### **CONSULTATION SUMMARY – DEPARTMENTS AND AGENCIES**

Department/Agency	Comment	Staff Response
<ul> <li>Alectra Utilities</li> <li>Corporate Real Estate, Economic Development, Planning and Economic Development</li> <li>Legislative Approvals and Staging of Development, Growth Management, Planning and Economic Development</li> <li>Sun-Canadian Pipeline</li> </ul>	No Comment/No Objection.	Noted.
	Internal Departments	
Healthy Environments, Medical Office of Health, Healthy and Safe Communities	Chronic Disease Prevention does not support the proposed White Church urban boundary expansion due to its anticipated negative public health impacts associated with its failure to meet the PPS requirements of a complete community, protect agricultural lands, or develop a safe or accessible transportation system.  The expansion would result in the permanent loss of approximately 746 acres of Agricultural Land—87.4% of which is prime Class 1–3 soil. It would also fail to comply with the minimum distance separation formulae. In effect, the existence of a healthy, sustainable food system will be undermined.  The proposed development does not demonstrate the characteristics of a complete community, as required under Section 2.1 of the PPS. Instead of supporting a mix of land uses and housing options connected by accessible infrastructure, the proposed expansion risks furthering cardependent, low-density development. The conceptualized	The recommendation for a Health Impact Assessment is acknowledged and may be explored if the applications are approved, as part of future Secondary Planning.

design is almost exclusively residential with few to no employment spaces, community services, or food environments. Additionally, the single, small commercial space conceptualized in the applications are both insufficient to support the proposed population and located in an area that would fail to serve the entire community. For residents at the far corner of the site, near the corner of White Church Road East and Miles Road, the proposed commercial site on the corner of Upper James Street and Airport Road is approximately 4 kilometres away; or about a 55-minute walk. As such, residents through much of the White Church UBE will have to rely on personal vehicles to access this commercial site. Moreover, given the limited amount of employment space proposed in the UBE concept, it is likely that residents will need to travel outside of the new development to access employment, goods, and services.

Additionally, although three elementary schools are identified within the plan, their proposed locations, positioned on or near opposite corners of the site, pose barriers to active travel for most students. This will contribute to an increase in vehicle traffic beyond the UBE area, potentially creating negative impacts for pedestrians and cyclists in other parts of Hamilton and neighbouring municipalities.

In effect, the design of the proposed area does not sufficiently prioritize infrastructure to support active transportation. Lack of walkable and bicycle-friendly environments reduces opportunities for daily physical activity, contributing to increased risks of chronic diseases and negative mental health outcomes.

Given the potential for significant and long-term implications for population health, it is recommended that a comprehensive Health Impact Assessment (HIA) be conducted as a condition of any approval of the proposed UBE.

Development Charges,	From a Development Charges ("DC") perspective, staff note	Noted.
Programs and Policies Team,	that, if there is an Urban Boundary Expansion, any	
Corporate Services	development within the expansion lands would be levied	
	according to current DC rates using "Urban Area B" as	
	opposed to "Urban Area A". The City's 2024 DC Bylaw defines	
	these urban areas for the sake of DC calculation.	
Financial Planning	Noted that the 2024 DC By-law relies on Masterplans and	Future financial planning updates
Administration and Policy,	growth projections to 2031. This analysis may need to be	associated with these
Corporate Services	revisited when Master plans and growth projections to 2051	applications will consider the
	are completed.	need to revisit the Financial
		Impact Assessment when Master
	It is also important to note that DC revenue assumptions,	plans and growth projections to
	operating cost projections, and tax revenue projections are	2051 are completed and the DC
	based on full build-out. The City will likely have some carrying	By-law is updated to ensure
	costs for financing infrastructure in advance of full build-out.	projections are accurate.
		The issue raised with regards to
		carrying costs will be considered
		through the evaluation of the
		applications.
Commercial Districts and	Allowing the urban expansion to occur beyond the existing	The potential impact on
Small Business, Economic	urban boundary may reduce demand for growth through urban	intensification targets and
Development, Planning and	intensification (i.e. redirect the demand) and inhibit staff's	subsequent effects on the City
Economic Development	ability to direct new housing and growth to strategic	will be considered in the
	commercial districts and corridors where new housing and	evaluation of the applications in
	residents could support existing businesses that are vital to	accordance with policy objectives
Oliverate Olegania	supporting the revitalization of these areas.	outlined in the PPS and OP.
Climate Change	A core question that must be addressed in the Phase 1	Staff acknowledge the concerns
Administration, Climate	Energy & Climate Change Assessment is this – 'Does the	raised by the Office of Climate
Change, Planning and	proposed expansion adversely impact the ability of the City to	Change Initiatives (OCCI)
Economic Development	achieve carbon neutrality?' If the answer is 'yes', then high	regarding the methodological limitations and lack of firm
	level commitments need to emerge at this Phase to	
	demonstrate how the proponent will mitigate these adverse	commitments within the
	impacts. Basic modelling needs to be done at this Phase to	submitted Energy and Climate
	assess, even in a preliminary manner, the magnitude of the	Change Assessment (ECCA).
	impact (which is effectively a response to the core question).	

	The Office of Climate Change Initiatives (OCCI) believes this is a fundamental consideration that cannot be left until Phase 2 – leaving potential risk that outcomes will inflict adverse impacts on the community-wide effort to realize Net Zero by 2050 that cannot be wholly mitigated.  The OCCI subsequently concurs with the detailed assessment undertaken by Dillon Consulting in their peer review of the Whitechurch Landowners Group Energy and Climate Change Assessment Report. Further, the OCCI supports the recommendations set out in the peer review to address the identified shortcomings of the Energy and Climate Change Assessment Report.	These limitations will be considered as part of the ongoing evaluation of the applications.
Infrastructure Planning, Growth Management, Planning and Economic Development	Based on the materials submitted, staff cannot support the proposed Urban Boundary Expansion at this time.  From a water and wastewater perspective, the submission lacks sufficient detail to demonstrate sufficient capacity in both the existing and planned water and wastewater systems to accommodate the subject lands. In alignment with Council's "no urban expansion growth strategy" the City's population growth forecasts are focused on growth within the urban area. As such, the City's forthcoming Water, Wastewater, and Stormwater Master plans will identify infrastructure needs to support this growth and will not identify infrastructure needs to support an urban boundary expansion. If approved, the White Church urban boundary expansion applications would presume to remove water and wastewater servicing capacity from planned growth within the existing urban boundary.  From a stormwater perspective, the submission lacks sufficient detail to determine if the concept plan is feasible because a Phase 1 Subwatershed Study has not been completed in accordance with the Draft Framework. While it may be possible to develop a feasible stormwater management plan to the satisfaction of all parties, that plan	The submission lacks the detail to demonstrate feasibility for water, wastewater, and stormwater servicing.

Transit Strategic Planning, Transit, Public Works	may be significantly different from that which has been proposed. To demonstrate feasibility, the strategy for developing the concept plan (i.e. an opportunities and constraints analysis/map) should be completed early in the process to ensure that all factors influencing stormwater management planning have been considered. The current submission materials need to be revised to include the required items to enable the development of a stormwater management strategy. Given the importance of the concept plan in relation to the proposed intent of the urban boundary expansion lands to be brought into the urban boundary, this work establishes the overall feasibility from a high-level/conceptual basis.  Hamilton Street Railway (HSR) is supportive of the location of the potential transit station and confirms that local routes that will serve the new White Church area can connect with existing routes at this location; however, HSR is not currently planning on providing a hub at this location. The current and future hubs that are planned for have been designed so that it is possible to travel directly between them within one transfer, with direct connections provided between major hubs. Providing this level of connectivity to a hub in Mount Hope may be difficult.  HSR is of the opinion that the proposed bus stops and bus routes on the interior roads are appropriate, but the proposed bus stops on the exterior roads are not supported by HSR, as the adjacent land uses are not supportive of transit. HSR does not envision providing bus service on the exterior roads unless the adjacent land use changes to higher density commercial/residential. Additionally, it is important to note that servicing these exterior roads may create additional pressure to develop adjacent to the new transit corridor, continuing outwards pressure on the urban boundary.	Noted. Transit servicing implications, routing needs, and cost estimates will be considered through the evaluation of the applications. If the applications are approved, staff recognize that further coordination will be required during future planning stages to assess transit feasibility and service model options.
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Transportation Planning Services, Transportation Planning and Parking, Planning and Economic Development Department	Staff estimate 10,000 additional annual service hours will be required to divert routes in the area to serve the neighbourhood as designed, representing approximately \$1.1 million (2025\$) in additional operating costs each year.  HSR may also be able to provide On-Demand transit service in the area, but the costs and service hours for this method are difficult to predict.  The proposal includes very little employment opportunity onsite, requiring longer-distance commute trips to central Hamilton. Only 15% of trips are projected to be local to Mount Hope. Increasing local employment use, particularly in the commercial area, may encourage sustainable mode use and support more balanced transit loading. If the majority of employment destinations are located downtown, further capacity on the 20 A-Line and 27 Upper James may be required, which would add additional costs.  Transportation Planning does not support the Urban Boundary Expansion as currently proposed, as the submitted transportation assessments and studies did not contain sufficient information to demonstrate:  • The existing transportation network has capacity to accommodate the traffic generated by the applications.  • The planned future transportation network, both adjacent to the study area, and the broader community/transportation system both upstream and downstream, has capacity to accommodate the traffic generated by the proposal.  • The proposed active transportation facilities will support and promote cycling within the urban boundary expansion area and to/from the (future) external network.	A revised Transportation Assessment should be submitted to address existing and planned capacity, connectivity, implementation phasing, and policy alignment. If the applications are approved, the requirements outlined in the full comments will need to be addressed through a future Secondary Planning process.
	expansion area and to/from the (future) external	

- expansion area and to/from the (future) external network.
- A network implementation plan that ensures adequate transportation facilities with acceptable levels of service, where required, will be provided at all stages/phases of buildout for all modes of travel and which will promote active and alternative transportation through the urban boundary expansion area and to/from the external network.

#### Additionally:

- Through the Transportation Master Plan, the City has not planned for sufficient transportation infrastructure to support development of these lands, due to the firm urban boundary strategy.
- Any future Transportation Assessment submissions shall address the specific issues outlined in the full comments provided, and shall be undertaken using the appropriate standards, policies, and guidelines.

Heritage and Urban Design,
Planning, Planning and
Economic Development

## **Cultural Heritage and Archaeological Potential**

The subject property meets four of the 10 criteria used by the City of Hamilton and Ministry of Citizenship and Multiculturalism for determining archaeological potential – meaning the property has archaeological potential.

Staff concur with the recommendations of the Stage 1 Archaeological Assessment that the following requirements should be addressed as part of a future Secondary Plan and/or future redevelopment application:

- Any future developments within the study area, beyond those portions that have been cleared of any further archaeological concern, must be preceded by a Stage 2 archaeological assessment prior to any approvals.
- Conduct a Stage 3 archaeological assessment on two registered site areas (AgGx-606 & AgGx-618).
- Confirm if Stage 3 and 4 Archaeological assessments for registered site AhGx-1030 has been completed, and have these reports be submitted to staff along with a copy of the letter from the Ministry of Citizenship and Multiculturalism for review prior to any further approvals.

The urban boundary expansion area is also comprised of eight properties that are inventoried or registered on the City's Municipal Heritage Register.

Staff reviewed the Cultural Heritage Impact Assessment that was submitted by the applicant and found it to be comprehensive and mostly complete; however, the following changes are required to be addressed as part of a future Secondary Plan and/or future redevelopment application:

 That revisions be made to address impacts to Cultural Heritage Resource 2, the proposed road network as Noted. If the applications are approved, the recommendations outlined in the full comments will need to be addressed through a future Secondary Planning process.

- submitted looks to have major impacts on CHR-2, staff could ask for a more fulsome review of this heritage resource and potential impacts, should the road network be approved as submitted.
- That the report be revised to include potential polices which support appropriate retention and reuse of Cultural Heritage Resources, particularly in the proposed commercial area.

#### **Urban Design**

Urban Design Staff reviewed the preliminary concept plan drawings and associated documents, and note that Urban Design Guidelines, an Urban Design Brief, and Updated Concept Plan(s) will be required to support the preparation of a secondary plan. At a high level, the following required improvements to the preliminary concept plan were identified:

- Clear vision for the design and layout of development that creates an identity for the expansion area.
- Illustrate the vision for Upper James Street This should become a transit focused development area. There should be an area of pedestrian focus along this corridor. There should be a mix of residential, commercial, and mixed use along Upper James to serve the community.
- Demonstrate the vision for the existing feeder streets that will need upgrading in conjunction with the proposed expansion. Further consideration and upgrades are required to the proposed streetscapes and uses at grade in these areas with mixed uses being preferred.
- Integration of best-practices of urban design and sustainable design - clear demonstrations of a connected community design and sustainable design features in a practical and responsible manner.
- Further justification of how the proposal meets Hamilton's policies to provide a range of housing types.

Waste Policy and Planning, Waste Management, Public Works	Waste Management requirements are not applicable to the Official Plan Amendment applications but must be addressed at later stages of the development process. Applicants will be required to apply the City of Hamilton Waste Requirements for Design of New Developments and Collection, dated 2021. These requirements outline specific design considerations for different development types and ensure safe and efficient	Noted. Waste Management requirements will be addressed at later development stages, should the applications be approved, in accordance with applicable City standards.
Forestry and Horticulture, Environmental Services, Public Works	waste collection services.  If the applications are approved and this area is included as part of the urban boundary, Forestry would need to review service levels and impacts to staffing/operating, as staff currently service areas outside of the urban boundary on an on-demand basis. Staff also anticipate impacts to existing public tree assets and, if approved, a tree management plan would need to be submitted. Staff can only assess canopy cover through the submission of landscape plans, to determine if additional public tree assets will be planted.	If the applications are approved, a tree management plan and landscape plans will be required through subsequent planning stages. Forestry and Horticulture service implications/impacts to staffing and operations will be considered in this and future reviews.
Landscape Architectural Services, Environmental Services, Public Works	Horticulture would also need to assess service levels impacts if horticultural features are proposed within the rights-of-way.  In 2023, City Council made a clear decision to say 'no' to urban boundary expansions. The proposed applications run counter to this mandate and as a result, will impact the City's ability to provide parkland (through funding that is required to secure land) and to maintain or enhance existing service levels of these future park spaces. Sprawling outward through the built environment will require Environmental Services staff to spread existing resources more thinly (with respect to coordinating parkland acquisition, planning, design, and eventually parks operations and maintenance).  The City-wide Parks Master Plan highlights that any parkland provisioning for new growth areas outside of the existing built-up urban area would need to be undertaken through the Secondary Planning process.	Noted. Based on existing operating budgets and staffing resources, approval of the applications will have negative impacts on the City's ability to provide parkland and to maintain and enhance existing service levels.  If the applications are approved, parkland needs, integration of natural features, and coordination with external agencies such as Hydro One will be addressed through a future Secondary Planning process.

	Of note with respect to the current concept plan is that the area identified as a potential trail network over the existing pipeline will require a detailed review, once more information is available, regarding required buffers and other constraints including passing through significant woodlands.	
Parks, Environmental Services, Public Works	Information provided in the concept plan does not allow for an informed response from Environmental Services. Please confirm that a Secondary Plan exercise would follow with more information regarding land use designation details, particularly open space designations and active transportation connectivity.  The proposed neighbourhood parks appear to be undersized; it is unclear if the proposed population for this area conforms to the Urban Hamilton Official Plan parkland requirements.	Noted. Staff confirm that a Secondary Planning process would follow, should the applications be approved. The proponent would be required to provide the detailed land uses and active transportation planning necessary for a fulsome Parks review at that time. Staff will take comments related to the proposed neighbourhood parks into consideration through the review of these applications.
Infrastructure Renewal, Engineering Services, Public Works	Upper James to Terminal Access (Airport Road) is tentatively scheduled for road urbanization and widening from two lane rural to three lane industrial cross sections in 2028.	Noted. Coordination with planned infrastructure projects will be considered in future development staging and servicing strategies.
City Wide Services, Recreation, Healthy and Safe Communities	The Recreation Master Plan (RMP) accounts for planned growth and population density within the current urban boundary. As such, the RMP identifies facility needs and distribution to support this growth within recreation planning areas and does not consider needs to support an urban boundary expansion.	Noted. Adequate existing or planned capacity for public service facilities to support the proposed development has not been demonstrated by the proponent.
	The Recreation Master Plan proposes growth related Community Recreation Centres (CRC) in Elfrida, Glanbrook, and Mount Hope. Secondary planning will further identify CRC classification and outdoor sport space needed and where these sites should be located to best serve the community.	Additionally, it is noted that the proposed development could place pressure on planned facilities, potentially impacting their siting and servicing. These implications will be considered

	As the applications do not address the existing and planned capacity as set out in the RMP, the submission lacks detail to demonstrate capacity in existing and planned Recreation facilities to accommodate the proposal. Moreover, the proposed intensification outside the urban boundary increases pressure on planned buildings and may impact placement of facilities and site servicing needs which will need to be considered.	through the evaluation of the applications.
	While secondary planning could further identify classification and identify the outdoor sport spaces needed — as well as where they should be located to best serve the community — this has not been sufficiently addressed to ensure adequate existing or planned capacity, as noted above.	
	Indigenous Communities and External Agencies	
Mississaugas of the Credit First Nation (MCFN)	A preliminary meeting with the White Church Urban Boundary Expansion landowner group's representative occurred on April 22, 2025. However, the MCFN understand that individual landowners may be moving forward with development activities on their own. Therefore, they have shared a list of minimum expectations for consultation.	The proponent and/or other landowners will be advised to notify and engage DOCA regarding any subsequent development activities.
Six Nations of the Grand River (SNGR)	SNGR met with the applicant in January 2025 and have noted that they are opposed to the expansion applications because of their negative impacts to Aboriginal and treaty rights, but they will need to go through the natural environmental reports to quantify those impacts and are seeking capacity funding to review them.	Staff recognize SNGR's position regarding the potential rights impacts associated with the scale and nature of development. Further engagement with SNGR will be supported as additional information becomes available.
John C. Munro Hamilton International Airport	The assessment shows that the proposed development falls outside of the Airport's OLS, however the lands lie under the AZR – Outer Surface. The Airport considers the City of Hamilton's development review process in place for assessing individual applications suitable for safeguarding the AZR in regard to these lands.	The Airport's position regarding the need for noise mitigation in NEF 25+ areas and avoidance of residential uses in NEF 28+ areas is acknowledged. Staff will take this into consideration through their review of the

	In addition, the lands fall under the AZR Wildlife Hazard Zone – Part 7, where applicable measures must be taken in regard to management of open water and any activities or uses that may attract wildlife.	applications.
	In effect, the Airport has no objection to the proposed urban boundary expansion as long as existing processes are maintained in regard to height development and wildlife management on these lands, and that suitable land use, in consultation with the Airport, protects the Airport's present and future operational needs.	
	However, part of the land falls under the current NEF 28-30 contours and it is the Airport's general position that land that falls under the NEF 28 and above category should not be developed for residential purposes, especially in this case where land is located within proximity to the airport. This is in line with the Urban Hamilton Official Plan. It should also be noted that NEF and NEP contours may change in the future.	
	For any future development that would fall under the NEF 25 and above category, it is recommended that noise mitigation measures be implemented.	
Enbridge	The growth area subject to these applications is intersected by Enbridge pipeline infrastructure, centrally located in an east-west alignment. The circulation was reviewed and appears to contain some existing mapping with respect to development in proximity of pipeline infrastructure, specifically identifying the pipeline corridor as a "Pipeline/Trail Network".	Noted. If the applications are approved, Enbridge's recommendations will be addressed through a future Secondary Planning process.
	Enbridge recommends including their pipelines and facilities on one or more maps within the secondary plans provided, and that some additional policies be considered for inclusion through future planning phases, including the following:	

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	<ul> <li>"When a neighbourhood plan, zoning amendment, subdivision application, or development permit application is proposed that involves land within 200m of a pipeline, as demonstrated in "Map xx:" (per recommendation #1), Administration shall refer the matter to the pipeline company for review and input."</li> <li>"All development within 30m or crossings of a pipeline shall require written consent from the pipeline company and is the responsibility of the applicant to obtain prior to development approval."</li> </ul>	
Hamilton-Wentworth Catholic District School Board (HWCDSB)	The existing catchment area elementary schools do not have sufficient capacity to accommodate the future students that are anticipated from the development of this urban boundary expansion area.  The Board's current Education Development Charges (EDC) by-law identifies the need for one 458-pupil place elementary school in the South Ancaster or Mount Hope area by 2027. However, this recommendation does not take into consideration the additional 1,786 school age children, that are anticipated by the development of the 7,629 residential units for this proposed secondary plan area. As a result, the	Staff note that additional school capacity may be required beyond current EDC by-law forecasts should the applications be approved. In this case, the proponent will be advised to work with the HWCDSB to provide dwelling unit counts, types, and densities as part of the Secondary Planning process.
	Board has an identified need for up to three Catholic elementary school sites in the subject urban boundary expansion area to accommodate the sizeable, forecasted growth.  The area's secondary schools have sufficient capacity to accommodate projected enrolment.	
	With respect to the HWCDSB acquisition of lands identified for future school use, HWCDSB would request the Secondary Plan include policy direction wherein the lands are protected for their intended use. Where land is to be developed by Plan of Subdivision, this objective can be achieved by including the appropriate Conditions of Draft Plan Approval.	

# Hamilton-Wentworth District School Board (HWDSB)

The Hamilton-Wentworth District School Board is not advocating for this development, but provided the following comments:

- The administration has reviewed the applications and notes that the School Accommodation Issues Assessment needs to be updated as it states that there are an expected 5,488 residential units planned for the development, while other provided documents list approximately 7,600 units. Additionally, the school enrollment and utilization data quoted in the report is from 2023. The Board is requesting the following data to support their evaluation of existing and anticipated capacity of elementary and secondary schools in the area:
  - Dwelling unit types, counts and bedroom counts to the smallest geographic area possible;
  - o Density of the proposed expansion area; and
  - Development phasing strategy if possible.
- The Board is requesting more information regarding the following:
  - The Environmental Impact Study Report shows the Twenty Mile Creek Sub Watershed and Welland River Sub Watershed running through both proposed elementary school sites, which creates concern as to what the conservation and/or mitigation implications would be for future development of the school sites.
  - The Phase II Environmental Site Assessment also identified soil and groundwater exceedances in soil contamination standards near the proposed elementary school.
- Additional considerations for the siting of schools are also provided by the School Board in the full comments.

The deficiencies of the submitted School Accommodation Issues Assessment is acknowledged. Staff support the request for additional up-to-date information.

Should the applications be approved, the proponent will be advised to work with the HWDSB to address their list of considerations and provide additional information to support planning for future facilities.

## Niagara Peninsula Conservation Authority (NPCA)

In general, the NPCA did not identify any concerns with the findings of the Preliminary Hydrological Investigation or Karst report. Additionally, there are no objections in principle to the attenuation of post-development peak flows to predevelopment levels or to the use of SWM facilities to meet this criterion, though the NPCA will require that detailed designs and supporting calculations be submitted for review and approval at the detailed design phase. NPCA staff are supportive, in principle, of the proposed 15-metre setback distance from wetlands and watercourses.

By contrast, NPCA staff are not supportive of the online ponds shown in Figure 3.2 of the Preliminary Proposed Drainage Plan in the Functional Servicing Report. Additionally, should the applications be approved, a Wetland Water Balance Risk Evaluation will be conducted during Phase 2 of the Subwatershed Study, and the NPCA will review the findings at that point.

The NPCA has also requested a site visit before the end of the current growing season to confirm the presence and extent of NPCA regulated features on the subject lands, which may result in additional comments.

NPCA's request for a site visit to verify regulated features is acknowledged and staff have communicated this to the proponent.

Staff will take NPCA staff's comments regarding online ponds into consideration through the review of the applications. Should the applications be approved, staff will share the findings of the Phase 2 Subwatershed Study with the NPCA.