



April 13, 2026

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 L8P 4Y5

WE HBA Letter: Report PED26038 (Fee and Process Review for Formal Consultation and Holding Removal Applications)

Dear Mayor and Members of Planning Committee,

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 320 member companies made up of all disciplines involved in land development and residential construction. In the City of Hamilton in 2024, residential construction contributed over \$3.1 billion in investment value and provided nearly 14,000 jobs paying about \$1.1 billion in wages¹. WE HBA notes that these economic indicators are in rapid decline as housing starts continue to drop.

WE HBA would like to thank staff for the work undertaken in preparing Report PED26038 and for the continued engagement with the development industry throughout this review process. We are generally supportive of the direction outlined in the report. We appreciate the City's efforts to reduce Formal Consultation fees, streamline processes, and improve timelines. In particular, the commitment to issuing Formal Consultation documents within five business days following Development Review Team meetings represents a welcome improvement that will enhance predictability and efficiency for applicants.

While the proposed fee reductions are appreciated, WE HBA would encourage the City to strengthen incentives for participation in the Formal Consultation process. Specifically, we recommend that the cost of Formal Consultation be applied as a rebate or credit toward subsequent application fees. This approach would go further to encourage early engagement, improve submission quality, and reap the benefits of collaborative pre-application review.

Lastly, with regards to the proposed resubmission fee structure for Holding Removal (Standard) applications of 25% of the application fee charged for each resubmission we respectfully request that some transitional flexibility be considered as the industry adapts to these new expectations and processes. Specifically, we recommend the implementation of a six-month transition period following adoption of the new fee schedule, during which applicants would receive warnings or guidance in place of resubmission fees; and staff could work collaboratively with applicants to reinforce expectations for complete submissions under the updated framework.

¹ CHBA Economic Impacts 2023 Fact Sheet, City of Hamilton.



This transitional approach would support the successful implementation of the new system, and reduce the risk of unintended financial impacts during the adjustment period.

Lastly, in addition to the proposed transition period, consideration could also be given to aligning the process and cost of resubmissions for Holding Removal applications (both Standard and Site Plan) with the existing Site Plan resubmission framework. Under the current Site Plan process, a resubmission fee is only introduced at the third resubmission, which provides applicants with an opportunity to address initial comments and refine submissions without immediate financial implications. Aligning these approaches would help promote consistency across application types and support a collaborative and efficient development review process.

WE HBA is encouraged by the City's efforts to improve service delivery and foster a collaborative and efficient development review process. We believe the proposed changes represent a positive step forward and, with the addition of the recommendations outlined above, will further support both industry participation and successful implementation. WE HBA looks forward to continuing to work collaboratively with Council and staff to advance shared objectives, including increasing housing supply and improving the overall development approvals process.

Thank you for the opportunity to provide comments.

Sincerely,

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