

August 15, 2024

Mayor and Members of Council
City of Hamilton
71 Main Street West

5.22

West End Home Builder's Association | Submission on Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications under the proposed Provincial Planning Statement (PED24109) (City Wide)

The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Burlington. The WE HBA represents approximately 300 member companies made up of all disciplines involved in land development and residential construction, including: community builders, developers, professional renovators, trade contractors, consultants, and suppliers.

The WE HBA supports the newly permitted ability for landowners to privately initiate urban boundary expansions. While our organization understands the City had adopted a "No Urban Boundary Expansion" position in their Official Plan, **the City of Hamilton's initial Staff Recommendation in 2021 was that an urban boundary expansion is necessary to accommodate the City's forecasted population growth.** Additionally, both the City's Land Needs Assessment and a third-party review of that Land Needs Assessment clearly demonstrated the City requires a boundary expansion to accommodate the forecasted population growth and projections in the City's Official Plan. Furthermore, the City's in force Official Plan is based on outdated Schedule 3 Growth Plan population projections which identified Hamilton growing at a significantly slower rate than the region is ultimately experiencing.

To put our region's rapid growth into context, Ontario experienced a decade's worth of population growth in the past three years. Hamilton cannot support that growth without building significantly more homes of all types. To quote economist Dr. Mike Moffatt's [August 7th, Toronto Star Article](#), "[i]n the first six months of the year alone, Ontario's population grew by nearly 200,000" people. How this impacts Hamilton is that when the "No Urban Boundary Expansion" decision was made, it was based on Hamilton's population growing at a stable forecasted rate, which is not occurring. Instead, Hamilton's supply of housing is lagging far behind Ontario's population growth. As a result, Hamilton is displacing tens of thousands of residents annually to neighbouring communities. Bill 185 enables new home and community builders to access expansion area lands by applying for an Urban Boundary Expansions in the City of Hamilton as necessary. This ability provides the City with an additional opportunity to set a framework for collaborative discussions to work together and move more quickly towards building more attainable housing supply in new complete communities.

Finally, WE HBA would like to identify that a proposed annual expense of \$1.5 million to oppose boundary expansions at the Ontario Land Tribunal is a significant cost taxpayers will incur. Council may wish to consider this expense if the City seeks to defend its refusal or failure to make decisions on urban boundary expansion applications within the context of our regional housing crisis.

Appended to this letter are our organization's initial comments on the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications. WE HBA looks forward to participating in the upcoming consultation.

Sincerely,

Michelle Diplock, RPP, Manager of Planning and Government Relations, West End Home Builders' Association



West End Home Builder's Association's Initial Comments: Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications under the proposed Provincial Planning Statement

- Given the critical need for housing in the City of Hamilton, the end result of an applicant pursuing an Official Plan Amendment for an Urban Boundary Expansion should be the inclusion of the subject area into the Urban Boundary **with** a Secondary Plan implemented. Since many of the supporting studies require the applicant to evaluate the subject lands at a Secondary Plan-level of detail, implementation of a Secondary Plan at the conclusion is reasonable.
- There is concern with the number of supporting materials required which do not have a Terms of Reference authored by the City at this time. This may create a scenario where applicants are unable to submit plans and reports to constitute a complete application until the City has drafted and approved Terms of Reference for each study. WE HBA looks forward to participating in the City's next phase of consultation on the Development Application Terms of Reference project.
- The Staff Report sets out that the framework for the Financial Impact Analysis set out as a requirement of an Urban Boundary Expansion recommends "that the time horizon assess in any analysis extend past the lifecycle replacement costs of new infrastructure". It is unclear to what end a proponent is expected to provide analysis on costs of infrastructure beyond the lifecycle of said infrastructure.
- The Staff Report notes that the removal of any open space and natural heritage features would have additional costs due to the ecological services value these natural features provide. As a result, the City states that the Financial Impact Analysis should include this in the municipal finance considerations. It is unclear how the ecological services value associated with natural heritage features could be quantified for the purposes of a report like a Financial Impact Analysis.
- The Dillon Report states "It is recommended that the City require that the assessment be prepared by a qualified urban land economist or municipal finance practitioner with clearly demonstrable experience in fiscal impact analyses prepared for public sector clients". Limiting consultant teams to only those with experience preparing analyses for public sector clients creates high potential for conflicts in qualified consultants due to their engagement with the public sector. Ultimately, this expectation may limit the ability to find objective consultants which can provide expert analysis.

