



City of Hamilton Report for Consideration

To: Chair and Members
Planning Committee

Date: June 25, 2025

Report No: PED25179

Subject/Title: Official Plan Amendment to Expand the Urban
Boundary to Include the Elfrida Lands

Ward(s) Affected: Wards 9 and 11

Recommendations

- 1) That **Urban Hamilton Official Plan Amendment Application UHOPA-25-007** by Bousfields Inc., on behalf of the Elfrida Community Builders Group Inc., for the lands shown in Appendix A to Report PED25179, to add the subject lands to the Urban Hamilton Official Plan to provide for an expansion of the City of Hamilton's Urban area and to designate the majority of the Elfrida Lands 'Urban Expansion Areas – Neighbourhoods' and the balance 'Urban Expansion Area'; to establish the requirement for the preparation of a Secondary Plan prior to any urban development; and, to provide policies that permit only currently existing land uses and expansions thereto and those planned through Rural Site Specific Area 21, **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-25-008** by Bousfields Inc., on behalf of the Elfrida Community Builders Group Inc., for the lands

shown in Appendix A to Report PED25179, to remove the Elfrida lands from the applicable mapping and policies of the Rural Hamilton Official Plan, except for the site-specific mapping and policies of Rural Site Specific Area 21 as they relate to establishing permitted uses, **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, protect agricultural lands and natural heritage features, and minimize climate impacts.

Key Facts

- The purpose of this report is to provide a recommendation regarding the Official Plan Amendment applications submitted by Bousfields Inc., on behalf of the Elfrida Community Builders 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 and to include the Elfrida lands, and to designate the majority of the lands "Urban Expansion Area – Neighbourhoods" and the balance "Urban Expansion Area." Development in the proposed expansion area would lower the City's intensification rate and would not be in keeping with the Council directed growth strategy for a firm urban boundary to preserve agricultural lands and natural heritage features and minimize climate change impacts.
- The applications do not demonstrate that there is sufficient existing or planned capacity relative to infrastructure and public service facilities.
- The applications do not demonstrate that development of the lands would be fiscally sustainable to 2051 after considering long-term replacement costs of services.
- 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 structured and submitted does not adequately address the Urban Hamilton Official Plan's vision and objectives for development. In staff's opinion there are insufficient policy assurances to ensure the same at subsequent stages of development, would address these matters.

Financial Considerations for the Official Plan Amendment to Expand the Urban Boundary to Include the Elfrida 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 likely be required to defend Council's decision on the applications, as well as any potential future applications. Due to the complexity of this matter and the anticipated duration of the hearings, additional funding in the range of \$4 million to \$6 million may be required.

Background

The applications seek to bring approximately 1,209 hectares of land into the urban boundary with the intent to use the lands to accommodate approximately 114,900 people and 14,360 jobs at 135 persons and jobs per hectare (according to the submitted Fiscal Impact Assessment and Land Needs and Housing Assessment). The current concept proposes 18,939 low density units, 7,444 medium density units, 13,248 high density units, and commercial space and schools (according to the Transportation Assessment submitted by the applicant). The final unit numbers and mix would be determined at the Secondary Plan and development approvals stage.

The proposed Urban Boundary Expansion area encompasses 79 total properties, of which 41 are owned by the Elfrida Community Builders Group Inc. (51.9% of all properties). Additional information about land ownership can be found in Appendix D.

Additional materials can be found in Appendices A-O to Report PED25179, including a Planning Report Fact Sheet (Appendix D to Report PED25179). All submission materials have been made available on the City's webpage at www.hamilton.ca/ube.

Elfrida Historical Context

In 2006, the comprehensive Growth Related Integrated Development Strategy (GRIDS) process reviewed opportunities as to how the City should grow and where growth outside the urban boundary could occur. The Elfrida area was identified as the preferred location to accommodate new growth to 2031, based on the Triple Bottom Line sustainability tool.

The Elfrida Study Area was included as a special policy area in the Rural Hamilton Official Plan (RHOP) adopted by Council on September 27, 2006. This special policy area outlined a process, and studies required to incorporate the lands into the urban boundary. When the RHOP was approved by the Province on December 24, 2008, the Province removed the special policy area. This deletion was appealed to the Local Planning Appeal Tribunal (LPAT) (formerly the Ontario Municipal Board (OMB)) by landowners in the area.

The Urban Hamilton Official Plan (UHOP), adopted July 9, 2009, included a more general set of policies that addressed urban boundary expansion, and a policy reference to Elfrida as a future growth area. When the UHOP was approved, the Province again removed the reference to Elfrida as a growth area; however, the general policies addressing urban boundary expansions were left in the Plan. The modification that removed the references to Elfrida was appealed to the Local Planning Appeal Tribunal by the City and landowners in the area. The appeals on this matter relative to the Urban Hamilton Official Plan and Rural Hamilton Official Plan have since been withdrawn as a result of the 2022 ministerial modifications to the City's Official Plan, which was subsequently reversed through Bill 150.

The infrastructure identified in the 2006 Water Wastewater Master Plan preferred growth plan included Elfrida and identified all the major trunk infrastructure required to support it (e.g. the Upper Centennial / Dickenson trunk sewer and the District 7 water tower). This same infrastructure was included in the 2019 Development Charges background study's quantum with a certain amount of post period benefit.

The Elfrida Growth Area Study was initiated in 2016, to fulfil the requirements for an urban boundary expansion to take place. A number of different studies were part of the Elfrida Growth Area Study, including the preparation of a Secondary Plan and sub-watershed plan.

As part of the Elfrida Growth Area Study staff analysed and consulted on the development of a vision and guiding principles as a foundation for the development of a secondary plan. Three land use concepts were prepared and consulted on. Of the three options, the current Elfrida Concept Plan, submitted with the subject applications, most resembles Option 2 from the Elfrida Growth Area Study (see Appendix L for comparison). It should be noted that Option 2 was not selected by staff to move forward with as the preferred option because relative to the preferred option, Option 2 would:

- not promote 'walkability';
- encourage a reliance on cars because of the single central node;
- not provide for a complete community;
- challenge first and last mile connectivity, as trips would be centred on the central commercial node;
- likely require the highest fire flow, and largest diameter watermains and sewers due to central high-density node;
- be difficult to phase cost-effectively; and
- result in a less connected community with limited active transportation opportunities.

It is noted that the above reasons are similar to comments raised about the Concept Plan submitted with the subject applications. Additionally, while the first phase of a three phase sub-watershed plan was completed for the previous Elfrida Growth Area Study, much of this information is more than five years old and considered out of date.

Materials Reviewed and Role of City Retained Consultants/Peer Reviewers

In support of their applications, the proponent submitted a total of 15 studies, in addition to the official plan amendments, planning rationale 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 divisions and eight (8) 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 PED25179.

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 PED25179 for peer review)
- Land Needs and Housing Assessment Report (see Appendix H to Report PED25179 for peer review)
- Fiscal Impact Assessment (see Appendix I to Report PED25179 for peer review)
- Land Use Compatibility and Preliminary Air Quality and Odour Impact Study Peer Review (see Appendix J to Report PED25179 for peer review)
- Energy and Climate Change Assessment (see Appendix K to Report PED25179 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 for staff 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 & 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 Elfrida Community Builders Group Inc.

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 Elfrida Lands. City staff have, however, used the Framework to guide their review of the proposal. The recommendations in this Report PED25179 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 L to Report PED25179.

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 following background is provided, given that the Elfrida 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.

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.

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) and states that Municipal Official Plans are the most important vehicle for implementing its policies. In assessing what is an "appropriate" range and mix of land uses consideration should be given to the Urban Hamilton Official Plan which 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 and Housing Assessment Report prepared by Parcel Economics Limited which concluded that there is a need for additional ground-related housing and that under a 'market-based' housing forecast, the demand for ground-related housing could account for as much as 73% of housing demand and that this demand cannot be reasonably accommodated within the built-up area. The Assessment Report identifies a community land need of 1,780 gross hectares. Staff note that the Assessment Report was based on 2024 Ministry of Finance population projections for Hamilton.

The Land Needs and Housing Assessment Report assumes the expansion area will be developed at 80 people and jobs per hectare whereas the applicant's Financial Impact Analysis and Functional Services Report identifies a density of 135 people and jobs per hectare. This has a significant impact on the mix of housing types that would be constructed within the expansion area.

The City has had the Land Needs and Housing Assessment Report peer reviewed by Watson & Associates (see Appendix H to Report PED25179) which observed the Land Needs Analysis:

- Bases its population and housing growth on 2024 Ministry of Finance forecasts which are ambitious;
- Significantly overstates the city's urban land needs by 2051 and does not consider longer-term redevelopment opportunities within the built-up urban area; and,

- Underestimates demand for Additional Dwelling Units and the ability of this housing form to accommodate families.

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 the Report PED24110 (2023 and interim 2024 Market and Land Supply Monitoring Report), it has found the City is generally on track for 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 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.

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 projected 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:

- Elfrida Urban Boundary Expansion: Functional Servicing Report (FSR) (Stantec, November 15, 2025)
- Opportunities and Constraints Mapping Elfrida Lands Proposed Urban Boundary Expansion: Stoney Creek, Twenty Mile Creek, Hannon Creek, Upper Davis, and Sinkhole Creek Subwatersheds (GeoProcess, Palmer, and Stantec, February 28, 2025)
- Elfrida Subwatershed Study Review: Karst Considerations (Landtek, November 14, 2024)

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

The Elfrida expansion area is located immediately adjacent to the City's existing settlement area boundary and includes some existing and planned infrastructure elements and public service facilities. However, the quantum and timing of proposed development is expected to have a significant impact on the City's ability to service growth opportunities in the existing settlement area boundary. To service development in this area would require significant changes to the City's short-, medium- and long-term capital plans and deviate from the Urban Hamilton Official Plan's vision and strategy for growth through intensification. The Functional Servicing Report (FSR) prepared by Stantec Consulting Ltd., dated November 2024, states that the subject site can be serviced through the extension of existing utilities, pending further assessment and discussion with City staff and service providers. There are several deficiencies in the analysis that make it difficult for the City to approve the applications. Key considerations include:

Water

The submission lacks sufficient detail to demonstrate sufficient capacity in existing and planned water systems to accommodate the subject lands. The proposed development presumes to remove water servicing capacity from planned growth within the existing urban boundary. The City's ongoing Water and Wastewater Master Plan update to 2051 is intended to reflect growth forecasts within the existing Urban Hamilton Official Plan and will not include capacity for urban boundary expansion lands. In addition, a Watermain Hydraulic Analysis is required to demonstrate adequate water service before the lands can be brought into the urban area. The applicant has recommended that this analysis be completed at the Secondary Planning stage, however, without an updated Master Plan and the Water Hydraulic Analysis, it is not possible to identify the extent of impact on planned infrastructure capacity within the existing urban boundary or determine what new infrastructure is required. The applicant's Functional Servicing Report referenced a 2013 servicing strategy and assumed that planned/completed projects within Pressure District 7 would support the subject lands. The conclusions of the 2013 study are no longer valid. Without the Master Plan Update, it is not feasible to assess or assume sufficient capacity in the planned systems.

Wastewater

The submission lacks sufficient detail to demonstrate sufficient capacity in existing and planned water systems to accommodate the subject lands. The proposal is perceived to consume wastewater servicing capacity (in trunk sanitary sewers and the treatment facility) intended for future growth within the existing urban area, pending the Master Plan update. This is considered likely based on the assessment in the report. While the Dickenson and Upper Centennial Parkway (UCP) trunk sewers' historical design did consider Elfrida lands based on 2013 population figures, the capacity in the trunk system and the treatment plant has since been reassigned to planned growth within the existing urban boundary. The 2013 population estimate was significantly lower (approximately 35%) than that proposed in the 2025 applications. The applicant's report assumes the presence of available or reserve capacity within these trunk sewers at the treatment plant post-upgrades. There is insufficient capacity within the existing system

to accommodate the subject lands. Specifically, the UCP trunk currently connects to an undersized sewer. Although it will be upsized, it is not intended to specifically accommodate growth from the subject lands. Evaluating adequate capacity in the planned system is not possible until the Master Plan update is finalized. Given the projected population, significant extensions, and expansions of trunk infrastructure, exceeding current plans and budgets, would be necessary. Existing system capacity would be exceeded, not maximized, when combining the proposed population with approved growth in the existing urban area. Without the Master Plan Update, assessing or assuming sufficient capacity in the planned systems is not feasible.

Stormwater

The application materials are insufficiently detailed to confirm the feasibility of the proposed concept plan because a Phase 1 Subwatershed Study (SWS) was proposed to be provided at the Secondary Planning stage, which postponed critical studies and calculations, including peak flow figures, erosion control assessments, and water balance analysis, to subsequent development phases. Limited information has been provided on climate change mitigation methods, specific details on Low Impact Development (LID) practices, their site-specific suitability, or a climate resilience assessment. The report notes a lack of commentary or plans for resilience and adaptability regarding stormwater. An evaluation of the capacity of current stormwater infrastructure, including rural ditch, culvert, and channel systems, was not conducted. No stormwater modelling has been performed to quantify system capacities or constraints. Analysis of outlet and culvert elevations and capacity, while required, was not undertaken. The use of retaining walls is not supported to address transitional grading constraints adjacent to existing land uses. Although not a requirement of an urban boundary application, future development proposals will be required to demonstrate compliance with the City's Consolidated Linear Infrastructure Environmental Compliance Approval concerning stormwater runoff control. Reference was made to an outdated 2018 Draft SWS. An updated SWS adhering to current standards and guidelines is required. The application fails to demonstrate avoidance or mitigation of potential negative impacts on water resources, avoidance of key hydrologic areas, or protection of Natural Heritage Systems. The missing SWS would provide the necessary context for these aspects. Without the required studies and analysis, including an analysis of water balance requirements and the receiving system, determining the need for significant infrastructure extensions is not possible. Also, confirming that the expansion would not deplete existing and planned stormwater capacity depends on these missing analyses. Based on the submitted materials and the concerns highlighted, the subject policy criteria have not been adequately addressed.

Transportation

The Transportation Assessment was reviewed by the Transportation Planning, Transit Strategic Planning, and Parking staff.

The application materials lack sufficient detail on the planned internal collector road network and impacts on the broader road network as a result of the proposed Elfrida

expansion area. The Transportation Assessment by C.F. Crozier & Associates Inc., dated March 2025, indicates that while there is enough land to accommodate several collector roads, the screenline analysis focused on Trinity Church Road and Mud Street, not the future internal road network. The assessment notes that confirmation of adequate capacity within this network is expected to be completed as part of the Secondary Planning process. It is also noted that various future transit and active transportation improvements are being planned near the subject lands, including the Elfrida Gateway Station, the BLAST network, and surrounding bike lanes. It is assumed that these enhancements would improve transit connectivity and the capacity of the broader transportation network. However, the applications do not address potential impacts on the broader transportation network as a result of the expansion, including, for example, the potential need for additional Niagara Escarpment crossings. The applications are deficient in demonstrating sufficient capacity within the existing or planned transportation networks.

Public Service Facilities

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

The submission lacks sufficient detail to confirm the capacity of planned public service facilities. While the applications provide an inventory of existing public service facilities available near the subject site, it acknowledges that due to the anticipated increase of 114,900 people and 14,360 jobs, additional public service facilities will be required. According to the Planning & Urban Design Rationale prepared by Bousfields Inc., dated November 2024, while the subject lands are within the catchment area of seven existing schools, these schools are at or over capacity. Further, the City's 2022 Recreation Master Plan identifies numerous recreational needs based on the number of residents and the location of nearby facilities. Additionally, the City's 2024 Development Charges study identifies the need for a new 12,000-square-foot library branch to be located within Elfrida, as well as one new fire station to be located within the Elfrida/Upper Stoney Creek Growth Area. The potential need for numerous public service facilities in the area raises concerns about the capacity to plan for these developments.

Based on all 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 PPS 2024 defines a specialty crop area as: "areas designated using guidelines developed by the Province, as amended from time to time. In these areas, specialty crops are predominantly grown such as tender fruits (peaches, cherries, plums), grapes, other fruit crops, vegetable crops, greenhouse crops, and crops from agriculturally developed organic soil, usually resulting from: a) soils that have suitability to produce specialty crops, or lands that are subject to special climatic conditions, or a combination

of both; b) farmers skilled in the production of specialty crops; and c) a long-term investment of capital in areas such as crops, drainage, infrastructure and related facilities and services to produce, store, or process specialty crops”.

As per the existing Rural Hamilton Official Plan – Schedule D, the Greenbelt Plan, and mapping by the Government of Ontario accessed through the online Agricultural Systems Portal, there are no specialty crop areas within the subject lands. The lands immediately adjacent to Mud Street, which form the northern boundary of the subject lands, are situated within the Niagara Peninsula Tender Fruit and Grape Area.

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;

Colville Consulting Inc. prepared the Agricultural Impact Assessment (AIA) in November 2024 in support of the Official Plan Amendment applications. Its purpose was to evaluate the potential impacts of this urban boundary expansion on agricultural operations and the broader Agricultural System, consistent with OMAFRA's 2018 AIA Draft Guidance Document, and to recommend mitigation measures. The study area included the approximately 1,209-hectare Subject Lands (Primary Study Area) and extended 1.5 km beyond its boundaries to form a Secondary Study Area.

The Agricultural Impact Assessment Report (AIA) prepared by Colville Consulting for the Elfrida Community Builders Group Inc., dated November 2024, identifies that the majority of the subject lands, 1,154 ha (95%) of approximately 1,209 ha are located in prime agricultural areas. According to the Agricultural Impact Assessment, while the lands are predominantly class 1,2, or 3 based on the Canada Land Index mapping, they are considered to be lower priority agricultural land due to the following reasons:

- Exclude specialty crop areas.
- Exhibit high levels of fragmentation based on the existing road network.
- Abut the existing City of Hamilton settlement area boundary which has been developed for a variety of non-agricultural uses.
- Includes non-agricultural uses, such as commercial, industrial, recreational, and institutional uses.
- Absence of signs of recent investment in agricultural infrastructure and land improvements.

Dillon Consulting prepared a peer review of the Agricultural Impact Assessment which 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. The review included a site visit completed on April 22, 2025, to review/consider Minimum Distance Setbacks (MDS) livestock assumptions based on windshield survey methodology.

In general, Dillon agrees with the conclusions of the AIA based on its review of the report, methods, cross-referencing of the references provided and on-site review. Dillon Consulting found that the AIA 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.

The conclusion of the AIA is what Dillon would expect and only found minor discrepancies with some of the site findings, and Minimum Distance Separation analysis, none of which would impact the final results of the AIA relative to alternative locations.

The entirety of the expansion area is located in a Prime Agricultural Area. Alternative locations have been considered, however, the avoidance of prime agricultural areas within the subject lands is not possible as the majority of the lands are located on prime agricultural lands. The AIA prepared by Colville Consulting notes that the subject lands are located in the City's Whitebelt area and other alternative locations beyond the Whitebelt are not suitable for expansion. Planning staff generally concur with the Agricultural Impact Assessment and peer review findings. Prime agricultural areas cannot be avoided in most locations in the City's Whitebelt area (i.e., the rural areas of the City not within the Greenbelt Plan).

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

Dillon Consulting Limited's peer review of the Agricultural Impact Assessment Report notes a discrepancy in the MDS calculator for Site #24 (Poultry Operation). The current MDS 1 calculation for the site only includes one two-storey poultry barn. An unoccupied poultry barn was omitted from the MDS calculation. As a result, Dillon noted that MDS calculation revisions are recommended for Site #24 (Poultry Operation), which will increase the identified setback from 220 m to 480 m, reflecting the inclusion of both poultry barns and the removal of the ineligible setback reduction. Relative to the overall size of the Elfrida expansion lands, it is assumed that the above-noted discrepancies could be reconciled through the Secondary Planning exercise should the applications obtain approval. A map illustrating the minimum distance separation adjustment is attached as Appendix N to Report PED25179.

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

Impacts to the agricultural system cannot be avoided within the subject lands. The Agricultural Impact Assessment identified potential impacts to existing agricultural areas, including loss of prime agricultural land, infrastructure, and cropland, as well as

indirect effects like drainage issues, farm disruptions, non-farm traffic, MDS conflicts, hydrogeological concerns, trespassing, and vandalism, are unavoidable.

Mitigation measures have been identified to minimize these impacts. Example mitigation measures include maintaining the use of prime agricultural lands for cultivation until they are needed for development, preparing a grading plan and stormwater management plan, and considering the use of edge planting techniques. The submission did not include a phasing plan or proposal, making it difficult to assess the effectiveness of certain mitigation measures.

The AIA makes reference to a Traffic Impact Study as part of the Secondary Planning process to ensure agricultural related transportation impacts are minimized.

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 urban 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 notes 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.

Overall, given the lack of a phasing plan, it is difficult to assess the impacts on the agricultural system as well as impacts to affordable food options and food security. Planning 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 Elfrida expansion area has a perimeter of approximately 19 km. It is estimated that 7.7 km (or 40.5%) of the proposed expansion area interfaces directly with the existing urban boundary along Trinity Church Road, the existing neighbourhood to the south of Rymal Road East, Swayze Road, and Upper Centennial Parkway; the remaining 11.3 km (59.5%) perimeter along the north, east, south and portions of the west edges with existing agricultural lands. The subject lands are situated along the southeastern periphery of the existing urban boundary, allowing for outward expansion to the east along Trinity Church Road, Swayze Road, Upper Centennial Parkway, and to the south

of Rymal Road. Based on Schedule E of the Hamilton Urban Official Plan, the draft concept plan presented in the Planning & Urban Design Rationale prepared by Bousfields Inc., dated November 2024, outlines a phased progression of development based on the City's planned urban structure.

The Elfrida lands are one of several potential urban area expansion areas located outside of the Greenbelt and outside of the City's current urban boundary. If there was a need and infrastructure planned to accommodate a future settlement area expansion, Elfrida would be one of the candidate areas amongst several options based on previous City planning for the area, being the Elfrida Growth Area Study.

Based on the Urban Hamilton Official Plan (UHOP), the City expects to grow by 236,000, including 110,300 households and 119,000 jobs between 2021 and 2051. The application proposes that the subject lands could support approximately 114,900 people – which is the equivalent of 49% of the City's planned growth. The development proposal represents a significant deviation from the City's current Official Plans, given the size and scale of the development, the Elfrida proposal would undermine the City's ability to achieve its planned intensification targets and overall vision for growth and servicing strategy for same.

Urban and Rural Hamilton Official Plan

Both the Urban and Rural Hamilton Official Plans implement the Council directed firm 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 development 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”, and direction #4 is to “Protect rural areas for a viable rural economy, agricultural resources, environmentally sensitive recreation and the enjoyment of the rural landscape”.

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).

Looking beyond the intrinsic conflict between the applications and the firm urban boundary growth strategy, staff have reviewed the applicant's proposed Official Plan Amendments against both the general objectives and growth management policies of the Urban Hamilton Official Plan and would advise as follows:

- The proposed language identifies six objectives that development of the expansion lands *should* achieve. When compared against the principles and 10 directions established in the Urban Hamilton Official Plan, staff found that the applications do not establish a strong vision and 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, and creating new neighbourhoods within Hamilton that are equitable and inclusive.
- The proposed Official Plan Amendments state that the current Urban Hamilton Official Plan minimum density target (70 people and jobs per hectare) will apply; however, as noted earlier in this report, the Land Needs and Housing Assessment Report submitted is based on 80 people and jobs per hectare and the Financial Impact Analysis and Functional Servicing Report project a much higher density of 135 people and jobs per hectare. This discrepancy impacts the conclusions of the applicant's Land Needs and Housing Assessment, as a planned density of 135 people and jobs per hectare would dramatically reduce the amount of greenfield land required (i.e., for comparison purposes, at 80 people and jobs per hectare, 1,435 hectares of land is required, whereas at 135 people and jobs per hectare, 851 hectares of land is required). There are also implications on the City-wide intensification rate, infrastructure master planning and financial sustainability which are discussed in this report.
- The proposed Official Plan Amendments would not apply the Secondary Plan implementation policies for urban expansion areas set out in Section F.1.2.9 of the Urban Hamilton Official Plan. These policies were approved through Urban Hamilton Official Plan Amendment No. 185, which Council approved as part of the adoption of Secondary Planning Guidelines for Urban Expansion Areas, and which set out specific study and process requirements for Secondary Planning initiated by either the City or private landowners' groups. The proposed Official Plan Amendments identify some of the studies identified under F.1.2.9 to be completed as part of a Secondary Plan; however, other studies are not listed and policies related to enhanced public notification, cost sharing and City approval of a terms of reference for a Secondary Plan before work begins are not carried forward.
- 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.

- An area specific policy has been proposed through the Draft Official Plan Amendments, which were submitted by the applicant (Appendix A and Appendix B), which states that “Development on the lands identified as Area A on Schedule “B” to this amendment should: i. Promote and protect natural heritage features, where they exist”. The use of the term “should” instead of “shall” allows for flexibility, as opposed to requiring any future development application to demonstrate and/or implement a commitment to protecting natural heritage features.
- The proposed Official Plan Amendments do not seek to lower the City’s 80% intensification target; however, as discussed in this report, urbanization of these lands will have a significant impact on the City’s target.

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 the Council directed firm urban boundary growth strategy.

Additional Topic Areas Assessed Relative to Provincial and Municipal Policies

An analysis of the application 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 has submitted a Financial Impact Analysis prepared by Parcel. This analysis concluded that the proposed expansion would have a net financial benefit to the City with an operating surplus of \$27,592,000. The City had the applicant's Fiscal Impact Assessment peer reviewed by Watson & Associates (see Appendix I to Report PED25179). The peer review questioned several assumptions of the Financial Impact Analysis. Most notably, that it did not estimate the long-term operating and replacement costs based on average expected useful life by asset class. The peer review states that "incorporating these costs into the fiscal impact results in a negative overall position, given the magnitude of the work required to service this population/development area".

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 O to Report PED25179 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 Elfrida and White Church 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 Preliminary General Vegetation Inventory for natural areas and MPAC data for agricultural lands. The analysis found an ecological services value of approximately \$1.5 million 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 55% 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 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% 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.

Based on the findings of the City's peer review of the applicant's Land Needs and Housing Assessment Report (see Appendix H to Report PED25179) and additional internal analysis, staff are of the opinion that approval of the proposed expansion would negatively impact the City's ability to meet this target by redirecting planned population growth away from the built-up area to this expansion area. At this time staff cannot provide an estimate on what the city-wide intensification rate would be lowered to, should the urban boundary expansion applications be approved as:

- The applicant has not provided a breakdown of the number of low, medium, and high-density residential dwellings within the proposed expansion area. Staff note that the Draft Framework identified that this information should be included as part of a complete Housing Assessment.

- The applicant has not stated the time horizon in which they propose these lands to be developed.
- The application materials provided list three different density targets for the expansion area; the Draft Official Plan Amendments, which were submitted by the applicant (Appendix A and Appendix B) propose a minimum density of 70 people and jobs per hectare, the Land Needs and Housing Assessment Report considers a density of 80 people and jobs per hectare and the Concept Plan, Financial Impact Analysis and Functional Services Reports identify a full build out of 135 people and jobs per hectare.
- The City-wide intensification rate would also be impacted should other urban boundary expansion applications be approved.

While a specific reduction cannot be determined, it is staff's opinion that the intensification rate would be lowered. The Urban Hamilton Official Plan forecasts Hamilton's population increasing by 236,600 people between 2021 to 2051. A planned density of 135 people and jobs per hectare for the Elfrida lands equates to approximately 114,900 people or just over half the total forecasted population growth. This leaves less than half of the remaining forecasted population growth to 2051 to be directed to both the built-up area through intensification and continued development of the City's existing greenfield areas. Note that this does not account for the City's increased population since 2021 or the impact of other urban boundary expansion applications.

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 additional households through intensification 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 applicant has submitted several preliminary environmental documents, including a General Vegetation Inventory and Tree Management Plan (SLR Consulting), an Opportunities and Constraints Mapping Memorandum (GeoProcess, Palmer Environmental, Stantec), and a Karst Considerations Memorandum (Landtek). These documents outline natural heritage constraints and treed communities in the study area. Although preliminary and subject to change based on further fieldwork, they have informed the current Concept Plan and are planned to support a Phase 1 Subwatershed Study, expected to commence in fall 2025 as part of a future Secondary Plan application.

City staff reviewed these materials alongside the Planning Rationale and Concept Plan (Bousfields) against the Rural Hamilton Official Plan (RHOP) Natural Heritage System (NHS) mapping. Core Areas are identified within the subject lands in the RHOP, including Significant Woodlands, Wetlands (Provincially Significant, Non-Provincially Significant, and unevaluated), and watercourses. However, the RHOP mapping is intended to be flexible to recognize the dynamic nature of area boundaries and ecological community composition and does not capture all Core Areas—such as significant wildlife habitat and significant habitat for threatened and endangered species. The City’s Official Plan policies (RHOP C.2.2.5; UHOP C.2.2.4) recognize that natural heritage policies apply even where features are not mapped on Schedules B (Natural Heritage System) and B-1 to B-8 (Detailed Natural Heritage Features), but that the feature has been identified based on studies undertaken by the City (e.g., as part of the Environmental Assessment process) or a property owner (e.g., in support of a development application).

As part of a development application, NHS mapping is refined, where applicable, based on field inventories and studies. Typically, this involves an Environmental Impact Statement (EIS) or Subwatershed Study that inventories and characterizes the existing natural features and their ecological functions and thereafter informs concept planning. The constraints information submitted with the applications has not assessed the potential impacts to the NHS resulting from the proposed urban boundary expansion. The applicant has identified a preliminary NHS in their Concept Plan, and as previously noted the proposed Official Plan Amendment language identifies that further studies will be required. However, as further surveys are scheduled for Fall 2025, it is clear that this mapping may not reflect existing site conditions. Additionally, while the applicant intends to complete a Subwatershed Study and Karst Assessment during the Secondary Planning phase, Natural Heritage staff do not support this approach as delaying these assessments prevents early integration of aspirational goals, such as alignment with the City’s Climate Change Action Plan, Biodiversity Action Plan, and Urban Forest Strategy.

Growth Management staff note that the submission lacks sufficient detail from a stormwater perspective to determine the feasibility of the concept plan, because a Phase 1 Subwatershed Study has not yet been completed. As a result, the natural features and open space, areas supporting species at risk and their habitat, and evidence demonstrating no negative impacts on the ecological features and functions of Core Areas have not been clearly identified by the applicant. Based on the information submitted, the application does not demonstrate protection of the Natural Heritage System from the potential impacts of development. In addition:

- Section 4.1.3 of the Provincial Planning Statement (PPS) requires identification of NHS in Ecoregions 6E and 7E (which includes the subject lands), and Section 4.1.2 states that “the long-term ecological function and biodiversity of natural heritage systems should be maintained, restored or, where possible, improved”. Additional policies in Section 4.1.4 to 4.1.5 identify prohibitions against development where specific features exist, and negative impacts cannot be prevented, which clarifies the importance of the initial identification process.

- RHOP and UHOP policy directs that Core Areas be preserved and enhanced and prohibits development or site alteration within or adjacent to them, if it will negatively impact their environmental features or ecological functions (RHOP policy C.2.3.3, UHOP policy C.2.3).
- The City's Draft Framework for Evaluating Urban Boundary Expansion Applications includes considerations for natural hazards, natural heritage, water resources, and climate change (Appendix O to Report PED25179). Given the nature of the materials provided, staff found them insufficient to address these criteria.

The submitted materials do not satisfactorily demonstrate the long-term protection of the NHS 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.). Provincial Planning Statement Policy 3.5 states that municipalities shall protect the long-term viability of existing or planned industrial, manufacturing, and other major facilities that are vulnerable to encouragement by ensuring that planning and development of proposed adjacent sensitive land uses is only permitted if potential negative impacts are minimized and mitigated.

Within the Urban Hamilton Official Plan, the City has specific policies to avoid sensitive land uses from being near the Hamilton International Airport (C.4.8) which seek to protect the airport's status as a 24/7 unrestricted airport by prohibiting new sensitive land uses within 28+ Noise Exposure Forecast Contours. The Provincial Planning Statement prohibits sensitive land uses above 30+ Noise Exposure Forecast Contours.

The Urban Hamilton Official Plan also has policies (B.3.6.1) respecting development and redevelopment near landfills which require the completion of a landfill impact assessment as part of the development review process.

5.1 Noise Impact Study

In support of the applications a Noise Impact Study titled "Proposed Official Plan Amendment to Noise Related Policies" prepared by HGC Noise Vibration Acoustics was submitted. The Study assessed noise impacts to the Elfrida lands from both highways and the Hamilton International Airport. With respect to overhead noise from airplanes, the study concluded that none of the subject lands are located above the Noise Exposure Forecast 28+ contour found within the Urban and Rural Hamilton Official Plans. The report also stated that none of the Elfrida lands are located above the 28+ Noise Exposure Forecast contours included in the recently approved 2023-2043 Airport Master Plan. The study included recommendations on both warning clauses and the design of future dwellings within the expansion area with respect to aircraft noise.

Staff have reviewed the Noise Impact Study and generally agree with its conclusions, noting that should the expansion be approved future noise impact studies and mitigation measures will need to be implemented. The Hamilton International Airport has also reviewed the Noise Impact Study and commented that they have no objection as long as existing processes are maintained in regard to building heights within the Airport's flight corridors and that they continue to be consulted on the planning of these lands.

5.2 Odour Impact Study

With respect to odour, a Land Use Compatibility and Preliminary Air Quality and Odour Impact Study prepared by SLR Consulting (Canada) Ltd was submitted as part of the expansion applications to address its proximity to the GFL Stoney Creek Regional Facility landfill site located at the northwest corner of Mud Street and Upper Centennial Parkway. The study concluded that based on the monitoring completed to date, residential uses are suitable for the subject lands. To address the potential for future complaints, the study recommends using both warning clauses and incorporating building elements (e.g. MERV rated filters) for residential dwellings proposed within 500 metres of the landfill.

Staff had the applicant's Land Use Compatibility and Preliminary Air Quality and Odour Impact Study peer reviewed by EXP Services Inc. (attached as Appendix J to Report PED25179). Overall, the peer review concluded that there is insufficient information provided to determine whether the proposed expansion is compatible with the landfill, including the need to:

- Conduct additional study once more details of the project are known.
- Updating the study with respect to CLC complaint history.
- Updating the report with respect to available data on the Hamilton Air Monitoring Network.
- Provide comment on the status of the MECP order and the likelihood of continued operations in compliance with the Environmental Compliance Approval and Design and Operations Report

Staff note that while a more detailed land use plan would be determined through the Secondary Planning process, the applicant's Concept Plan identified residential uses as being within 500 metres of the landfill. Based on the conclusions of the peer review, staff are not satisfied that the proposed expansion is consistent with the land use compatibility policies of the Provincial Planning Statement and City Official Plans.

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 K to Report PED25179). 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.

The peer review concludes that the Phase 1 Energy and Climate Change Assessment Report falls short of fulfilling the expectations of the criteria outlined in the Draft Framework. The peer reviewer notes that the report does not present detailed quantitative modelling or committed implementation pathways, limiting the robustness of its scenario analyses and long-term projections. Moreover, in terms of providing an effective high-level framework that aligns conceptually with Hamilton's energy transition, climate adaptation and mitigation objectives, as articulated through the Community Energy and Emissions Plan (CEEP) and Climate Change Impact Adaptation Plan (CCIAP), the report lacks any ability to plan for how the proposed boundary expansion will impact the City of Hamilton's ability to achieve carbon neutrality and does not fully meet the City's current procedural requirements for this stage. In effect, the ECCA would leave a significant gap moving into Secondary Planning, as related to Energy and Climate Change.

Office of Climate Change Initiatives staff provided comments on whether strong enough commitments had been made by the proponent to demonstrate how adverse impacts will be mitigated. 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 on what the magnitude of the impact might be. These fundamental pieces must be present in the Phase 1 assessment when consideration is being given to whether an urban boundary expansion is appropriate or not, and that modelling at this Phase is much more critical given the magnitude of the proposed urban boundary expansion and the related potential for significant impacts on Hamilton's greenhouse gas emissions profile.

Growth Management staff also assessed the applications against the City's Draft Framework for Evaluating Urban Boundary Expansion Applications, which includes considerations for climate change (Appendix O to Report PED25179). It was noted that the ECCA Report does not identify specific risks associated with climate change,

proposes limited and non-specific measures to mitigate against the impacts of a changing climate, does not discuss how the location of the expansion area impacts reliance on private automobiles, does not incorporate any of the energy efficient and environmental design development criteria under UHOP policy B.3.7.2., and has not provided sufficient information to address:

- Whether the expansion area supports the maintenance and enhancement of the tree canopy.
- Whether the existing stormwater management system has sufficient capacity to manage potential changes in weather patterns and increased climate variability.
- Whether the proposed stormwater management system will provide resilience and consider climate change adaptability (i.e., the Functional Servicing Report provides no commentary or plans to this effect).
- Whether the proposed stormwater management considers Low Impact Development Best Management Practices (i.e., the Functional Servicing Report considers but does not provide any details around the suitability of the subject lands to support Low Impact Development).
- Whether other green infrastructure measures will be incorporated (e.g. rain/green streets, sponge parks, etc.).

Additionally, 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 aggravates 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 approximately 91% of the study area exhibits archaeological potential. These resources are afforded protection under Section 2(d) of the *Planning Act* and Section 4.6. of the PPS. 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, including the need for a Cultural Heritage Impact Assessment (see Appendix F to Report PED25179 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 summarized in their full comments (see Appendix F to Report PED25179 for a summary of Urban Design comments). The plan will 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 UHOP policies.

Chronic Disease Prevention staff also provided high level comments related to urban design, which noted significant concerns about the proposal lacking clear plans for how the proposed mix of land uses will be functionally connected through complete street design, active transportation networks, and transit integration. They noted that, based on the concept plan submitted, much of the proposed residential land is located too far from commercial and mixed-use nodes to be considered walkable, and that the lands are relatively isolated and surrounded by car-dependent neighbourhoods, which is likely to reduce the viability of transit and active transportation. While, the applicant can make adjustments at the Secondary Planning stage, the applications raise concerns relative to addressing energy conservation and climate change as well as healthy communities.

Relationship of these Applications to the White Church Urban Boundary Expansion Applications (UHOPA-25-004/RHOPA-25-005)

The implications of these applications, if approved, could be magnified or compounded by the concurrent approval of the White Church urban boundary expansion applications, particularly in relation to loss of agricultural land, impacts on natural heritage, impacts on residential intensification, the financial sustainability of the development to the City, and climate change impacts. Normally these factors would be considered through a municipal comprehensive review or City led Official Plan planning process review if expansions are 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 earmarking 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
 - 1.2
 - 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 foot, 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 applications. 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 130 comments or questions were received regarding the Elfrida applications. The applicant also hosted a virtual open house on April 15, 2025.

The top concerns identified through public feedback include:

- Infrastructure Needs
- Impacts to Agricultural Land
- Built Form and Density Objectives
- Fiscal Impact to City
- 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 PED25179.

Indigenous Consultation

City staff sent the applications to and invited comments from indigenous communities.

Staff had discussions with Mississaugas of the Credit First Nation and Six Nations of the Grand River Elected Council, and the applicant also discussed the application with these communities.

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

Previous Reports Submitted

- 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 – Elfrida Urban Boundary Expansion Application Public Engagement Summary Report
- Appendix F – Consultation Summary – Departments and Agencies
- Appendix G – Agricultural Impact Assessment Peer Review
- Appendix H – Land Needs and Housing Assessment Report Peer Review
- Appendix I – Fiscal Impact Assessment Peer Review
- Appendix J – Land Use Compatibility and Preliminary Air Quality and Odour Impact Study Peer Review
- Appendix K – Energy and Climate Change Assessment Peer Review
- Appendix L – Elfrida Urban Boundary Expansion Policy Background
- Appendix M – Comparison of the Urban Hamilton Official Plan and Ministry of Finance Population Forecasts
- Appendix N – Minimum Distance Separation Adjustment Map
- Appendix O – Elfrida Urban Boundary Expansion Draft Framework Assessment

Prepared by: Dave Heyworth, Director and Senior Advisor -
Strategic Growth Initiatives, Planning and
Economic Development

**Submitted and
recommended by:** Steve Robichaud, Acting General Manager/Chief Planner
and Director of Planning, Planning and Economic
Development