



March 24, 2026

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

To:  
**Mayor and Members of Planning Committee**  
City of Hamilton, 71 Main Street West  
Hamilton, Ontario L8P 4Y5

### **WE HBA Letter: Official Plan Amendments for Major Transit Station Areas and Protected Major Transit Station Areas - PED23105(a)**

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On behalf of the West End Home Builders' Association (WE HBA), we appreciate the opportunity to provide comments on Report PED23105(a) regarding the proposed Official Plan Amendments for Major Transit Station Areas (MTSAs) and Protected Major Transit Station Areas (PMTSAs).

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 wages<sup>1</sup>. WE HBA notes that these economic indicators are in rapid decline. As such, we appreciate the City's ongoing willingness to work together with our association to align policy with better housing outcomes.

WE HBA strongly supports intensification along major transit corridors. Concentrating growth near higher-order transit optimizes infrastructure costs, improves project viability, supports housing attainability, and creates complete communities where residents can access jobs, services, and amenities. Aligning land use with transit investment also ensures that public infrastructure is fully utilized while helping municipalities meet provincial density targets.

As such, we would like to express our general support for the recommendations in PED23105(a). We are hopeful it represents a step toward achieving more complete, connected, and sustainable communities. In particular, we are supportive of the revisions to boundaries to increase development opportunities. This makes better use of the land and will help enable increased redevelopment opportunities.

While we are supportive of this overall direction, we would like to flag our concerns with Inclusionary Zoning (IZ). We respectfully recognize that PMTSAs create the framework

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<sup>1</sup> CHBA Economic Impacts 2023 Fact Sheet, City of Hamilton.



for IZ. However, it will be critical to ensure that IZ requirements are calibrated carefully to avoid undermining project viability, particularly in emerging or transitioning market areas. The province has recognized that IZ is a complex, market sensitive tool and has made regulatory amendments to Ontario Regulation 232/18 to pause implementation until July 2027. WE HBA has consistently cautioned that IZ must be treated as a partnership model (which would require municipalities to provide meaningful funding support), not a mechanism to download municipal housing policy costs onto the next generation of home buyers.

Further, given the evolving nature of market conditions and construction costs, we encourage the City to establish a monitoring framework to track development uptake within MTSAs and revisit policies as needed to ensure targets remain achievable.

In closing, the West End Home Builders' Association supports the City's efforts to advance transit-oriented growth and meet provincial requirements. We believe the proposed Official Plan Amendments provide a strong foundation for intensification. We look forward to continued collaboration with the City of Hamilton as this work advances through consultation and implementation.

Thank you for your consideration.

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