

**West End Home Builders' Association**

1112 Rymal Road East, Hamilton

Serving members in Hamilton and Halton Region

August 8, 2022

To:

Members of Planning Committee

City of Hamilton

71 Main Street West

WE HBA Comments on Bill 109 Draft Amendments to the Urban Hamilton Official Plan and Rural Hamilton Official Plan to Implement Bill 13 and Bill 109 (PED22112(c))

The West End Home Builders' Association (WE HBA) is pleased to be engaged in discussions on the City of Hamilton's Official Plan Amendments to Implement Bill 13 and Bill 109. As key stakeholders and partners to the City of Hamilton, the means through which Hamilton implements this key provincial legislation has a significant impact on how our members deliver new housing supply. In a time where the CMHC,¹ the Federal government,² and the provincial government³ have all agreed there is a need for significantly more new housing supply to resolve Ontario's housing crisis, the City of Hamilton must seize the opportunity brought forward by these two legislative pieces to streamline planning approvals, setting the framework to enable our members to bring new housing supply of all types and tenures online in an expedited fashion. Open communication and transparency are of crucial importance as we work together to resolve the crisis we find ourselves in.

While we understand the timelines specified by Bill 109 leave Council with limited time for implementation prior to the municipal election, it is our hope that the City intends to conduct fulsome industry consultation to avoid outcomes from these policy changes that would actually slow down the process. Of note, there is a clear need for continued dialogue with potential further tweaks to the proposed policies. The WE HBA has significant concerns about how the Site Plan Application process will be impacted by these changes, especially it appears there are many technical matters that remain unresolved. Full industry participation in the development of the proposed *Formal Consultation* and *Terms of Reference* structures is recommended, and WE HBA will continue to reach out to City Staff for more information as it becomes available. We would be pleased to participate in a working meeting with a few of our members to have a deep dive discussion on how to improve processes.

Finally, the private market is responsible for providing homes for 80% of all Canadians,⁴ and by extension Hamiltonians. Right now, there are significant housing market distortions in Hamilton where young families, newcomers and young people are driving further and further outside our urban centre to find a home that meets their needs due to a lack of available housing supply. This problem is one of

¹ "Housing Shortages in Canada: Solving the Affordability Crisis" Cmhc-schl.gc.ca, June 23, 2022. <https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/research-reports/accelerate-supply/housing-shortages-canada-solving-affordability-crisis>.

² "Making Housing More Affordable" Government of Canada Budget 2022, April 7, 2022. <https://budget.gc.ca/2022/report-rapport/chap1-en.html>.

³ "Report of the Ontario Housing Affordability Task Force" Ministry of Municipal Affairs and Housing, February 8, 2022. <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>.

⁴ "About-Affordable-Housing-In-Canada." Cmhc-schl.gc.ca, March 31, 2018. <https://www.cmhc-schl.gc.ca/en/professionals/industry-innovation-and-leadership/industry-expertise/affordable-housing/about-affordable-housing/affordable-housing-in-canada>.



Together **WE** Build the Future

the key reasons the Provincial Government saw a need for urgent provincial intervention in the municipal approvals process, and brought forward Bill 109, the *More Homes for Everyone Act*. As the City of Hamilton works towards implementation of these changes it is important to acknowledge the role the municipality can play in making their own internal process more efficient to address the housing supply crisis we find ourselves in. Decisions made today have cumulative long-term effects on the supply and cost to deliver new homes. WE HBA appreciates our working relationship with the City as collaboration between the industry and the City of Hamilton is of the utmost importance.

Kind Regards,

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