



April 7, 2025

From:
West End Home Builders' Association
1112 Rymal Road East
Hamilton, Ontario L8W 3N7

To:
Members of Planning Committee
City of Hamilton, 71 Main Street West
Hamilton, ON L8P 4Y5

WE HBA Letter: Framework for Processing & Evaluating Urban Boundary Expansion Applications

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 City of Hamilton, residential construction consists of \$3.2 billion in built investment value, and provides over 14,000 jobs paying \$1.0 billion in wages¹. We note that these economic and job figures have been in decline over the past couple of years, and are anticipated to sharply decline in 2025 as project cancellations and job losses continue to pile up in the residential construction industry.

WE HBA appreciates the opportunity to provide comment on the Final Framework for Processing and Evaluating Urban Boundary Expansions ("Framework") as Council moves to formally adopt the Framework and associated Official Plan Amendments ("OPA"). WE HBA appreciates the numerous opportunities to engage with the City and staff, and a willingness from staff and Dillon Consulting to meet with industry and take note of our concerns. We appreciate the opportunity to provide further input on behalf of our membership on the impact of the Framework on process and our collective ability to meet our housing needs.

Previously Submitted Comments

WE HBA appreciates that the City has taken some of the industry's comments into consideration. Previous. WE HBA welcomes:

- modifications of who is considered qualified to prepare Financial Impact Assessment ("FIA"), removing municipal experience requirements for financial consultants;
- removal of the quantification of ecological service value for the FIA, as well as previous requirements for the time horizon assessed extending past the lifecycle replacement costs; and
- the introduction of TORs for required studies.

These modifications address several outstanding concerns from the industry on the Framework, and will ease some burden in preparing complete applications for the City's review. Clearly laying out study requirements prior to submission for any Formal Consultation is paramount for community builders to make property decisions and come to the City fully informed, and we appreciate the TORs being provided for the following studies for Urban Boundary Expansion ("UBE") applications: Subwatershed

¹ CHBA Economic Impacts 2023 Fact Sheet, City of Hamilton.

Study (Phase 1), Energy and Climate Change Assessment Report, Housing Assessment, Financial Impact Analysis, Emergency Services Assessment, School Accommodation Issues Assessment, and Concept Plan.

Outstanding Concerns

There are several elements included within the Housing Assessment TOR that WE HBA would like to highlight and provide comment on.

- 1) "The Assessment shall consider whether there is a need for additional supply for 'ground-related' housing, at the time of application, and show that this type of supply cannot reasonably be provided within the existing urban area."
- 2) "...proponents shall assess whether the proposed expansion would adversely affect City-wide intensification objectives including demand for higher-density forms within the Downtown Urban Growth Centre, other Urban Growth Centres and Urban Nodes and Corridors, notably the Major Transit Station Areas (MTSA)."
- 3) "The Housing Assessment shall include the planned greenfield density of the urban boundary expansion area and provide commentary on how this density relates to Provincial Policy and Plans and Urban Hamilton Official Plan policies. Where planned density exceeds Provincial and Municipal policies, implications to the City's intensification targets (see topic area #2) must be assessed."

WE HBA provides the following comment:

- 1) As per the City's previous Lands Need Assessment and opinion of professional planning staff at the City of Hamilton, additional land is required to accommodate Hamilton's projected growth. Those initial projections were based on the Growth Plan Schedule #3 forecasts, which are now out of date and have been replaced by Ministry of Finance projections based on the much higher levels of growth that Canada and Ontario have experienced these past few years. Demographic pressures have only increased with the gap between housing supply and population demand having grown further. According to the Financial Accountability Office of Ontario, single detached housing starts are at a 69-year low across the Province². There has been a decline in starts of ground-related housing at a time where there is escalating demand for family-friendly housing typologies. The July 2024 Dillon memo notes that "work undertaken as part of the March 2021 LNA concluded that delivering the necessary number of larger, family-sized apartments and ground-related units within existing areas would be a challenge." Requiring developers to provide additional study to demonstrate the need for additional housing is superfluous.
- 2) Demand for ground-related housing such as townhomes and singles is largely unrelated to demand for studio, one- and two-bedroom apartments in Downtown towers. Between 2016 and 2021, Hamilton built 5,990 3+ bedroom dwellings, while rural-exurban areas such as County of Brant built 2,815, at a much higher per capita rate³. Families are increasingly leaving the GTHA to find attainable, family-friendly housing that meets their needs⁴ in the form of ground-related housing and are typically not looking for units in tower apartments. Further

² Ontario Economic Monitor: April to September 2024, Financial Accountability Office of Ontario [https://fao-on.org/en/report/oem-2024-q3/](https://fao.on.org/en/report/oem-2024-q3/)

³ Inside the crisis facing Canada's dysfunctional housing market. Globe and Mail, Statistics Canada.

⁴ Who Will Swing the Hammer, Smart Prosperity Institute. <https://institute.smartprosperity.ca/WhoWillSwingTheHammer>

reporting from the Missing Middle Initiative recognizes that ground-related housing has become completely unattainable in the GTHA.⁵ There should be explicit recognition that ground-oriented housing types will be displaced to neighbouring communities (such as Brant County) if they are not accommodated in Hamilton. Due to the location and distance from Downtown (and many other growth areas) of any potential UBE areas, it is difficult to determine the impacts of UBE on these areas. Furthermore, if the City is concerned about any “adverse effects on city-wide intensification objectives”, the first priority of City Council should be to demonstrate actual support for more intensification projects, as opposed to relying on the OLT to approve medium- and high-density applications within the urban boundary.

3) See commentary above.

Growth Allocation

In Part B, the Framework notes the following consideration: “A comprehensive review and land budget analysis is required to determine the need for an urban boundary expansion, which includes an assessment of occupied and vacant urban land, brownfield availability, greenfield densities, and intensification targets to determine if sufficient opportunities to accommodate forecasted growth contained in the UHOP are not available. (Former UHOP Policy deleted by OPA 167)”. As previously stated, the need for a UBE is clear; population projections have risen dramatically since the March 2021 staff recommendation to adopt the Ambitious Density Scenario, “which included an urban expansion of approximately 1,300 net ha combined with aggressive targets for residential intensification and greenfield density” (Dillon Memo, July 2024). 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. Again, 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. UBE Applications should be received and analyzed based on the Ministry of Finance 2046 population projection for Hamilton.

Relation to Green Building Standards

In October 2024, Hamilton Council adopted the Green Building Standards (GBS) which will apply to all new residential and non-residential development in the City. It is understood that the City is currently consulting internally regarding the implementation of the Standards and will be bringing a report to Planning Committee. It is noted in the Energy and Climate Change Assessment Report that “this section can reference requirements from the City’s Green Building Standards which would be implemented through subsequent planning approvals.” WE HBA strongly encourages the City prevent the duplication of study and review, and ensure that the requested information within the Energy and Environmental Assessment are aligned with and not extraneous to GBS requirements.

Part C Application Submission and Review Process

WE HBA requests clarification regarding the statement “acceptance by City Departments and/or External Review agencies of technical plans and studies as part of the urban boundary expansion application does not imply or constitute a positive staff recommendation of the application”. The province of Ontario is ultimately responsible for land use planning in Hamilton – and has identified

⁵ *Southern Ontario’s Home Affordability Crisis Remains at Near-Record Levels*. Missing Middle Initiative, April 1, 2025



that urban boundary expansions will occur in accordance with the provincial direction to allow for appeals to the OLT.

Conclusion

WE HBA is increasingly concerned and alarmed by a shifting political landscape in the City of Hamilton that caters to local political concerns of existing incumbent homeowners at the expense of younger generations, families, and those desperately trying to get into the housing market. The housing crisis will only get worse if we don't legalize more housing options of all types and tenures in both in existing and new communities. To put it bluntly - there is no pathway to middle class housing affordability with lengthy, costly and uncertain planning processes designed to prevent needed housing from being constructed.

The City of Hamilton is increasingly debating and passing policies that are both anti-housing and anti-intensification which despite political commentary to the contrary, further supports planning and demographic justification for UBE. The City's stated preference for a no-UBE scenario stands in stark contrast to the City's own public and political policy, including the phase-out of Downtown CIPA incentives, a 30-storey height limit city-wide, the anti-intensification apartment tax (Community Benefits Charges), the rejection of many intensification projects and subsequent OLT cases, and the need to use Strong Mayor powers to move forward affordable housing projects.

As widely cited by many politicians, "Don't tell me what you value, show me your budget, and I'll tell you what you value." – the City cannot simply state it values intensification over boundary expansion, while devaluing opportunities for intensification and housing supply through planning and fiscal policy. All levels of government and industry should be working together to spur construction of desperately needed housing of all types and tenures to close Canada's housing deficit. WE HBA looks forward to continuing to work in partnership with the City of Hamilton to achieve the City's housing targets through a variety of forms of growth.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Collins-Williams', written over a light blue horizontal line.

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