



RE: Environmental Registry of Ontario Posting 019-6822 – Site Plan for Residential Developments of 10 or Fewer Units – Two Proposed new Minister’s Regulations under the Planning Act and the City of Toronto Act, 2006

From: Steve Ganesh, Commissioner – Planning, Building and Growth Management Department, City of Brampton

To Whom It May Concern,

The City of Brampton (hereinafter referred to as ‘the City’) appreciates the opportunity to provide comments on the proposed changes outlined in the Environmental Registry of Ontario posting 019-6822 – Site Plan for Residential Developments of 10 or Fewer Units – Two Proposed new Minister’s Regulations under the Planning Act and the City of Toronto Act, 2006.

The City is supportive of efforts by the Province to address housing supply and development challenges, and remain committed to working with the Province towards their ambitious goal of delivering more housing.

The City has reviewed the draft legislation and offer the following comment to assist the Province. Site plan control provides a key opportunity for the City to ensure that the design of new buildings integrates into the existing urban fabric and supports the achievement of the planning goals and objectives of the community area. Site Plan also plays a critical role for the City to promote sustainable design (e.g., use of Green Development Standards) and enables the City to take a comprehensive approach to planning and designing sustainable and complete communities.

The City appreciates the clarification provided in these proposed changes, specifically parcels of land located within 300 metres of a railway line and 120 metres from a shoreline. However, the City maintains the position that full site plan control should be restored.

The City of Brampton would like to thank the Province for the opportunity to provide feedback and comments on the proposed changes.

Sincerely,

Steve Ganesh
Commissioner
Planning, Building & Growth Management



RE: Ontario's Regulatory Registry Posting 23-MMAH005 – Seeking Feedback on Future Regulations to Create a Balanced Framework Around Municipal Rental Replacement By-Laws

From: Steve Ganesh, Commissioner – Planning, Building and Growth Management Department, City of Brampton

To Whom It May Concern,

The City of Brampton (hereinafter referred to as 'the City') is submitting this letter in relation to the Ontario's Regulatory Registry posting 23-MMAH005 – Seeking Feedback on Future Regulations to Create a Balanced Framework Around Municipal Rental Replacement By-Laws. The City is supportive of efforts by the Province to address tenants' rights.

The City has reviewed the draft legislation and offer the following comment to assist the Province. The number of renters in Brampton has grown from 18.5% in 2006, to 20% in 2016, and 22% in 2021. However, given market influences over the past several decades, the creation of new purpose-built rental housing within Brampton has remained minimal, with the demand for rental outpacing supply and a widespread shortage of purpose-built rental housing throughout the city. Protecting the existing supply of purpose-built rental housing is critical to ensuring the provision of diverse and affordable housing supply options in Brampton.

The City recommends that rent for replacement units be regulated, and that 'similar rent' be clearly defined. 'Similar rent' could be defined as the last rent paid by the tenant with an increase no higher than the annual Provincial Guideline of a one-time capital allowance of 3%. Primary rental units are an important part of the affordable housing stock in the city, and it is vital that affordability is not compromised once replacement units are built.

Furthermore, as per comments submitted under Bill 23, the Minister should not limit municipal powers but expand them to ensure that the integral purpose-built rental stock in the city can be maintained and expanded. The Province should also authorize municipalities to require a minimum number of units and a minimum GFA through the replacement units, reflecting the need for larger-sized rental units.

Sincerely,

Steve Ganesh
Commissioner
Planning, Building & Growth Management



RE: Ontario's Regulatory Registry Posting 23-MMAH006 – Seeking Feedback on Proposed Changes to Help Protect Tenants from Bad Faith Renovation Evictions

From: Steve Ganesh, Commissioner – Planning, Building and Growth Management Department, City of Brampton

To Whom It May Concern,

The City of Brampton (hereinafter referred to as 'the City') is submitting this letter in relation to the Ontario's Regulatory Registry posting 23-MMAH006 – Seeking Feedback on Proposed Changes to Help Protect Tenants from Bad Faith Renovation Evictions. The City is supportive of efforts by the Province to address tenants' rights.

The City has reviewed the draft legislation and offer the following comment to assist the Province. The City is supportive of increased rights and additional protections for tenants in Brampton. The City appreciates the requirement for landlords to provide written notifications about the status of the renovations, and the requirement for landlords to obtain and provide a report stating the repairs require the unit to be vacant before a tenant is required to leave.

The City supports the 60-day grace period requirement, as many tenants will need to provide two months' notice to their current landlord if they have needed to rent elsewhere in the interim while the renovations are being completed. Without it, renters seeking temporary accommodation may have been penalized and incurring additional costs without the 60-day period.

The City requests clarification on the remedy for the landlord's failure to comply with the requirements.

Sincerely,

Steve Ganesh
Commissioner
Planning, Building & Growth Management



RE: Ontario's Regulatory Registry Posting 23-MMAH007 – Seeking Feedback on Timeframe for Occupancy for Landlord's Own Use Evictions

From: Steve Ganesh, Commissioner – Planning, Building and Growth Management Department, City of Brampton

To Whom It May Concern,

The City of Brampton (hereinafter referred to as 'the City') is submitting this letter in relation to the Ontario's Regulatory Registry posting 23-MMAH007 – Seeking Feedback on Timeframe for Occupancy for Landlord's Own Use Evictions. The City is supportive of efforts by the Province to address tenants' rights.

The City has reviewed the draft legislation and offer the following comment to assist the Province. The City is supportive of increased rights and additional protections for tenants in Brampton. A reasonable timeframe to require that a landlord move in after the tenant has vacated the unit is within a 60-day timeframe. If proof of significant work on the property is required with relevant documentation, this should be the only reason why going beyond the reasonable timeframe would be required (e.g., redesign for accommodation purposes, etc.)

In addition, it can be difficult for tenants to know whether a landlord has given notice in bad faith. The City recommends that, if a landlord evicts a tenant under Section 48, the landlord should be required to provide proof to the tenant that either they or an immediate family member or caregiver have occupied the unit within 30 days of moving in, such as proof of address on a government issued ID or a utility bill.

Sincerely,

Steve Ganesh
Commissioner
Planning, Building & Growth Management