



## City of Hamilton Report for Consideration

**To:** Chair and Members  
Planning Committee

**Date:** June 25, 2025

**Report No:** PED25180

**Subject/Title:** Official Plan Amendment to Expand the Urban  
Boundary to Include the White Church Lands

**Ward(s) Affected:** Ward 11

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### Recommendations

- 1) That **Urban Hamilton Official Plan Amendment Application UHOPA-25-004** by Urban Solutions Planning & Land Development Consultants Inc., on behalf of the Whitechurch Landowners Group Inc., for the lands shown in Appendix A to Report PED25180, to add the lands to the Urban Hamilton Official Plan to provide for an expansion of the City of Hamilton's Urban area and to establish a site-specific policy for the White Church Urban Expansion Area, **BE DENIED** on the following basis:
  - a) The application is not consistent with the Provincial Planning Statement (2024); and,
  - b) does not align with the general intent of the Urban Hamilton Official Plan, as it has not been demonstrated that the development would be supported by sufficient existing or planned infrastructure and public service facilities, would be fiscally sustainable to 2051, would support the Council directed growth strategy for a firm urban boundary, would protect agricultural lands and natural heritage features, or would minimize climate impacts.
- 2) That **Rural Hamilton Official Plan Amendment Application RHOPA-25-005** by Urban Solutions Planning & Land Development Consultants Inc., on behalf of the Whitechurch Landowners Group Inc., for the lands shown in Appendix A to Report PED25180, to remove the White Church lands from the applicable mapping and policies of the Rural Hamilton Official Plan, **BE DENIED** on the following basis:

- a) The application is not consistent with the Provincial Planning Statement (2024); and,
- b) does not align with the general intent of the Rural Hamilton Official Plan, as it has not been demonstrated that the development would support the Council directed growth strategy for a firm urban boundary, would protect agricultural lands and natural heritage features, or would minimize climate impacts.

## **Key Facts**

- The purpose of this report is to provide a recommendation regarding the Official Plan Amendment applications submitted by Urban Solutions Planning & Land Development Consultants Inc., on behalf of the Whitechurch Landowners Group Inc.
- The proposal is to remove the lands from the Rural Hamilton Official Plan and add them to the Urban Hamilton Official Plan to provide for the expansion of the City's Urban area to include the White Church lands and to establish a site-specific policy to establish a vision and acknowledgement of future Secondary Planning for the White Church Urban Expansion Area. Development in the proposed expansion area would not be in keeping with the Council directed growth strategy for a firm urban boundary intended to preserve agricultural lands and natural heritage features and minimize climate change impacts and would lower the City's intensification rate.
- The applications do not demonstrate that there is sufficient existing or planned capacity relative to infrastructure and public service facilities to service the subject lands.
- The applications do not demonstrate that development of the lands would be financially sustainable to 2051 when consideration of the long-term replacement costs of services is included in the analysis.
- The impact on the agricultural system in terms of the removal of agricultural lands cannot be clearly delineated as development phasing timelines are unknown.
- The Official Plan Amendments, as submitted, do not adequately address the Urban Hamilton Official Plan's vision and objectives for growth. In staff's opinion there are insufficient policy assurances to ensure subsequent stages of development would address these matters.

## **Financial Considerations for the Official Plan Amendment to Expand the Urban Boundary to Include the White Church Lands**

Upon consideration of Report PED24109, Council approved a budget of \$1.5 million, which was subsequently reflected in the 2025 budget. Should Council deny these applications and the applicant appeal Council's decision to the Ontario Land Tribunal, a budget allocation in 2026 will be required to defend Council's decision on the applications, as well as any potential future applications. Due to the complexity of these matters and the anticipated duration of the hearings, additional funding in the range of \$4 million to \$6 million will be required.

## **Background**

The subject lands are approximately 364 hectares and at full build out are projected to have a population of approximately 26,700 people. The number of residential units proposed is approximately 7,600, according to the Planning Justification Report.

The proposed Urban Boundary Expansion area encompasses 62 total properties, of which 7 are owned by the Whitechurch Landowners Group Inc. (11.3% of all properties or approximately 44% of the total land area). Additional information about land ownership can be found in Appendix D. The absence of a cost-sharing framework and participation of only 11.3% of all property owners weakens confidence that later phases of development will proceed in a coordinated manner.

Additional materials can be found in Appendices A-P to Report PED25180, including a Planning Report Fact Sheet (Appendix D to Report PED25180). All submission materials have been made available on the City's webpage at [www.hamilton.ca/ube](http://www.hamilton.ca/ube).

## **White Church Secondary Plan Application History**

On December 13, 2023, the City received an Official Plan Amendment from the applicant for a Secondary Plan to allow urban uses within the White Church area. The City of Hamilton deemed the application incomplete on January 12, 2024. The decision to deem the application incomplete was appealed to the Ontario Land Tribunal under Section 22(6.2) of the *Planning Act* on February 9, 2024, by the applicant. As of the date of this report, a hearing has not been scheduled to consider the appeal of the decision by staff to deem the application incomplete. It is important to note that the appeal is only with respect to whether the application is to be deemed complete, not on the merits of the application itself.

Staff note that the subject lands within the Secondary Plan do not directly align with the urban boundary expansion proposed through the Official Plan Amendment applications. Most notably, the Secondary Plan does not include lands south-east of the intersection of Upper James Street and Airport Road. The applicants have submitted a revised Secondary Plan.

Should the Ontario Land Tribunal rule that the application is complete, the City will be required to process the application and the applicant will have the right to appeal should a decision not be made by Council within 120 days.

## **Materials Reviewed and Role of City Retained Consultants/Peer Reviewers**

In support of their applications, the proponent submitted a total of 25 studies, in addition to a planning justification report, a concept plan, and other associated materials. The submitted materials were circulated to internal City departments, external commenting agencies, and indigenous communities for comment. The City received comments from 15 internal Division and five external commenting agencies, in addition to the Six

Nations of the Grand River and Mississaugas of the Credit First Nation. These comments are summarized in Appendix F to Report PED25180.

In addition to these comments, staff retained external consultants to complete peer reviews of the following studies submitted with the applications:

- Agricultural Impact Assessment (see Appendix G to Report PED25180 for peer review)
- Commercial Needs Analysis (see Appendix H to Report PED25180 for peer review)
- Land Needs Analysis (see Appendix I to Report PED25180 for peer review)
- Fiscal Impact Assessment (see Appendix J to Report PED25180 for peer review)
- Noise Feasibility Study (see Appendix K to Report PED25180 for peer review)
- Odour Feasibility Study (see Appendix L to Report PED25180 for peer review)
- Energy and Environmental Assessment Report (see Appendix M to Report PED25180 for peer review)

In preparation of this Report, City staff reviewed all materials submitted by the applicant, the peer reviews, as well as all comments submitted by City departments, commenting agencies, Indigenous communities, and the general public. In support of this review, Dillon Consulting was retained to provide review, summary, and commentary on these materials for staff consideration with respect to the Provincial Planning Statement (2024), Hamilton's Official Plans, and Hamilton's Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications.

### **Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications**

In direct response to recent Provincial legislative and policy changes, City Council approved a Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications on August 16, 2024, through Report PED24109, and provided direction to staff to use the Draft Framework in reviewing any urban boundary expansion applications received until the Framework is finalized and incorporated into the Official Plans.

On April 16, 2025, City Council approved a Final Framework for Processing and Evaluating Urban Boundary Expansion Applications through Urban Hamilton Official Plan Amendment No. 232 and Rural Hamilton Official Plan Amendment No. 44, which enshrined the requirements of the Final Framework into policy. The City subsequently received three appeals of the Official Plan Amendments to the Ontario Land Tribunal. One of these appeals was from the legal firm Aird Berlis, who is representing the four corporations that make up the Whitechurch Landowners Group.

The Draft Framework is intended to establish a clear and fulsome process for review, while ensuring transparency and providing opportunities for public input. The Draft Framework contains submission requirements, considerations for reviewing applications, and requirements for application processes, such as consultation.

Generally, these new Official Plan policies cannot be applied retroactively to an urban boundary expansion application that was deemed complete prior to the implementation of the Framework in policy, which includes the White Church Lands. City staff have, however, used the Framework to guide their review of the proposal. The recommendations in this Report PED25180 are based on an analysis of the applications in relation to the Provincial Planning Statement, Urban Hamilton Official Plan and Rural Hamilton Official Plan only, and not on compliance with the Draft Framework directly.

For further details about the policy history related to these applications, see Appendix N to Report PED25180.

### **Updates to Ministry of Finance Population Projections (2025)**

The Ministry of Finance prepares and releases population forecasts for Ontario and selected municipalities (including the City of Hamilton) on an annual basis. . The White Church applications are based on 2024 Ministry of Finance projection numbers and not the Urban Hamilton Official Plan population forecasts.

Under the previous Growth Plan, the Province created and assigned population and employment forecasts to single-tier and upper-tier municipalities within the Greater Golden Horseshoe. In addition, the Province provided a specific Land Needs Assessment methodology to determine the quantity of land required to accommodate forecasted growth.

Under the Provincial Planning Statement, each municipality is required to base its population and employment growth projections on Ministry of Finance 25-year projections (2.1.1) but also states:

- Municipalities “may modify projections, as appropriate;” and,
- Municipalities may continue to use the previous forecast issued by the Province until its next Official Plan review.

More recently, the Province announced through its technical briefing on Bill 17, *Protect Ontario by Building Faster and Smarter Act, 2025*, released on May 12, 2025, that the Official Plan population updates will be required to align with October 2024 Ministry of Finance population projections. As illustrated in Appendix O to Report PED25180, these projections are significantly higher than the current Urban Hamilton Official Plan projections. Bill 17 received Royal Assent on June 25, 2025. Should the Province proceed with the direction in the technical briefing the City would be required to base its population forecast in its next Urban Hamilton Official Plan update on a population of 903,270 by 2051 whereas the current Urban Hamilton Official Plan 2051 population forecast is 820,000 (which was based on the Growth Plan). Bill 17 did not make any policy, legislative or regulative changes directly requiring municipalities to use the 2024 Ministry of Finance population projections. The Province has indicated it will further consult with municipalities on the matter prior to any form of implementation.

The Province has stated that it will be providing new guidelines for municipalities to assess land needs under the new Provincial Planning Statement; however, the most up to date guidance available is the 1995 Projection Methodology Guideline, published by the Ministry of Municipal Affairs and Housing. During the consultation periods on the policy and legislated changes, the City identified concerns that the Ministry of Finance projections do not consider infrastructure capacity, housing affordability, land supply or other matters that influence the pattern of growth in southern Ontario. As a result, these projections vary from year to year, given that the method is based on a continuation of recent patterns of migration and population growth rather than a forecast of longer-term trends. With respect to Provincial land needs assessment methodologies, the City of Hamilton advocated for municipalities to have the ability to adopt transformational urban growth strategies rather than basing future land needs on historical development patterns.

It is important to note that the October 2024 Ministry of Finance projection was established during record high international immigration levels (including non-permanent residents). Recent changes in Federal immigration policy to reduce these levels has lowered the Ministry of Finance's 2025 interim 2051 population projection from 22,119,641 to 20,804,658 or 6.3%. This reduction Province wide is expected to be reflected in the 2025 Ministry of Finance population projection for Hamilton which should be released this fall.

## **Analysis**

### **Provincial Planning Statement, 2024 (PPS)**

In October 2024, the Provincial Planning Statement (PPS) came into force and effect, replacing the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe. The PPS was accompanied by legislative changes to the *Planning Act* to permit privately initiated urban boundary expansion applications at any time.

Staff reviewed Section 2.3 of the Provincial Planning Statement, which establishes general policies for settlement areas and settlement area boundary expansions specifically, against the proposed applications.

Seven criteria are outlined in policy 2.3.2.1 of the PPS, which is outlined below. Planning analysis comments are provided under each criterion.

### **Policies Planning Authorities Must Consider Under Section 2.3.2.1 of the Provincial Planning Statement**

The proposal is not consistent with the Provincial Planning Statement (2024), as it has not been demonstrated that it meets the seven criteria outlined in section 2.3.2.1., as noted below.

**a) The need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;**

Planning staff support the importance of “building more homes faster” and, through the City’s Housing Pledge, the City has demonstrated its commitment to same. While bringing more lands into the urban area could allow more homes to be built, there are significant infrastructure, fiscal, and further planning work that would need to be carried out to do so should these applications be approved. Further, the applications need to be reviewed in the context of the Provincial Planning Statement and City’s Official Plans.

*Housing Land Needs*

The Urban Hamilton Official Plan’s forecasts Hamilton’s population increasing to 820,000 people by the year 2051 and the City’s approved growth strategy directs 80% of forecasted growth to the built-up area through residential intensification and 20% to designated greenfield areas. As discussed above, the City of Hamilton has not yet updated its Urban Hamilton Official Plan’s population forecast based on the new Provincial Planning Statement and Bill 17 requirements.

In considering this criterion it is important to note that the Provincial Planning Statement has policies including 2.2.1.a, directing a full range of housing options which is defined as being different housing types across the continuum. However, the Province does not provide specific targets for different housing forms (e.g. percentage of new housing that is to be low-, mid- and high-rise development). The Provincial Planning Statement notes that Municipal Official Plans are the most important vehicle for implementing PPS policies. In assessing what is an “appropriate” range and mix of land uses consideration should be given to the Urban Hamilton Official Plan which establishes housing and affordability targets and focuses the City’s population growth towards the built-up area through residential intensification including the redevelopment of underutilized lands.

Staff note that the Urban Hamilton Official Plan does include targets for the percentage of ownership and purpose-built rental housing as well as the percentage of new housing that is affordable for low to moderate income households. The proposed Official Plan Amendment does not include any minimum targets for purpose built rental housing or affordable housing for low to moderate income households.

The applicant submitted a Land Needs Analysis prepared by urbanMetrics, which concluded that there is a need for additional ground-related housing in Hamilton to the years 2031 and 2051. The Land Needs Analysis was based on an intensification rate of 50% which is lower than the Council adopted growth strategy. The applicant’s Land Needs Analysis was based on the Ministry of Finance 2024 population projections for Hamilton and identified a land need of 2,386 hectares for designated greenfield lands to the year 2051.

The City had this Land Needs Analysis peer reviewed by Watson & Associates (see Appendix I to Report PED25180) which observed the Land Needs Analysis:

- Based its population and housing growth on 2024 Ministry of Finance forecasts which are ambitious and do not take into consideration more recent Federal changes to immigration levels or growing economic uncertainty;
- Significantly overstates the city's urban land needs by 2051 and does not consider longer-term redevelopment opportunities within the built-up urban area;
- Is not clear in how it considers how Additional Dwelling Units impact the forecasted demand for ground-related units; and,
- The Land Needs Analysis does not provide direct responses to the considerations of the Draft Framework.

As directed under the Urban Hamilton Official Plan, the City undertakes an annual Market and Land Supply Monitoring Report that tracks and assesses, among other things, the type and tenure of housing starts, the housing City wide intensification rate, the supply of designated and available land for residential development and changes in affordability rates. Through Report PED24110 (2023 and interim 2024 Market and Land Supply Monitoring Report), it was reported that the City is generally on track of implementing a firm urban boundary growth strategy with:

- A 90% intensification rate in 2023;
- A steady increase in the number of Additional Dwelling Units;
- More than a 15-year supply of designated and available residential land; and,
- The estimated number of new dwellings on vacant land steadily increasing even as the amount of vacant residential land decreases as a result of the City increasing residential planning permissions.

Based on the above, staff are not satisfied that the applications have demonstrated the proposed urban expansion area is required to accommodate the City's population growth.

#### *Commercial Land Needs*

The applicant's Concept Plan identifies 16.78 hectares of commercial lands and a Commercial Needs Analysis prepared by urbanMetrics was submitted with the application.

The urbanMetrics Report also states: "this analysis is intended to identify the amount and types of commercial space needed to support the daily and weekly needs of the forecast population within subject lands and surrounding area, as well as the estimated employment generated by the required commercial space."

The urbanMetrics Report states that:

- "Between existing commercial space, development applications with commercial space, the potential of the District Commercial zoned lands, and the Commercial block in the White Church Urban Boundary Expansion Area the study area could accommodate 1.39 million square feet of retail. It is very unlikely that the majority of



this space will be required or be developed as commercial space over the 2051-time horizon; and

- Overall, there will be a need for an estimated total of 835,800 square feet of commercial space in the Study Area including existing and new commercial space, as well as vacant space by 2051. In their professional opinion there is more than sufficient designated commercial lands to accommodate this need.

A peer review of the urbanMetrics Report was completed by tateresearch. The peer review states the following:

- “The assumed redevelopment of all District Commercial designated lands in the Study Area as retail commercial uses may overstate future retail supply.
- The single planned commercial block is not within walkable distance of all future residents within the Proposed Urban Expansion Area. There has not been an analysis of the opportunity for additional retail commercial locations in the Proposed Urban Expansion Area.
- The uM analysis demonstrates that the amount of nearby designated commercial space exceeds the identified need, which could be interpreted to indicate that additional commercial designations are not required to meet the projected demand. This oversupply of commercial space situation could still exist even if the supply of retail commercial space is overstated. The urbanMetrics Report states that “This analysis is intended to identify the amount and types of commercial space needed to support the daily and weekly needs of the forecast population within subject lands and surrounding area.” Based on our review, the report does not demonstrate demand for the amount of retail commercial proposed at the Site.
- In our opinion, a retail centre of 452,000 square feet may be larger than required to ‘support the daily and weekly needs of the forecast population...’.
- The uM Report identifies that there is a need for an additional 783,500 square feet of retail and service commercial space. This space relates to the Study Area at build-out. The uM Report indicates potential future commercial space of 851,000 square feet in lands designated District Commercial in the Study Area. There is more supply than demand, according to the uM Report. If the Proposed Urban Expansion Area was developed with the proposed commercial block of 452,000 square feet, it would impact the market demand available to support the designated District Commercial lands in the Study Area. The development of the Proposed Urban Expansion Area, as proposed, could adversely impact the planned function of the existing designated District Commercial lands within the Mount Hope Secondary Plan.”

Staff notes the Concept Plan submitted with the applications does identify commercial lands within the 28 NEF contour. Should these lands be approved to be within the urban boundary there could be pressure to convert these lands to other sensitive land uses, if these lands are not viable for commercial development.

**b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;**

It is important for any urban boundary expansion to have sufficient infrastructure, existing or planned to accommodate growth in the expansion area. This infrastructure includes water, wastewater, stormwater, transportation, and community facilities including schools, parks etc.

With respect to water, wastewater, and stormwater the applicant submitted the following studies which were reviewed by the City's Growth Management Division in collaboration with Hamilton Water:

- White Church Boundary Expansion Area Subwatershed Study, SCS Consulting Group Ltd, January 2025
- Appendix C: Stormwater Management Report, SCS Consulting Group Ltd, January 2025
- Environmental Impact Study, Beacon Environmental Limited, December 17, 2024
- Functional Servicing Report (FSR), SCS Consulting Group Ltd, January 2025
- Preliminary Hydrogeological Investigation, Landtek, January 30, 2025
- Geotechnical Investigation, Landtek, February 4, 2025
- Overburden Thickness Study (Karst), Terra-Dynamics Consulting, November 22, 2024
- Energy and Climate Change Assessment Report, buildABILITY, December 2024

The Growth Management Division's review was completed in collaboration with Hamilton Water.

The Functional Servicing Report prepared by SCS Consulting Group Ltd. dated January 2025 relies on leveraging additional capacity through the planned infrastructure upgrades within the City's Water & Wastewater Master Plan (which is currently underway). The Master Plan is being prepared based on the premise of "no urban boundary expansion", which is the current approved and in force growth management framework in the City's UHOP. As such, the planned infrastructure upgrades identified in that document were not intended to accommodate growth within the White Church expansion area. If the proposed infrastructure outlined in the Master Plan is used for the White Church expansion area, it would effectively reallocate servicing capacity away from both residential and non-residential areas within the existing urban boundary that the Master Plan is planning to accommodate.

The following considerations are noted:

*Water Servicing*

The submission lacks the details to demonstrate that sufficient capacity is available in the existing and/or planned water system to accommodate the proposed expansion. While there is existing and planned water infrastructure in the vicinity of the proposed

expansion area, the applications did not include a hydraulic analysis to demonstrate that the existing/planned watermains can support the required peak domestic and fire flow demands. These mains also service existing communities, such as Caledonia, and no spare capacity has been identified or confirmed by the City for the expansion lands. It was noted by City staff that any capacity assumptions for these mains must be tested through a hydraulic model, which has been deferred to the Secondary Planning stage.

The applications also note that water capacity “can be available” through upgrades in future Master Plans and Development Charge By-law cycles; however, the current 2024 DC By-law and Master Plan do not contemplate servicing these lands, making the proposal inconsistent with approved infrastructure planning. It was also noted that the population and employment assumptions considered in the Functional Servicing Report were not consistent with the UHOP’s 2051 population/employment projections, raising further questions about the accuracy and applicability of the analysis.

### *Wastewater Servicing*

The applicant’s submission does not demonstrate that there is sufficient capacity in the City’s existing and/or planned wastewater servicing system to service the subject lands. The applicant proposes that approximately 103.82 ha of the site will discharge to the Homestead Pumping Station, which in turn conveys flows to the Mount Hope Pumping Station and ultimately to Upper James Street. However, the submission lacks sufficient detail and does not demonstrate that the Homestead Pumping Station has residual capacity to accommodate the additional flows. The applicant acknowledges that “additional analysis is required” during the Secondary Planning stage to confirm residual capacity and that potential upgrades to the pumping station may be necessary. The City is currently constructing a 1500 mm diameter trunk sewer along Dickenson Road, scheduled for completion in late 2028. The applicant proposes to connect to this trunk via a new pumping station and forcemain on Miles Road. The sewer was designed to 60% of its full hydraulic capacity (2.56 m<sup>3</sup>/s), leaving an estimated 1.02 m<sup>3</sup>/s of residual capacity. However, the applicant did not confirm allocation for the subject lands.

The applicant assumes capacity is available but does not account for other potential users or planned growth within the Urban Boundary that may already be relying on that capacity. The City’s Master Plan update does not include the subject lands, and any assumptions about using this infrastructure are therefore inconsistent with Council-endorsed infrastructure planning. A new pumping station and forcemain are proposed to serve 217.03 ha via a connection to the 1500 mm Dickenson Road Trunk Sewer (under construction), but again, staff have not confirmed allocation of residual capacity for the subject lands, as the turnaround time for the review of the applications did not allow for substantial analysis that would normally occur through a City-led planning process. The Functional Servicing Report assumes 40% capacity remains (1.02 m<sup>3</sup>/s), while Public Works staff clarify that the sewer was designed for 80% of full-flow capacity, significantly reducing assumed capacity.

### *Stormwater*

The applicant's submission does not demonstrate that there is sufficient capacity in the City's existing and/or planned stormwater servicing system. The applicant's Functional Servicing Report refers to a series of existing roadside culverts along White Church Road East, Airport Road, and Miles Road, as well as the White Church Road Municipal Drain as outlets for post-development drainage. The report concludes that post-development peak flows will be controlled to pre-development levels through future stormwater management facilities, and that these outlets have "sufficient capacity" to accommodate runoff. However, the submission does not include any Watermain Hydraulic Assessment or modelling to verify whether these culverts or the municipal drain can actually accommodate even controlled post-development flows.

Growth Management staff have confirmed that the municipal drain's performance and suitability will require further review, which the applicant's engineering reports defer to the Secondary Planning stage. The engineering reports propose to discharge flows to downstream watercourses such as DF20 and the White Church Drain, both of which may already be constrained and are identified in Growth Management staff's comments as requiring a sensitivity assessment for potential chronic flooding and/or streambank erosion impacts. These watercourses serve the Mount Hope Secondary Plan area and may be impacted by additional flows or changes in sediment regime. The proposed storm sewer network is conceptual. The engineering reports acknowledge that gravity servicing will not be feasible in certain areas and that sump pumps will be required, yet does not identify the extent of these areas or address risks associated with relying on private mechanical solutions. The need for sump pumps, and any mitigation of internal constraints (e.g. pipeline crossings, soil conditions, outlet elevation limitations), are deferred to a future design phase.

### *Transportation*

The applicant's submission (prepared by NexTrans, January 2025) did not include adequate details to demonstrate that there is existing or planned infrastructure to accommodate the proposed expansion. Staff have not planned for transportation infrastructure to support development of these lands through the Transportation Master Plan. Further, the applicant's studies did not demonstrate whether the existing transportation network will have sufficient capacity to accommodate the proposed development nor outlined how the required future transportation network will be provided to ensure sufficient facilities and capacity are provided as development progresses. Revisions to the applicant's transportation modelling are required in response to deficiencies and errors identified by Transportation Planning staff. Furthermore, the City's long range transportation plans have not accounted for the scale of development proposed for the subject lands and multiple improvements could be required to accommodate the proposed population.

*Public Service Facilities*

Comments from Environmental Services, Recreation, as well as City Wide Services, Healthy and Safe Communities, and the School Boards were considered in the assessment of sufficient existing or planned public service facilities.

The applicant's submission considers nearby existing public service facilities and identifies that the expansion will require three elementary schools, and a network of neighbourhood and community parks. The proposed plan for public service facilities appears to be deficient, lacking the appropriate quantum of school facilities and the feedback from the School Boards questions the enrolment assumptions. Further, the proposal notes existing Fire, Police and Ambulance services in the vicinity of the area; but does not identify whether these existing facilities are sufficient to support the expansion or if new/expanded services are needed.

Based on all of the above, the applications have failed to demonstrate sufficient existing or planned capacity with respect to water, wastewater, stormwater, transportation and public facilities.

**c) whether the applicable lands comprise specialty crop areas;**

The proposed White Church expansion area is not comprised of specialty crop areas. The Agricultural Impact Assessment prepared by DBH Soils (February 10, 2025) for the applications states that there are no specialty crop areas located in the proposed White Church expansion area. While the proposed expansion area includes existing agricultural and agricultural related uses, however, no areas of provincially or municipally designated specialty crop lands were identified in the Primary or Secondary (1500 m buffer) Study Area. The Study Area is located, at a minimum, 10 km southwest from the nearest specialty crop areas.

As per the existing Rural Hamilton Official Plan – Schedule D, and the Ontario Fruits, Vegetables and Other Specialty Crops GIS mapping tool, the southern boundary of any specialty crop areas within the region is Mud Street E.

**d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;**

The Agricultural Impact Assessment (AIA) for the Whitechurch Urban Boundary Expansion was completed by DBH Soil Services Inc. on February 10, 2025, for the Whitechurch Landowners Group Inc. The scope of the Agricultural Impact Assessment involved identifying and assessing agricultural impacts based on roadside reconnaissance surveys and online resources, providing avoidance or mitigative measures as necessary to offset or lessen any impacts, and considering whether the proposed urban boundary expansion is consistent with the Provincial Planning Statement (2024) policies 2.3.2.1 c, d, e, and f. The study encompassed the Primary

Study Area, which is the Whitechurch Urban Boundary Expansion Area itself (approximately 326 ha), and a Secondary Study Area extending 1500 metres beyond the Primary Study Area boundaries to characterize the agricultural community and assess potential impacts.

The Agricultural Impact Assessment concludes that the Primary Study Area lands are a "reasonable alternative" on lower priority agricultural lands within a prime agricultural area because: the lands do not comprise a Specialty Crop Area; the location of the lands in the White Belt abuts the existing urban boundary; there is the presence of non-agricultural uses including a golf course; the subject lands represent a fragmented agricultural area; the lands are in proximity to John C. Munro International Airport; there is a lack of significant capital investment in agricultural infrastructure within the Primary Study Area, and the proposal complies with the Minimum Distance Separation of the Agricultural Code of Practice. The report proposes high level mitigation measures to be undertaken at the time of secondary planning.

Dillon Consulting Limited (Dillon) prepared a peer review of the Agricultural Impact Assessment prepared by DBH Soil Services Inc. for the Whitechurch Landowners Group Inc., dated February 10, 2025. Dillon's review is based on the Draft Agricultural Impact Assessment (AIA) Guidance Document prepared by OMAFRA (2018) as well as the relevant agricultural considerations set out under Part B of the Draft Urban Boundary Expansion (UBE) Framework (2024), as well as applicable policies of the Provincial Planning Statement and Rural Hamilton Official Plan. Their review included a site visit completed on May 16, 2025, to review/consider Minimum Distance Setbacks (MDS) livestock assumptions based on windshield survey methodology.

In general, Dillon agrees with the conclusions of the Agricultural Impact Assessment based on their review of the report, methods, cross-referencing of the references provided and on-site review. The Assessment was completed in accordance with the Draft AIA Guidance Document prepared by OMAFRA and met the relevant agricultural considerations set out under Part B of the Draft Urban Boundary Expansion (UBE) Framework (2024), as well as applicable policies of the Provincial Planning Statement and Rural Hamilton Official Plan.

Dillon concurred with the Agricultural Impact Assessment's classification of the subject lands as "lower priority agricultural lands" relative to other prime agricultural lands in the City. They agreed that if an expansion is necessary, the subject lands would be a reasonable choice from an agricultural perspective, as prime agricultural areas are largely unavoidable in the City's Whitebelt area (i.e., the rural areas of the City not within the Greenbelt Plan). Staff generally concur with the findings of the Assessment and peer review, although do not believe proximity to the airport should be a reason for classifying the lands as lower priority prime agricultural lands. However, prime agricultural areas are largely unavoidable in the City's Whitebelt area.

The conclusions of the Agricultural Impact Assessment are what Dillon would expect and only found minor discrepancies with some of the site findings, none of which would impact the final results of the Agricultural Impact Assessment.

**e) whether the new or expanded settlement area complies with the minimum distance separation formulae;**

The Dillon Peer Review undertook a detailed review of Minimum Distance Separation (MDS) calculations in the Agricultural Impact Assessment for livestock facilities which included a desktop analysis, field verification via windshield survey (completed May 16, 2025), and drone photography. Only minor discrepancies were identified in the MDS calculations for six sites. These adjustments led to moderate increases in MDS setbacks for several sites. Despite these increased setbacks (with separation distances from these operations to the subject lands ranging from 698 m to 1,488 m), none of the revised MDS setbacks encroach into the Subject Lands.

**f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and**

The Agricultural Impact Assessment identified potential impacts to the agricultural area including: interim or permanent loss of agricultural lands; fragmentation of agricultural lands and operations; loss of existing and future farming opportunities; loss of infrastructure, services, or assets; loss of investments in structures and land improvements; disruption or loss of functional drainage systems; disruption or loss of irrigation systems; changes to soil drainage; changes to surface drainage; changes to landforms; changes to hydrogeological conditions; disruption to surrounding farm operations; effects of noise, vibration, dust; potential interim compatibility concerns; traffic concerns; and changes to adjacent cropping due to light pollution. These impacts are outlined in greater detail on pages 60 to 63 inclusive in the Agricultural Impact Assessment.

The Agricultural Impact Assessment generally notes that the detailed mitigation planning can be done through secondary planning and notes a variety of possible approaches, such as (but not limited to) vegetated buffers, berms and screens to separate uses and minimize visual impacts and vandalism risks, salt management plans to reduce amount of salt required for de-icing, design of new roads and structures to be compatible with farm equipment/vehicles, ground water monitoring, restoration of impacted tile drainage, and edge planning to manage interface zone.

The Agricultural Impact Assessment did not address the more general higher-level considerations identified in the Urban Boundary Expansion Framework from an impact perspective, namely:

- Does the expansion area promote healthy, local, and affordable food options, including agriculture?

- Does the proposed expansion area impact community food security from a climate emergency point of view?

The City's Chronic Disease Prevention, Public Health Services raised concerns over the expansion's impact and noted the Provincial Policy Statement (2024) states, "Growth and development will be prioritized within urban and rural settlements that will, in turn, support and protect the long-term viability of rural areas, local food production, and the agri-food network. In addition, resources, including natural areas, water, aggregates, and agricultural lands will be protected." Furthermore, the "Grow Ontario" agri-food strategy aims to increase the production of food grown in Ontario 30% by 2032 (Government of Ontario, 2022), which requires viable lands.

The Phasing Plan submitted with the applications proposes a rationale as to why the lands are a logical progression of development. The Plan indicates the detailed phasing of the proposed development will be generally based on servicing availability and will be contemplated through the future Official Plan Amendment application to establish a Secondary Plan, and other future *Planning Act* applications for the subject lands.

Overall given a lack of information as to when lands will be taken out of production, it is difficult to fully assess the impacts on the agricultural system as well as impacts to affordable food options and food security. Staff are of the opinion this policy regarding impacts on the agricultural system has not been adequately addressed.

**g) the new or expanded settlement area provides for the phased progression of urban development.**

The Land Needs Analysis prepared by urbanMetrics (dated February 3, 2025) notes the following with respect to population and employment growth:

- The subject lands would accommodate a total of 26,703 people through to 2051, an amount equal to 11.3% of the planned city-wide population growth through to 2051.
- The subject lands would accommodate a minimum of 3,930 jobs through to 2051, an amount equal to a minimum of 3.3% of the planned city-wide employment growth through to 2051 (the term "minimum" is used as the applicant was not able to estimate employment generated by schools, recreation facilities and emergency services).

The applications include a "Phasing Plan" document prepared by Urban Solutions, dated February 24, 2025. The Phasing Plan for White Church includes a brief rationale explaining some of the geographic/location advantages of the proposed expansion area (proximity to future potential Highway 6 extension, proximity to John C Munroe Airport and Airport Employment Growth District). The Phasing Plan notes that development phasing will be based on servicing availability and future secondary planning.



The White Church lands are one of several potential expansion areas located outside of the Greenbelt and outside of the City's current urban boundary. The other areas (Garner Road, Twenty Road West, Twenty Road East, and Elfrida) are much closer in proximity to the broader urban area. Should there be a need to expand the urban boundary, the White Church lands in their entirety would likely represent a longer-term option for urban expansion, as opposed to the first or near stage development.

It is estimated that 1.3 km (or 16%) of the proposed expansion area interfaces with the existing urban boundary along Upper James Street (Mount Hope); the remaining 6.9 km (84%) perimeter along the north, east and south boundaries directly interface with existing agricultural lands. A single-face adjacency to the City's settlement area would not necessarily represent a "phased progression of urban development". Because the Greenbelt fixes the southern and eastern limits, the City cannot extend development south-or-east in later phases. The proposal has potential to effectively create an urban peninsula at the edge of Hamilton's urban area.

The Phasing Plan identifies broad stages within the 364-ha area and is subject to refinement at the secondary planning stage; no timing, unit thresholds, or triggers for servicing upgrades, or public facility needs are identified in the phasing plan. Additionally, the proposed Urban Boundary Expansion area encompasses 62 total properties, of which 7 are owned by the Whitechurch Landowners Group Inc. (11.3% of all properties or approximately 44% of the total land area). Consequently, the absence of a cost-sharing framework and participation of only 11.3% of all property owners weakens confidence that later phases of development will proceed in a coordinated manner.

Watson and Associates Peer Review of the Fiscal Impact Analysis identified several gaps in the infrastructure cost modelling, noting that the proponent's conclusion of a positive net 2051 operating position of \$5.4M does not include annual lifecycle replacement costs of \$31.84 M, effectively meaning that the proposed development would result in a net fiscal deficit.

Based on the above, it is staff's opinion the applications do not provide for phased progression of urban development.

### **Urban and Rural Hamilton Official Plan**

Both the Urban and Rural Hamilton Official Plans implement the Council directed firm urban boundary growth strategy, implemented through Official Plan Amendments No. 167 (UHOP) and No. 34 (RHOP), directing all urban population and employment growth forecasted in the Official Plan to the year 2051 to lands within the existing urban boundary. This strategy is reflected and implemented in numerous Urban Hamilton Official Plan policies including the establishment of an 80% intensification target (A.2.3.4.4), growth management policies (A.2.4) and policies restricting urban boundary expansions (A.2.2).

More broadly, the Urban Hamilton Official Plan growth principles include “environmental systems – land, air and water – that are protected and enhanced,” “reducing Greenhouse Gas (GHG) emissions” and “adapting to the impacts of a changing climate”. In addition, the Urban Hamilton Official Plan establishes 10 directions to guide growth which include direction #3 to “Concentrate new development and infrastructure within existing built-up areas and within the urban boundary through intensification and adaptive re-use”, direction #4 is to “Protect rural areas for a viable rural economy, agricultural resources, environmentally sensitive recreation and the enjoyment of the rural landscape” and direction #5 is to “Design neighbourhoods to improve access to community life for all, regardless of age, ethnicity, race, gender, ability, income and spirituality”.

With respect to planning for designated greenfield areas within the existing urban boundary that are not subject to existing development approvals, the Urban Hamilton Official Plan establishes a minimum density target of 70 people and jobs per hectare (A.2.3.4.3).

Staff have reviewed the Draft Official Plan Amendments (Appendix A and Appendix B), which were submitted by the applicant, against both the general objectives and growth management policies of the Urban Hamilton Official Plan and would advise as follows:

- The vision proposed in the Urban Hamilton Official Plan Amendment does not establish a strong set of policies/objectives to be carried forward to future development approvals, including Secondary Planning, should the applications be approved. This includes enhancement of natural heritage features, reduction in Greenhouse Gas emissions, specific targets for modal splits away from private automobiles, how the lands will be integrated into the surrounding area and creating new neighbourhoods within Hamilton that are equitable and inclusive. One distinct policy in the proposed Urban Hamilton Official Plan Amendment is to support the consideration of private roads, parks, public community facilities and infrastructure through the Secondary Plan process which is not consistent with direction #5 noted above to improve access to community life for all.
- The proposed Official Plan Amendments state that a minimum density target of 77 people and jobs per hectare will apply; this is higher than the target in the Urban Hamilton Official Plan for new greenfield areas of 70 people and jobs per hectare. While this is positive, the proposal does not provide a variety of housing types and the densities are not at a level that makes the development financially sustainable over the long-term. It should also be noted that there are discrepancies in the applicant’s submissions with regards to projected population and unit count. For example, while the Official Plan Amendment application projected a total of 4,846 residential units and the School Accommodation Issues Assessment projected 5,488 residential units, the Recreation Needs Assessment, Transportation Master Plan, Planning Justification Report, Fiscal Impact Assessment, and Emergency Services Assessment project approximately 7,629 residential units. Similarly, the Commercial Needs Analysis based their review on a study area which included both the White

Church Urban Boundary Expansion Area as well as the Mount Hope population centre, totalling a projected 32,800 residents at build-out. These variations created complications in the City's analysis of the application.

- The proposed Official Plan Amendments do not carry forward the natural heritage system designations that currently apply to the subject lands in the Rural Hamilton Official Plan into the Urban Hamilton Official Plan. While the Official Plan Amendment states that no urban development shall occur until detailed Secondary Planning has occurred which would include updating mapping of natural heritage features, staff note that existing rural and agricultural zoning permissions remain on the subject lands and the lack of natural heritage system mapping in the Urban Hamilton Official Plan creates a natural heritage policy vacuum should the City receive rural and agricultural development proposals within the subject lands before new Secondary Plan(s) are in effect for the area.
- The proposed Official Plan Amendments do not seek to lower the City's 80% intensification target; however, as discussed in this report, the housing assessment is based on an intensification rate of 50%.

It is staff's opinion that the proposed urban expansion does not meet the general intent and purpose of the Urban and Rural Hamilton Official Plans, which implement a firm urban boundary growth strategy.

## **Additional Topic Areas Assessed Relative to Provincial and Municipal Policies**

An analysis of the applications against existing Provincial and Municipal policies—beyond Policy 2.3.2.1 of the PPS, organized thematically, is presented below.

### **1. Inadequate Demonstration of the Financial Viability of the Required Infrastructure and Public Service Facilities Over their Life Cycle**

A central consideration under the Draft Framework is whether the expansion is anticipated to be financially viable and have a net positive impact on the City's financial position over the long term. To have a comprehensive assessment of the long-term fiscal impact of expansion applications, the City developed guidance as part of the Draft Framework on the Terms of Reference for a Financial Impact Analysis submitted as part of an urban boundary expansion application. The guidance included the need for analysis of the full replacement costs of infrastructure and public service facilities (i.e. recreational facilities, libraries, fire, police, and EMS services) required to support the expansion area as well as municipal operating costs to service the area.

This is consistent with direction in the Provincial Planning Statement which states municipalities shall plan infrastructure and public service facilities so that they are financially viability over their life cycle (3.1.1) (3.6.1 b) (3.6.4) and that the use of

existing infrastructure and public service facilities are optimized before developing new infrastructure and public service facilities (3.1.2).

Further, one of the principles of the Official Plan, as stated in Section A.1.4 Urban Hamilton Official Plan, is to ensure: "financial stability;" and to promote: "strategic and wise use of infrastructure services and existing built environment". Policy C.5.3.15 of the Urban Hamilton Official Plan links development to the City's financial capability for infrastructure stating that the provision of full municipal sewage and water services in the urban area shall be subject to the City's financial and physical capabilities, as determined by Council. The Urban Hamilton Official Plan also requires full lifecycle planning for stormwater and waste management services.

The applicant submitted a Fiscal Impact Analysis prepared by urbanMetrics. This analysis concluded that the proposed expansion would have a positive financial impact for the City, estimating that at full buildout the lands would generate approximately \$5.4 million in net revenues. The analysis states that these surpluses would likely be more than sufficient to cover future replacement costs of infrastructure needed to support the new urban area.

The City had the Fiscal Impact Analysis peer reviewed by Watson & Associates (See Appendix J to Report PED25180) which questioned several of the assumptions and conclusions of the analysis, including that the method to estimate the assessed value of the expansion lands was too high and that it was presumed that the urban lands would be serviced by volunteer fire fighters rather than salaried fire fighters. More importantly, the peer review found that the estimated infrastructure replacement costs had not been annualized and incorporated in the net fiscal impact. Based on these and other factors, the peer reviewer anticipated that the development would not result in a net operating surplus.

Based on the findings from the peer review, it is staff's opinion that the applicant has not shown that the proposed urban boundary expansion is financially viable (i.e., the proposal will negatively affect the City's fiscal position).

Appendix P to Report PED25180 outlines whether the applications address considerations with respect to the urban boundary expansion framework.

## **2. Ecological Services Valuation**

Ecological services valuation is the process of assigning value, often monetary, to the benefits that ecosystems provide to humans, to inform policy and decision-making, and to demonstrate their importance for human well-being and society. An example related to municipal infrastructure is to quantify the value wetlands have on the City's storm water management systems.

Through the approved Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications staff retained Dillon Consulting to provide guidance on urban

boundary expansion criteria, including the scope of a Financial Impact Analysis and Subwatershed Study (Phase 1) submitted as part of an expansion application. As part of this guidance, Dillon Consulting identified there are benefits to understanding the value of ecological features and functions but recommended that further review/analysis of an approach would be required to successfully implement valuation into the application review process.

In response to comments from Planning Committee respecting these conclusions, staff submitted Memorandum PED24109(c) to City Council on April 16, 2025 advising that the City would undertake analysis of the ecological services for both the White Church and Elfrida urban boundary expansion applications and that this analysis may be based on existing information provided with the applications against the valuations in report “Ontario Wealth, Canada’s Future: Appreciating the Value of the Greenbelt’s Eco-Services prepared by the David Suzuki Foundation (2008)”. Staff’s memorandum stated that this analysis is for high level insight only and not be used for decision making purposes since the City has not yet adopted a methodology for ecological services valuations.

Staff have taken the per hectare, annual valuation classifications found in the Greenbelt Eco-Services Report, adjusted it for inflation, and applied it to the existing land uses within the subject lands based on the Applicant’s Agricultural Impact Assessment. Staff note that the applicant’s Environmental Impact Study and Subwatershed Study did not include area calculations for different natural features within the subject lands, so staff used the numbers in the Agricultural Impact Assessment. The analysis found an ecological services value of approximately \$300,000 annually; however, staff caution:

- several assumptions had to be made respecting the actual area of distinctive features within the subject lands which have not been verified on the ground; and

it is not known at this time which natural areas (woodlands and wetlands) are proposed to be preserved, removed, or enhanced. These features made up approximately one third of the estimated valuation. A more detailed Ecological Services Evaluation can take place at the Secondary Planning stage if the applications are approved. As such, this estimation is for information purposes only and should not be used for decision making purposes.

### **3. Impact to Intensification Targets**

As stated under Section B.2.4 of the Urban Hamilton Official Plan residential intensification is a key component of Hamilton’s growth strategy and is essential to meet the City’s growth and employment targets. Intensification ensures land, urban services and the transportation network are used more efficiently, and sufficient population is maintained to support existing community facilities. Successfully accommodating more residents and/or households within the existing built-up area reduces the need for development of greenfield lands and urban boundary expansions.

The Provincial Planning Statement states that municipalities shall establish and implement minimum targets for intensification (2.3.1.4). The Urban Hamilton Official Plan has established a target that 80% of the forecasted residential dwellings (88,280) to the year 2051 are directed to the built-up area. The other 20% of forecasted dwellings (22,020) are directed towards greenfield areas within the existing urban boundary.

It is important to note that the Land Needs Analysis submitted by urbanMetrics applied a 50% rather than an 80% intensification rate. Meaning that the analysis does not even consider the impact of the application to the City's approved intensification target. The analysis concluded that based on this lower intensification rate and assumptions that the expansion lands would be developed predominantly as ground-oriented housing, the expansion will not impact continued redevelopment of areas targeted for increased density.

Based on the findings of the City's peer review of the applicant's Land Needs Analysis (see Appendix I to Report PED25178) and additional internal analysis, staff are of the opinion that approval of the proposed expansion would negatively impact the City's ability to meet its 80% intensification target. Staff note the City-wide intensification rate would also be impacted should other urban boundary expansion applications be approved.

In addition to impacting the city wide intensification target, this reallocation of future population growth away from the built-up area would also impact planned intensification of strategic growth areas within the City including the Downtown, Major Transit Station Areas and other community nodes which in turn creates a risk that infrastructure and public service facilities currently planned and upgraded to support an 80% intensification rate may become underutilized. This could result in a stranded debt situation whereby the City cannot recoup the costs to upgrade infrastructure through the expected development charges. Historically it has been shown that policies that support intensification generate more interest in redeveloping underutilized lands within the built-up area.

#### **4. Impacts to Natural Heritage**

The following documents were reviewed as part of these applications:

- Environmental Impact Statement Study White Church Urban Boundary Expansion prepared by Beacon Environmental Limited December 17, 2024
- White Church Urban Boundary Expansion Area Limit of Core Areas and Conservation Authority Regulated Area
- Karst Assessment prepared by Terra Dynamics Consulting Inc. November 11, 2024
- White Church Boundary Expansion Area Functional Servicing Report prepared by SCS Consulting Group Limited January 2025
- White Church Boundary Expansion Area Subwatershed Study prepared by SCS Consulting Group Limited January 2025

- White Church Urban Boundary Expansion Area Concept Plan prepared by Urban Solutions
- Conceptual Community Design Package prepared February 2025
- Draft Rural Hamilton Official Plan Amendment
- Draft Urban Hamilton Official Plan Amendment

Natural Heritage Planning staff has reviewed these applications based on the Urban Boundary Expansion Framework and policies in the Urban and Rural Hamilton Official Plans. The foundation of the natural heritage policies within the Provincial Planning Statement is the protection and enhancement of both natural features and their functions. This is known as a “system-based” approach. The Natural Heritage System (NHS) is an integral component of this approach.

A Natural Heritage System (which includes Core Areas, Linkages, and any restoration/enhancement areas) has not been identified within the Concept Plan, Environmental Impact Statement (EIS), or Subwatershed Study. The Natural Heritage System should be based on the one identified and designated within the Rural Hamilton Official Plan as a basis and be enhanced as a result of field inventories that have not been undertaken.

An important element of an EIS/Subwatershed Study is to inventory and characterize the existing natural features and their ecological functions. This should inform the Concept Plan. The Concept Plan does not take this into consideration since only woodlands have been included as part of the Natural Heritage System.

As part of the proposed amendment to the Urban Hamilton Official Plan, the vision for the area is that “White Church will be integrated with Mount Hope and the related Airport employment lands to create a complete community which protects a linked natural heritage system and is sustainable. The community will be designed to efficiently use land, resources and infrastructure and accommodate a range and mix of land use including a full range of housing options, related public service facilities, including parks and open space and provision for a multi-modal transportation system”. Aspirational goals and innovation to achieve a linked natural heritage system and sustainability have not been acknowledged within the Concept Plan, EIS, or Subwatershed Study. In addition, City-wide initiatives such as the Climate Change Action Plan, Biodiversity Action Plan and Urban Forest Strategy have not been considered.

The EIS and Subwatershed Study do not consider the impacts as a result of bringing these lands into the urban boundary, namely:

- An analysis associated with the Concept Plan has not been provided.
- An analysis of retaining the study area in the RHOP versus the inclusion of it in the urban area has not been provided.
- As per the City’s Council adopted EIS Guidelines (revised March 2015), the impact assessment within an EIS is to identify direct, indirect, and cumulative impacts as

well as how the proposal is consistent with natural heritage policies. Potential impacts can include clearing, grubbing, grading, encroachment, elimination of habitat, removal of trees, edge effect, change in habitat, dumping, invasive species, light and noise impacts, changes to aesthetic qualities, effects on adjacent natural areas).

Connections to the Concept Plan have also not been included within the discussion. The impacts on the natural heritage features have not been adequately discussed.

Natural Heritage staff note the sub-watershed and Environmental Impact Study terms of reference were not submitted and pre-approved in accordance with City guidelines.

Growth Management staff noted the following with respect to considerations from the Urban Boundary Expansion Framework:

- There is no indication provided in the applications that the water quality/quantity will be protected, improved, or restored.
- The applications do not use a watershed approach to consider cumulative impacts of development. A number of headwater drainage features (small watercourses) and small wetlands have been identified within the site boundaries but there was not work carried out beyond the site boundary. There are six subcatchments that drain the site; development in their headwater regions would significantly increase impervious cover.
- The two major basins (Upper Welland River and Upper Twenty Mike Creek) are identified but not the small subbasins; the latter being necessary to evaluate the impact of development on the form and function of these subbasins.
- Several elements of the water resource system, namely headwater drainage features and small wetlands, were identified in the EIS but no linkages between these features was examined nor recommended.
- An opportunities and constraints map were not developed which means that no development restrictions were provided to protect, improve, or restore vulnerable surface and groundwater and their hydrologic functions.
- The applications do not demonstrate avoidance and/or mitigation of potential negative impacts on the water resource system; for example, a small local wetland that supports an endangered bird species is proposed to be removed without any discussion of mitigation and/or compensation.
- The applicant has initiated field work to investigate key hydrogeologic areas, specifically to assess groundwater recharge, but has not reported any findings nor made any indication of the presence/absence of any groundwater recharge. Similarly, several watercourse reaches, classified as needing “protection” under the “Headwater Drainage Features Guidelines (TRCA 2014)”, do not appear to exist in the concept plan. This work should be completed at this stage to aid in the development of an “opportunities and constraints” map.
- The applications do not indicate how the wetlands (identified in the ELC) and headwater protection features (classified as “protection”) will be avoided or protected. It is reasonable to expect that during the SWS Phase 1 an “opportunities



and constraints” map would be developed where at least one opportunity would be to connect the noted headwater and wetland features as a contiguous natural heritage corridor that could be incorporated into the proposed stormwater management infrastructure.

Overall, the submitted materials cannot assure the long-term protection of the Natural Heritage System within a future urban context.

## **5. Land Use Compatibility**

Both the Provincial Planning Statement and City Official Plans contain policies that seek to avoid and address potential land use compatibility issues between sensitive land uses (e.g. residential) and industrial lands, including major facilities (e.g. airports, landfills etc.). This includes Provincial Planning Statement Policy 3.5, which states municipalities shall protect the long-term viability of existing or planned industrial, manufacturing, and other major facilities that are vulnerable to encroachment by ensuring that planning and development of proposed adjacent sensitive land uses is only permitted if potential negative impacts on these sensitive uses are minimized and mitigated.

Section C.3.6.3.18 of the Urban Hamilton Official Plan outlines general policies for ensuring land use compatibility. These policies apply to development or redevelopment proposals that may create conflicts between sensitive land uses and sources of point source or fugitive air emissions, such as noise, vibration, odours, and dust. The Urban Hamilton Official plan requires that such development proposals have regard for all applicable provincial legislation, as well as relevant provincial and municipal standards and guidelines.

Within the Urban Hamilton Official Plan, the City also has specific policies to prevent sensitive land uses from being located near the Hamilton International Airport (C.4.8). These policies are intended to protect the airport’s status as a 24/7 unrestricted cargo airport by prohibiting new sensitive land uses within 28+ Noise Exposure Forecast Contours. The Provincial Planning Statement which prohibits sensitive land uses above 30+ Noise Exposure Forecast Contour. Additionally, section B.3.6.3.1 of the UHOP requires compliance with provincial and municipal guidelines and standards associated with the development of noise sensitive land uses in the vicinity of provincial highways, parkways, minor or major arterial roads, and collector roads.

### **5.1 Noise Feasibility Study**

In support of the applications, a Noise Feasibility Study prepared by HGC Engineering was submitted. The Study assessed noise impacts to the White Church lands from road traffic on Airport Road West, Upper James Street, and White Church Road East and air traffic from the Hamilton International Airport.

With respect to the Airport, the applicant’s Concept Plan and Noise Feasibility Study are based on updated Noise Exposure Forecast contours recently approved as part of the

2023-2043 Airport Master Plan. The 2023-2043 Airport Master Plan assumes no sensitive land uses will be developed above 30+ Noise Exposure Forecast contours rather than 28+ Noise Exposure Forecast contours. Staff note that the current Rural and Hamilton Official Plan Noise Exposure Forecast contour mapping is not based on the new Airport Master Plan and that an update to the Official Plan is planned based on the new Master Plan once more clarity is provided around the timing of the implementation of the capital improvements to the airport. This is to ensure that no new sensitive land uses are developed in areas that may be removed from the 28+ NEF contours when and if the capital upgrades occur and the fleet composition changes. Until this update occurs, staff will continue to review development applications against the mapping and policies in the Official Plan but have also considered the new Airport Master Plan Noise Exposure Forecast contours.

The Noise Feasibility Study found that the future road traffic sound levels are predicted to exceed MECP guideline limits during both the daytime and nighttime at locations closest to Upper James Street, Airport Road, and White Church Road, necessitating noise mitigation measures, such as central air conditioning systems or forced air ventilation systems, noise warning clauses, upgraded building constructions (exterior walls and windows), and potential noise barriers. The Study also notes that a Professional Engineer will need to conduct a detailed noise study once the detailed lotting plans and building locations are available to determine if these noise control measures are required for each specific block.

Staff had the Noise Feasibility Study peer reviewed by EXP Services Inc. (attached as Appendix K to Report PED25180). While the peer reviewer stated that they generally agree with the assumptions, calculations, and approach in the submitted Study, they note that it fails to address the City's Official Plan policies prohibiting sensitive land uses above 28+ Noise Exposure Forecast contours, despite the fact that part of the proposed residential area falls between 28 NEF and 30 NEF. Additionally, it was noted in the submitted Noise Feasibility Study (Section 3.2.) that there is no effective means of mitigation for outdoor amenity areas with relation to aircraft noise. Consequently, it is EXP's opinion that the White Church lands located between 28 NEF and 30 NEF can only be developed for non-noise sensitive land uses.

The Hamilton International Airport has reviewed the noise impact study and commented that lands that fall at Noise Exposure Forecast 28+ or above should not be developed for residential purposes, especially in this case where land is located within proximity to the airport. They also noted that any future development that would fall under the 25 NEF and above category should implement noise mitigation measures, in accordance with the City of Hamilton, Ministry of the Environment and Climate Change, and Transport Canada standards/guidelines.

Chronic Disease Prevention staff also noted concern about air and noise pollution from the nearby airport and traffic and recommended a Health Impact Assessment to address these concerns. Similarly, Urban Design staff emphasized the importance of promoting subdivision design and building orientation to improve air quality. They also

highlight the need for urban places and spaces that support active, healthy lifestyles, which contribute to improved air quality.

Given the above, it is staff's opinion that the applicant's Concept Plan is not consistent with the land use compatibility policies of the Provincial Planning Statement and Urban Hamilton Official Plan. Staff note that, should the proposed expansion application be approved, staff's comments respecting allowing sensitive land uses above 28+ Noise Exposure Forecast contours would be carried forward to Secondary Planning which may impact the mix of land uses.

## **5.2 Odour Feasibility Study**

With respect to odour, an Odour Feasibility Study was prepared by Alliance Technical Group in support of the application. The Study assessed the feasibility of the proposed development in relation to potential odour impacts from existing and future industrial and agricultural operations within the study areas of 1000 metres and 1500 metres, respectively. The Study concludes that the proposed development is compatible with existing industrial operations within a 1000-metre radius and is likely feasible concerning future industrial or commercial developments within the 1000-metre study area, from an odour impact perspective. The Study clarifies, however, that the feasibility of the proposed development in relation to current and future agricultural operations within a 1500-metre radius requires a detailed odour study, per the permitted uses identified in the Rural Hamilton Official Plans.

The Study also reviewed surrounding agricultural operations; however, staff note that the applicant submitted a separate Agricultural Impact Assessment which included a Minimum Density Separation review from nearby livestock facilities, which is discussed in a previous section of this report.

Staff had the Odour Feasibility Study peer reviewed by EXP Services Inc. (attached as Appendix L to Report PED25180), which identified additional industrial and agricultural sources and recommended updating the report to include these. EXP also suggested updating the report to include online databases for nearby industries, 5-year meteorological data, traffic-related air pollutants, odour complaint history, and odours detected during the site visit. The peer review concludes that the assessment is not adequate to determine compatibility without further study.

Based on this peer review, staff are unable to confirm at this time whether the proposed expansion is consistent with Policy 3.5 of the PPS and Official Plan land use compatibility policies from an odour perspective.

## **6. Impacts to Climate Change Mitigation and Adaptation Goals**

The applicant has submitted an Energy and Climate Change Assessment (ECCA) Report by buildABILITY Corp., which is intended to demonstrate the impact of the

proposed expansion on the City's ability to achieve carbon neutrality and demonstrate the opportunities to reduce climate change impacts and avoid climate change risks.

The City had the ECCA peer reviewed by Dillon Consulting (see Appendix M to Report PED25180). The peer review was based on the requirements outlined in the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications, as well as the applicable energy and climate change policies set out under the Provincial Planning Statement (2024), the Urban Hamilton Official Plan, the City's Climate Change Impact Adaptation Plan (2022), and the Community Energy and Emissions Plan.

In particular, Policy 2.9 of the Provincial Planning Statement requires that planning authorities plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate. Additionally, under Section A.2.1. of the Urban Hamilton Official Plan, 10 directions to guide development are identified, with the first direction being to "Plan for climate change mitigation and adaptation and reduce greenhouse gas emissions". Further, Section B.3.7.2. states that the City shall prepare for the impacts of a changing climate by encouraging energy efficient and environmental designed development.

In reviewing the ECCA against applicable requirements, the peer review concludes that the Phase 1 Energy and Climate Change Assessment Report demonstrates alignment, in principle, with the key municipal and provincial policies, but that the Report lacks the analytical depth and actionable detail required to establish a credible foundation for future planning phases and fails to provide adequate quantification, firm commitments, or scenario modelling to illustrate how the proposed urban expansion will impact Hamilton's long-term sustainability objectives. The peer reviewer notes that the Report does not meet the procedural or substantive standards required for Phase 1 and would significantly limit the City's ability to assess climate-related implications during Secondary Planning. The peer reviewer suggests that to move forward effectively, the next phase would need to address the identified deficiencies through comprehensive modelling, robust policy integration, and clearly defined implementation pathways to support Hamilton's climate commitments and ensure the credibility of the planning process. A list of nine requirements for improvement to the ECCA Report was provided by the peer reviewer, which support these conclusions (Appendix M).

City staff from the Office of Climate Change Initiatives (OCCI) provided comments on whether strong enough commitments had been made by the proponent to demonstrate how adverse impacts will be mitigated. As per the City's Draft Framework, the core question that must be addressed in the Phase 1 Assessment is "Does the proposed expansion adversely impact the ability of the City to achieve carbon neutrality?" A "yes" to this question indicates that high level commitments at Phase 1 demonstrating how the proponent will mitigate these adverse impacts, supported by basic modelling needs to occur to assess in a preliminary manner what the magnitude of the impact might be. These fundamental pieces must be present in the Phase 1 assessment, and that their exclusion risks adverse impacts on the community-wide effort to realize Net Zero by 2050. OCCI staff also noted their agreement with the assessment undertaken by Dillon

Consulting through their peer review of the ECCA Report and support their recommendations to address its shortcomings.

Further supporting these conclusions, Growth Management also undertook an assessment of the applications against the City's Draft Framework for Evaluating Urban Boundary Expansion Applications, which includes considerations for climate change (Appendix P to Report PED25180). It was noted that the applicant does not identify specific risks associated with climate change and proposes limited measures to mitigate the impacts of a changing climate, as it related to stormwater. The applications also fail to discuss capacity of the existing drainage network and the proposed stormwater management system comprising seven ponds. This is significant as the White Church lands are particularly flat, as are downstream lands, so development in the area may be more vulnerable to chronic flooding or exacerbation of existing flooding. Accordingly, Growth Management staff note that land needs for stormwater management and the form and type of development may require changes to the concept plan. Staff also identified that, although the applicant has noted that Low Impact Development (LID) practices will be considered, they did not provide any discussion of specific LID practices nor any analysis on their effectiveness or ability to mitigate the impacts of a changing climate.

Finally, as noted in the sections above, staff have identified several deficiencies in the applications with regards to Natural Heritage/biodiversity and Agriculture – the loss of which has the potential to aggravate climate change impacts and negatively impacts the City's capacity to adapt to the health impacts of climate change. Chronic Disease Prevention staff also highlighted the need for clearer commitments to elements of the proposal, such as complete streets and active travel infrastructure, to address the risk of reinforcing car dependency and undermining city-wide goals related to climate change.

Based on the findings from the peer review and through contemplation of the above-noted staff comments, it is staff's opinion that the applicant has not demonstrated a clear enough commitment to the climate change mitigation and adaptation goals, as set out in Provincial and Municipal policies, and that the magnitude of the potential impacts of the proposed urban boundary expansion justifies the need for a higher standard of commitment than may be applicable otherwise.

## **7. Impacts to Archaeological and Cultural Heritage Resources**

The Stage 1 Archaeological Assessment (S1AA) states that about 90% of the subject property has general archaeological potential due to the presence of 13 historic farmsteads within the property, the proximity to early historical transportation routes, the proximity of the subject property to historic Mount Hope, nearby water sources, and the presence of 187 registered sites located within 1 km of the subject property, including 13 registered sites located within the subject property. The S1AA recommended that lands identified as having archaeological potential (approximately 91% of the subject lands) undergo a Stage 2 Archaeological Assessment prior to development. Archaeological resources are afforded protection under Section 2(d) of the *Planning Act*

and Section 4.6. of the Provincial Planning Statement. Staff concur with the recommendations of the S1AA with regards to the requirements that need to be addressed as part of a future Secondary Plan (see Appendix F to Report PED25180 for a summary of Cultural Heritage staff comments).

## **8. Impacts to Urban Design**

Urban Design staff have reviewed the preliminary Concept Plan drawings and associated documents and provided recommendations for improvement based on the concepts provided, with the understanding that, should the expansion be implemented, Urban Design staff will require further attention to the points and policies noted in their full comments (see Appendix F to Report PED25180 for a summary of Urban Design comments). The Concept Plan will need to be developed through subsequent steps in the Secondary Planning process, based on collaboration with Urban Design staff to arrive at a vision and framework that meets the city's standards and Urban Hamilton Official Plan policies.

Chronic Disease Prevention staff also provided high level comments related to urban design, which noted significant concerns about the proposal lacking a comprehensive plan to integrate planned elements, which could result in a community that is incomplete, disconnected, and without adequate active transportation networks and transit integration. Staff noted that, based on the concept plan submitted, the conceptualized design is comprised almost exclusively of residential uses, with few to no employment spaces, community services, or food environments. Additionally, much of the proposed residential land is located too far from the proposed commercial site to be considered walkable. Consequently, there are concerns that the development would lead to increased traffic congestion, higher greenhouse gas emissions, and diminished community vibrancy. While, the applicant can make adjustments at the Secondary Planning stage, the applications raise concerns relative to the development of a healthy vibrant community.

## **Relationship of these Applications to the Elfrida Urban Boundary Expansion Applications (UHOPA-25-007/RHOPA-25-008)**

The implications of these applications, if approved, could be magnified or compounded by the concurrent approval of the Elfrida urban boundary expansion applications, particularly the cumulative effects in relation to loss of agricultural land, impacts on natural heritage, impacts on residential intensification, the impact of the financial sustainability of the development on the City, and climate change impacts. Normally these factors would be considered through a municipal comprehensive review or City led Official Plan planning process if expansions were to be considered. However, Provincial legislative changes have permitted site-specific applications resulting in more piecemeal growth considerations.

## **Next Steps**

- If the applications are denied by Council and subsequently appealed to the Ontario Land Tribunal, it may be a year or more before an OLT Hearing would commence.
- If Council denies the applications, staff may need to review the 2026 budget in preparation to defend the applications before the Ontario Land Tribunal (OLT).
- During this time, the applicant can update the original studies provided to address concerns coming out of this report. If that occurs, then the Ontario Land Tribunal could be considering more updated applications and information than what Planning Committee and Council are considering through this report.

## **Alternatives**

There are several alternatives to staff's recommendations Council could consider, namely:

1. Council could approve the applications, which would necessitate the need for Secondary Planning and updates to the Transportation Master Plan, Water, Wastewater and Storm Water Master Plans as well as Development Charges. There will be a cost associated with updating or developing these plans.
2. Council could approve a portion of the lands, likely requiring similar updates to those mentioned above.

Council's selection of Alternatives 1 or 2 would require staff direction to negotiate Official Plan Amendments with the applicant that better addresses the Urban Hamilton Official Plan's vision and objectives for development and provides greater policy assurances to ensure the same at subsequent stages of development.

3. Council could defer the applications or deny the applications, but direct staff to develop a "Deferred Urban" designation to be applied to the subject lands. A "Deferred Urban" designation would place the lands within the urban area earmark ing the lands which could gradually be considered for urban purposes over the long term, extending past 2051. This designation would indicate the lands could be phased gradually for urban development, subject to Official Plan Amendments, pending an analysis against to be developed Official Plan policy criteria such as:
  - Updating of the Master Plans to determine the phasing of development relative to the expansion areas.
  - City led Secondary Planning for each area would occur in concert with Master Planning updates to establish a "blueprint" for how growth could occur over the long term, having regard for the Secondary Planning objectives in the Urban Hamilton Official Plan for urban expansion lands.
  - A land and housing needs analysis every five years bringing a portion of deferred urban lands into the urban area if the City is also achieving its intensification rate.

- The phasing of lands from deferred urban to urban would only occur if financially sustainable.
- Addressing considerations in the City's Urban Boundary Expansion framework, as submitted.

This alternative is not a direct alternative that can be applied to a decision on these applications specifically. Its implementation would require Council direction as well as deferral or denial of the White Church Urban Boundary Expansion Applications. This alternative would represent an alternative City lead approach towards gradually phasing development in expansion lands over the longterm and under specific circumstances and meeting specific vision and objectives.

4. Council could defer or deny the White Church applications but direct staff to develop a "Deferred Urban" designation to be applied to the subject lands as well as Elfrida lands, Twenty Road West lands, and Twenty Road East lands subject to the same policy context identified in Alternative 3.

With respect to Alternatives 3 or 4 there will be a cost associated with the updating or development of the plans mentioned.

## **Relationship to Council Strategic Priorities**

1. Sustainable Economic & Ecological Development
  - 1.1 Reduce the burden on residential taxpayers.
  - 1.3 Accelerate our response to climate change.
  - 1.4 Protect green space and waterways.
2. Safe & Thriving Neighbourhoods
  - 2.1. Increase the supply of affordable and supportive housing and reduce chronic homelessness.
  - 2.2. Make sure people can safely and efficiently move around by food, bike, transit, or car.
  - 2.3. Provide vibrant parks, recreation, and public space.

## **Public Consultation**

Consultation occurred between March and April 2025 and included multiple opportunities for the public to receive information about the applications and provide input prior to staff's review of the submissions. The City hosted one in-person open house on April 14, 2025, and one virtual open house on April 17, 2025, with a combined attendance of approximately 250 people. A total of 98 comments or questions were received regarding the White Church applications. The applicant also hosted a virtual open house on November 19th, 2024.

The top concerns identified through public feedback include:

- Infrastructure Needs



- Impacts to Agricultural Land
- Fiscal Impact to City
- Built Form and Density Objectives
- Contribution to Climate Change and Natural Disasters

For additional information about the public consultation process and a full listing of comments and questions received from the general public, see Appendix E to Report PED25180.

## **Indigenous Consultation**

City staff circulated the applications to, and invited comments from potentially affected Indigenous Communities, including:

- Mississaugas of the Credit First Nation
- Six Nations of the Grand River Elected Council

Staff had discussions with each community noted above and the applicant also discussed the applications with the communities.

Further details on the comments received and staff's response is included in Appendix F to Report PED25180.

## **Previous Reports Submitted**

- PED23145(a) – City of Hamilton Comments on Proposed Provincial Planning Statement, 2024
- PED24109 – Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications under the proposed Provincial Planning Statement
- PED24109(a) – Draft Framework for Processing and Evaluating Urban Boundary Expansions – Consultation and Engagement Plan Consultation
- PED24109(b) – Official Plan Amendment and Final Framework for Processing and Evaluating Urban Boundary Expansion Applications (City Wide)
- PED24109(c) – Supplemental Memorandum to PED24109(b) - Official Plan Amendment and Final Framework for Processing and Evaluating Urban Boundary Expansion Applications – Consideration of Ecological Services Valuations in Urban Boundary Expansion Applications
- PED24110 – Market and Land Supply Monitoring Report - 2023 and Interim 2024 Update

## **Appendices and Schedules Attached**

Appendix A – Location Map  
Appendix B – Draft Urban Hamilton Official Plan Amendment as Submitted by the Applicant  
Appendix C – Draft Rural Hamilton Official Plan Amendment as Submitted by the Applicant  
Appendix D – Planning Report Fact Sheet  
Appendix E – White Church Urban Boundary Expansion Application Public Engagement Summary Report  
Appendix F – Consultation Summary – Departments and Agencies  
Appendix G – Agricultural Impact Assessment Peer Review  
Appendix H – Commercial Needs Analysis Peer Review  
Appendix I – Land Needs Analysis Peer Review  
Appendix J – Fiscal Impact Assessment Peer Review  
Appendix K – Noise Feasibility Study Peer Review  
Appendix L – Odour Feasibility Study Peer Review  
Appendix M – Energy and Environmental Assessment Report Peer Review  
Appendix N – White Church Urban Boundary Expansion Policy Background  
Appendix O – Comparison of the Urban Hamilton Official Plan and Ministry of Finance Population Forecasts  
Appendix P – White Church Urban Boundary Expansion Draft Framework Assessment

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