



Planning and Development

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October 10, 2024

Ken Melanson
Township of Southgate

RE: Zoning By-Law Amendment C9-24
Zoning By-Law Update: Additional Residential Unit Regulations
Applicant: Township of Southgate

Dear Mr. Melanson,

This correspondence is in response to the above noted applications. We have had an opportunity to review the application in relation to the Provincial Policy Statement (PPS) and the County of Grey Official Plan (OP). We offer the following comments.

The purpose and effect of the subject amendment would be to update the Township's Zoning By-Law to permit 'Additional Residential Units' (ARU's) in accordance with the Provincial legislation and to facilitate alignment with the County's Official Plan.

It is noted that the in 2022 and 2023, the County undertook a review of Provincial ARU policies, and how they have been implemented throughout different municipalities across Ontario. In partnership with the University of Guelph, students also undertook a survey and interviews with Planning and Building staff both inside and outside of the County to understand best practices for considering ARU's. As a result of this work, the students developed an ARU report, which is available [here](#). County staff further refined that work to create a Technical Guideline document that outlines a template for OP and Zoning considerations for municipalities to use as a starting point for internal and external ARU discussions.

Generally speaking, County staff are supportive of the proposed amendments put forward by Township staff, which appear to demonstrate alignment with the County's Official Plan, as well as both the current PPS and proposed 2024 PPS. County staff would acknowledge a few points below for further consideration:

1. **Lot Size / Private Servicing** - County staff acknowledge that there may be concerns with locating ARU's on smaller residential parcels that are serviced solely by private servicing. Generally, staff would recommend considering

minimum lot sizes for proposed ARU's on privately serviced lots. Section 8.9.1 (18) of the County's OP states:

Municipalities may choose to require a nitrate study for additional residential units on lots less than 0.4 hectares in size.

On the above, municipalities may wish to consider a minimum lot size where “up to” one ARU is permitted on private services; and a larger minimum lot size where up to two ARU's may be permitted. Where a minor variance or zoning by-law amendment is proposed to amend sizing criteria, County staff would recommend that a nitrate study be required to ensure that new units can be safely serviced, without impacts to surrounding lands.

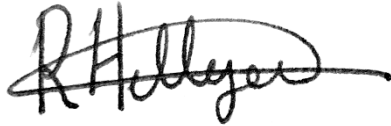
2. **Basement / Cellar units** – Historically, some zoning by-laws have differentiated between ‘basements’ and ‘cellars’ for the purpose of deciding whether a residential unit may be adequately accommodated on the lower floor of an existing structure. As the Ontario Building Code regulates safe access (window sizing, exits, smoke alarms, etc.) and minimum ceiling height, staff would recommend that these regulations be removed, to eliminate unnecessary minor variances, re-zonings, etc. where an individual can safely locate a new unit below grade, while meeting all requirements of the OBC.
3. **Maximum height of ARU's in accessory structures** – during discussions with local and regional planning and building staff, it was noted that in some cases, ARU's were proposed above existing garages, which would exceed the proposed maximum height of one storey. County staff would recommend considering a height exception in cases where an ARU is proposed within an existing, legally constructed accessory structure, to limit construction costs and minor variance applications where new units of this type are proposed.
4. **Define appropriate licensing / permitting for mobile and modular units** – in some municipalities, there has been acknowledgement that existing definitions of “mobile” or “modular” residential units limit the potential for more affordable housing types that could be appropriate for use ARUs. To avoid unnecessarily triggering ZBA's and OPA's, County staff recommend working with building staff to specifically identify and define which factory certification standards match or exceed the requirements of the Ontario Building Code for the purposes of ensuring all-season use and safety for occupants. More information in this respect is available through the [Province's website](#).

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County staff have no further comments at this time but are available for further discussion on this topic if required.

If you wish to discuss this matter further, please contact me.

Yours truly,

A handwritten signature in black ink, appearing to read "R. Hillyer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Becky Hillyer (RPP)
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