



July 6, 2026

From:

West End Home Builders' Association

1112 Rymal Road East
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To: **Members of the Planning Committee,
City of Hamilton**

71 Main Street West
Hamilton, Ontario L8P 4Y5

WE HBA Letter: Terms of References and Guidelines for Complete Application PED26012

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 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.

Before commenting on the substance of the report, WE HBA wishes to express concern regarding the timing of its public release. Report PED26012, together with 75 appendices, was posted sometime on the eve of a national holiday, when many industry stakeholders were likely away or focused on family commitments over a long holiday weekend.

We are not suggesting this timing was intentional. However, the circumstances are difficult to reconcile with the City's stated commitments to transparency and meaningful stakeholder engagement. Given the breadth and complexity of these materials, a more deliberate release would have better supported meaningful stakeholder review and engagement.

With respect to the substance of the report, WE HBA is generally supportive of efforts to improve transparency and efficiency in the development approvals process. Clearer Terms of Reference and standardized submission requirements have the potential to reduce uncertainty, improve application quality, and streamline review. This work is particularly important in Hamilton, where development application approval timelines continue to be the worst in the country. At a time when housing supply and affordability remain critical priorities, reforms that improve predictability and reduce delays should remain a central focus.

WE HBA is broadly supportive of Phase 1, particularly where it consolidates existing requirements and improves administrative clarity. However, the report references modifications intended to reflect legislative changes, address gaps, and clarify content since Phase 1 was approved for interim use back in 2022. Given the scale and complexity of the report and appendices, it would have been extremely helpful for stakeholders to receive these modifications in a redlined or change-tracked format so substantive changes could be easily identified and reviewed.

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

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



Without a clear mechanism to distinguish what has been newly added, stakeholders are left to compare extensive technical documents line by line, making meaningful review unnecessarily difficult.

As the City moves into Phase 2, WE HBA welcomes the opportunity to engage as a constructive stakeholder. We believe continued dialogue with industry will help ensure future refinements support the shared objectives of clarity, predictability, and, most importantly, faster housing delivery.

WE HBA appreciates the opportunity to provide comments and looks forward to continued collaboration with staff and Council to help build a development approvals framework that supports both sound planning and the timely delivery of housing.

Sincerely,

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