

Staff Response to Public Concerns - Key Themes

1. Concern about Provincial Changes

Comment	Staff Response
<p>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.</p>	<p>The City of Hamilton shares these concerns and had raised them with the Province when it was considering changes to planning rules.</p>
<p>Environmental and agricultural risks: Many 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.</p>	<p>The City of Hamilton shares these concerns and had raised them with the Province when it was considering changes to planning rules.</p>
<p>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.</p>	<p>The recommended Framework and terms of reference for the submission of a Financial Impact Analysis are based on understanding whether or not a proposed expansion area would have a positive or negative impact on the City’s long term financial outlook.</p> <p>Through the 2025 budget, City Council approved an additional \$1.5 million to be used by the City in defending its position at future Ontario Land Tribunal hearings.</p>

2. Support for a Robust and Transparent Review

Comment	Staff Response
<p>Detailed submission requirements: Several participants appreciated the inclusion of the numerous technical studies and reports required for urban boundary expansion applications. They valued the focus on examining environmental, social, economic, and infrastructure impacts before decisions are made.</p>	<p>Noted.</p>
<p>Broad thematic considerations: Many supported the emphasis on agricultural impacts, climate change, and community well-being.</p>	<p>Noted.</p>
<p>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.</p>	<p>Noted.</p>

3. Balancing Growth and Preservation

Comment	Staff Response
<p>Advocacy for maintaining the current urban boundary: Many participants 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.</p>	<p>The Urban Hamilton Official Plan supports and directs new residential development towards the existing built up area through residential intensification to achieve the City’s 80% intensification target.</p>
<p>Support for strategic expansions: Some participants 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.</p>	<p>The recommended Framework requires the City to carefully consider and assess each individual urban boundary expansion application across a range of land use planning considerations including housing.</p>
<p>Calls for responsible planning: If urban boundary expansion was to occur, many called 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.</p>	<p>The recommended Framework seeks to incorporate all of these considerations into the City’s review of an urban boundary expansion application.</p>

4. The Role of Housing Affordability in Urban Growth

Comment	Staff Response
<p>Concerns about restricting boundary expansions: Some participants argued that limiting urban boundary expansions could constrain housing supply, worsening affordability challenges and making it harder for families to find homes.</p>	<p>Staff have updated the Framework to include a consideration of whether or not the proposed expansion would have a positive impact on meeting the City’s housing supply needs.</p>
<p>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.</p>	<p>Noted.</p>
<p>A focus on affordability: Where urban expansion might occur, many participants stressed that such developments must prioritize affordable, inclusive housing rather than catering to luxury markets.</p>	<p>The recommended Framework requires the applicant to provide information on what types of housing would be proposed within an expansion area so that the City can consider whether it supports broader housing goals and objectives.</p>

5. Environment and Climate Resilience

Question	Staff Response
<p>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.</p>	<p>Considerations of the impact on natural heritage systems, biodiversity and climate change targets are all considered under the recommended Framework.</p>

Question	Staff Response
<p>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.</p>	<p>This is also a consideration under the recommended Framework.</p>
<p>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.</p>	<p>Should an urban boundary expansion be approved, these matters would be considered through the Secondary Planning process.</p>
<p>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.</p>	<p>The Framework requires applicants to submit a Energy and Climate Change Assessment which is required to consider and incorporate these goals.</p>
<p>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.</p>	<p>The Framework requires the applicant to submit an Energy and Climate Change Assessment which considers how the expansion relates to climate change risks.</p>

6. Equity and Accessibility in Public Engagement

Comment	Staff Response
<p>Inclusive and clear communication: Many participants expressed difficulty understanding the technical aspects of urban boundary expansion due to complex language and inaccessible presentation formats. They 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.</p>	<p>Through the City’s engagement on the Draft Framework, effort was put into making sure that consultation materials were easily accessible and in plain language. This included the preparation of several infographics and a short video.</p> <p>Staff will continue this approach in how it shares information on individual urban boundary expansion applications, including the materials shared at any City initiated Open Houses.</p>
<p>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.</p>	<p>The recommended Framework identifies that both pre-application community meetings scheduled by the applicant and City led Open Houses to receive input on urban boundary expansion proposals may be both in-person and virtual.</p> <p>If an urban boundary expansion application is received, staff will work with the ward councillor to identify where/how additional notification and consultation can occur on an application (e.g. staff providing information at a Ward Councillor’s regularly scheduled town-hall meeting).</p>
<p>Engagement with marginalized and underrepresented communities: Some participants called 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.</p>	<p>Comment noted. Through the City’s engagement on Draft Framework staff reached out to local organizations that support and provide services to marginalized communities. The Planning Division will continue to work with the City’s Public Engagement office to improve engagement of communities that have been historically underrepresented in planning discussions.</p>

Comment	Staff Response
<p>Strengthened Indigenous engagement: Feedback throughout the engagement underscored the importance of Indigenous community involvement. Some participants suggested mandating Indigenous input for all expansion proposals.</p>	<p>The recommended Framework:</p> <ul style="list-style-type: none"> - Specifies that any Formal Consultation application received for an urban boundary expansion application will be provided to Six Nations Elected Council for review and input. - Requires applicants to submit an Indigenous Community Consultation Summary and Comment Response as part of a complete application that documents how the applicant has informed local Indigenous communities of the proposed expansion and documents any meeting notes and/or comments received from the Indigenous Community.

7. Perspectives Challenging the Firm Urban Boundary and Draft Framework

Comment	Staff Response
<p>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. Some viewed the firm boundary as a contributing factor to affordability challenges and a barrier to meeting housing demand.</p>	<p>The recent Provincial changes to the planning rules governing urban boundary expansions have been changed to open the door for privately initiated urban boundary expansion proposals to be considered and approved.</p>

Comment	Staff Response
<p>Frustration with process complexity: Several participants felt that the Draft Framework makes applications overly difficult for developers, potentially discouraging responsible growth.</p>	<p>Any proposal to expand Hamilton’s urban boundary seeks to transform lands from their current rural/agricultural state to an urban state. This impacts the City as a whole, including how the City funds and delivers both hard infrastructure and city services. As such, these applications are inherently complex and require thorough assessment and evaluation.</p>
<p>Preference for managed expansion over intensification: Many participants highlighted 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.</p>	<p>By establishing the Framework, the City is seeking to ensure that any urban boundary expansion received must consider and be assessed against a broad range of considerations including infrastructure capacity and housing demands.</p>
<p>Concerns about overemphasis on environmental goals: A few participants expressed concerns that prioritizing environmental preservation and farmland 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.</p>	<p>The City has an approved firm urban boundary growth strategy which was approved, in part, to protect existing natural areas and farmland. The Provincial changes to planning rules governing urban boundary expansions now allows privately initiated urban boundary expansion applications. The recommended Framework requires a more rigorous review of the impact of urban boundary expansions but do not preclude City Council or the Ontario Land Tribunal from approving an expansion proposal.</p>