should include long-term operating costs of infrastructure: i.e. roads, water, schools, sewers
- How is the growth self-sufficient? Climate change needs more than energy-efficient: no gas, net zero, energy positive
- Connecting the "Climate Change" and "Complete Communities" considerations. Many new city parks are not much more than a sprawling lawn with a playground. Can the city amend requirements for new parks to include features that address climate and community considerations, for example, mini-forests, community gardens near multi-storey, multi-res buildings, pollinator plants around storm-water ponds, etc...
- Define "affordable housing." Ensure percentage of new builds include homes that low income families can afford.
- Implement bylaws to encourage / support mixed-use developments that have food production as a commercial component.
- I completely agree that Hamilton should maintain the no boundary expansion: At all costs, we need to consider the impact of climate change, natural hazards, and heritage, water resources, land use and agricultural needs. There is plenty of non-used land within our current boundary to accommodate growth.
- Impact on recreation places (parks, playgrounds, sports, pools, etc.)
- Impact on education system
- Economic impact!!!
- Addition of water resources criteria for assisting site application is great! But who in the planning dept has the expertise to assess this?
- Construction labour management
- Much needed tax revenue to allocate towards infrastructure and repairs!
- I support expansion to build more homes in Hamilton
- Impact on anticipated social services

- Impact of development on surrounding economic development (house vs. airport, house vs. Amazon)
- Make Donna Skelly defend this provincial government's decisions.
- Simplify this sign. It's too difficult to read from a car window.
- Mail or email
- social media
- Applicant contact info (email+phone) / whether or not they had formal consult w/ city FNMI
- Much more visible from Andrea Horvath
- adverts in local newspaper should also be done
- Use the Spectator to inform about the leadership erosion of city council planning
- Public meetings should be held in community where change is made - not at City Hall

Comment Source: Open House Verbal Comments Recorded

- Comment period too short
- Against the inflexibility of a firm urban boundary. We should be able to negotiate rather than be at the whim of the OLT.
- Support a firm urban boundary
- Can we strengthen the language from "encourage" to "must"?
- Dissatisfaction that the City has to pay for the results of Provincial policy changes
- Public and Catholic school boards interest in contributing to School Assessment Terms of Reference
- It's not practical to keep a firm urban boundary
- We need to expand the urban boundary to alleviate homelessness
- This represents too much process, slowing things down
- Another key to this is reductions in permeable surfaces which causes flooding, loss of baseflow in watercourses and wetlands etc. The Environment and Climate

Change Canada document, How Much Habitat is Enough contains recommendations including targets for impervious surfaces, noting what to expect as the percentages of impervious surfaces increase. This same document describes targets for % wetlands in watersheds and sub-watershed, % forest cover, % interior forest etc. so it would support identification of ERZ areas noted in my first comment. That is, based on OP and PPS policy and Council-adopted plans like the Climate Change and Biodiversity Action Plan, a re-mapped NHS would include how much habitat is really needed to achieve ecological function.

- Link firm urban boundary to affordable housing, addressing homelessness.
- Concern about how to pay for infrastructure that UBE would necessitate
- Concern about congestion, need for road expansions with UBE
- Concern about online surveys being biased and not representative of the whole public since not everyone has time to fill out a survey
- 120 days is so much time and the City will probably always take the full 120 days to finish reviewing an application
- How are you going to provide affordable housing if you take so long to approve of development?
- Referendum style is a good option for engagement
- There is so much information on Engage Hamilton so it is hard to navigate the Urban Boundary Expansion project. There should be an easier filter process to find projects.
- There should be a direct Engage page from Hamilton's website so it is easier to find.
- My taxes are paying for these events even though the public voted against the urban boundary expansion
- We are with the urban boundary expansion because with it more housing can be built.
- Can/will the potential residential/employment areas change?
- Stop urban sprawl. Protect the environment, farmland & wetlands, natural habitat.
- Flooding is an ongoing concern & will only become more so in the near future.

- So many steps for small farmers to complete the application.
- How do individuals get indigenous contact info?
- Prime agricultural land: based on soil types (Class 1-7; in Hamilton classifies 1-3 as prime)
- Steps are so much (11 step). Definitely favors developers. Maybe a smaller process for smaller expansions (scale expansion process)
- Process seems sufficient, more encouragement - rebates for proceeding development.
- Combine steps 2-3, look at Haldimand, Indigenous with formal consultation.
- Sliding fee for step 1, lump steps 2-3.
- Key considerations are unachievable
- Calgary Public Notice is good
- Affordable housing is impossible on Whitebelt
- Small properties should be allowed to sever
- Stronger lawyer team for OLT.
- Charting OPA that undermines public good
- First principle approach
- OLT appeals should be super transparent.
- List of OPAs that affect this.
- Load map from table onto webpage
- Land purchase inquiries
- Prospective land development.
- Concern that OLT process favors the interest of the province + not the city. More likely that developers will get approval.
- Concern that the province can determine itself to be the approval authority of OPAs if it wishes (ex. Toronto OPAs recently).

- I wonder how well this 'Open House' was promoted in Hamilton - So much staff, security, cautions - Less would suffice.
- What is the impact of UBE on the housing crisis in the centre of the city?
- Why are we doing this again when it's already been decided?
- Does the White belt have a higher opportunity to be built than lands within the greenbelt?
- How many times do we need to vote on this?
- We're in Elfrida. How do we stop development here?
- What's the new third-party appeal rule? Can I / how can I be involved in the OLT/appeal process?
- What is the point if people will just appeal after the 120 days?
- Is OLT decision final or can Hamilton appeal?
- What is the benefit of pre-consultation?
- Request for information on development behind property
- Commercial property. Wants to know if the property can be made commercial.
- What are the existing land use permissions/zoning for specific property?
- How can we mandate green building standards in these areas?
- If I was notified of the open house, will I get notice of all applications?
- Email the What We Heard summary (email removed)
- Economic, business impact of the area, needs
- Focus speaker at events
- Website it complicated. Make simpler.
- Statistics for Hamilton housing
- Make a print-out of contacts on the "Your Questions and Next Steps" panel
- More 11x17 maps
- Indigenous consult should be mandated.

- Updates on application should be reflected on notice. Meeting should be in the neighbourhood the application is in.
- Affordable housing should be part of any proposal. If there's no affordable housing, it shouldn't be permitted.
- If building new, must make a commitment to affordable housing (20-30%).
- Need to mix incomes.
- Avoid large homes (i.e. 5 bedrooms). Those are not needed or appropriate.
- Concern about environment, specifically wetlands and sensitive species.

Comment Source: Telephone Message

- Hi, is this my phone number is [REDACTED] if someone could please call me back. That would be great. I just have a couple of questions about what's happening right behind my house right now. Thank you. Bye.
- It's about a mailing that we received responding to the provincial policy changes, the proposed framework for urban boundary expansion and I just wanted to be sure that this is a legitimately from the city. My name is [REDACTED]. Merci and my number is [REDACTED]. Thank you.
- Hello, I'm calling about the expansion of the boundary lines that was in the paper I can't get to vote, but definitely against the expanse sprawling out into the countryside. You're taking all the beautiful from land and putting farmers out of business and taking food that has grown fruit trees, everything away expansion. Say that it is too much too much. There's too many people coming in. There should be bound against too many people coming in that they're taking up all our land. It's not right the expense. It should be. Oh, thank you. Very much. Bye.
- Hi, Charlie, it's [REDACTED] that you're calling. I believe I left a message about a week ago and hoping to hear from you soon. Still have not heard back from you if you wouldn't mind. Giving me a call. My number is [REDACTED] and it is about 20 to 1 on Friday, November the 15th. Thank you.
- Hi, Charlie, my name is [REDACTED]. I will have some information like some information from you if you could give me a call. [REDACTED]. Thank you.
- Hi, this is [REDACTED] I'm calling from cell phone. [REDACTED], cycled all the way from Hamilton to the convention center to go to the open house, but convention center is closed on Monday. The 20 at 12:30:Wow open house was

advertised as being from 12 noon to 9 evening. So, I'd like to have an explanation for that so you can call me back or give me a text or something. I appreciate that. Thank you. And hopefully.

- Good afternoon. It's [REDACTED]. From the city of Bradford playing department calling. I have some questions about process for evaluating urban boundary expansions in the city. Hamilton, the city of Branford is currently looking at some of our processes and just looking at some of the criteria for what the city of Hamilton evaluates. I see that your contact information from provided here. So, yeah, just looking to have a general high level conversation about some of the processes that you guys have utilized within recent years, when evaluating these types of applications. So, give me a call back. That'd be greatly. Appreciate it again as [REDACTED] from the city of Bradford. I'll leave you my phone number here. Um, the city don't use it too often. So my phone number here is [REDACTED] thanks a lot.

Comment Source: Virtual Open House

- Thank you, City of Hamilton for all you're doing to protect the farm, wet and woodland here from this rapacious provincial government! Keep up the firmness on the boundary!
- I own [REDACTED]. I have been paying property taxes since purchasing the land in 2011. It is not only in the interest of the land owners if the urban boundary is expanded, but also for the city of Hamilton. I will be able to build my house on the property (once the land is developed privately) and the city can get higher property taxes anywhere between 18 to 20 times what I pay currently. It is a win-win for all. Population of Hamilton is set to increase in the coming decades and time to act is now. Please do not wait until 2050 to revise the boundary limits. Thanks!
- I thought we had banned child abuse. Why don't we apply these to the province
- Auditor General recent concerns about OLT :
https://www.auditor.on.ca/en/content/annualreports/arreports/en24/pa_ONlandtribunal_en24.pdf#page31
- Add a specific requirement for increasing and protecting biodiversity.
- safety study as seniors dominating area around Garth/Twenty Road.
- labour considerations - we need to prioritize our construction labour to densification of existing neighborhoods

Appendix G - Full Record of Comments

- At minimum inform everyone who was part of the urban boundary survey
- I want to provide feedback in person!
- Property owners,' name. Is it primary agricultural land?
- Notice board should include name of property owner not just the numbered company.
- Notice board should clearly say at the top URBAN BOUNDARY EXPANSION APPLICATION
- FULL identification oof owner and developer involved mplus their insurance company
- Who is the company? What's their full name? Who is insuring the project?
- the diagram explaining the notice components demonstrates its inaccessibility
- more context as to the intent of the proposal is required, the notice should inform the observer what is going on not that something is
- Thank you for providing this information to us. It's a lot of work but I think people are really engaged in this topic that affects all our lives and the future of Hamilton.
- Thanks for your efforts in trying to enshrine these criteria in official plan so that it has the "teeth" to refuse applications. My personal feeling is that ALL applications should be refused as the people have clearly spoken and expressed opposition to urban boundary expansion.
- This has been amazing! Thanks to you all for this information. Special thanks to Charlie Toman for his deep knowledge. Looking forward to the future of this development.
- The OLT has WAY too much power over municipalities! Totally undemocratic!
- Doug ford the dictator!
- How many applications have been submitted for development?
- how will it minimize flooding?
- Will this information be easily accessible for those that cannot attend?
- Can they check the habitat for wildlife?

- How long would it take for the city to give a final decision on the requests?
- How do we get the provincial government to back down from this provincial policy which undermines our local democracy?
- Specific to proposals coming from developers, how many urban boundary expansion proposals do you anticipate receiving each year?
- How do the Strong Mayor Powers relate to these policy orders and the capacity of the Mayor to represent the City and Councillors?
- Have feasibility studies or visioning exercises been done to establish best practices for these development areas?
- How does Bill 212 and the proposed highway 413 impact the urban boundary expansion?
- Can the Province for Hamilton to service lands outside of this firm urban boundary?
- Is there documentation the city legal team can prepare to advocate these areas be added to the green belt or a new category under a restoration plan or animal corridors to protect this area?
- Are any of these areas have city water and sewer systems already in place ?
- how does the city define "prime agricultural land"? Is there a standard?
- Can Hamilton say that we are too busy doing intensification within our already firm boundaries to even consider something outside because we are already meeting Provincial targets?
- the city has a history of settling with developers before olt regardless of frameworks, breaking trust with the community groups it engages with. Is the city preparing a new approach to defend cases at olt, if so, how (ex, additional legal staff etc.)?
- Toxins in the air from spraying of toxins from Sod Farms
- what are the population forecasts prepared by the city and does the city need more land to achieve its housing targets?
- Can we set development chsrge for private additions thst FULLY cover actual costs?

- Environmental impact studies and proof that these developments will not cause more flooding in the lower city or any parts of the city?
- A question relating to how these sites relate with the larger regional context and connectivities of multiple functions and values: Is the province attempting to force unwanted development in Burlington, Halton Region, the Niagara Escarpment and the RBG's Cootes-to-Escarpment lands?
- The preparatory review is excellent but does not address the positive social, financial, economic and health impacts of densities that are accountable to nuanced qualities of spaces and daily life -- from childhood to elders to immigrants and youth and many more ways of seeing Hamilton's peoples and affordability, walkability etc. (In additional to robust data in landscape architecture, planning, class-based & other research regarding physical, mental & social health w/nature access & airqual
- Have any of these submission requirements incorporated the new work on the Biodiversity Action Plan for the city?
- The recent auditor general's report on the OLT had concerns: https://www.auditor.on.ca/en/content/annualreports/arreports/en24/pa_ONlandtribunal_en24.pdf#page31 Does the City have recourse if the OLT unfairly favours land speculators?
- Is there a plan to explicitly address social impacts and the accountability of development (and the city) to update quality of human life, health, thermal comfort, and local economic & social relationship wellbeing?
- Rural lands and greenspace, with or without regenerative support, are critical for flood & stormwater retention, and the support of trees/air quality/dust management and more. Accountability on these ecosystem functions and on cumulative impacts of various activities and proposals isn't clear in the documentation I've seen, and may be legally and educationally important to make very clear to applicants and as an act of public knowledge mobilization.
- Are these going to be detailed in updated ways under the fiscal and longterm costs of municipal, provincial and federal services and impacts on Canadian and local wellbeing at various human and social scales?
- Can a developer go to OLT if they submit an incomplete application? What requires them to submit the additional studies (wind and solar is missing, are on-

site renewable opportunity studies required for these applications? Can these areas be required to be "off-the grid" or "grid positive"?

- EIS studies?
- Can we ensure all potential climate impacts on and by these new boundary expansions are paid for
- What about studies for schools and impact on Boards of Education?
- This tedium just dances around the obvious fact we have a corrupt provincial government. One that is perfectly willing to disregard environmental laws and bully municipalities.
- The city has already spent millions developing a zero
- There is a strong unexamined case to be made for a legal and professional duty of care concerning the impacts and potential of city planning on human and social daily quality of life. Intimate historic and global towns are beloved for reasons that Ontario developers could be invited (and counterpressured) to participate in -- to mutual win-win benefit. It's happening in Jasper now. But it's up to municipal council and populace to be stern about this and create the necessary details, policies+
- Re: impacts on the Unhoused Persons -- also the *prevention* of unhousedness and the dynamics that lead to precarious mortgages, rentals, access to safe and thriving housing and neighbourhoods etc
- Will these new communities be required to have a better balance between the needs of people who walk, cycle and those that drive?
- The New York Times posted that "North Carolina Town Sues Duke Energy Over Climate Change". "Court sides with youth in historic climate case against Ontario". If the government of Ontario pushed an expansion that affects the municipality's ability to move toward net zero would litigation against Queens Park be considered?
- What feedback/input do home/property owners have in this proposal. As this will drastically impact their homes, families, lives and investments.
- can these developments be linked to goals/measurable outcomes of the climate change department/office?

- Is there a requirement that food /work/healthcare/schools be within 15 minutes or will we just get food deserts? and urban sprawl? having to drive and thus an impact on environment?
- what about a submission requirement about labour availability of sufficient density is happening within existing neighborhoods. Labour and resources should not be prioritized outside the UBE.
- Are there any concerns with the provincial government's gutting of conservation authority powers and the requirements for subwatershed assessments?
- Would it violate provincial policy for the City of Hamilton to publicly report the anticipated lifetime cost to Hamilton taxpayers of a given proposal and to identify the developer who proposes and would profit from the expansion?
- More than health care, there is robust data showing the powerful impacts of green space and biodiversity on human medical, mental and behavioural and community health (crime reduction)_ and that began in Chicago in the 1930s through landscape architect Jens Jense's work and continues to this day (see the evidence gathered by Kaiser Permanente, by Rich Louv's Child & Nature Network's library and science circle, social science and impacts on dementia and neurodiversity support and much much more
- what about health care? putting in a family health care unit if none in that area or existing ones are not large enough for more family doctors to service this new population
- Have studies included densification vs. expansion in regard to effects on homelessness situation? (eg. expanding suburbs with large homes will not address the huge problem that Hamilton faces housing the unhoused - urban intensification with construction of rental facilities is what is needed ie. affordable housing
- Can the city require notices to new residents of these expansion areas that there kids will have to be bused?
- Higher density/affordable housing isn't listed as an evaluation factor.
- another consideration: Does the urban boundary expansion contribute to more affordable housing, or does it simply facilitate taking up valuable green space with dwellings with a much higher single environmental footprint?

- What will Hamilton do if the Province bulldozes through new legislation that outlaws Hamilton's key considerations?
- Legal duties of care are not limited to municipal and provincial policy for a city on the shores and watershed of a major freshwater lake that the planet and not just Ontario depends upon. From UNDRIP to the Navigable Waters Act to emergent Ecocide Law and impact on shared US wataers, the scope of responsibilities operates at multiple scales and geographies of impact.
- Will you examine the impact of additional traffic on already busy roads.
- It appears to me that the proposed submission requirements and City proposed criteria to be satisfied are very onerous and are unfairly geared to discouraging applications. There is a shortage of affordable housing in Hamilton and the areas that are eligilbe either have services or are in close proximity to services. How are these proposed submission requirements and proposed criteria to be satsfied are justified having regard to the need for more housing and the fact that eligible areas are either serviced or in close proximilty to services?
- It is important and wise to not exploit Indigenous peoples for these purposes; however, this challenge opens an opportunity for Hamiltonians and the city to update its ways of being in right relations with Indigenous peoples and the full constellation of responsibilities that Covenanted friends provide one another.
- How will these requirements play out at the OLT?
- i'd like to also hear narratives in plain language about this adventure in policy and power relationships, and in descriptive engaging ways that connect the people of Hamilton (and councilors etc) with Place. Making visible and alive the relationships between policy decisions, local governance, and quality of daily personal lives and livelihoods
- (alongside these notices about applications etc)
- That is very disappointing that all the people signed up to the GRIDS email list won't be automatically transferred to the new Urban Boundary List. Why can't you write to all the GRIDs list people and ask if they would give their permission to be notified about Urban Boundary applications. It would be a shame to lose all those contacts. Can't you give them the option to join?
- I think this is an important question that is consistantly disregarded. but impacts families ability to commute to work, schools and community servicesses.

- Is it possible to include a QR code
- Will the notice have a soil map ?
- It is important to invite and market this information to citizens and peoples in the municipalities, rural communities, watersheds and soilsheds adjacent to these areas. This is not solely a Hamilton matter.
- i think the public notice should have a warning like a cigarette package the impacts it will have on the environment...and taxes i guess
- Much larger print should be on the notices. Also, maybe a special large banner at the top of any urban boundary application public notice
- Story marketing on the notices would be powerful so people can relate to the impacts and see their own relevance to decisions and the point of putting these notices up in the first place.
- (technical language excludes and distances many(
- more detail re. proposed development is needed as I think the form is too brief ie. developers can "fudge " it. We really need to know the environmental impact of what they are doing and the project really needs to justify giving up green space
- yes i agree - additional attention on the notice that this is beyond the urban boundary and part of an expansion and pan expansion that the VAST majority of the city voted against
- is there a concern about safety. There is a current development in Mount hope with no sidewalks from new development school or bus stops on major street. Residents are forced to walk on the road.
- A QR code on notices could lead citizens to continually updated "living documents" regarding impacts and the public shared conversation. And also provide Accessible ways of engaging in this information and the decisions.
- is adequacy of supply and affordability of housing missing as considerations?
- The Red Hill Parkway and Linc are already a parking lot, are there any plans to expand these roads and add more infrastructure before building more houses?
- Agree with Laura! Give the Notice Boards a huge **warning! tax increases and environmental degradation application** at the top.
- Notice boards should have QR code that leads to application page.

- Laura nailed it! The sign should say development is dangerous to your health and that of your city and grandkid! And show a ruined wetland like a cancerous lung!
- I have attended an Ontario Land Tribunal hearing and it was very discouraging, as it seemed the "judge" was hand picked to support developers. It seems a very undemocratic process, perhaps it has improved since my experience?
- I'm still not understanding why the province is able to override the city's decision (and backing studies and constituent input) on this matter
- The whole suite of changes and processes at this moment is attempting to make city governance moot. Laden with catch 22s.
- Will developers have to adhere to environmental regulations? Will they have to pay considering the potential environmental impacts (ie flooding)?
- I would like considerations into how existing residents affected by potential developments be compensated in regards to infrastructure. (i.e. I'm on well water, the development may effect absorption/water table, will considerations be made to connect my residence to the new infrastructure)?
- DOUG FORD IS THE REASON WHY WE ARE IN THIS SITUATION
- Because our premier is a tinpot tyrant who seems only to care about driving his car!
- Historically, housing development has taken place prior to road development. How does Hamilton plan to prioritize this.
- Thank you for this presentation. Great job!
- Thank you to the team for this meeting tonight
- Well done! Thank you!
- Since many projects seem to be stalled, can the city set timelines for new proposals, where approvals can be reviewed if they do not move forward in a timely manner.
- Please define what is meant by affordable housing
- Nearly one third of current greenhouse gas emissions are absorbed by existing green spaces, wetlands, etc. Will the loss of such rural areas also be compensated as part of climate impacts?

- where is the environmental review in this process?
- Does the Gardner Marsh fall into one of the areas noted on map, and does the plan allow for “replacement” wetlands? Thank you to everyone at the city for their efforts to protect our urban boundary
- is there a time frame for addressing these issues that have been raised?
- Can you post the link to the webpage where all the development applications and materials can be viewed?
- Can the city just honestly explain the OLT is a province appointed body?
- are new staff being hired to address the olt cases that will be brought forward in these areas?
- how many were on the Grids2 list?
- is the city legal team and planning department monitoring the changes / amendments (and diagramming) to the planning act that infringe on the common goods / constitutional rights ?
- can't think of any right now. A dedicated website (doesn't have to be linked to the City for security reasons) with rich, readable "storytelling" would really honour the citizens who are so engaged.
- Public Facing Notice boards posted on the property (with coloured banners for application status changes)
- Text
- Virtual meetings if you do not live that close to an area that is being discussed In person for the local neighbourhood should be made .
- In person
- Through The Hamilton Spectator
- Notification when decisions are made
- Yes, I want to hear narratives told like a story --in plain language --to interpret & mobilize the technical information about both applic'ns and sites and impacts - public ESIA respect & consentethic

- Specifically would like to know about any decisions that are made esp after the council meeting.
- New legislation re land use
- Like tonight -- this was so well done, and you truly made space for so many different voices -- even more than when live. Please remember persons with disabilities and do e-consultations for them too
- In an on-line meeting.
- In person meeting
- In person
- at a virtual and in person meeting
- In person
- yes
- A QR code to access the documents?
- Narrative interpretive information so all readers are included and understand that they are democratically invited and welcomed to engage in their own ways and words. Rich narrative+RHFACsite.QRcode.
- QR code that leads to the City's appropriate application webpage where all the materials are displayed. Clearly listed as Urban Boundary Expansion
- How many houses/units will be built
- No. The diagram explaining the content describes its inaccessibility. More visuals that indicate the intent of the proposed changed and not just a notice that a change is being considered.
- Yes however it should link to the full application.
- Yes
- A QR code to access the documents.
- "Much larger print.
- Maybe a special 'banner' at the top indicating it is for an UBE application"
- yes

- Yes, it provides a comprehensive description.
- Yes
- The area affected needs to be more visible
- Note any effects on wetlands, forests, biodiversity or other environmental concerns.
- Banner saying this will expand the urban boundary.

Whether the project has an EI Study

Who are all the companies involved?

Who is financially responsible?

- Always provide a City of Hamilton contact name and how to reach them by phone or email
- Urban Boundary expansion should be in larger print. Better map.
- Owner name & phone number rather than a numbered company which is no help at all. Whether or not it is prime agricultural land.
- close to road allowance (but not affecting sightlines)
- Every 100 metres
- HUGE, with BRIGHT NEON YELLOWGREEN EDGES FOR CATCHING EYES ON Multiple sides of site AND IN GATHERING PLACES IN NEIGHBOURHOODS AND CITYWIDE SIGNIF sites where lingering HAPPEN(markets/sports/librar+++)
- yes. all around.
- closest spot on nearby road? (Outside of urban boundaries it might not even be on a road); and in all neighbouring homes or other structures.
- Large white Board with bright Yellow or Orange border to grab viewer, clearly seen with no obstruction of trees, etc.
- All road facing properties
- a notice board is insufficient for public interest. this space should be required to inform the public of the intent and committed outcomes of the proposal

- Highly visible in the immediate area of the proposed expansion
- Closest to the nearest public roadway and entrance to the property. If the property fronts on multiple roads, boards should be centered on each frontage.
- on all sides of affected area
- All corners and in full street view
- Along roads and trails and in the closest residential areas.
- The front of the possible so that residents would not trespass on these properties.
- All roadsides.
- All around and further than a few hundred yards. More than just the immediate neighbours are impacted.
- at the public right of way and along the edges of current/existing urban boundary that is proposed for expansion.
- Website
- as close to the property as possible
- Posted along the boundaries of the property and not just in one spot.
- All corners of it.
- At a main entrance site and in a place where it can be read without trespassing on the land and in an area with at least safe access to read it, ideally from a car if in a rural area.
- In a safe location for people to stop and read the info on the sign
- At the front in a highly visible location.
- Near the public roadway in front of the affected property.
- Proof that any development meet the 15 minute walkable city criteria in order to have services /housing /food /work meet greenhouse targets and prevent the city having to pay for urban sprawl.

- I answered this thoroughly and in detail on the Q&A during tonight's meeting. :). You need to give us more than 200 characters for these answers. Another act of inclusion ++ democratic generosity.
- EIS that includes actual on the ground fieldwork.
- type of housing to be built
are rental units, co-ops, supportive housing included?
- Commuter traffic, air quality, noise pollution. Ensure wildlife can be sustained in area of developments.
- Yes, existing traffic issues, prior to development, schools and churches and turning lanes.
- Impact to existing residents - i.e. Water absorption effecting the water table impacts basement flooding or reducing well water supply. Residents should be compensated in new connections to infrastruc
- Not that I think about right now
- Impact on school boards. Contribution to mid-density/affordable housing. Documenting resources provided to Indigenous communities (often under-resourced/over-committed) to respond in a timely manner.
- It should never be expanded on farmland.
- Ecological/biodiversity impact assessments.
- How local, neighbouring, farm operations will be impacted - traffic, stormwater runoff onto fields, complaints from new UBE neighbours about farming noise, smells, slow moving farm equipment etc
- Nothing comes to mind at the moment
- Assessment of growth implication on municipal infrastructure, servicing and municipal budget.
- None
- Effect on Hamilton's Climate Strategy, urban Forest canopy, plan for mitigating the effects of rainwater and runoff, and effect on our Biodiversity plan.
- They're good! Just absurd the developers can go over our heads to OLT! 🙄

Appendix G - Full Record of Comments

- Environment impact on the land and if it is good agricultural land we are going to need all that we have as per raising food costs and self sustainability
- Impact on rural communities such a flooding and bussing to school for children.
- A very strict EIS that no one can refute!