



July 28, 2026

From:

West End Home Builders' Association

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To: **Members of the Planning Committee**

71 Main Street West

Hamilton, Ontario L8P 4Y5

WE HBA Letter: Report PED26128 – City-Initiated Secondary Plan Work 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.

Thank you for the opportunity to comment on Report PED26128 respecting the City's Secondary Plan Work Program. WE HBA supports thoughtful long-range planning. Secondary Plans can provide clarity for residents, guide infrastructure investments, and give both the community and the development industry a better understanding of how neighbourhoods are expected to evolve over time.

The report sets out an extensive work program that includes several new Secondary Plans, updates to existing plans, and coordination with other major planning initiatives already underway across Hamilton. The report indicates that this work will largely be carried out with existing staff resources. Meanwhile, Hamilton continues to struggle with lengthy development approval timelines, ranking in last place for Canada's municipal planning application processing times³.

Each Secondary Plan being reviewed is an opportunity for modernization and therefore, we encourage the City to focus on removing barriers to housing rather than creating new ones. These plans should identify where growth belongs, what infrastructure is required, and how approvals can be made more straightforward. They should provide direction that is practical to administer and easy for applicants, staff and residents to understand. WE HBA views the review as an opportunity to improve efficiencies and provide greater clarity and direction with an objective to improve planning process timelines and encourage investment in the City of Hamilton.

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

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

³ CHBA Municipal Benchmarking Study 2024



The report also commits to consultation throughout each planning process. We appreciate that commitment and encourage staff to involve the homebuilding industry early in the process. Builders, planners, engineers and architects work with these policies every day and can often identify implementation issues before they become obstacles to housing delivery.

We also note that Secondary Plans should not be viewed as a mechanism to accommodate all of Hamilton's future growth within the existing built boundary. While intensification has an important role to play, it has practical limits. Not every household wants or can afford apartment living, and not every site is suitable for redevelopment. A healthy housing market requires a balanced supply of housing types across both existing neighbourhoods and new communities. Planning policies should reflect that reality by enabling housing in all appropriate locations rather than relying on any single growth strategy.

Finally, we encourage Council to judge the success of this work program not by the number of Secondary Plans completed, but by the results they produce. If these plans lead to faster approvals, clearer policies, coordinated infrastructure investment and more housing, they will have achieved their purpose. If they introduce additional process without improving housing delivery, the City should be prepared to adjust its approach.

Hamilton has no shortage of planning policy. Its greatest challenge is turning that policy into homes that people can afford to buy or rent.

WE HBA looks forward to continuing to work with Council and staff to ensure Hamilton's planning framework supports both complete communities and a housing approval process that is timely, transparent and effective.

Thank you for your consideration.

Sincerely,

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