



October 3, 2025

From:
West End Home Builders' Association
1112 Rymal Road East
Hamilton, Ontario L8W 3N7

To:
Members of Committee of the Whole
City of Burlington, 426 Brant St
Burlington, ON L7R 3Z6

WE HBA Letter: Burlington Residential Zones – October 2025

The West End Home Builders' Association ("WE HBA") is the voice of the land development, new housing and professional renovation industries in Hamilton, Burlington, and Grimsby. WE HBA represents 300 member companies made up of all disciplines involved in land development and residential construction. In the Hamilton CMA in 2023, residential construction contributed over \$4.6 billion in investment value and provided over 21,000 jobs paying about \$1.6 billion in wages¹.

WE HBA appreciates the City bringing forward draft new Residential Zoning-Bylaw as part of the New Zoning By-law Project ("NZBP"). WE HBA and our membership have participated throughout the consultation on this project and have been pleased to provide the City with comments to inform the development of the first Phase of the By-law. WE HBA is supportive of the work to facilitate more streamlined processes and increasing housing options.

WE HBA is broadly supportive of the document brought forward today, as a clear, easy-to-read document that provides flexibility through built-in variability in zoning regulations, the removal of regulations related to Floor Area Ratio or Floor Space index and the use of form-based regulations. WE HBA has several outstanding comments that we wish for Committee and staff to consider moving forward as the City targets adoption of the zones in December of this year.

Please see below for comments:

- It is our understanding that the LN8 Zone is intended to encompass all residential typologies below high-density residential, with buildings above four storeys covered by the High-Rise Neighbourhood Residential Provisions within the HN zone. WE HBA requests the City consider a Mid-Rise Neighbourhood Residential zone to include options for a Zone that is specific to mid-rise housing typologies.
- WE HBA does not support the use of angular planes to mitigate perceived impacts related to shadow and privacy. Angular planes severely reduce the viability of density on many sites, drive up construction costs, reduce building layout efficiency, lead to poor urban design outcomes, and are not necessary to mitigate the aforementioned impacts. WE HBA encourages the City to consider the use of a single stepback above a certain height as an alternative to angular planes
- It has been the position of WE HBA that the private market is well-positioned to determine the minimum level of parking that is necessary for residents. WE HBA understands that the City has recently introduced a City-wide On-Street Residential

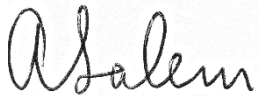
¹ CHBA Economic Impacts 2024 Fact Sheet, Hamilton CMA.

Parking Permit. On-street parking reduces the need for on-site parking and should be taken into consideration when determining the level of mandated parking within the By-law.

- It is the position of WE HBA that triplexes and fourplexes are functionally the same in form as units with two and three Additional Residential Units, as it is not necessary for ARUs to be secondary to a “primary” unit. Thus, triplexes and fourplexes should be permitted within all Residential areas of the City as an option for gentle density within all neighbourhoods. WE HBA understands that OPA 3 permitted four units as-of-right, and therefore purpose-built triplexes and fourplexes, through zoning, should not be limited to major streets.
- WE HBA requests clarification between the definition of a “Multiplex” and an “Apartment Building”. Buildings containing five or more units, but are similar in form to triplexes or fourplexes (such as six- and eight-plexes), may have common accesses, stairwells, and amenities. However, they may be considered a more compatible typology within existing neighbourhoods than apartments but may be classified as such. Therefore, clearly delineating the definitions may be helpful to expand options for multiplexes in more areas than apartments.
- WE HBA appreciates the inclusion of varying levels of “EV readiness” through definitions related to Electric Vehicle Ready Parking Spaces and Electric Vehicle Capable Parking Spaces. WE HBA requests that the City confirm with Burlington Hydro that Electric Vehicle Capable Parking Spaces do not require buildings to be designed to handle the load required by those spaces being electrified in the future.

WE HBA appreciates the opportunity to comment on the proposed Residential Zones and looks forward to future discussions over the coming months prior to the adoption of the zones in December of this year.

Sincerely,



Anthony Salemi, BURPI

Planner, Policy and Government Relations
West End Home Builders' Association