



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 would like to congratulate City Staff for proposing the Accessory Dwelling Units (Pilot Project) – Temporary Use Bylaw for City of Hamilton Zoning By-law No. 6593 (PED19176). If not for the application of Licensing, we believe the relaxed regulations on zoning requirements in section 19 will help maintain the number of units and perhaps increase the supply. We applaud the City for accepting the direction of the Provincial Government by enacting Bill 108 (More Homes, More Choice Act, 2019).

This effort to help housing providers create more housing is a great step toward increasing supply in Hamilton. Along with the other 25 recommendations proposed in the “Promoting Code Compliant, Affordable, Safe, Clean and Healthy Rental Housing”, we believe if this is introduced City wide the changes will go a long way to reduce the housing affordability crisis the City is currently facing. We can only hope that when the official re zoning plan comes out it will also see the same zoning regulation changes so the benefits can increase supply across the City. It would be a shame if the only reason this zoning bylaw change is being proposed is for a licensing regime to be enacted and not because it helps create more affordable housing.

We would like to have the Planning Committee and City Staff look at the implication of what happens 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?

If the Proposed Pilot Project requires those who create or legalize secondary suites to obtain a building permit with associated inspections, wouldn't that eliminate the need for a licence program as the bylaw officers will have access to the unit during building permit inspection?

Although the Accessory Dwelling Units Pilot Project will help negate some of the displacement issues we would see if a trial licensing program is passed, it will not remove the threat entirely. The position of HDAA remains unchanged and our support of the Accessory Dwelling Units (Pilot Project) should not be considered an acceptance of the concept of Rental Housing Licensing. The threat of licensing 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 Cities proactive bylaw enforcement program.

As such, HDAA would support a City-wide section 19 bylaw change as suggested in the Accessory Dwelling Units (Pilot Project) – Temporary Use Bylaw for City of Hamilton Zoning By-law No. 6593 (PED19176).

Respectfully yours,
Hamilton and District Apartment Association