



December 3, 2019

Planning Committee  
Hamilton City Hall  
2nd floor - 71 Main Street West  
Hamilton, Ontario L8P 4Y5

**RE: Temporary Use Bylaw for City of Hamilton Zoning By-law No. 6593 (PED19176)**

The Hamilton and District Apartment Association (HDAA) continues to support the Accessory Dwelling Units (Pilot Project) – Temporary Use Bylaw for City of Hamilton Zoning By-law No. 6593 (PED19176) as it is our belief that it will not only help maintain the number of rental units but perhaps increase the supply of rental units within the City of Hamilton.

In our previous submission, which we have attached, we raised three questions in regards to what would happen after the 3-year proposal term:

- Will units be forced to go back to the current zoning regulations?
- Will investments be wasted when this bylaw is discontinued?
- Will there be a grandfathering clause added?

The City has responded to our first question advising that “a Special Exception could be created for each property that received a Building Permit during the Pilot Project to create and/or legalize an accessory unit.” The HDAA wishes to express its concerns in regards to uncertainties that this could cause and we would be seeking a commitment from the City to ensure that this special exception is created. It may be difficult for community members to embrace the intentions of the Pilot Project if there are concerns of what may occur to their investments after the Pilot Project comes to an end.

The HDAA also continues to stand by the belief that this Pilot Project should not be concentrated on just wards 1 and 8 (and now part of ward 14), but that it should be implemented City wide as this could go a long way to reduce the housing affordability crisis the City is currently facing. By implementing this Pilot Project within only a few wards we may see a large concentration of rental units in those areas only and other areas of the City would be negatively impacted. With a City wide implementation there would be more scattering of rental units within the City as a whole and the whole of the City would benefit from these changes.

We remain hopeful that this zoning by law change is being proposed to help create more affordable housing within the City of Hamilton and not with any intention to have a licencing regime enacted. As such the position of HDAA remains unchanged and our support of the Accessory Dwelling Units (Pilot Project) – Temporary Use Bylaw for City of Hamilton Zoning By-law No. 6593 (PED19176) should not be considered an acceptance of the concept of Rental Housing Licencing. The threat of licencing still brings with it a serious risk of significant tenant displacement and increased rents because of the costs associated with a program that is already being done through the City’s proactive bylaw enforcement program.

Respectfully yours,  
**Hamilton and District Apartment Association**