



April 29, 2025

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

To:  
**Members of General Issues Committee**  
City of Hamilton  
71 Main Street West

### **WE HBA Letter: Hamilton Green Building Standards Implementation Plan**

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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 Hamilton CMA in 2023, residential construction contributed over \$3.8 billion in investment value and provided nearly 17,000 jobs paying about \$1.2 billion in wages<sup>1</sup>. WE HBA notes that these economic indicators are in rapid decline as housing starts continue to drop. As such we appreciate the opportunity to provide comment on the implementation of the Green Building Standards ("GBS") and how this will impact our members ability to deliver housing.

WE HBA has participated in engagement over the past several years as the City has moved towards implementing new building requirements for new development. However, within the current economic realities there are growing concerns that the proposed adoption timeline is too aggressive and will be extremely challenging for builders to adhere to. Supply chain challenges and cost burdens related to the ongoing trade war, cost increases related to adhering to the standards and adapting staffing resources to respond to the guidelines are of top concern. The GBS requests various detailed and technical drawings including Energy Modelling Reports, Community Energy Plans, electrical and mechanical single-line diagrams, metering plans, and more which may require increased City staffing capacity, which will not be evaluated until Q4 2026. WE HBA and our members are doubtful the industry will be market-ready for the metrics with the proposed implementation timeline and September 1<sup>st</sup>, 2025, effective date. As such, WE HBA proposes a more manageable and achievable transition to ensure more successful outcomes.

We recommend applying the GBS first to a limited scope to "pilot" the approach before full rollout. This approach would allow for a detailed cost-benefit and economic impact analysis before City-wide implementation. This approach could provide more meaningful trend analysis and ensure a smoother widespread transition.

WE HBA takes note of the proposed incentives within the GREEN Hamilton Community Improvement Plan (CIP). However, given the current market conditions we suggest these incentives be expanded to encompass Tier 1 metrics. Without incentives our members can rely on and account for when determining a build is financially viable, we have serious concerns the GBS will add yet another financial barrier to building homes in the City of Hamilton. We urge

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<sup>1</sup> CHBA Economic Impacts 2023 Fact Sheet, City of Hamilton.



Council to solidify incentives in advance of burdening industry with new and costly standards in order to achieve City goals and objectives.

WE HBA proposes that the GBS metrics should be a condition of Site Plan Approval or Draft Plan of Subdivision and confirmed for the issuance of building permit. This would be the appropriate time for builders to carry out detailed design work that would fulfil the requirements of the metrics. The timing of report requirements causes concern; for example, energy modeling is typically conducted closer to the Building Permit stage, when the building design is finalized. While that can be avoided through the alternative path, the metrics propose various requirements (i.e. Requiring kitchen cabinet design to be determined) that are premature for Site Plan stage of the process. Additionally, there is concern that the requirements of the GBS may be asked for earlier in the planning process, such as around site design; guardrails must be established to keep any new standards at the appropriate stage of the process that makes the most sense when advancing the design process.

We also propose that extended transition provisions be considered for projects already in pre-application consultation, Official Plan, or Zoning stages. These projects are at serious risk due to the current economic realities. Requiring that additional costs be added mid-stream and the timelines associated with compliance are an undue burden and will delay or worse make the projects completely unviable. Moreover, an extended implementation period allows the industry and the City to address previously raised concerns over the timing of certain reporting requirements and ensure they are required at the appropriate time within the overall planning process.

While WE HBA is supportive of the general goals the city is attempting to achieve through the GBS, the guidelines (many of which are beyond municipal jurisdiction) will apply further pressure on the industry's ability to deliver homes due to cost. Our members have concerns related to the practical implementation of the GBS in such a short timeframe. An extended implementation period would better allow the industry and City staff to prepare and account for the challenges, training requirements and processes refinement that these new guidelines present.

We appreciate the City's ongoing engagement with the industry. We thank you for your time and consideration.

Sincerely,

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