



Dear Mississauga City Council,

I am writing as a real estate professional active in the Mississauga housing market, working closely with property owners, investors, and housing providers and on behalf of the Cornerstone Association of REALTORS®, representing 7,500 members across various regions, including the City of Mississauga.

I would like to express my support for the City’s objective of protecting tenants from bad-faith evictions. However, I am concerned that the proposed Rental Repairs and Renovations Licensing By-law may have unintended consequences that could negatively impact housing supply, reinvestment, and overall market stability. Notably, this licensing framework was not included as a recommendation in the Mayor’s Housing Task Force. At a time when the focus remains on increasing housing supply and choice, Council should be cautious about adopting measures that suppress private investment and increase administrative burden.

### **1. Impact on Reinvestment in Existing Housing Stock**

The proposed licensing framework introduces additional procedural requirements, costs, and timelines for landlords undertaking significant renovations. While well-intentioned, these added layers may discourage property owners from reinvesting in aging rental housing.

In practice, many older buildings require substantial upgrades to remain safe, functional, and competitive. If the process to undertake such improvements becomes overly complex or uncertain, landlords may defer or abandon renovation plans altogether. Over time, this may contribute to the deterioration of existing housing stock and reduce the availability of quality rental units.

### **2. Indirect Impact on Secondary Suites and Gentle Density**

While accessory dwelling units (ADUs), basement apartments, and garden suites are not directly governed by this framework, the broader impact on landlord decision-making should not be overlooked.

Small-scale landlords typically evaluate property improvements holistically. If the ability to renovate or reposition an existing unit becomes constrained, the overall incentive to invest additional capital into the property, including the creation of secondary suites, is reduced.

Given that secondary suites represent one of the most accessible and scalable forms of gentle density, any policy that discourages reinvestment at the property level may unintentionally limit this important source of housing supply.

### **3. Disproportionate Impact on Small-Scale Housing Providers**

Smaller landlords play a critical role in Mississauga’s housing ecosystem, particularly in providing rental units within low-rise and “missing middle” housing forms.

Unlike institutional operators, small-scale providers are more sensitive to regulatory complexity, financial risk, and administrative burden. Requirements such as licensing applications, professional reports, and additional financial obligations may create barriers that disproportionately affect their ability to operate and reinvest.

A Rental Repairs and Renovations Licensing By-law may also create redundancy and potential conflict with existing provincial legislation that already serves this purpose.

This may lead to reduced participation from small landlords and a decline in organically created rental supply.

#### **4. Investment and Capital Allocation Considerations**

Real estate investment decisions are driven by risk, return, and execution certainty. Increased regulatory uncertainty, particularly around timelines, approvals, and costs which may influence where and how capital is deployed.

There is a risk that investment may shift:

- Away from properties that require reinvestment
- Toward jurisdictions with less complex regulatory frameworks
- Away from renovation-based strategies that contribute to housing quality

A reduction in reinvestment activity may have long-term implications for both housing supply and affordability within the City.

#### **5. Considerations for a Balanced Approach**

In the spirit of supporting both tenant protection and housing supply, the following considerations may help achieve a more balanced outcome:

- Establishing clear, objective criteria defining when vacant possession is required for legitimate renovations
- Implementing streamlined and predictable approval timelines for licensing applications
- Considering reduced administrative burden or scaled requirements for small-scale landlords
- Exploring incentives for landlords who improve housing quality while maintaining long-term affordability

Protecting tenants is an essential and commendable objective. However, it is equally important to ensure that policies do not unintentionally discourage investment, renovation, and incremental developments that contribute to a healthy and sustainable housing market.

A balanced framework that supports both tenants and housing providers will be critical to maintaining and expanding Mississauga's rental housing supply.

I encourage Council to carefully consider these unintended consequences to ensure policy supports both tenant protection and long-term housing supply.

Thank you for your time and consideration.

Sandra Longden

Member of the Board of Directors

Chair of Local Advocacy Committee

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#### About Cornerstone

Cornerstone Association of REALTORS® (Cornerstone) is a not-for-profit organization with over 325 years of collective service from its founding associations.

Established on July 1, 2024, Cornerstone leads with purpose, advocates boldly, and creates positive change for the success of our members throughout Burlington, Haldimand County, Hamilton, Mississauga, Niagara North, Norfolk County, Waterloo Region, and surrounding areas.

With approximately 7,500 members, Cornerstone is the second-largest REALTOR® association in Ontario, dedicated to promoting the greater good of the real estate community.