



October 22, 2024

Planning Policy Branch 13<sup>th</sup> Floor, 777 Bay Street Toronto ON M7A 2J3

Sent by Email: PlanningConsultation@ontario.ca

The Township of Ramara has reviewed the proposed changes to *Ontario Regulation 299/19 ADDITIONAL RESIDENTIAL UNITS*, made under the Planning Act. The Township has concerns regarding the as-of-right maximum lot coverage allowance of 45% for all buildings and structures on parcels with Additional Residential Units. Ramara utilizes open swales and ditches for storm water and in many areas has stormwater management ponds designed based on the expected flows of the subdivisions that benefit from the pond. In the Village Residential zones (fully serviced lots in primary settlement areas as zoned as such), the lot coverages and heights are as follows:

DWELLING TYPE	MAXIMUM LOT COVERAGE	MINIMUM LANDSCAPED OPEN SPACE	MAXIMUM BUILDING HEIGHT
SINGLE FAMILY DWELLING (PERMITS ARU)	30%	n/a	10 metres
SEMI-DETACHED AND DUPLEX (PERMITS ARU)	40%	30%	20 metres
OTHER MULTIPLE DWELLINGS	50%	30%	20 metres

The Township of Ramara Zoning By-law allows for sufficient heights and lot coverages to allow for properties to develop within the guidelines to allow for ARU development with ease. Accessory buildings containing an ARU are permitted to be as tall as a single family dwelling (10 metres).

Allowing for an as-of-right 45% lot coverage for all lots containing additional residential units would have an automatic increase in stormwater run off that could have negative impacts on the Township's stormwater infrastructure. Conflicts between minimum landscaped open space values and the 45% allowable lot coverage could occur.

Depending on the stormwater design of a development, the Township has seen minimum landscaped open space requirements of up to 80% in development proposals which is implemented through a site specific zoning on the lands. When these subdivisions become serviced in the future, and a maximum 45% lot coverage is permitted as-of-right the following results are expected:

- Overloading of stormwater into Township ditches flooding roads and/or properties
- Singular lot development will require private stormwater management mechanisms to preserve the municipal stormwater capacity which are difficult to ensure proper maintenance
- Infrastructure Investments will be required to upgrade the stormwater management infrastructure to retrofit to accommodate development pressures.

The Township has identified that if the 45% lot coverage is permitted as of right, all development applications moving forward will need to be designed to allow for 45% lot coverages, which will require infrastructure investments of stormwater management grey infrastructure such as storm water ponds and piping. Township stormwater infrastructure may pose engineering constraints to capture, direct, and discharge storm water in an appropriate location due to the flat topography of Ramara and the fluctuations in water levels in the Lake Simcoe basin.

The Township's planning policies have been updated to support ARUs in all residential zones within the Township borders. The additional residential units are written to follow the same zoning and setback requirements of the current zones and there is a requirement of one additional parking space per unit. The Township has removed minimum dwelling sizes in the Zoning By-law that are more restrictive than the Ontario Building Code.

Additional Residential Unit permits have been issued and properties within the Township have been able to meet the zoning requirements, lot coverage and servicing options for the land. The Township has not implemented any additional setbacks for dwellings with additional units or any other more restrictive policies for the units, which has resulted in a positive outcome for the municipality.

Signed,

Walied Zekry
Director of Building and Planning

Chief Building Official

RAMARA TOWNSHIP