

Planning Committee
City of Hamilton

[West End Home Builder's Association](#) | Recommended Amendments to the City of Hamilton's Official Plan
PED 23252 - Provincial Announcement Impacting Provincial Decisions on Municipal OPs and OP Amendments

The West End Home Builders' Association (WE HBA)

The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton. The WE HBA represents nearly 300 member companies made up of all disciplines involved in land development and residential construction. The residential construction industry employed over 22,400 people, paying \$1.6 billion in wages, and contributed over \$3.4 billion in investment value within the City of Hamilton in 2022.

Background

On October 23, 2023, the Minister of Municipal Affairs and Housing announced they are providing 45 days for municipalities to submit information about the modifications to the official plans that were originally submitted to the Ministry. In a November 2, 2023 letter to heads of Council, the Minister confirmed that legislation would be tabled and that if there are changes that a municipality would like to see made to the Official Plan that the province had previously made, and which the municipality supports – that municipal feedback on the original official plan submitted to the province will be important to supporting its implementation.

WE HBA Broad Position on Hamilton's Official Plan

The Greater Golden Horseshoe is Canada's primary economic engine and is the fastest growing region in the country. Growth has accelerated the last few years with changes to federal policy in which Canada's population grew by 1.15 million from July 2022 to July 2023 (that is larger population increase than the entire United States of America, a country nearly ten times our size). Hamilton is not an island, and there are incredible growth pressures on our city requiring a complete paradigm shift in terms of planning for long-term growth. That means further adjustments in public policy (both planning policy and fiscal policy such as maintaining the DC exemptions in the downtown CIPA) to support much higher levels of intensification as well as an urban boundary expansion as recommended by City of Hamilton professional planning staff and third party consultants. To put it bluntly, you just can't pack an extra 500,000 people into Ontario every year and accommodate all that with intensification. Difficult and sometimes politically unpopular decisions are required to plan for the level of growth that is arriving each and every year.

The WE HBA appreciates that professional planning staff at the City of Hamilton recognized and recommended that an urban boundary expansion will be required to accommodate population growth to the year 2051. WE HBA is supportive of the original professional planning staff position to significantly increase the intensification rate from the current below 40% to a rate of 60% while also expanding the urban boundary. Both are necessary to accommodate growth.

WE HBA notes the context has evolved the last few years. The *Schedule #3* forecasts to which Hamilton's planning department planned for the GRIDS 2 Municipal Comprehensive Review and Land Needs Assessment was based on a very out-of-date forecast of 35,000 new housing units over the next decade. The Official Plan approved by Hamilton Council in 2022 was based on these out of date forecasts and even that plan did not confirm to the Provincial Planning Statement or Growth Plan. In the time since that Official Plan was approved, the City of Hamilton has signed a 47,000 unit housing pledge as it's contribution to the provincial target of 1.5 million homes to be built over the coming decade. The leaves a significant 12,000 unit gap. WE HBA further notes that data from the Smart Prosperity Institute (Dr. Mike Moffatt) suggests that even the provincial housing target is too low and that Hamilton requires at least 52,400 new housing units over the next decade. It is abundantly clear that the Council approved Official Plan will fail to come even close to achieving the necessary number of housing units or diversity of housing typologies required to accommodate growth. The council approved plan includes a shortfall of 59,300 ground oriented units over a 30-year period. The City of Hamilton should carefully review the 77 modifications made by the provincial government in 2022 and accept most if not all of them and make even further modifications to facilitate even higher levels of intensification and density within existing nodes, corridors and communities.

We need to plan for the future. Our association strongly supports intensification and transit-oriented communities as a mechanism to support a significant proportion of our future population growth. WE HBA believes that the City of Hamilton is well positioned through the provincial planning framework to accommodate a range of new housing supply opportunities through both greenfield development opportunities and through intensification. The City of Hamilton should therefore adopt a number of the provincial modifications including the removal of the 30-storey height limit as well as supporting higher densities in nodes and transit corridors including the entire BLAST network.

The WE HBA initially supported the City Staff recommendation for the "Ambitious Density" scenario with a 1340 ha urban boundary expansion. However, in light of significantly higher levels of population growth well beyond what *Schedule #3* of the Growth Plan (and the initial council approved Official Plan) ever contemplated, that scale of boundary expansion is insufficient to accommodate the volume of growth anticipated. More land is required, thus WE HBA recommended via the Environmental Registry of Ontario in 2022 that MMAH consider the initial "Increased Density" target growth scenario in which 1630 ha of lands at an *absolute minimum* should be brought into the urban boundary. WE HBA reiterates this recommendation as Council considers adopting provincial modifications.

Without addressing housing shortages, our City will continue to see significant displacement of our residents, especially families to neighbouring communities that have more attainable housing opportunities and a diversity of housing options for families (as was outlined in the [Smart Prosperity Institute Report "Who Will Swing the Hammer"](#)). Our association maintains that the population pressures leading to this point are unlikely to diminish. The outlook for Hamilton region to continue attracting international talent is bright given the Government of Canada's immigration targets and the fact that it is home to two leading educational institutions (Mohawk and McMaster). Our concern is that as the housing shortage worsens, it will push up home prices in Hamilton even further, pricing out current residents and causing young families and newcomers to move elsewhere.

Hemson Consulting's Provincial Forecasts Establish a Baseline for a Growth Plan Compliant, Market-Based Supply and Mix of Housing

The introduction of the Provincial Land Needs Assessment Methodology (LNAM) issued under the Provincial Growth Plan reinforced that a market-based approach to housing supply is a foundational consideration for municipalities in the Greater Golden Horseshoe when calculating land needs. Recognizing that local needs are diverse, the LNAM provided the key components to be completed as municipalities plan to ensure that sufficient land is available to: accommodate all housing market segments; avoid housing shortages; consider

market demand; and plan for all infrastructure that is needed to meet the complete communities objectives to the horizon of the Plan. The LNAM required that settlement area boundary expansion calculations be based on a market-based forecast. The LNAM required a balance between achievement of the minimum targets of the Growth Plan while ensuring sufficient land supply for housing that meets the projected needs of current and future residents, meaning a market-based supply. A market-based supply of housing is good planning and in the public interest.

The context has evolved in terms of demographic demand and population growth

Hamilton's Official Plan—submitted to the province for review in June 2022—presents several challenges to the province's goal of building 1.5 million homes for Ontarians, as recommended by the provincial *Housing Affordability Task Force*. The Official Plan is based on Hemson's 2021 housing forecasts, which are now incompatible with the provincial goal of 1.5 million homes. The Hemson forecasts identify that by 2031 Hamilton would require 35,000 homes, however the provincial housing pledge signed by the City of Hamilton requires 47,000 new homes. This alone would leave a 12,000-unit shortfall in Hamilton if the minimum number of homes required by the Growth Plan were built. Dr. Moffatt with the Smart Prosperity Institute has identified that Hamilton actually requires 52,400 new homes. A complete paradigm shift in planning and housing will be required as we currently build on average ~2,000 units a year in Hamilton – the Growth Plan minimums would take us to 3,500; while new forecasting projections suggest we need to build over 4,700 units in Hamilton on an annual basis each and every year going forward. This is a monumental task.

There is broad consensus that Ontario needs to ramp up housing production to resolve our housing affordability crisis. In years since the Hemson *Schedule #3* Forecasts were generated, the Federal Government has significantly increased immigration targets and international students (non-permanent residents) have significantly increased in numbers adding additional pressure to the housing system despite not being adequately captured in *Schedule #3*. Furthermore, new forecasting that considers these emerging factors from the Ministry of Finance and federal government greatly exceeds *Schedule #3* forecasts. Through its review of Hamilton's Official Plan, WE HBA strongly recommends that the City of Hamilton should seize this fresh opportunity for bold action on increasing housing supply.

Local municipal consultation (GRIDS 2) and the City Survey

WE HBA appreciates the efforts of the planning department and city staff to have a robust public consultation process through a complex set of public policy discussions. The rapid population growth Hamilton has experienced has created a shortage of housing of all types, which needs to be addressed in a thoughtful, balanced and rationale manner. Now is not the time for small plans, but rather bold action.

WE HBA directly participated in the city consultation with the following public submissions and deputations in just the last couple of years:

- Deputation to City Council, Official Plan Amendment to Implement GRIDS 2 / MCR – May 17, 2022
- Submission on GRIDS 2, Rethinking Hamilton's Planning Framework: OP Consultation – March 8, 2022
- Submission on GRIDS 2, Important Info Relating to GRIDS 2 / MCR Process, November 9, 2021
- Submission on GRIDS 2, MCR Phasing Criteria – May 31, 2021
- Deputation to General Issues Committee, GRIDS 2 Deputation – March 29, 2021
- Submission on GRIDS 2, GRIDS 2, MCR and LNA – March 5, 2021

At the request of Council, the City of Hamilton staff conducted a mail-out and online survey, which claimed 90.4% of Hamiltonians were against an urban boundary expansion to help accommodate new residents. However, according to a [statistically significant randomized survey completed by Nanos Research](#)—the top public opinion firm in Canada—80% of Hamiltonians surveyed did not recall receiving a survey from the City, with a staggering 87.9% of younger residents (ages 18-34) not remembering receiving it at all.

In contrast to the City survey, the Nanos Research survey found (in a representative sample of residents) a much more balanced viewpoint on the urban boundary expansion. In their survey, 38% said the best approach to handling growth in Hamilton is to expand the urban boundary, while 32% stated that boundaries should be kept the same, and another 22% opposed both the boundary expansion and intensification. Younger residents of Hamilton (18-34) were twice as likely to prefer expanding the urban boundary (50%) compared to older residents of Hamilton (55+) (25%). Incidentally, young people and renters in Hamilton were the least likely to recall receiving a city survey but were also the most likely to prefer a boundary expansion. The founder of Nanos Research, Nik Nanos, suggested the reason results of their survey differed so dramatically from the City's survey is that when respondents "self-select" to participate, only those with the time and motivation to participate choose to do so; therefore, the city results are "not necessarily representative" of opinions within the city as a whole and therefore confirms the City survey is not an accurate depiction of public sentiment.

Data and evidence should drive local decision making

The local interest is not the same as the broader public interest. The Provincial Planning Statement captures the Provincial and public interest in planning. Hamilton is not an island unto itself. Hamilton Council disregarded Provincial policy and disregarded the recommendations of their own professional planning staff and a peer review of that work due to local political pressure in the lead up to a municipal election cycle. Hamilton City Council knowingly submitted an Official Plan that results in a shortfall of ~60,000 homes in the next 30 years from the Hemson growth forecasts which are already incompatible with the provincial goal of 1.5 million homes. The No Urban Boundary Expansion (NUBE) decision, combined with other policies such as the city-wide 30-storey height limit reflect a hyper-local political perspective shaped on local opposition to new housing supply.

In the four years since those Growth Plan forecasts were generated, the Federal Government has significantly boosted immigration targets. New forecasts from the Ministry of Finance and the Federal Government have emerged, and demographic research from the Smart Prosperity Institute suggests that we are in fact "forecasting for failure". The *Schedule #3* forecasts under-estimate the rapid and accelerating pace of population growth. New data and new evidence require a new approach. The City of Hamilton should use its fresh review of Hamilton's Official Plan Amendment No. 167 as an opportunity to make further changes allowing for more than double the supply of housing in Hamilton.

Going forward, the City of Hamilton cannot ignore demographic reality and must do much more than the bare minimum. The City must set the stage towards economic prosperity and housing abundance by supporting the provincial objective of 1.5 million homes in the coming decade.

WE HBA Seven Key Principals and Recommendations to the City to Modify the Official Plan

- Responsibly expand the Hamilton's Urban Boundary to conform to the PPS and the LNAM. An Urban Boundary Expansion of *at least* 1630 ha should include a range and mix of housing with transit supportive densities in complete communities.
- The height limit for tall buildings (30-stories) should be removed entirely from the Official Plan. The City of Hamilton Official Plan should have no height limit. Taller building heights, especially downtown are absolutely required to achieve residential intensification targets. Views of a 700 km long feature (Niagara Escarpment) should not be prioritized over housing on transit in the downtown core.
- Encourage and facilitate transit-oriented communities, not *ONLY* on the future Hamilton LRT route, but significantly expand intensification-oriented policies to encourage much higher levels of intensification and high-density housing opportunities along all BLAST network corridors.
- Amend policies in the Official Plan that limited mid-rise and mid-density to six-stories unless a long list of criteria such as complying with angular plans and neighbourhood "character" were complied with (in which case up to 12-stories would be permitted). Hamilton's Official Plan should facilitate and allow mid-density intensification to a 12-storey limit as-of-right, without numerous layers of red-tape designed to make it virtually impossible to achieve a 12-storey threshold. Furthermore, WE HBA

opposes the reversal that would also reinstate the reduced density targets for the Ancaster Community Node.

- Remove all references in the Official Plan regarding urban design inhibitors including, but not limited to angular plans, neighbourhood character, and shadows. Furthermore the outdated neighbourhood plans policies should be removed as they will frustrate intensification efforts.
- Abolish minimum parking standards.
- Eliminate exclusionary zoning. WE HBA acknowledges that Hamilton's Official Plan Amendment No. 167 makes positive initial steps towards eliminating exclusionary zoning. Further modifications to the zoning by-law are required to liberalize low-density zoning to allow a greater range of housing options and to actually allow new construction rather than just conversions. The Official Plan should take further steps to allow as-of-right residential development of up to 6-units and 4-stories on a single residential lot. Furthermore, the Official Plan must set the policy framework for a comprehensive review and modernization of ALL of the City of Hamilton zoning.

Conclusion

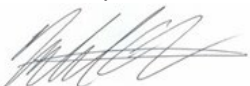
The City of Hamilton in collaboration with the Ministry of Municipal Affairs and Housing has a duty to protect the public interest. Now is the time for bold action on housing in Hamilton and across Ontario. The Greater Golden Horseshoe is Canada's primary economic engine and is the fastest growing region in North America. It is critical that there is a holistic provincial planning framework to provide a broad, long-term, and comprehensive plan that promotes prosperity, employment growth and an appropriate supply of housing.

Outside of the Greenbelt, a long-term urban reserve (whitebelt) was set aside to accommodate future growth. WE HBA supports addressing the future housing needs of Hamilton by expanding the Urban Boundary into the long-term urban reserve (whitebelt). The City of Hamilton's zoning has not been comprehensively reviewed since amalgamation, this needs to be a priority for the city. The City of Hamilton should work with the Provincial Government to restore balance in housing choice and to provide housing that meets the aspirations of Ontario families.

The WE HBA strongly believes that a healthy housing system only exists when all levels of government work together with the private sector to ensure the right mix of housing choices and supply that provide all residents' shelter needs through their full life cycle. A properly functioning housing system should provide stability to both renters and owners, at prices people can afford and in the choice that meets their needs. The housing system must also be able to respond to meet projected demographic and market requirements for current and future residents. Without assertive intervention, there will continue to be an exodus of young families out of Hamilton and other inner ring municipalities, leapfrogging the greenbelt and moving to communities up the 403 like Paris, Woodstock and even further, in search of more attainable ground-oriented housing. This is causing displacement and pressures on housing and infrastructure in those communities.

Hamilton needs to grow up, in and out to accommodate its fair share of Ontario's target of 1.5 million additional homes. Local political considerations should not cloud rational decision making to accommodate long-term growth. WE HBA strongly recommends the City of Hamilton adopt many of the significant policy modifications to Hamilton's Official Plan, including a boundary expansion, facilitating much higher levels of intensification and transit-oriented communities and as well as more robust policies to put an end exclusionary zoning.

Sincerely,



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