

Staff Report



To **City Council**
Service Area Infrastructure, Development and Environment
Date Tuesday, December 10, 2024
Subject **Decision Report
Permitting Four Dwelling Units on a Lot
City-initiated Official Plan and Zoning By-law
Amendment**

Recommendation

1. That the City-initiated Official Plan Amendment to exclude multi-unit residential buildings with four units or less from the net density calculation in the low density residential designation be approved, as shown in Attachment-1 of Report 2024-405 dated December 10, 2024.
2. That the City-initiated Zoning By-law Amendment to permit up to four units on low density residential lots be approved, as shown in Attachment-2 of Report 2024-405 dated December 10, 2024.
3. That in accordance with Section 34 (17) of the Planning Act, City Council has determined that no further public notice is required related to the minor modifications to the proposed Official Plan and Zoning By-law Amendments permitting up to four units on a lot.

Executive Summary

Purpose of Report

This report provides a staff recommendation to approve the City initiated Zoning By-law amendment to permit up to four units on low density residential lands within the City.

Key Findings

Planning staff support the proposed amendments to the Zoning By-law to permit four units as written in Attachment-2 of this report.

- This Gentle Density Project and Zoning By-law amendment is one of eight (8) initiatives that are part of the larger Housing Accelerator Fund (HAF) project. In January 2024, the City partnered with the federal government to deliver Guelph's [Housing Accelerator Fund's Action Plan](#). A total of \$21.4M will be provided to incent and stimulate 739 housing units (above annual average) by 2026. Receipt of the full grant amount is dependent on successfully achieving the targets and fulfillment of all the initiatives outlined in the Action Plan.

- The original decision meeting date for this project was scheduled to proceed in June, however, the Province released Bill 185 which had several implications for Additional Dwelling Units (ADUs), including removing parking minimums downtown. As such, it was decided to postpone the decision meeting until October. This meeting was again postponed to December as the Province released new regulations regarding ADUs, which recently came into effect on November 25th. It is staff's opinion that these regulations do not impact this proposed by-law amendment.
- Comments were received at the April 9th public meeting and changes were made with regards to issues around parking, built form, and privacy. Details on consultations and the resulting changes are provided in the report.
- The proposed by-law amendment clearly distinguishes between the definition of a fourplex, where four (4) units on a lot are equally divided, and four (4) units, which requires one principal unit that is larger than the subsequent three (3) ADUs.
- This work is estimated to unlock approximately 14,250 lots for four units. Updating the zoning provisions for these units will unlock an estimated additional 3,150 lots.
- The proposed by-law amendment distinguishes between the definition of a fourplex, where four (4) units on a lot are equally divided, and four (4) units, which requires one principal unit that is larger than the subsequent three (3) ARDUs.
- Despite the large number of lots, and therefore potential units, unlocked, trends on the current uptake of triplexes and detached ADUs have been limited.

Strategic Plan Alignment

The recommended Zoning By-law amendments align with the with the approved 2024-2027 Strategic Plan theme of City Building and the Future Guelph objective of improving housing supply by increasing the range of housing options for current and future residents.

Future Guelph Theme

City Building

Future Guelph Objectives

City Building: Improve housing supply

Financial Implications

The City of Guelph has a funding agreement for \$21.4 million with the Federal Government known as the Housing Accelerator Fund (HAF) to incentivize an increase in housing supply. Under the HAF agreement, the City committed to reviewing its zoning regulations to permit four units on low density lands to encourage missing middle housing such as Accessory Dwelling Units (ADUs). Receiving the full \$21.4 million is contingent on following through with the City's HAF initiatives.

There may be additional downstream financial implications because of the proposed Zoning By-law amendments. The Development Charges Act (DCA) provides exemptions for the first two additional dwelling units in both new and existing detached houses, semi-detached houses, or row houses. This exemption includes

additional dwelling units in an accessory or ancillary structure. However, this exemption does not apply to a third ADU, or any units in a multiplex. For the purposes of the Development Charges By-law, an ADU and an Additional Residential Dwelling Unit (ARDU) are the same.

Further as ADUs become more prevalent it is important to note that assessment growth and subsequent on-going property tax levied per ADU is significantly less than a current single detached, townhome or condo. For an ADU the additional assessed property values reflect only the incremental increase in overall property value of the unit. This puts increased pressure on property taxes overall to support growth through ADUs.

To help administer the different rules, the proposed by-law amendment distinguishes between the definition of a fourplex, where four (4) units on a lot are equally divided, and four (4) units, which requires one principal unit that is larger than the subsequent three (3) ADUs.

Since the DC exemption does not apply to the third ADU, increasing the allowable units per lot would have a positive financial impact to DC collections. At the same time, amending the provisions to make it easier to build ADUs generally would have a negative financial impact to DC collections.

Supporting gentle density is an efficient way to use existing infrastructure and increase density, however development charge exemptions for ADUs shift the burden of the capital cost of infrastructure and amenities to support growth to property taxes and utility rates. The net financial impact depends on the type of developments the changes promote. It is impossible to predict what the uptake will be, and the financial impact cannot be reasonably quantified at this time. Staff will continue to monitor the impact of evolving legislation and by-laws to increase housing supply and will continue to report on DC exemptions in the quarterly budget monitoring reports.

Report

Background

The City of Guelph has made various commitments to increasing residential housing stock and type, through its planning policies, commitments to the Provincial government, and funding obligations with the Federal government under the Housing Accelerator Fund (HAF). As a result, Council has directed staff to study and prepare a Zoning By-law amendment to permit up to four units on low density residential lands as-of-right. As-of-right permissions means that a property owner is entitled to use or develop their property, in accordance with the zoning of the property, without a public hearing process or vote from municipal council.

It is important to note that with as-of-right permissions, a building permit is still required for any additional dwelling unit, regardless of whether it is for three units or the proposed four units. This means that before adding units onto a property, homeowners/applicants must first consult with the municipality to ensure the following criteria are met, including that:

- the proposed units and configuration are permitted;
- there is adequate and available servicing; and,
- applicable zone provisions (i.e., setbacks, coverage, height, parking, etc.) can be satisfied.

This report is broken down into the following sections:

- Chronology of proposed regulations
- What is gentle density and why do we use this term?
- What we heard (consultations and engagement)
- Proposed changes
- Policy Analysis
- Planning Analysis – Overview
- Summary of changes between April and October
- Monitoring
- Financial Considerations

The detailed Zoning By-law Amendment and Gentle Density Background Report, along with Design Demonstrations are included in Attachment-2 and Attachment-3 of this report.

Chronology of proposed regulations

In November 2022, the Province changed the Planning Act to permit three (3) units, as-of-right, on properties containing a single-detached, semi-detached or townhouse dwelling provided there is sufficient municipal water and sewage servicing. The three units can be within the existing residential structure or one attached additional dwelling unit and one detached dwelling unit (in the rear yard, for example). The Province did not provide any additional zoning regulations with respect to height, setbacks, or coverage.

In March of 2023, the City committed to facilitating the development of 18K units by 2031, through a Provincial Municipal Housing.

In April 2023, when Council approved the Comprehensive Zoning By-law (currently partially under appeal) which provided for three (3) units on residential lots city-wide, direction was also provided to staff to consider as-of-right permissions for greater than three (3) units per property within low density residential zones. Staff were directed to report back to Council with options and recommendations by the end of Q1 2025.

Subsequently, in October 2023 and due to increasing urgency around housing affordability challenges, Council directed staff to immediately prepare a zoning by-law amendment that would permit, as-of-right, up to four (4) residential units per lot within residential zones where the Council-approved (subject to appeal) Zoning By-law (2023)-20790 permits a maximum of three (3) residential units per lot. A draft by-law amendment is to be completed by Q2 of 2024 and presented to Council for a decision.

In April of 2024, a statutory public meeting was held for the proposed Zoning By-law amendments to permit four units as of right. A description of the public meeting is included in the consultation section of this report.

The original date for a decision meeting was anticipated to occur earlier this year, however, the Province's Bill 185 was then released, which had several potential implications for the proposed by-law, such as ADU size regulations, bedroom limits, height restrictions, and removal of coverage maximums. For this reason, staff waited to bring the by-law to Council for a decision. The meeting was again postponed from October to December as the Province released new regulations regarding ADUs, which recently came into effect on November 25th. It is staff's opinion that these regulations do not impact this proposed by-law amendment.

What is gentle density and why do we use this term?

Gentle density is a term that describes modest increases in the number of dwelling units in a given low-density neighborhood. It is coined **gentle** as this increase is limited to permitting more units on a lot at the same scale as single-detached dwellings, while **gently** adding more dwelling units.

The City of Guelph is poised to grow to approximately 208K people by 2051. As a result, it is anticipated that 27,700 new dwelling units would be required to house this growing population from the end of 2023. Incremental growth within the City's urban boundary, and within existing residential neighborhoods, is an efficient way to use the City's existing infrastructure and servicing to facilitate the development of more homes. This can help provide more affordable housing options for residents in existing neighborhoods. Additionally, growth within existing residential neighborhoods is demonstrated to have a positive impact on public health, the environment and economy.

Gentle density is one of the handful of land-use planning tools that municipalities have at their disposal to address the shortage of housing supply in the market. Permitting gentle density is widely considered to be a less disruptive way to increase housing supply in existing neighborhoods while maintaining their character and built environment, which is achieved through maintaining the existing low density regulations regarding setbacks, building envelopes, and landscaped open space.

Permitting four units as-of-right is a way for the City to further disperse future population growth across the city instead of being concentrated in certain areas, while maintaining much of the existing zoning regulations currently permitted in the zoning by-law. The dispersion of potential lots where ADU's are being built, and have the potential to be built, is shown in Attachment-4. It also provides an opportunity for landowners and citizens to be part of the city building process while receiving some of the benefits, vis a vis rental income, multigenerational living, or downsizing and aging in place. Gentle density is a tool that increases the variety of housing types within a neighborhood, helping us move away from traditional, often times exclusionary, zoning.

What we heard (Consultations and Engagement)

The Gentle Density project conducted public and industry engagement via four engagement sessions held in February 2024. A summary of the four sessions, their time, location, and date, is included in the table below.

Table 1 Consultations and Engagement Sessions

SESSION 1	SESSION 2	SESSION 3	SESSION 4
Tuesday, February 20th, 1-3pm	Thursday, February 22nd, 2-4pm	Thursday, February 22nd, 6-8pm	Thursday, February 29th, 5-8pm
Virtual information session for development and homebuilding industry	In-person information session for development and homebuilding industry	In-person information session for community and resident groups	In-person public open house

The engagement sessions offered an opportunity for the public to learn about the concept of Gentle Density and four-unit housing types. They were also used as an opportunity to demonstrate where gentle density may occur and gather feedback on preliminary site demonstration plans showing four units, including configurations showing accessory dwelling units. Ultimately, the sessions provided an opportunity to gather feedback from the public and interest groups on regulations that presented opportunities and challenges.

A full summary of the engagement sessions, including details on each engagement session is included in Attachment-3 of this report.

A public meeting for the Gentle Density project was held on April 9, 2024. Detailed feedback was provided on the draft zoning regulations. Details on the public meeting, including the background staff report (2024-140), [can be found on the City's website](#).

Overall, the following three themes were taken away from the consultation process:

- 1. Keep requirements simple and less restrictive:** Participants, especially those from the development and home building industry, wish to see regulations that are clear and allow the four-unit housing type to be efficiently implemented on eligible lots.
- 2. Parking requirements are a barrier:** Each engagement session included significant conversation around the negative impact of high parking requirements on the feasibility of gentle density. Although many residents are used to having driveways to park personal vehicles and noted parking needs to be sufficient for new residents, some participants are open to exploring reduced parking requirements to reduce the amount of on-site area that parking will use.
- 3. Additional Dwelling Unit (ADU) regulations:** Several suggestions were made about adjusting by-laws for ADUs to enable a four-unit housing configuration (especially on smaller lots) that is more favourable (e.g., large units, more bedrooms per unit). However, feedback on enabling 4-units was mixed.

The original date for a decision meeting was anticipated to occur earlier this year, however, the Province's Bill 185 was then released, which had several potential implications for the proposed by-law, such as ADU size regulations, bedroom limits, height restrictions, and removal of coverage maximums. For this reason, staff

waited to bring the by-law to Council for a decision. These implications could result in additional amendments being required to the zoning by-law. However, due to the obligations to meet timelines under the HAF, staff have decided to move ahead with the current by-law amendment.

Provincial Consultation on Additional Dwelling Units

The decision meeting was scheduled for the October 8th meeting of Council, however, the Province released consultation on potential changes to Ontario Regulation 299/19, proposing potential changes to provincial regulations. This consultation period opened on September 23rd, 2024, and closed on October 23rd, 2024. This report, and decision meeting, was thus pulled from the scheduled October 8th meeting in order for staff to review the proposed changes from the Province and any implications it might have for this work.

After review, it is staff's opinion that the proposed changes, if they come to fruition, will not significantly impact the by-law as currently proposed.

Proposed Changes

The following is a summary of the changes proposed to the Official Plan and the Zoning By-law.

Official Plan Amendment

The proposed Official Plan Amendment is a minor amendment to clarify the net density policies for multi-unit buildings in the low density designation. It is staff's opinion that the maximum net density set out in the Official Plan should not apply to multi-unit buildings up to four units. As a result, a clarifying policy amendment has been proposed. A similar amendment was approved when the City permitted 3 units on low density residential lots (Official Plan Amendment 88). Details on the Official Plan Amendment can be found in Attachment-1.

Zoning By-law Amendment

The proposed regulations to be amended in the City's Comprehensive Zoning By-law (2023) are included in Attachment-2 of this report. In summary, the following changes are proposed.

The definition of "fourplex" has been amended to allow for four units to be built in one ground-oriented building (distinct from an apartment building).

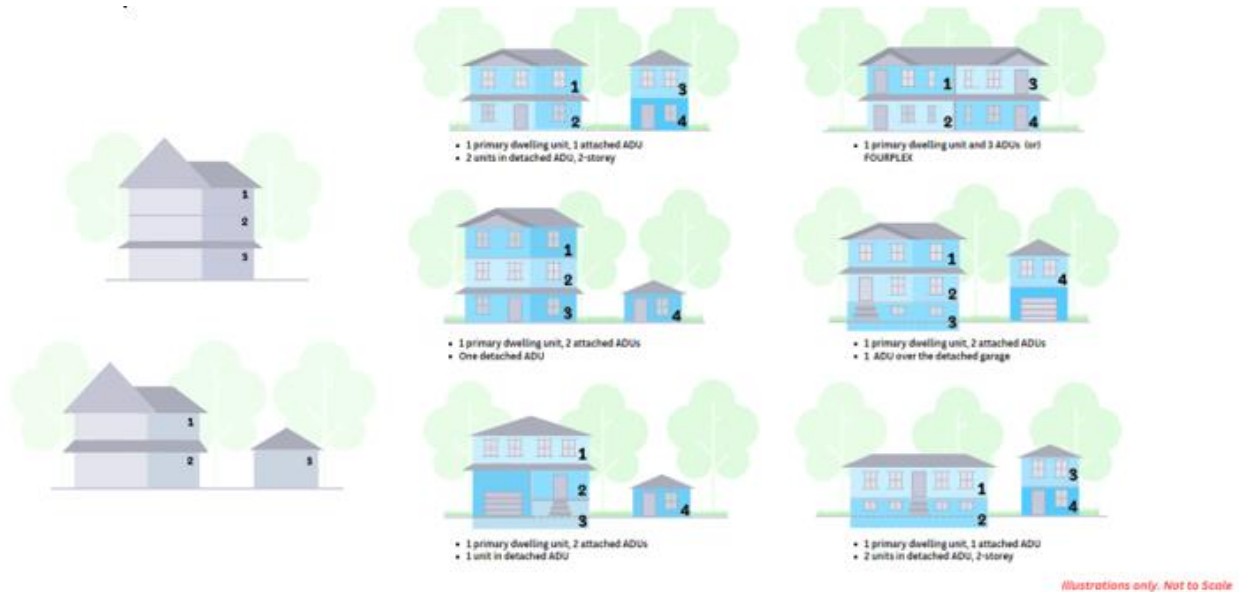
The number of units permitted in low density zones (RL.1 and RL.2) will be increased from three units to four units. How property owners choose to configure these units, between the primary dwelling and detached accessory dwellings will also change, allowing up to 2 units to be placed within the detached accessory dwelling (Figure 1). Regulations on the number of bedrooms have also been removed.

Parking regulations have been amended to require 1 parking spot per unit after the second unit (i.e., the number of spots required is one less than the number of ADUs.). This incorporates feedback heard from community members that parking is important while giving some flexibility to property owners to make it more feasible in providing additional units.

Detached ADU heights are proposed to be permitted up to 6.1 metres. This is currently permitted when an ADU is located above the garage and is now proposed to provide consistency and create flexibility in ADU configuration (i.e. two storey

typology). Detached ADU size requirements have also been simplified to permit a maximum floor area of 80 square metres per unit.

Figure 1 Potential unit configurations (NOTE: For illustrative purposes only. These images are not to scale.)

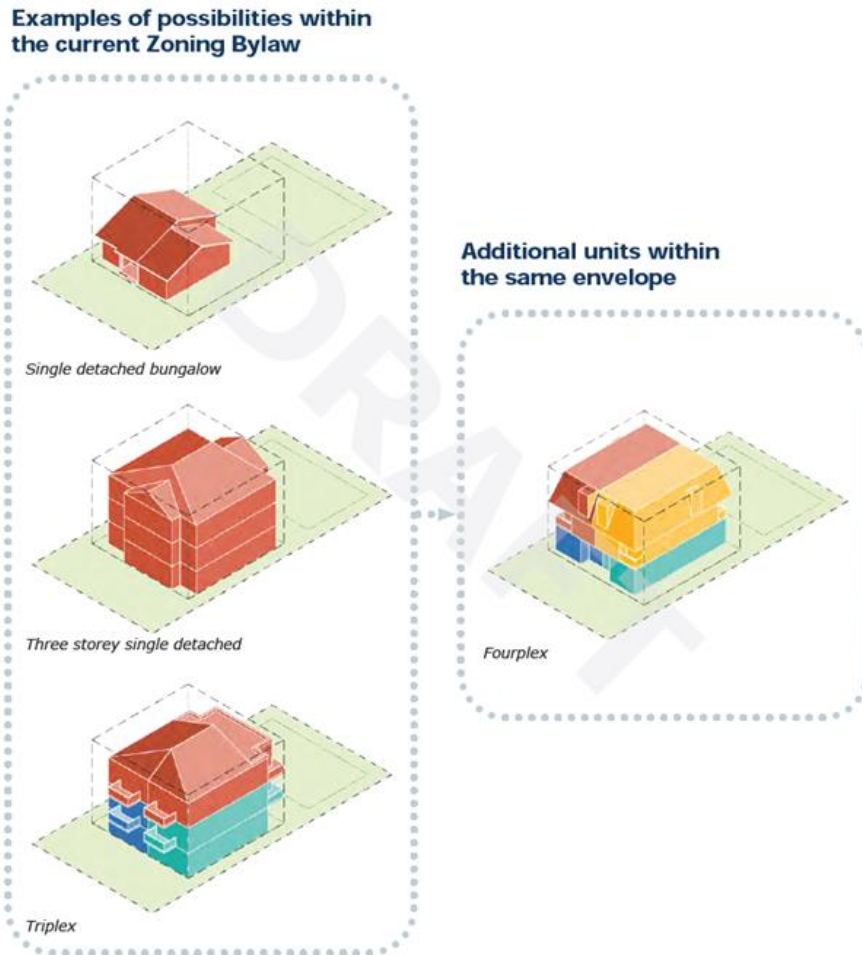


The proposed regulations keep existing setback requirements, building envelopes, landscaped open space, and lot coverage for primary buildings (Figure 2). These setbacks ensure that any proposed development fits within the existing neighborhood scale.

The proposed changes reflect the feedback heard from the community during the public meeting on April 9, 2024. The proposed changes to the Zoning By-law aim to promote the development of ADUs while limiting the potential impacts on existing neighborhoods.

Detailed renderings of what a potential fourplex, or detached, two storey ADU could like under the proposed by-law amendment have been included in Attachment-2 of this report (p. 62-69).

Figure 2 Diagram showing how the building envelope has stayed the same while allowing more units.



Policy analysis

Recent legislative changes from the Province have pushed forward the legalization of ADUs on all residential lots in Ontario. Bill 23, passed in November of 2022, permits up to 3 dwelling units on residential lots. This direction has been incorporated into the City’s plans, policies, and by-laws.

The Provincial Planning Statement (PPS) 2024 provides policy direction on matters of provincial interest related to land use planning and development in the province, setting the foundation for regulating the development and use of land. The PPS replaces both the Provincial Policy Statement (2020) and the Growth Plan for the Greater Golden Horseshoe (2019). The PPS provides several overarching policies regarding housing, infrastructure, and the development of healthy communities. Core to these policies are the principles of promoting efficient development patterns, accommodating an appropriate mix of residential typologies (including, specifically, ADUs). The PPS directs municipalities to permit all types of residential intensification, including ADUs (2.2.1.b.2).

The City recently reviewed its Official Plan resulting in Official Plan Amendment 80 which was modified and approved by the Ministry of Municipal Affairs and Housing. The Official Plan prioritizes new development that respects the existing character of

Guelph. The Official Plan supports built forms that encourage sensitive intensification and the provision of a diverse mix of housing options, which is supported by the City’s Urban Design Guidelines. The City’s Official Plan recognizes that growth should be directed to built up areas, and where capacity exists to best accommodate expected population growth.

Planning Analysis - Overview

Lot Analysis

The Residential Low Density 1 and 2 (RL.1 and RL.2) zones present the greatest opportunity to support gentle density through minor wording revisions in these zones (see Attachment-1 for details on Amendments). RL.1 and RL.2 zoned parcels make up 80 per cent of the City’s residentially zoned lands (32K lots). RL.1 and RL.2 zones hold the highest potential for enabling gentle density. This is because they are primarily developed with single detached dwellings (approximately 85 per cent of RL.1 and RL.2 lots contain a single detached dwelling), cover the most residential-designated lands in the City, and can accommodate up to three units under current Provincial legislation and the new Comprehensive Zoning By-law (2023).

Table 22 Total number of Low Density lots unlocked

Total Number of Low Density (RL.1 & RL.2) Lots	32,000
Number of lots that could support four units without changing current by-law provisions	11,100
Number of additional lots that could support four units with proposed by-law provisions	3,150
Total increase as a result of by-law amendments	14,250

Despite the prevalence of RL.1 and RL.2 zoning in the City, certain lot characteristics limit the ability for these lots to add ADUs. The primary characteristic determining the ability for lots to be developed is lot width, as even gentle density requires core elements such as parking, driveway, pedestrian access, setbacks, and the building itself, which all compete for space on the existing lot.

The analysis of current lot configuration in the City has revealed that, under the proposed by-law amendment, approximately 14,250 lots could support four units as-of-right. This is an increase from 11,100 that would be supported in the current by-law. These lots are well dispersed across various neighborhoods within the City (Attachment-4).

Parking

Parking is one of the main space requirements for residential development in the city, including gentle density developments. A review of municipal parking requirements has been conducted. Municipalities have been taking different approaches to parking minimums, with some not requiring any parking depending on location, and others requiring one spot per dwelling unit.

Based on consultation and the analysis completed, a decision was made to take a balanced approach when it comes to parking minimum requirements. The proposed by-law requires a minimum of 3 spaces for a fourplex or primary unit with 3 ADUs.

The required parking minimum for other dwelling units follows a similar pattern, requiring one less space than the number of units.

Table 33 Summary of parking changes

Residential Use	Minimum Parking Requirement
Additional Dwelling Unit (ADU)	1 ADU = No space required 2 ADUs = 1 space 3 ADUs = 2 spaces
Fourplex	1 space per dwelling unit to a maximum of 3 spaces

Given that setbacks, height restrictions, landscaped open area, and driveway width have remained the same in both the current and proposed by-laws, the increase of 3,150 lots is almost entirely due to the removal of one required parking space. It was determined that this approach was best suited to balance the need to incentivize additional housing in the form of gentle density and the parking requirements of current and future residents.

Height and built environment

The front, side, and rear setbacks are not proposed to change as to what is currently permitted in the zoning by-law. Similarly, the height of fourplexes is proposed to be consistent with what is currently permitted for single detached dwellings. The height allowance for detached ADUs has been revised to be more straightforward, allowing two storeys without the requirement that a second story must be above a garage.

This approach was taken to ensure that new units were kept to the same scale within existing neighbourhoods, and that neighbourhood character was maintained. These regulations, working together with landscape open space and maximum lot coverage requirements ensure that this density remains gentle in nature.

Lot severances

While the analysis focuses on single lots and does not include lot consolidation within the city, the issue of severances has come up throughout consultation on the project. According to the analysis, in order for a parcel to be severed into two lots that support four units each it would likely need to be at least 24 metres to 30 metres wide. Only 6 per cent of all RL.1 and RL.2 parcels are 24 metres wide, and only 3 per cent of all RL.1 and RL.2 parcels are 30 metres wide. Only about 1 per cent of all RL.1 and RL.2 are 36 metres or wider, which may be wide enough to be severed into 3 lots that each support four units.

Servicing

Concerns were raised about the proposed by-law amendment's impacts on servicing. The proposed by-law requires that any proposal to develop four units demonstrates that there is adequate servicing for the project. This continues the existing practice required for three units, to ensure that there is enough servicing capacity for a proposed development. Additionally, as part of the Building Permit

application process, proponents are required to submit site grading plans, which will demonstrate how stormwater is managed onsite.

Summary of changes between April and December

Consultation on the proposed by-law amendment culminated with a Statutory Public Meeting on April 9th, 2024. The decision meeting for the proposed by-law amendment was originally scheduled to take place prior to Council's summer break. Staff decided to push the decision meeting to October in order to accommodate for potential provincial changes in legislation that were released in the interim.

Since April, some modest changes have been made to the proposed by-law to accommodate what we heard during consultation. This includes a provision requiring increased setbacks for all second story windows, balconies, and stairwells that are facing an adjacent lot line. This change was implemented to improve privacy concerns heard by residents regarding potential onlooking in neighbouring backyards.

Other concerns were raised regarding limiting the number of bedrooms in an ADU. Staff determined that restricting the overall size of ADUs is more in line with provincial direction and zoning for land use instead of for people. Overall, the size limits will be the mechanism to ensure that density levels are appropriate while maintaining flexibility for property owners.

Height and parking were also concerns raised by the public at the statutory public meeting. It was determined that these provisions would not be changed. It is staff's opinion that the proposed height limits for fourplexes and ADUs are consistent with the built form of low density residential neighborhoods.

Additionally, with regards to parking requirements, it is staff's opinion requiring 3 spots for a fourplex or four units is the best way to balance the public interest to incentivize the development of new housing while maintaining provisions for private car parking for residents. This approach is in line with other municipalities such as Kitchener and Hamilton.

Changes to Configuration

The configuration of ADUs has also been changed in the proposed by-law amendment from what was presented in April. The proposed amendment would only permit four units on lots with detached dwellings. The Province has indicated, as mentioned above, that they may introduce additional ADU regulations, including the removal of lot coverage maximums and maximum size limits for ADUs. Lot coverage maximums and landscaped open space are tools of this by-law to control potential overbuilding impacts, such as stormwater management and potential overbuilding.

At this time, staff are recommending that four units be permitted only on lots with detached dwellings. This approach was taken in order to allow staff to monitor potential provincial changes. Allowing four units on lots with semi-detached and townhomes would be further investigated through work on additional units (5+, below), and would allow staff to potentially bring forward changes in concert with other work, including the upcoming tree removal by-law.

Next Steps

Further work on gentle density and enabling more units on low density lots will take place in accordance with the commitments in the HAF. This includes work related to investigating and examining the potential for 5, 6, 8, and 12+ units. Additional work related to ADUs that will occur includes an incentive program, which is currently underway.

Monitoring

The uptake of ADU development will be monitored via Building Permit data to see whether or not the proposed changes to the by-law have had an impact on the development of ADUs and their location. This will be included in the City's monitoring reports that are currently done to ensure that growth targets are being met.

Under the HAF, the City is also undertaking a project to financially incentivize the development of ADUs for affordable rental units. That project is currently underway. Monitoring efforts for the incentive program will be coordinated with this project to measure the impacts of the programs and policy changes together. This was presented with the Community Improvement Plan at the [November 13, 2024 planning Committee meeting](#).

Financial Implications

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Further as ADUs become more prevalent it is important to note that assessment growth and subsequent on-going property tax levied per ADU is significantly less than a current single detached, townhome or condo. For an ADU the additional assessed property values reflect only the incremental increase in overall property value of the unit. This puts increased pressure on property taxes overall to support growth through ADUs.

To help administer the different rules, the proposed by-law amendment distinguishes between the definition of a fourplex, where four (4) units on a lot are equally divided, and four (4) units, which requires one principal unit that is larger than the subsequent three (3) ADUs.

Since the DC exemption does not apply to the third ADU, increasing the allowable units per lot would have a positive financial impact to DC collections. At the same time, amending the provisions to make it easier to build ADUs generally would have a negative financial impact to DC collections.

Supporting gentle density is an efficient way to use existing infrastructure and increase density, however development charge exemptions for ADUs shift the burden of the capital cost of infrastructure and amenities to support growth to property taxes and utility rates. The net financial impact depends on the type of developments the changes promote. It is impossible to predict what the uptake will be and the financial impact cannot be reasonably quantified at this time. Staff will continue to monitor the impact of evolving legislation and by-laws to increase housing supply and will continue to report on DC exemptions in the quarterly budget monitoring reports.

Attachments

Attachment-1 Proposed Official Plan Amendment

Attachment-2 Proposed By-law Amendments

Attachment-3 Gentle Density Background Review and Design Demonstrations Report

Attachment-4 Map of Current Additional Dwelling Units and Lots with Potential for Four Units

Attachment-5 Council Presentation

Departmental Approval

None

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