

## Results of Public Meeting and Correspondence Received

Planning and Development Committee

Monday, June 17, 2024

### Members Present:

Regional Councillor M. Palleschi - Wards 2 and 6  
Deputy Mayor H. Singh - Wards 9 and 10  
Regional Councillor R. Santos - Wards 1 and 5  
Regional Councillor P. Vicente - Wards 1 and 5  
Regional Councillor N. Kaur Brar - Wards 2 and 6  
Regional Councillor D. Keenan - Wards 3 and 4  
Regional Councillor M. Medeiros - Wards 3 and 4  
Regional Councillor P. Fortini - Wards 7 and 8  
Regional Councillor G. Toor - Wards 9 and 10  
City Councillor R. Power - Wards 7 and 8

### Staff Present:

Angelo Ambrico, Acting Commissioner, Planning Building and Growth Management  
Allan Parsons, Director, Development Services  
Henrik Zbogor, Director, Integrated City Planning  
David Vanderberg, Manager, Planning Building and Economic Development  
Melinda Yogendran, Planner, Integrated City Planning  
Wang Kei (Edwin) Li, Planner, Development Services  
Harsh Padhya, Planner, Development Services  
Yinzhou Xiao, Planner, Development Services  
Chinoye Sunny, Planner, Development Services  
Sadaf Shahid-Hussain, Planner, Development Services  
Arjun Singh, Planner, Development Services  
Satwant Hothi, Planner, Development Services  
Noel Cubacub, Planner, Integrated City Planning  
Tristan Costa, Planner, Integrated City Planning  
Samantha DeLaPena, Planner, Development Services  
Genevieve Scharback, City Clerk  
Charlotte Gravlev, Deputy City Clerk  
Gagandeep Jaswal, Acting Legislative Coordinator

### Results of the Public Meeting:

The Information Report titled “**City-wide Community Improvement Plan for Affordable Housing**” was presented at the hybrid in-person and virtual public meeting of the Planning and Development Committee held on June 17<sup>th</sup>, 2024. The presentation provided an overview of the background research and financial analysis conducted as part of the development of the CIP, as well as the key components of the draft CIP for Affordable Housing.

At the June 17<sup>th</sup> statutory public meeting, one (1) member of the public spoke to the draft CIP and zero (0) written submissions and/or objections were received:

1. Sylvia Roberts, Brampton Resident

## Results of External Circulation

City staff circulated the draft CIP materials presented at the public meeting to the Region of Peel and the Ministry of Municipal Affairs and Housing (MMAH). A copy of the original comments received from staff at the Region of Peel and MMAH are included below.

**Table 1: Ministry of Municipal Affairs and Housing – Comments received August 8, 2024**

Section	Comments	Staff Response
Brampton Policies and Programs	Consideration could be given to highlight how the Residential Rental Licencing Pilot Program, the Brampton Housing Catalyst Capital Project and the Community Benefits By-Law influenced the formation of the Affordable Housing CIP.	Staff have updated the CIP to include details on these three programs.
Community Improvement Plan Area	To comply with Section 28 (2) of the Planning Act and the Brampton Official Plan, Council must adopt a by-law designating all lands within the City of Brampton as a CIPA prior to the adoption of the Community Improvement Plan.	Staff have prepared a CIPA By-law to designate all lands within the City as a Community Improvement Plan Area.
Program Eligibility and Requirements	Clarity should be provided as to whether an appeal mechanism is also provided to applicants wherein the total grant value is more than \$2 million, which would require City Council approval.	Staff have updated the CIP to clarify that applicants can re-apply in the next application intake period if their project is not approved for funding by Council.
	When funding sources from other affordable housing programs are available, the City should consider collaborating with the Peel Region Service Manager to match the number of funded units if possible.	Staff have already discussed this with the Housing Services Department at the Region of Peel as well as Peel staff coordinating the Region's Rental Incentive Program.
	Clarify the limit, if there is one, to how many grants an applicant can apply for. The same clarification should also be provided for applicants who own multiple properties.	There is currently no reason to put a limit on the number of applications per applicant, given that the evaluation criteria will only allocate funding for viable projects.
Program Descriptions	Rebate Program for Garden Suites: Municipality should consider replacing the word "rebate" with language that reflects a grant equivalent to the intended "rebate" amount, as there is no legislative authority to provide a rebate.	Staff have updated the CIP to include this change.
	City staff should employ an alternative mechanism other than a "fine" such as requiring the housing provider to reimburse the city, as the City may not have authority to issue and collect a "fine".	Staff have noted this for the future when the contribution agreement template is drafted.
	MMAH recommends adding a statement to the 'Program Parameters' section of the CIP to clarify that the total of all grants, loans and tax assistance provided shall not exceed the eligible costs of the improvements to the lands and buildings.	Staff have updated the CIP to include this change.
Appendix A	Was there any consideration of extending this to institutions covered under the Provincial Credit Union and Caisse Populaire Act?	Staff have included a line in the evaluation matrix to include this change.

**Table 2: Region of Peel – Comments received July 5, 2024**

Section	Comments	Staff Response
Garden Suite Rebate Program	Will there be requirements or incentives to make Garden Suite units more affordable?	There will be no requirements or incentives to make Garden Suite units more affordable. The program will only encourage gentle densification and the completion of Garden Suites.

Evaluation Matrix	It is appreciated that the scoring matrix provides higher scores for units with a higher depth of affordability, percentage of affordable units, and affordability period.	-
	Appreciate the inclusion of proximity to child care in the scoring matrix. Support efforts to continue to encourage co-location with child care where possible and feasible.	-
	Will the City consider reducing the spread of points for applicants who have secured other funding? Consideration that federal or provincial funding may have different eligibility criteria and goals and therefore applicants may not be eligible for these programs.	Upon evaluation, City staff will consider which other funding programs the housing project is eligible for, however, the spread of points for this section is significant because staff are hoping to ensure that projects that receive funding through the CIP for Affordable Housing are at a stage where they have strong financial viability. If the projects are not receiving funding from provincial/regional/federal sources, applicants will be able to provide staff with information on their other sources of funding to confirm financial viability and score points.
General	Will exemptions for affordable units from DCs have any potential impacts on this program?	Yes, the exemption of DCs for affordable housing units was included in the financial analysis done by SHS. The grant amounts do take into account that DCs will be waived.

**Ministry of  
Municipal Affairs  
and Housing**

Municipal Services Office Central Region  
Municipal Services Division  
777 Bay Street, 16<sup>th</sup> Floor  
Toronto ON M7A 2J3  
Tel.: 416 585-6226

**Ministère des  
Affaires municipales  
et du Logement**

Bureaux des services aux municipalités  
région du Centre  
Division des services aux municipalités  
777, rue Bay, 16<sup>e</sup> étage  
Toronto (Ontario) M7A 2J3  
Tél.: 416 585-6226



August 8, 2024

*Sent via email only*

Melinda Yogendran, Principal Planner/Supervisor (Housing)  
Planning and Development Department, City of Brampton  
2 Wellington Street West  
Brampton, ON L6Y 4R2

Dear Melinda,

**Re: City of Brampton – Draft Community Improvement Plan for Affordable Housing  
MMAH File No.: 21-CP-242566**

Thank you for providing Ministry of Municipal Affairs and Housing (MMAH) staff with the opportunity to review and comment on the City of Brampton's draft Community Improvement Plan (CIP) for Affordable Housing.

Ministry staff understand that the purpose of this CIP is to attract and incentivize affordable rental and ownership housing in the City. The CIP would apply city-wide, and proposes financial incentive programs for non-profit and private sector affordable housing developers to address housing affordability through the creation of various forms of affordable housing.

We have reviewed the proposed CIP document and the new incentive programs (New Affordable Housing Incentive, Rebate Program for Garden Suites, and Concierge Program) with respect to the legislative requirements of the *Planning Act* and the *Municipal Act*, as well as consistency with the *Provincial Policy Statement, 2020* (PPS) and conformity with provincial plans. It is noted that the CIP shared with MMAH staff is in the draft stage of development and the recommendations and comments provided herein reflect this early stage and are intended to inform the City's development on the CIP.

- **Page 7 – Brampton Policies and Programs**

There are six programs and studies noted as informing the CIP design. Of these, the Concierge Program for Affordable Housing, the Additional Residential Unit Policy Program and the Brampton Parking plan are all further explained. Consideration could be given to highlight how the other three programs – the Residential Rental Licencing Pilot Program, the Brampton Housing Catalyst Capital Project and the Community Benefits By-Law – influenced the formation of the Affordable Housing CIP.

- **Section 3.1 – Community Improvement Plan Area**

This section of the draft CIP document outlines the areas to which the CIP applies. A fully approved CIP must reference the Community Improvement Project Area By-law.

Section 28 (2) of the *Planning Act* requires municipalities to designate a Community Improvement Project Area (CIPA), in whole or in part, by by-law prior to the adoption of the Community Improvement Plan. Section 5.14 of the City of Brampton Official Plan contains policies enabling community improvement initiatives on lands which have been designated as CIPAs, pursuant to the provisions of the *Planning Act*.

To comply with Section 28 (2) of the *Planning Act* and the Brampton Official Plan, Council must adopt a by-law designating all lands within the City of Brampton as a CIPA prior to the adoption of the Community Improvement Plan.

- **Section 3.3 – Program Eligibility and Requirements**

For CIP applications wherein the total grant value is less than \$2 million, the Commissioner of Planning, Building and Growth Management is delegated the authority to approve the application, and an applicant may appeal to City Council if the application is denied. Clarity should be provided as to whether an appeal mechanism is also provided to applicants wherein the total grant value is more than \$2 million, which would require City Council approval.

The City has indicated that incentive programs in the CIP may be combined or stacked. When funding sources from other affordable housing programs are available, the City should consider collaborating with the Peel Region Service Manager to match the number of funded units if possible.

MMAH also recommends clarifying the limit, if there is one, to how many grants an applicant can apply for. The same clarification should also be provided for applicants who own multiple properties.

- **Section 3.4 – Program Descriptions**

*Concierge Program*

Section 28 (7) of the *Planning Act* enables a municipality to make grants or loans to pay for the whole or any part of the eligible costs of the CIP. The municipality will need to determine whether the municipal support to proponents aligns with the legislation.

*Rebate Program for Garden Suites*

Section 28 (7) of the *Planning Act* enables a municipality to make grants or loans. Therefore, municipality should consider replacing the word “rebate” with language that reflects a grant equivalent to the intended “rebate” amount, as there is no legislative authority to provide a rebate.

*New Affordable Housing Incentive*

City staff are encouraged to seek advice from the city solicitor to ensure the city has the authority to issue and collect a “fine”. Is there an alternative mechanism – such as a clause in the agreement requiring the housing provider to reimburse the city – to claw back the funding provided as per the agreement?

For example: “If affordability is no longer maintained within the affordability period, the owner would be required to reimburse the city x amount for each affordable unit.”

Or alternative language: “if the housing provider does not carry out its obligations under the agreement, the housing provider shall pay to the City the entire amount of benefits conveyed under the agreement, together with any applicable costs and interest.”

### *Program Parameters*

To ensure conformity with Section 28 (7.3) of the *Planning Act*, MMAH recommends adding a statement to the '*Program Parameters*' section of the CIP to clarify that the total of all grants, loans and tax assistance provided shall not exceed the eligible costs of the improvements to the lands and buildings.

- **Section 4.1 – Implementation Plan**

It is understood that intake for the programs will run until the end of 2026, at which time Council will consider cancelling, amending or continuing with the CIP incentive programs. Staff should consider adding this context and clarifying the intended duration of the incentive programs in the '*Implementation Plan*' section of the CIP.

- **Section 4.3 – Monitoring**

This section outlines provisions for measuring the efficacy of the CIP. It is recommended to add a provision linking Section 3.3 (2) with Section 4.3 to track the occupancy and rent of program units annually. For program units with stacked funding, the City should consider collaborating with the Service Manager for monitoring. In cases where there is only CIP funding, the City should establish a reporting mechanism to ensure its investments in affordability remain consistent annually for up to 25 years.

- **Section 4.4 – Plan Amendments**

The municipality needs to determine if the amendment process aligns with the legislative framework for amendments to existing CIPs as set out in the *Planning Act*.

- **Appendix A**

Project Funding Review notes Schedule 1 bank acquisition loan or line of credit to support their work. Schedule 1 banks are defined in the *Federal Banking Act*. Was there any consideration of extending this to institutions covered under the *Provincial Credit Union and Caisse Populaire Act*?

Thank you for providing MMAH staff the opportunity to review and comment on the draft CIP. If you have any questions regarding the above matter, please do not hesitate to contact me by phone at 416-903-0611 or by email at [Marc.Mitanis@Ontario.ca](mailto:Marc.Mitanis@Ontario.ca) or Heather Watt, Manager, by phone at 437-232-9474 or by email at [Heather.Watt@Ontario.ca](mailto:Heather.Watt@Ontario.ca).

Regards,

Marc Mitanis  
Planner, Community Planning and Development (West)  
Municipal Services Office – Central Ontario  
Ministry of Municipal Affairs & Housing

Archived: 2024/10/07 6:12:06 PM

From: [Lewkowicz, Paul](#)

Sent: Fri, 5 Jul 2024 21:35:30

To: [Yogendran, Melinda](#)

Cc: [Vyas, Archana Fang, Bihui April Longalong, Czeryll](#)

Subject: [EXTERNAL]RE: For Review: City of Brampton Draft CIP for Housing

Importance: Normal

Sensitivity: None

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**Caution: This email originated from outside the organization. Do not click links or open attachments that you do not trust or are not expecting.**

Hello Melinda,

Thanks so much for circulating for input.

Below are our comments:

### Information Report

P.2 Region of Peel's *Housing Needs Assessment 2021 Update*

- The document should be referenced as **2018 Regional Housing Strategy Data Update (April 2021)** Link: <https://peelregion.ca/business/planning/official-plan/review/pdf/2021-04-Apr-Housing-Strategy-Data-Update-for-IZ-Assessment-Report.pdf>
- References to % of owner households and renter households in Brampton in core housing need could be updated based on 2021 Census data and other estimates. Please contact Daniel Rowe ([Daniel.rowe@peelregion.ca](mailto:Daniel.rowe@peelregion.ca)) and Indro Bhattacharyya ([indro.bhattacharyya@peelregion.ca](mailto:indro.bhattacharyya@peelregion.ca)) and copy Paul Lewkowicz to get more up-to-date estimates.

### Attachment 3

P.16: "the primary goal of Garden Suite is the creation of new units, there is no requirement for the units to be rented at an affordable rate or to report to the City on rents that are charged".

- Garden Suites in the ARU policies are included as the City's affordable housing strategy.
  - It appears that this existing program is being incorporated as part of this new CIP. Will there be requirements or incentives to make Garden Suite units more affordable?
- It is appreciated that the scoring matrix provides higher scores for units with a higher depth of affordability, percentage of affordable units, and affordability period.

### Addition comments/questions:

- Eligibility Matrix: source of funding and how the scores are being distributed. Will the City consider reducing the spread of points for applicants who have secured other funding? Consideration that federal or provincial funding may have different eligibility criteria and goals and therefore applicants may not be eligible for these programs. Also, the chart under section 1: project funding Review (document page #28) in City of Brampton's Protocol for Evaluation of New Rental Incentive Requests will need to be updated to reflect the current CMHC programs (e.g., CMHC now has an Affordable Housing Fund which encapsulates previous programs like NHCF, RHI, etc.).
- Will exemptions for affordable units from DCs have any potential impacts on this program? As per the Province's

Affordable Housing Bulletin, the Development Charges, Community Benefits Charges, and Parkland Cash In Lieu fee relief for eligible projects took effect as of June 1, 2024. These exemptions could result in cost savings for eligible projects. It would be good to include an analysis of how these exemptions impact the funding required by project proponents. In other words, if one were to stack all the funding available through various programs, does that bring the funding ask down and the City may be able to get more affordable units from the allocated \$5M?

- Appreciate the inclusion of proximity to child care in the scoring matrix. Support efforts to continue to encourage co-location with child care where possible and feasible.
- Support Brampton's efforts to find ways to fast-track affordable rental projects

Thanks!

Paul

**Paul Lewkowicz** RPP MCIP PMP (he/him)  
647-407-5780

 **Region of Peel**  
working with you



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**From:** Yogendran, Melinda <Melinda.Yogendran@brampton.ca>  
**Sent:** Monday, May 27, 2024 2:47 PM  
**To:** Lewkowicz, Paul <paul.lewkowicz@peelregion.ca>  
**Cc:** Vyas, Archana <archana.vyas@peelregion.ca>  
**Subject:** For Review: City of Brampton Draft CIP for Housing

**CAUTION: EXTERNAL MAIL. DO NOT CLICK ON LINKS OR OPEN ATTACHMENTS YOU DO NOT TRUST.**

Hi Paul,

I've attached our draft CIP materials for your review and feedback. Please let me know if you have any questions or would like to discuss. I'm cc'ing Archana here, who is a member of our Technical Advisory Committee and is reviewing the materials as well.

Please also feel free to forward to others who you think should review, and it would be great to have any feedback by June 24<sup>th</sup>.

Thanks!  
Melinda

**Melinda Yogendran** (she/her/hers)  
Principal Planner/Supervisor (Housing)  
Integrated City Planning

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[melinda.yogendran@brampton.ca](mailto:melinda.yogendran@brampton.ca)





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