



June 15, 2026

From:

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To: **Planning Committee, City of Hamilton**
71 Main Street West
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WE HBA Letter: PED26093 Official Plan Review Program

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.

At the outset, we would like to commend staff for bringing forward a comprehensive work program and for recognizing the need to modernize and simplify Hamilton's planning framework. We are particularly encouraged by staff's acknowledgement that the current dual-official-plan structure has become increasingly complex and that a future single city-wide Official Plan would create a more user-friendly, efficient, and understandable planning framework for residents, businesses, City staff, and applicants alike.

We also appreciate staff's recognition that the Province's evolving policy framework has significantly altered the context within which Hamilton's Official Plans must operate. The planning environment today is substantially different than it was when the Growth-Related Integrated Development Strategy was initiated.

As Planning Committee embarks on this review, WE HBA believes there is an important conversation that must occur regarding the effectiveness of Hamilton's current growth strategy.

The Urban Hamilton Official Plan establishes a firm urban boundary growth strategy that directs 80 percent of new residential development to the built-up area and 20 percent to designated greenfield areas through 2051. While the objective of promoting intensification is broadly supported, it is appropriate to ask whether the current policy framework is successfully translating into housing delivery on the ground.

Hamilton continues to face significant housing affordability challenges, lengthy development approval timelines, declining housing starts and increasing difficulties bringing projects to market. Many intensification projects face substantial barriers related to economics and

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

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

approvals processes. At the same time, greenfield lands remain an important component of housing supply and provide opportunities to deliver a range of housing types, especially ground-based three-bedroom (GB3B) housing units that are well suited for families, that are increasingly difficult to achieve within the built-up area.

The City's Official Plan review presents an opportunity to evaluate whether existing growth assumptions remain realistic and whether the policy framework is effectively supporting housing delivery across all forms of housing. This discussion should be informed by actual market performance, housing completions, approval timelines, affordability outcomes, while responding to changing provincial policy direction.

The Official Plan review also presents an opportunity to evaluate whether Hamilton's growth strategy is delivering the types of housing that residents are seeking. The Smart Prosperity Institute's report "[Who Will Swing the Hammer?](#)" found that Hamilton is struggling to attract and retain young families, and that housing availability is the primary driver of migration decisions. The report specifically identifies a shortage of family-friendly housing and notes that Hamilton has increasingly shifted toward the construction of smaller apartment units while larger family-oriented housing forms have become a smaller share of new housing supply. It further concludes that larger units suitable for families should form a greater portion of Hamilton's future housing mix.

While WE HBA supports intensification and the creation of complete communities, the City should carefully examine whether the Urban Hamilton Official Plan's growth strategy is producing the housing choices required to attract and retain families. The report notes that nearly three-quarters of couples with children in Hamilton live in single-detached homes and that rowhouses represent the second most common housing type for families. A successful growth strategy must recognize the continued demand for family-sized, ground-orientated housing forms and ensure that these housing opportunities remain available as Hamilton plans for growth to 2051.

WE HBA is also concerned by the report's acknowledgement that uncertainty surrounding urban boundary expansion applications is creating challenges for the City's broader planning program. Staff note that the outcome of current Ontario Land Tribunal proceedings affects the City's ability to undertake land needs assessments, infrastructure planning, and future growth management work.

This situation highlights a broader concern with the current legislative framework. **By requiring major growth management decisions to be resolved through costly and time-consuming Ontario Land Tribunal proceedings, all parties incur significant expense while critical planning exercises remain delayed, while creating unnecessary risk.** Regardless of one's position on urban boundary expansion, this approach is neither efficient nor productive.

Municipal growth planning decisions should ideally be addressed through transparent municipal planning processes and Official Plan reviews rather than through lengthy litigation. The current situation creates uncertainty for residents, municipalities, infrastructure providers, and the development industry alike, while diverting resources that could otherwise be invested in planning for complete communities and delivering new housing.



As the City proceeds with the Official Plan Review Program, WE HBA respectfully requests that the development industry be formally engaged as a stakeholder throughout the process.

Recently, WE HBA participated in the Town of Grimsby's Official Plan review process and found the consultation approach to be highly effective. Stakeholders were provided an opportunity to review and comment on draft policy language, after which revised drafts were circulated with clear redline tracking identifying changes made in response to feedback. This process improved transparency, facilitated meaningful participation, reduced misunderstandings, and allowed stakeholders to focus their comments on substantive policy changes.

We would welcome a similar consultation model in Hamilton. Early and ongoing engagement with industry stakeholders can help identify implementation challenges, improve policy clarity, and ensure the resulting Official Plan is both ambitious and achievable.

Hamilton's housing challenges will not be solved through any single policy change. However, an Official Plan that is clear, predictable, implementable, and aligned with market realities will be an essential tool in supporting housing supply, economic growth, and long-term community prosperity.

WE HBA appreciates the significant effort being undertaken by staff and looks forward to participating constructively throughout the review process.

Respectfully submitted,

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