



August 25, 2026

Mayor Andrea Horwath and Members of Hamilton City Council
City of Hamilton
71 Main Street West
Hamilton, ON
L8P 4Y5

Dear Mayor Horwath and Members of Council:

Re: Ontario Land Tribunal Decision – White Church and Elfrida Lands

On behalf of the Hamilton-Wentworth Federation of Agriculture (HWFA), representing more than 550 farm families who live and work in the City of Hamilton, and the Ontario Federation of Agriculture representing more than 38,000 farm families across the province of Ontario we are writing following the recent Ontario Land Tribunal (OLT) decision regarding the White Church, Elfrida and Twenty Road lands.

We are deeply disappointed by the Tribunal's decision to expand Hamilton's urban boundary. We recognize and appreciate that Hamilton City Council has repeatedly supported maintaining its existing urban boundary and, most recently, rejected the White Church and Elfrida expansion applications. City staff recommended denying both applications in 2025, in part because of their impact on agricultural land and the significant additional infrastructure that would be required.

As HWFA emphasized in our June 2025 submission, the lands at risk are not simply vacant or undeveloped land waiting for another use. They include some of the most productive farmland in the country, comprised predominantly of Class 1 to 3 soils and considered prime agricultural land. Once these lands are converted to urban development, their agricultural productive capacity is permanently lost. The municipality 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 supports the protection of prime agricultural areas for long-term agricultural use.

The approximately 2,987 acres identified in Elfrida are almost exclusively high-quality prime agricultural farmland, while the approximately 899 acres identified in White Church also include significant high-quality agricultural and rural lands. Based on their productive capacity, these lands have the potential each year to produce the equivalent of 5.3 million loaves of bread, 1.15 million litres of ethanol, 12.8 million litres of soy milk, and enough hay to feed 83,800 cows for a day.

Those numbers help put into perspective what is at stake. Farmland is infrastructure in its own right. It is the foundation of our food system, supports farm families and agri-food businesses, contributes to Ontario's economy, and provides environmental benefits including water management, carbon storage and wildlife habitat. Hamilton's agricultural sector is particularly significant: within the city limits there are more than 118,000 acres of farmland and nearly 3,000 agri-food businesses, supporting more than 26,000 jobs and contributing approximately \$580 million to Ontario's GDP.

We fully recognize the real need for additional housing in Hamilton. Protecting farmland is not about opposing growth or housing. It is about ensuring that growth occurs in the right places and that an irreplaceable, finite resource is not sacrificed when other opportunities for accommodating growth remain available. 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.

The OLT decision is particularly concerning because Hamilton has demonstrated that intensification can play a significant role in accommodating growth within the existing urban boundary. The recent reporting notes that while developers characterized Hamilton's 80 per cent intensification target as aspirational, a late-2024 report showed the City had already met and exceeded that target in 2023. This reinforces our long-standing position that every reasonable opportunity to grow up and in, before growing out, should be exhausted before prime agricultural land is permanently removed from production.

We are also troubled by the precedent this decision may set for agricultural communities in Hamilton and across Ontario. The Tribunal concluded that prioritizing local policies such as farmland preservation in refusing the expansion would be inconsistent with the Provincial Planning Statement, 2024. For farmers, municipalities and organizations working to preserve Ontario's limited agricultural land base, this is deeply concerning.

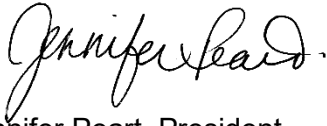
Ontario has a finite supply of prime agricultural land. Less than five per cent of the province's land base is suitable for agricultural production, and the pressures on that land continue to grow. Decisions made today about where and how our communities expand will determine whether future generations retain the capacity to produce food close to home.

HWFA therefore encourages Hamilton City Council to continue using every planning and policy tool available to protect the City's remaining agricultural land and to make farmland preservation a central consideration as the City responds to and implements the OLT decision. We also encourage the City to continue advocating to the Province for a planning framework that recognizes prime agricultural land not simply as land available for future development, but as a strategic provincial resource fundamental to food security, economic resilience and the long-term sustainability of Ontario.

Hamilton can and must accommodate growth. But growth should not come at the unnecessary and irreversible expense of some of Canada's best farmland.

HWFA appreciates Council's continued commitment to this issue and stands ready to work alongside the City to advocate for responsible growth that protects Hamilton's agricultural land base, its farm families and its capacity to produce food for generations to come.

Sincerely,



Jennifer Peart, President
Hamilton-Wentworth Federation of Agriculture



Drew Spoelstra, President
Ontario Federation of Agriculture

cc: MPP Donna Skelly, Flamborough-Glanbrook
MPP Monica Ciriello, Hamilton Mountain
Minister Rob Flack, Minister of Municipal Affair and Housing
Matthew Trennum, City Clerk, City of Hamilton
Charlie Toman Program Lead, Policy Planning & MCR, City Of Hamilton
Hamilton-Wentworth Federation of Agriculture Board of Directors
Ontario Federation of Agriculture Board of Directors