

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: Growing a Resilient and Environmentally Sustainable Hamilton CIP

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.

WE HBA has participated in engagement over the past year regarding the update to the LEEDing the Way CIP. We appreciate that industry comments have been taken into consideration regarding flexibility and the expansion of eligibility criteria to be based on benchmarking as opposed to one specific certification program. As noted in the report, there is an additional upfront capital cost associated with many green building practices. This is further exacerbated also as noted, by the sourcing of certain materials, made worse by the ongoing trade war with the United States. There is a significant need to incentivize developers to go beyond the Ontario Building Code to address the cost premium of several green building practices, as well as risk associated with developers adopting newer technology, training trades on newer construction techniques and incorporating newer equipment and products into projects.

WE HBA is supportive of the overall structure of both the GREEN Hamilton Study Grant Program and the GREEN Hamilton Development Tax Increment Grant Program. Both programs are structured to provide clear direction for what is required for developers to access each of these funding sources. WE HBA encourages the Study Grant to be expanded to Sites subject to Site Plan Control, Plans of Subdivision and thus subject to the requirements of the GBS, to assist those developers in meeting the additional cost requirements of these Standards.

Given the current market conditions, WE HBA is of the position that these incentives be expanded to encompass meeting some of the Tier 1 metrics, especially associated with the Energy and Carbon Impact Category. As noted in WE HBA's other correspondence regarding PED 24114(a) Enhanced Engagement and Recommendations, and PED25117 Green Building Standards Implementation Plan, the GBS will potentially add tens of thousands of dollars to the cost of a new home at a time when builders are unable to sell new units as the cost to build currently exceeds the price consumers are willing to pay. Meeting the Tier 2 metrics presents an additional cost consideration, but the Tier 1 metrics themselves add non-negligible costs to the price of a unit (See Appendix A of FINAL WE HBA Letter Package – Hamilton GBS Revised Recommendations April 2025). The City should incentivize builders to go above Building Code, not just above Standards determined by the City to be mandatory.



The City of Hamilton is facing catastrophic conditions in the new home industry and job losses are already occurring. The Committee should consider more aggressive incentivization levels in order to stop the bleeding and help projects move forward at a time when very few projects are able to do so.

Sincerely,

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