

Appendix 2 - Summary and Response to Public Comments/Correspondence Received

Below is a summary of the comments/questions that have been received at the statutory public meeting and/or through email correspondence. A response is provided b

Summary of Comments:

Opposition to garden suites

Several residents indicated a strong opposition to the City allowing garden suites, and questioned the need to undertake this review.

Staff response:

As a result of Bill 108, all municipalities in Ontario are mandated to permit both second units and garden suites (ARUs). As such, Brampton initiated a policy review to implement a made in Brampton solution that allows the City to comply with provincial legislation in a way that considers the City's context and individual needs.

Impacts to existing infrastructure

Concerns were expressed with respect to overloading existing infrastructure capacity due to the increase in population.

Staff Response:

By restricting the size of a garden suite to a maximum of 35 square metres, it is not anticipated that these units be occupied by more than 1-2 people, therefore limiting additional population in any given neighbourhood.

As opposed to second units, which are built within the existing building, it is anticipated that given the initial costs for construction and servicing, garden suites will only be a modest addition to the City's housing supply, so any impacts to servicing may be negligible.

Impacts to property values

Some comments indicated concerns with property values being impacted by construction of garden suites in their neighbourhood.

Staff response:

The construction of garden suites will not negatively affect property values in any given neighbourhood. Any construction or improvements being undertaken on a property will be considered by MPAC as part of the building permit process, and may result in a slightly higher property assessment.

Potential to convert existing garage

A few residents inquire about the potential of converting their existing detached garage into a garden suite.

Staff Response:

The proposed zoning by-law allows for the conversion of an existing detached garage into a garden suite, or the construction of a garden suite above an existing garage, subject to satisfying the zoning requirements (setbacks, separation distance, height, etc.).

Consider increasing maximum size of ARU

Some residents suggested that the proposed maximum size of garden suites is too restrictive and consideration should be given to increase it.

Staff Response:

The proposed policies aim to strike a balance for the range of residential lots that exist in the City, and provide flexibility while ensuring that garden suites only locate where appropriate.

In order to limit impacts to existing infrastructure, garden suites are intended to serve a specific segment of the population (elderly parents, caregivers, students), and are not intended for families, therefore it has been calculated that generally, the permitted 35 square metres would be appropriate to accommodate only a maximum of one bedroom.

The City may review any increase in size (or any other zoning requirement) on a case by case basis through the submission of a minor variance.

Incentives

Members of BILD and residents asked if the City will be offering any incentives (rebates, expedited approval, etc.) to developers/homeowners that wish to build ARUs.

Staff Response:

At this stage, the City is not considering offering incentives. The Region of Peel offers a Second Unit Renovation Program so that eligible homeowners can renovate and legalize an existing unregistered second unit. Staff is unaware if the Region will consider expanding this program to garden suites.

1. What plumbing upgrades to the municipal water service would be required to construct a garden suite?
1. With regards to servicing upgrades, water upgrades are the responsibility of the Region of Peel. It is the homeowner's responsibility to do the upgrade and it costs on average \$2,000+. As part of Second Unit applications, the Building Division requests homeowners to complete a plumbing data sheet which calculates if an upgrade is required based on total number of plumbing fixtures. City staff expect if you already have a second unit, and you wish to add a garden suite, an upgrade would be required. The upgrade for to the water service can be done as a separate building permit or with the application for the additional dwelling unit.

Impacts to neighbourhood character

A number of residents are concerned with potential changes to their neighbourhood character with the addition of garden suites.

Staff Response:

As garden suites will only be permitted in rear yards, their impacts and visibility from the street will be minimal. In addition, the proposed custom home review will allow the City to review the form and materials being proposed for garden suites, ensuring compatibility with existing buildings.

Increase in Municipal Property Taxes

During the consultation process questions were raised regarding the impact constructing a garden suite would have on municipal taxes.

Staff Response:

The assessment of the value of a property is undertaken by the Municipal Property Assessment Corporation (MPAC). The construction of a garden suite, or conversion of an existing accessory structure to a suite, may result in a change to the assessed value of that property

Any home improvements that require a building permit, including finishing a basement or constructing a garden suite become part of the annual assessment roll and yield a negligible one-time additional property tax revenue the first time it is returned on the assessment roll. MPAC will determine the property assessment based on the information provided by the City of Brampton Building Department as part of the permit process. MPAC may issue supplementary/omitted assessments through a Property Assessment Change Notice (PACN) to capture assessment values that have not been returned on the assessment roll.

Illegal Units

Many residents are questioning the ability of the City to control illegal garden suites.

Staff Response:

From an enforcement perspective, garden suites are not comparable to basement apartments or second units, as staff will only need to verify that a garden suite has been constructed, and permission to enter the property is not required.

To: Eshesh, Shahinaz
Subject: RE: [EXTERNAL]Comments: City-Wide Policy Review for detached Additional Residential Units (ARUs)

From: Roger Cawthorn <roger.cawthorn@gmail.com>
Sent: 2021/05/31 9:52 PM
To: Eshesh, Shahinaz <Shahinaz.Eshesh@brampton.ca>
Subject: [EXTERNAL]Comments: City-Wide Policy Review for detached Additional Residential Units (ARUs)

Comments Re: City-Wide Policy Review for detached Additional Residential Units (ARUs)
Commentor: Roger Cawthorn, Ward 3 resident
Note: Consent to include this email (including email address) as part of the public meeting record - Roger Cawthorn

Comments:

Expanding demand beyond planned, existing, and entrenched infrastructure capabilities through renovation or upgrade is, at best, costly and difficult. Often a complete demolition, redesign, and rebuild may be the only viable solution.

Just imagine infrastructure upgrades and/or complete rebuild costs at the neighbourhood level (assuming physical space is even available), should an unplanned surge in infrastructure demand occur due to a provincial legislation change. Consider the potential to overload existing electrical, water, sewage, transportation/road, parking, waste, telecom, emergency services, schools, health services, recreation and green spaces/parks frameworks within each neighbourhood. Please notice that the above existing infrastructure for the most part are working as designed and as per agreement of **all** residences and businesses who have chosen to make a given neighbour their home.

The City of Brampton's ARU implementation policy must either ensure population density per neighbourhood not be allowed to damage existing infrastructure capabilities or alternatively ensure the cost of upgrading and/or replacing existing functional infrastructure is incurred by those directly benefiting from that increased population density.

The City of Brampton should not indulge in wishful thinking with comments such as: "*Additional residential units help support a modest increase in housing units while respecting the overall low-density community form. ARUs are a form of gentle densification supporting the efficiency of existing City infrastructure (such as sewers, roads, and recreation facilities).*" The City will be unable to prevent or control even more ARUs being established in neighbourhoods that may very well experience excessive ARU growth. Furthermore, as currently the issue with legal and illegal second units, the City can not enter individual ARUs to assess the number of occupants. ARUs only exacerbate current (GTA specific) capacity issues over which the city is legally powerless to remediate through regulatory actions.

Beyond infrastructure impacts, it is unfortunate that the City of Brampton ARU implementation policy can not ensure that those benefiting from Provincial legislation (*Bill 108 More Homes, More Choice Act, 2019*) also incur the cost to neighbouring residences and business of property value degradation as a result of some of their neighbour's actions. This includes lost city tax revenue resulting from MPAC property value appeals. Hence, the City of Brampton does not need to encourage Provincial Bill 108. Instead the City of Brampton's ARU implementation policy should make every effort to place the cost and burden on those property owners actually benefiting from ARUs. As a first step, a realistic artist ARU renditions should replace the City's existing overly optimistic glossy representation. Why not illustrate un-maintained rental units with maximized tenants and automobiles plus existing accessory building (sheds) alongside neighbouring properties? With a realistic

visual representation in mind, then pursue ARU implementation policy that minimizes Bill 108 impact to existing infrastructure and property owners.

Retroactive actions envisioned by Bill 108 are, by definition, un-planned actions. Un-planned actions are a recipe for failure and should not be encouraged by a City policy. The City's policy should only do the minimum to comply with Provincial Bill 108. Instead, the City of Brampton should encourage and focus on NEW neighbourhoods where "*more homes, more choice*" can be effectively and efficiently implemented in a **planned** manner to actually address population growth demands.

Thank you for your consideration,
Roger Cawthorn