



November 13, 2025

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

To:
Members of Planning Committee
City of Hamilton, 71 Main Street West
Hamilton, Ontario L8P 1P9

WE HBA Letter: Hamilton Comprehensive Neighbourhood Plans Review

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 2024, residential construction contributed over \$4.6 billion in investment value and provided over 21,000 jobs paying about \$1.6 billion in wages¹. These figures are in decline as the condo market experiences its worst downturn in the past thirty years.

WE HBA appreciates report PED25248 – Comprehensive Neighbourhood Plans Review coming forward to Planning Committee to seek direction on draft criteria that will inform a review of Hamilton's 90 Neighbourhood Plans. As noted in the report, Hamilton's various Neighbourhood Plans range in age from approximately 30-60 years and have not been comprehensively reviewed for alignment and relevancy in the 21st century. In our opinion, ALL these Neighbourhood Plans are outdated, since they are based on old demographic data and were intended to address social and planning issues that applied when they were originally created.

These plans represent a significant barrier to missing middle housing development in existing neighbourhoods, as policies that were implemented from the 1960's to 1990's no longer reflect today's planning context in Hamilton which was brought forward through significant public consultation, and are currently being interpreted by staff as not permissive of already-mandated housing forms where Provincial direction applies. Furthermore, the neighbourhood plans have never been truly publicly accessible documents as they exist in the City's archives and are not publicly available on the City's website. Meaning these neighbourhood plans are hard to find for seasoned professionals and therefore even more obscure for the general public. These plans are an unnecessary barrier to modern development typologies, and not as a vision towards a future state.

WE HBA is of the opinion that these Neighbourhood Plans add an unnecessary level of policy that **complicate the development process and should be repealed**. Neighbourhood Plans do not form part of the Official Plan, are not statutorily required policy documents, and form a tertiary level of policy, thus creating duplication and a further level of review. Secondary Plans provide the same neighbourhood-level, specific policy language; therefore, Neighbourhood Plans are redundant. **WE HBA is supportive of Alternative 3 as an option that will reduce staff effort and streamline process.**

¹ CHBA Economic Impacts 2024 Fact Sheet, Hamilton CMA.



Should Committee approve the staff recommendation, WE HBA requests that the industry be consulted through the City Builders forum and that WE HBA and our members be invited to participate in other stakeholder consultation. Additionally, WE HBA requests that further criteria be developed to examine the Neighbourhood Plans with a housing-focused lens (i.e. does the Neighbourhood Plan support the creation of housing supply...).

WE HBA looks forward to further conversations that will increase housing supply, support well-paying jobs in the housing sector and address the housing crisis. WE HBA strongly believes that the City needs to ensure the land use policy framework is consistent with provincial policy in having a stronger focus towards expanded permissions and greater flexibility for a broader range of housing opportunities throughout the City of Hamilton.

Sincerely,

Mike Collins-Williams, MCIP, RPP
Chief Executive Officer
West End Home Builders' Association