

To Mayor, Members of Council & Staff

From Tracey Duffield

Re: Additional Residential Dwelling Unit Review Report

Understanding that this issue will have serious long-term repercussions for the City overall, I think the following should be given serious consideration before approving the recommendations before you:

- 1) At this point in time, we do not have a reliable means of tracking the number of residents living in rental properties as we do not have any licensing requirements in place for detached, semi-detached or townhouse housing. Perhaps now could be the opportunity to rethink the framework of such policies looking ahead to adding licensing amendments. Is there a way to incorporate these amendments, for instance, to allow for this new bylaw to be approved contingent on part of the structure being owner-occupied?
- 2) This licensing could be implemented upon application by the landowner to either alter the existing building or applying to add another structure to the property for rental purposes. A license registry would keep in check the total number of residents per property while still providing affordable rental accommodation.

For instance, in comparing our City of Guelph to London, Ontario (both having active student-rental markets) we discovered the following:

London has a bylaw that limits detached rentals to 5 bedrooms & with licensing, they have that info to ensure compliance. The new bylaw on backyard dwellings says that rentals can only have 5 bedrooms in total so if a house has 4 rental bedrooms, an additional backyard dwelling could only have 1; if the house has 5, then no backyard accessory building is permitted. This helps to ensure that neighbourhoods not fall victim to a situation where an unregistered lodging house with 7 bedrooms can also accommodate an additional backyard dwelling with two additional bedrooms. What London has in place is a much more sensible approach.

Comparison re Rental saturation just with respect to the student population London vs Guelph:

	Approx. Population	# of dwellings	University enrollments 2019
London	384 000	175 550	32 100
Guelph	138 500	55 000	30 310

The above illustrates that considering the student numbers and the general population, Guelph is a much more saturated market for student rental requirements. (London has almost three times the general population, more than three times the number of dwellings, yet only needs rental accommodation for slightly more students than Guelph). This translates to more residents per property (especially in wards that may be more attractive to renters). As we have no licensing requirements in place, it means a loss of information and lack of management of issues regarding investor-owned dwellings. As the need for infill and intensification becomes more urgent, so too is the need to incorporate it wisely along with some sort of licensing system. It would be prudent to proactively manage the issue now vs band-aid solutions later.

Also, one other issue I didn't see addressed in the outline was any specifics relating to property owners trying to garner perhaps outdoor space by adding rooftop decks or common areas to newbuild structures perhaps as a way of skirting the 30% yard coverage regulation. This too would have a high impact on any neighbours and hopefully not be allowed.

In summary, I ask that council direct staff to add a licensing component to the bylaw governing new additional backyard residential units. This would ensure that the City has a complete record of where these are located and it would also provide assurance to potential tenants that the accommodation is licensed and approved. Because this new form of housing has the potential to have such an impact on neighbourhoods, it is imperative that controls to monitor that impact be in place. It's easier to do it now than regret it later.