

June 20, 2025

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Submitted via email to urbanboundary@hamilton.ca

To: City of Hamilton

Re: White Church & Elfrida Urban Boundary Expansion Application

I'm writing on behalf of the Hamilton-Wentworth Federation of Agriculture (HWFA), representing over 550 farm families who live and work right here in the City of Hamilton. These are the people who grow the food we eat, the flowers we enjoy, and produce the fibre and fuel that helps move our province forward. They support local jobs, strengthen the economy, and take care of the land, water and natural resources with long-term sustainability in mind.

Hamilton is home to more than 118,000 acres of farmland and nearly 3,000 agri-food businesses and together, they employ more than 26,000 people and produce more than a third of the food Hamiltonians eat every day. The Hamilton agri-food sector contributes \$580 million to Ontario's gross domestic product. That's something we can all be proud of, and something worth protecting.

The HWFA is the local voice for farmers on issues impacting agriculture at all levels of government. We are dedicated to ensuring that the agri-food sector and rural community are considered and consulted regarding new or changing legislation or regulations that would impact the sustainability, profitability and growth of our farm businesses.

HWFA appreciates the opportunity to provide input on the consultations regarding the White Church and Elfrida Urban Boundary Expansion Application. With this application, Hamilton is considering the removal of 2987 acres from the rural Elfrida area to expand the urban boundary and "serve the needs of existing and future residents." Hamilton is likewise considering the removal of 899 acres of rural land from the White Church area "in order to permit the construction of 7600 residential units as well as commercial, institutional and recreational uses."

These are not empty fields or vacant land. This is some of the most productive farmland in the country and made up mostly of Class 1 to 3 soils according to the Canada Land Inventory, and considered "prime agricultural land" that has been feeding people and animals for generations. Once it's developed, it's gone for good.

The City of Hamilton has long designated these lands as *Agricultural Areas*, to be protected for long-term use for agriculture, consistent with the Provincial Planning Statement (2024) which



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supports the protection of prime agricultural areas for long-term agricultural use. There's still so much room to grow within Hamilton's current urban boundary — through smarter use of low-density areas, redeveloping brownfields and greyfields, investing in more compact and complete communities and investing in urban transit solutions. According to the Ontario Housing Affordability Task Force (2022), the issue isn't a lack of space, but how we use the space we already have.

Less than 5% of our province is suitable for agricultural use and since 1996, Ontario has lost 2.1 million acres of farmland, much of it within the Golden Horseshoe.

Under this proposal, here's what's at stake:

- **2987.5 acres in Elfrida** — almost exclusively high-quality prime agricultural farmland
- **899.5 acres in White Church** — almost exclusively high-quality prime agricultural farmland, rural land and the Southern Pines Golf & Country Club.

While this land isn't growing fruits and vegetables for the farmers' market, it plays a crucial role in local food, meat, dairy and fuel systems. Each year, it has the capacity to produce:

- **5.3 million loaves of bread**
- **1.15 million litres of ethanol for clean fuel**
- **7.68 million pounds of high protein soymeal**
- **Enough hay to feed 83,800 cows for a day**

That's the quiet, everyday productive capacity and value these lands provide — and it reaches far beyond the farm gate.

We've heard suggestions that urban expansion will generate tax surpluses, but that view doesn't tell the full story. Farmland contributes more in taxes than it costs in services. Urban sprawl, on the other hand, often stretches municipal budgets. It forces municipalities to build and maintain more roads, water and sewer lines and utilities across larger areas, and with less population density to offset those costs. Research studies prepared by the Ontario Federation of Agriculture consistently demonstrate that for every 1% drop in farmland share, municipalities can face a net loss of over \$240,000. Farmland also offers natural "environmental goods and services" that are priceless including helping to naturally manage and filter water, storing carbon, and providing wildlife habitat.

Hamilton has an opportunity and an obligation to grow in a strategic way that balances critical growth and housing needs while preserving precious farmland. With three-quarters of our residential areas still low-density, there is plenty of opportunity and space to build up — not out. We can create vibrant, livable neighbourhoods while still protecting the farmland that feeds Hamilton, Ontario, Canada and the world.

The HWFA understands lands in the Whitebelt are seen as part of Hamilton's long-term growth strategy. But choosing to use them now, when other viable options remain, risks leaving the City



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vulnerable to future urban sprawl and immediate significant losses of farmland. Once farmland is gone, we can't bring it back.

We appreciate the opportunity to share our feedback and perspective on the Elfrida and White Church Urban Boundary Expansion proposal. We hope this conversation continues, and that together we can find solutions that balance our community housing needs with the long-term sustainability of our farms, food system, and rural communities.

Sincerely,

Melvin Switzer, President
Hamilton-Wentworth Federation of Agriculture

cc: City of Hamilton Council
City of Hamilton Mayor – Andrea Horwath
City Manager – Marnie Cluckie
HWFA Board of Directors
Ontario Federation of Agriculture