



May 3, 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
Hamilton, Ontario L8P 4Y5

WE HBA Letter: PED25248(a) – Comprehensive Neighbourhood Plans Review – Status Update

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. WE HBA notes that these economic indicators are in rapid decline and that the Missing Middle Institute has noted that the decline in housing starts, compared to the previous four-year average, is estimated to have reduced the number of jobs in Hamilton by 1,921².

WE HBA appreciates the additional work undertaken by staff to advance a communication and engagement strategy and to improve transparency by making Neighbourhood Plans more accessible to Council and the public. Increasing awareness and accessibility is a positive step, particularly given that these documents have historically been difficult to locate and understand.

However, while the report focuses on public engagement and the development of evaluation criteria, it does not address the fundamental issues associated with Neighbourhood Plans that were identified in our letter to Planning Committee on November 14, 2025.

WE HBA reiterates its position that Neighbourhood Plans do not form part of the Official Plan and are not statutorily required. They represent a duplicative and tertiary layer of policy. Secondary Plans already provide appropriate guidance. Neighbourhood Plans introduce an additional and unnecessary layer of policy review that complicates approvals, creates uncertainty, and delays much-needed housing supply.

With regards to the public engagement and communications plan, WE HBA has concerns that a broad public engagement process introduces the risk that subjective considerations, such as perceived "neighbourhood character," may outweigh objective policy alignment and housing need. Without a clear and housing-focused framework, there is a risk that outdated plans will be retained with minor modifications rather than meaningfully modernized or repealed.

Given this, WE HBA strongly recommends that the evaluation criteria prioritize alignment with Provincial policy, the Urban Hamilton Official Plan, and recently approved Low Density

¹ CHBA Economic Impacts 2024 Fact Sheet, City of Hamilton.

² Missing Middle Institute: 2025 GTA and GGH Final Housing Report Card, April 2026



Residential zoning. The criteria should explicitly assess whether Neighbourhood Plans support or constrain housing supply, including missing middle and gentle density forms, and should support the removal of policies that limit as-of-right residential development. WE HBA is concerned that additional and unnecessary layers of planning documents and policies will frustrate intensification efforts and work at cross purposes with the Official Plan and the Provincial Planning Statement. Importantly, the City should establish a transparent weighting framework that prioritizes housing delivery and policy alignment over subjective considerations such as neighbourhood character.

WE HBA also requests that the development industry be actively engaged throughout the consultation process, including through the City Builders forum and other targeted stakeholder sessions, to ensure that the evaluation framework reflects practical, on-the-ground considerations related to housing delivery.

Hamilton is facing an urgent and ongoing housing supply challenge. It is critical that the City's land use planning framework be modernized in a timely manner to reflect current policy direction and enable a broader range of housing opportunities across all neighbourhoods. This review represents a key opportunity to remove outdated barriers, streamline processes and improve the efficiency and effectiveness of the planning system.

WE HBA looks forward to continued collaboration with staff and Council on this important initiative.

Sincerely,

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