

Written Submission to Council – Proposed Renovation Licensing Bylaw

Submitted by:

Sarah Molnar

Property Manager, representing over 120 small landlords in Chatham-Kent

Introduction

Thank you for the opportunity to provide this submission.

While I am not within your municipality, Chatham-Kent is currently considering a similar bylaw. I am here to raise awareness of the unintended consequences these policies create—particularly for small landlords who are trying to do the right thing.

Key Concern

The fundamental issue with this bylaw is simple:

It will not stop bad actors.

Those operating outside the rules will continue to find ways around them. Additional municipal licensing will not change that behaviour.

What it *will* do is place added cost, delay, and risk on compliant landlords—the very people maintaining and improving housing.

This creates a policy that:

- Misses its intended target
- Penalizes those following the rules

Scale of the Issue

Renovation-related evictions represent a very small portion of the system.

Approximate annual figures in Ontario:

- Non-payment evictions (L1): **50,000–70,000+**
- Renovation evictions (N13): approx. **600**

This means most of the eviction activity is not related to renovations.

This is not a systemic issue—it is a targeted issue involving a small number of bad actors. A broad licensing regime is disproportionate to the scale of the problem.

Impact on Small Landlords

Small landlords are the backbone of the rental market.

At the same time, Ontario's rental housing stock is aging and requires major reinvestment:

- Electrical and plumbing upgrades
- Structural repairs
- Energy improvements

These are essential—not optional.

However, landlords are already under significant pressure:

- Rising property taxes
- Increasing insurance costs
- Higher utilities and maintenance
- Rent control limiting revenue

Unlike municipalities, landlords cannot raise revenue to fund infrastructure repairs. Access to financing is also tightening, particularly where rents are constrained.

Impact of the Proposed Bylaw

The bylaw introduces:

- Licensing fees
- Engineering/reporting requirements
- Administrative delays

These burdens will not impact bad actors—they were not complying to begin with. They will fall directly on responsible landlords.

Combined with existing pressures, this creates a strong disincentive to reinvest in housing.

Unintended Consequences

The likely outcome is clear:

Landlords will delay or avoid renovations.

Not by choice—but because they cannot afford the added cost and complexity.

This will result in:

- Deferred maintenance
- Declining housing quality
- Landlords exiting the market

- Reduced supply of well-maintained units

This directly undermines the goal of the bylaw.

Duplication of Existing Frameworks

Renovation-related evictions are already governed provincially through:

- The Residential Tenancies Act
- The Landlord and Tenant Board
- Compensation requirements
- Tenant right of return

This bylaw adds another layer that largely duplicates existing protections.

A Better Approach

If the goal is to protect tenants, more effective solutions include:

- Education on existing tenant rights
- Stronger enforcement of current legislation

Many protections already exist—but are underutilized.

Conclusion

While well-intentioned, this bylaw risks:

- Penalizing responsible landlords
- Discouraging reinvestment
- Reducing the supply of quality housing

At the same time, it does not effectively stop bad actors.

It does not solve the problem—it risks making it worse.

A balanced approach—focused on enforcement and education, not added bureaucracy—will better support both tenants and housing providers.

Thank you for your consideration.

Sarah Molnar

sarah@paragonproperty.ca