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Ministry of Natural Resources  
Development and Hazard Policy Branch  
300 Water Street, Peterborough, ON K9J 8M5

**West End Home Builders' Association Submission - ERO 026-0329**

Technical Guide - River and Stream Systems: Flooding Hazard Limit and Technical Bulletin - Special Flooding Hazard Conditions in River and Stream Systems

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## **The West End Home Builders' Association**

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. 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.

## **The Environmental Registry Background**

The government is proposing to update technical guidance used by municipalities and conservation authorities in flood hazard identification and mapping. This includes updating the *Technical Guide - River and Stream Systems: Flooding Hazard Limit* and releasing a new *Technical Bulletin - Special Flooding Hazard Conditions in River and Stream Systems*

## **WE HBA Technical Comments**

On behalf of the West End Home Builders Association (WE HBA), we are writing to express our support for the Ministry's initiative to update the provincial flooding hazard technical guidelines.

WE HBA believes the modernization of Ontario's flood hazard framework presents an important opportunity to achieve two complementary provincial objectives: protecting people and property from flood risk while enabling the responsible development of lands that can be safely serviced, engineered and protected. The objective of flood hazard policy should not be to unnecessarily sterilize land from development where modern engineering solutions can demonstrably manage risk. Rather, the framework should establish clear, science-based performance standards that protect public safety while allowing municipalities, conservation authorities and qualified professionals to identify appropriate mitigation solutions on a site-specific basis.

The industry recognizes that the current guidelines, which have been in place for twenty-four years, are significantly outdated. Modernizing these technical standards is a critical and welcome step forward to align provincial guidance with current engineering practices, modern stormwater technologies, and the realities of building sustainable communities today. WE HBA members are highly encouraged by the Ministry's proactive approach to bringing this vital framework into the twenty-first century.

This much-needed modernization also directly aligns with both provincial and federal mandates to significantly increase and accelerate housing construction. By establishing updated, forward-looking technical standards, the Ministry is helping to remove outdated barriers and facilitate the efficient delivery of much-needed housing supply, all while continuing to prioritize public safety and environmental stewardship.

As urban land becomes increasingly constrained and development practices evolve, particularly within already developed, built-up urban areas, we are hopeful the updated guidelines will explicitly recognize modern, proven stormwater management practices. A modernized framework should distinguish between lands where development would create an unacceptable risk and lands where that risk can be appropriately managed through engineering, infrastructure and mitigation. Treating these circumstances identically can unnecessarily sterilize otherwise developable land, constrain housing supply and increase pressure on the limited supply of serviced land.

Applying uniform hazard limits to both greenfield and urban infill sites creates unintended barriers to neighborhood revitalization. Providing criteria-based recognition for robust, modern facilities, including properly engineered underground storage systems, will allow municipalities and builders to safely manage flood hazards while optimizing land use for new homes in established communities. Where risks can demonstrably be managed to an appropriate provincial standard, the policy framework should enable development rather than prohibit it by default.

Similarly, we recommend that the guide clarifies the applicable flood event standards for geographic locations that are prescribed under O. Reg. 41/24. The proposed change in Section 1.3 could shift established flood lines, which would negatively affect approved mapping, official plan schedules, regulation limits, and applications currently in process. Changes of this nature could unexpectedly alter the development potential of lands where significant planning, engineering and financial investments have already been made in reliance on an established regulatory framework.

Where updated technical guidance results in a material change to an established flood hazard limit, appropriate transition provisions should protect applications already in process and provide municipalities, conservation authorities and landowners with a clear and predictable implementation pathway. Introducing this level of disruption and uncertainty is directly inconsistent with overarching provincial housing policies aimed at spurring the rapid development of new homes.

Ontario should not have to choose between protecting communities from flooding and building the homes they need. Modern engineering, stormwater management and flood-mitigation practices allow us to pursue both objectives simultaneously.

We applaud the Ministry for undertaking this comprehensive and necessary update. Providing clear, unambiguous, and modernized technical direction will provide the building and development industry with the certainty required to continue delivering safe, high-quality housing across Ontario.

Regards,



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