



May 22, 2026

From:

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

To: **Members of Public Works Committee,  
City of Hamilton**  
71 Main Street West  
Hamilton, Ontario L8P 4Y5

**WE HBA Letter: Report PW26052 – Updates to the City of Hamilton Waste Requirements for Design of New Developments and Collection**

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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 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 1,921<sup>2</sup>.

WE HBA appreciates the City's efforts to modernize the waste design framework in response to evolving development patterns, intensification objectives, and operational realities. In particular, we recognize that staff have attempted to address longstanding concerns associated with the servicing of compact urban developments and small infill projects.

WE HBA appreciates the inclusion of language within the proposed Waste Design Requirements that recognizes the need for reasonable flexibility where strict application of the standards may conflict with broader City objectives such as intensification, urban design, heritage conservation, or existing neighbourhood context. We support the intent of this provision and acknowledge that a one-size-fits-all approach is not appropriate for all development scenarios, particularly on constrained urban infill sites. However, we would appreciate additional clarity regarding how this flexibility will be implemented in practice and how City staff will be empowered to exercise professional judgment on a consistent and practical basis.

In particular, we encourage the City to ensure that staff are able to consider context, functionality, and overall planning merit when evaluating waste servicing proposals, rather than applying technical standards in an overly rigid manner where a safe, workable, and reasonable solution can still be achieved. Providing clearer guidance around the application of discretion and equivalency-based review would help improve predictability, reduce unnecessary redesigns, and better support the City's broader housing and intensification objectives.

Overall, WE HBA appreciates staff's work in advancing a more modern and flexible waste servicing framework and believes the proposed direction represents a meaningful improvement

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<sup>1</sup> CHBA Economic Impacts 2024 Fact Sheet, City of Hamilton.

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



over the existing standards. We appreciate the effort the City undertook in its stakeholder engagement exercises. We believe the updated framework can better support housing supply, intensification, and efficient municipal servicing while continuing to maintain appropriate operational and safety standards.

The introduction of additional flexibility for turnaround areas on private roads appears to be a positive and practical improvement. In particular, permitting parking spaces or driveways adjacent to turnaround areas has the potential to reduce unnecessary land consumption and improve site efficiency, especially on constrained urban infill sites. These types of changes better align servicing requirements with contemporary urban design and intensification objectives.

That said, it appears the proposed framework still limits developments to only one turnaround area per site, which could significantly reduce the practical benefit of the added flexibility on larger or more complex developments. We would encourage the City to further review whether additional flexibility could be provided where multiple turnaround areas are operationally appropriate.

We also remain concerned about the continued requirement for mirrors at “constrained sightlines.” In our experience, these requirements can become excessive and disconnected from actual safety outcomes. For example, a development was required to install both a mirror and flashing light because a sidewalk crossed a loading space. Requirements of this nature can add unnecessary cost and visual clutter without meaningfully improving functionality or safety, particularly where site conditions are already being appropriately managed through design.

The proposed changes respecting Waste Set-Out Areas include some positive improvements, particularly the flexibility to permit grassed set-out areas instead of requiring concrete pads. This is a practical change that can reduce unnecessary hardscaping, improve site design flexibility, and better support urban landscaping objectives.

However, we remain concerned with the continued requirement that waste set-out areas be located on private property. This approach does not appear to be consistent with the way waste collection functions for traditional freehold dwellings along public roads, where set-out locations are routinely placed without rigid delineation between public and private property. In practice, it is unlikely that residents, collection staff, or by-law enforcement will be able to distinguish precisely where private property ends and public property begins in many multi-plex or townhouse developments. As a result, the requirement may prove difficult or impossible to enforce consistently.

More importantly, the policy creates an unnecessary distinction between multi-plex developments and conventional freehold housing forms that function in substantially the same manner from a waste collection perspective. We would encourage the City to reconsider this requirement and provide additional flexibility to permit waste set-out areas on public property where operationally appropriate and safely accessible.

With respect to Waste Storage Areas, we are disappointed to see the continued application of the maximum 100 metre round-trip distance requirement. In practice, this standard can become overly rigid as site designs evolve through the review process.



For example, a member was involved in a development application where the original site layout met the distance requirement for municipal collection. However, after revisions requested through the Urban Design review process, the project no longer complied and became ineligible for municipal collection. This highlights the need for greater flexibility and better coordination between departments when applying these requirements, especially where City-requested design changes create the issue.

With respect to In-Ground Containers, the current requirements may still create challenges for Class B Multi-Residential Townhouse developments seeking to utilize municipal collection. For example, a development using in-ground containers may still be forced to rely on private collection if the site cannot satisfy the 100-metre round-trip distance requirement or if multiple loading spaces are needed to make the layout function efficiently.

As previously mentioned, it is our understanding ~~is~~ that the current Guidelines permit only one turnaround area per development, which can further limit design flexibility on larger or more complex sites. In addition, while crane collection systems for in-ground containers are commonly used and operationally suitable in many jurisdictions, the City does not currently recognize crane collection as an alternative to front-loading collection.

We would encourage the City to clarify the turnaround requirements, consider permitting more than one turnaround area where appropriate, and review whether alternative collection methods such as crane collection could be accommodated within the Guidelines.

Additionally, WE HBA strongly supports the introduction of garbage cart collection for smaller multi-residential buildings and townhouse developments containing between six and 30 units. This is an important modernization of the City's servicing framework that recognizes the realities of missing-middle housing forms and smaller urban redevelopment sites. The previous requirement to accommodate full front-end loading operations often imposed disproportionate site design and cost burdens on projects that otherwise function similarly to low-rise residential developments.

Finally, we appreciate the City's efforts to provide clearer technical guidance through updated diagrams, definitions, classifications, and collection tables. Increased clarity and predictability in the development review process benefits both applicants and staff and can help reduce redesigns and approval delays.

Thank you for your consideration of these comments. We would welcome continued dialogue with staff and Council as the updated Waste Design Requirements are finalized and implemented.

Sincerely,

Amanda Stringer  
Manager of Government Relations  
West End Home Builders' Association