



## County of Brant Council Report

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**To:** The Mayor and Members of County of Brant Council  
**From:** Negin Mousavi Berenjaghi, Junior Planner – Policy Planning Division  
**Date:** May 13, 2025  
**Report #:** RPT-0157-25  
**Subject:** Zoning By-Law Amendments to Permit Four Units As-of-Right in Paris and St. George  
**Purpose:** For Approval

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### Recommendation

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**WHEREAS** on February 11, 2025, Council initially directed County Staff to proceed with a zoning by-law amendment to permit four (4) units as-of-right in fully serviced areas of Paris and St. George;

**AND WHEREAS** on April 8, 2025, Staff presented [ZBA2-25-NM](#) (Preliminary Zoning Changes to Permit Four Units As-of-Right in Paris and St. George) to Council as information for input and direction;

**AND WHEREAS** Council directed staff to finalize zoning by-law amendments and prepare a recommendation for enabling four units as-of-right in primary settlement areas;

**THEREFORE THAT** report RPT-0157-25 be received as information.

**AND THAT** Zoning By-Law Amendment file ZBA2-25-NM, initiated by the County of Brant to enable four units as-of-right in all low-density, fully serviced areas of Paris and St. George, be approved.

**AND THAT** the reason(s) for approval are as follow:

1. The amendments are consistent with the Provincial Planning Statement (2024) and County of Brant Official Plan (2023);
2. The amendments are in keeping with the overall intent of the County of Brant Comprehensive Zoning By-Law;
3. The amendments support the County in receiving federal funding and upgrading housing-enabling infrastructure; and
4. The amendments support the County's broader housing needs by promoting more diverse, innovative, and affordable housing options.

## **Executive Summary**

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This project began in February 2025 with [RPT-0078-25](#), where Council directed County staff to explore local zoning provisions that would enable four units as-of-right in fully serviced areas. On April 8, 2025, staff presented [ZBA2-25-NM](#) (preliminary zoning changes) to Council for input and direction. Since then, staff have further reviewed the zoning regulations in light of Council's direction and public feedback to finalize the zoning by-law amendments for recommendation.

This report outlines the project background, presents recommended zoning by-law amendments for approval, including the "Draft Amending By-Law" and the "Draft Amendments Chart" as supplementary documents, and identifies the next steps in the process. The amendments are organized into two main categories: (1) housing supply and delivery, and (2) change management. These zoning changes would support the County's eligibility for federal infrastructure funding and represent a positive step toward addressing broader housing challenges in the County.

## **Strategic Plan Priority**

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Strategic Priority 2 - Focused Growth and Infrastructure

## **Impacts and Mitigation**

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### Social Impacts

Allowing up to four units as-of-right in primary settlement areas with existing infrastructure would help mitigate housing availability and affordability challenges in the County, while also encouraging a greater diversity of housing options.

### Environmental Impacts

Facilitating infill development in fully serviced areas advances sustainable land use planning, optimizes existing infrastructure investments, and ensures that primary settlement areas are the focus of growth.

### Financial Impacts

Permitting four units as of right would allow development of such units without additional planning approvals. This reduces the costs for the applicant in terms of both application fees and timing. Such reductions can make units more affordable and may incentivize such developments by reducing barriers. Implementing the four units as-of-right initiative also supports the County of Brant to qualify for federal infrastructure funding programs, namely the Canada Housing Infrastructure Fund (CHIF). The CHIF funding, if awarded, could provide financial support for two major infrastructure projects: the expansion of the Paris Water Pollution Control Plant and the St. George Water Treatment Plant. These upgrades are essential to support housing-enabling infrastructure needed for future developments.

## Report

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### Background

On February 11, 2025, upon the receipt of [RPT-0078-25](#) as information, Council directed staff to undertake a detailed analysis to identify local zoning provisions that would permit up to four residential units as-of-right per lot within Paris and St. George. As such, staff presented zoning file [ZBA2-25-NM](#) – Preliminary Zoning Changes to Permit Four Units As-of-Right – for information and input on April 8, 2025 Council meeting. Both Council and members of the public provided comments at the meeting, which have informed further review of zoning regulations and are reflected in the recommended amendments outlined in this report. Additional public consultation on this project has been undertaken, including notice in the Brantford Expositor to fulfill the requirements of the *Planning Act*. Additional engagement opportunities were provided through the [Engage Brant](#) platform, as part of the broader Housing Needs Assessment (HNA) process, to make residents aware of this project, inform them of the May 13<sup>th</sup> public meeting, and invite written feedback submissions.

The four units as-of-right initiative is one of the initial steps in the process of updating regulations to support a broader range of housing options in the County. It is worth noting that while this initiative aims to reduce zoning-related barriers and enable more creative and affordable housing models, there are external factors such as the Residential Tenancies Act and Ontario's Building Code that fall outside the scope of land use planning but nonetheless affect the implementation of our housing policies. While these matters fall outside the scope of local land use planning, they play an important role in determining whether new housing can be delivered in a practical way. Through the broader HNA project, these external factors are being reviewed further to help identify potential implementation challenges, support the County's approach to advocate for provincial and federal policy changes, and support a coordinated and realistic approach to housing delivery. Acknowledging the need for broader provincial and federal support in addressing housing-related challenges, this zoning by-law amendment focuses specifically on land use aspects of facilitating more diverse housing options in settlement areas with existing municipal services.

## Analysis

Since presenting preliminary zoning changes at the public meeting on April 8, 2025, staff have further reviewed the County's zoning regulations in light of Council's feedback and public input to provide a recommendation. The recommended zoning by-law amendments remain similar to the draft proposed changes, with some additional amendments to the permitted uses in Urban Residential Zones (R-Class Zones), as well as the maximum lot coverage and building height for accessory structures, which will be explained later in this report. In general, the recommended zoning changes are based on two main themes:

**(1) Housing Supply and Delivery:** Increasing opportunities for diverse and innovative housing options in fully serviced areas

**(2) Change Management:** Introducing new housing types in a way that protects existing residents from unintended negative impacts, while benefiting the broader community. This includes removing overly restrictive requirements, new supportive provisions to ensure responsible growth, and maintaining zoning provisions that have effectively mitigated negative impact.

### **1. Housing Supply and Delivery**

The County's zoning regulations for permitted uses within R-Class Zones are very restrictive, especially for lower-density residential zones (R1, R2, and RM1 Zones). Current regulations only allow single-detached dwellings, existing duplexes, and group homes in the R1 Zone, while the R2 zone allows the same dwelling types, with the addition of semi-detached dwellings. RM1 is the most permissive zone, allowing for rowhouses, stacked townhouses, street-fronting rowhouses, triplexes, and lodging houses in addition to the permitted uses in R1 and R2 zones. One recommended amendment is to add fourplexes as a permitted use for all R-Class Zones. Subsequently, all dwelling types that can accommodate up to four units would be permitted in R1, R2, and RM1 zones.

Preliminary findings of the County's Housing Needs Assessment (HNA), as outlined in staff report [RPT-0175-25](#), identify *Affordability, Diversity, Availability, and Accessibility* as the four key themes that reflect core housing challenges in the County. Given that approximately 80% of housing growth in the County has been dominated by single-detached dwellings, the proposed changes to permitted uses in R-Class zones are intended to support the County's housing diversity needs by encouraging gentle density through the development of more inclusive, innovative, and affordable housing models. Staff acknowledge, however, that the recommended amendments would result in the permitted uses for R1, R2, and RM1 zones becoming almost the same. To address this, these zones will be consolidated as part of the upcoming zoning housekeeping project to reduce redundancy and simplify interpretation.

In addition, to better distinguish between the RM2 (Residential Multiple Density) and the RM3 (Residential Multiple High Density) zones, further amendments are recommended to

add duplexes as a permitted use for RM2 zones and remove triplexes from the list of permitted uses for RM3 zones (see **Table 1**). A corresponding footnote is also proposed for RM3 zones, requiring a minimum of four attached dwelling units to better reflect the intended higher-density character of this zone. No changes are currently proposed for group homes and lodging houses, as their definitions and related regulations will be further reviewed as part of the HNA project.

**Table 1: Permitted Uses in Urban Residential Zones**

List of Uses*	R-Class Zones				
	R1	R2	RM1	RM2	RM3**
Apartment					●
Duplex	●	●	●	●	
Fourplex	●	●	●	●	●
Rowhouse	●	●	●	●	●
Semi-Detached	●	●	●		
Single Detached	●	●	●		
Stacked Townhouse	●	●	●	●	●
Street Fronting Rowhouse	●	●	●	●	●
Triplex	●	●	●	●	●
Group Home	●	●	●		
Lodging House			●	●	●

The blue dots represent the proposed additional permitted uses in each zone, and the red dot indicates the use that is proposed to be removed.

\* Provided the applicable zoning standards can be met, a total of up to four (4) dwelling units are permitted per lot in any Urban Residential Zone, which may include the principal dwelling unit and up to three (3) additional residential units, regardless of the type of principle dwelling.

\*\* Notwithstanding any definition or standard of this By-Law to the contrary, in the RM3 Zone, a minimum of four attached dwelling units is required.

## 2. Change Management

### 2.1 Removing or Amending Restrictive Zoning Regulations

Amendments under this theme are generally intended to increase the flexibility of relevant zoning regulations. The definition of a converted dwelling is recommended to be removed to avoid unnecessary classification of additional residential units (ARUs). As noted in the previous staff report, converted dwellings are not defined as a permitted use in any R-Class Zones, and have only been used in two site-specific zoning provisions. Another recommended regulatory change is to remove the “existing only” condition for duplex dwellings in the R1 and R2 zones. This will ensure that both newly constructed duplex dwellings and those created through conversion are permitted in these zones.

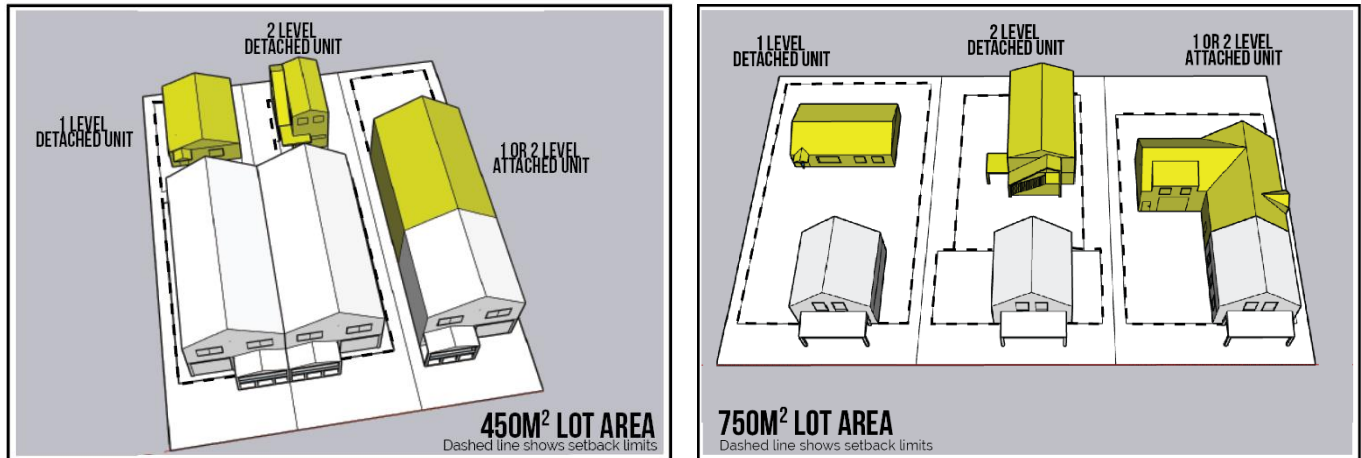
An amendment is proposed to remove the 45% overall lot coverage limit in low-density R-Class Zones. Currently, a footnote in Tables 8.2.1 and 8.2.2 of Comprehensive Zoning By-law 61-16 sets a maximum of 40% lot coverage for the primary dwelling, with an additional 5% permitted only for accessory buildings or structures. Since detached accessory buildings are not subject to the same requirements as the primary dwelling, it is recommended that this combined regulation be removed. This change would allow for clearer separation between the lot coverage limits for primary dwellings, which would remain at 40%, and those for detached accessory buildings or structures, helping to prevent unintended additional restrictions on accessory buildings.

Initially, no changes were proposed to the maximum lot coverage for accessory buildings or structures in Urban Residential Zones, which is defined as the lesser of 15% of the total lot area or 95 square metres. Public feedback suggesting the potential for increased maximum lot coverage resulted in further review of this provision. **Table 2** provides examples of average lot sizes in Rest Acres Road (representing more recent subdivisions) and Dundas Street (representing older established areas), which are approximately 450 and 750 square metres, respectively. As shown, applying the 15% lot coverage in older established areas may result in a lot coverage that exceeds the 95 square metre limit. Based on this analysis, it is recommended that the 95 square metre maximum be removed, and that maximum lot coverage be determined solely based on a percentage of the total lot area. This approach would provide greater flexibility for larger lots that can accommodate accessory buildings exceeding 95 square metres. **Figures 1 and 2** illustrate how lot coverage may appear on both smaller and larger parcels. As shown, larger lots have a greater capacity to accommodate larger ARUs.

**Table 2: Example Lot Sizes and Corresponding 15% Lot Coverage in Selected Areas**

Location	Average Lot Area (square metres)	15% of Lot Area (square metres)
Rest Acres Road	450	67.5
Dundas Street	750	112.5

**Figure 1 & 2: 3d Visualizations of Lot Coverage on Smaller and Larger Parcels**

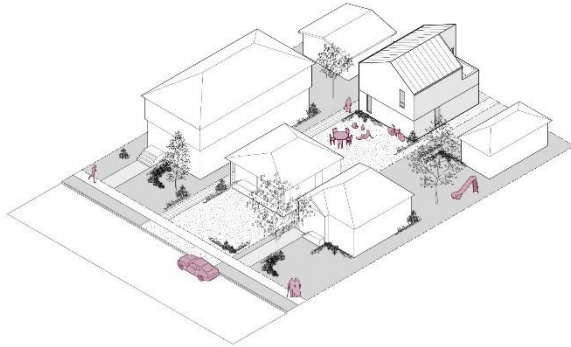


Another proposed amendment is related to the maximum height for accessory buildings. In the information report, staff highlighted that the existing maximum structure height of 4.5 metres is insufficient to accommodate a two-storey detached building. Two-storey structures support the inclusion of ground-level parking with habitable space above, making efficient use of the space and providing parking opportunities. This approach also provides opportunities for smaller properties to accommodate more living space within a compact footprint. The preliminary proposed increased height of 6 metres was based on an Ontario example from the [Housing Design Catalogue](#) published by the Canada Mortgage and Housing Corporation (CMHC). This height is consistent with regulations in other Ontario municipalities, such as Hamilton and London, which both set a 6-metre maximum, while the City of Guelph permits up to 6.1 metres. Staff note, however, that the federal design catalogue includes examples exceeding 6 metres in height, such as 6.73 metres for Alberta and 6.89 metres for Saskatchewan and Manitoba, which can be seen in **Figure 3**.



**Figure 3: Examples of a Two-Storey Detached ARU**

Alberta – Detached Two-Storey Structure



Saskatchewan and Manitoba – Detached Two-Storey Structure



Source: <https://www.housingcatalogue.cmhc-schl.gc.ca/>

In considering local provisions for maximum accessory structure height, staff further reviewed a Minor Variance Application (A5-21-AW) for a property at 6 Ann Street in Paris as a relevant example. The application involved a second-storey ARU above a detached garage, with a requested maximum height of 6.9 metres (22.6 feet) and a measured midpoint roof height of 6.248 metres (20.5 feet). Site photos have been included in **Figure 4** to illustrate the existing conditions and the context of the structure.





**Figure 4: 6 Ann Street, Paris**

Drawing on the CMHC Design Catalogue, regulations from other municipalities, and a relevant local example, staff recommend introducing a maximum height of 6.5 metres specifically for habitable accessory structures, with the existing 4.5-metre limit continuing to apply to non-habitable accessory buildings. Staff are of the opinion that the proposed 6.5-metre height would provide a reasonable balance by reducing the likelihood of future zoning relief requests while meeting the Building Code requirements.

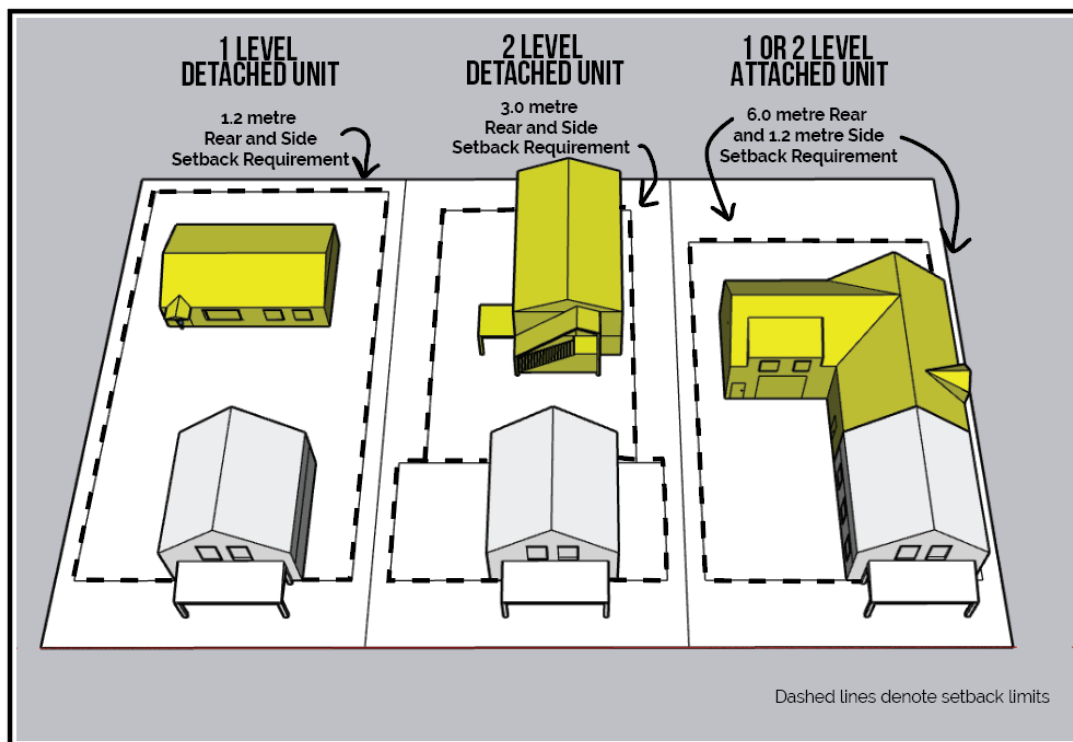
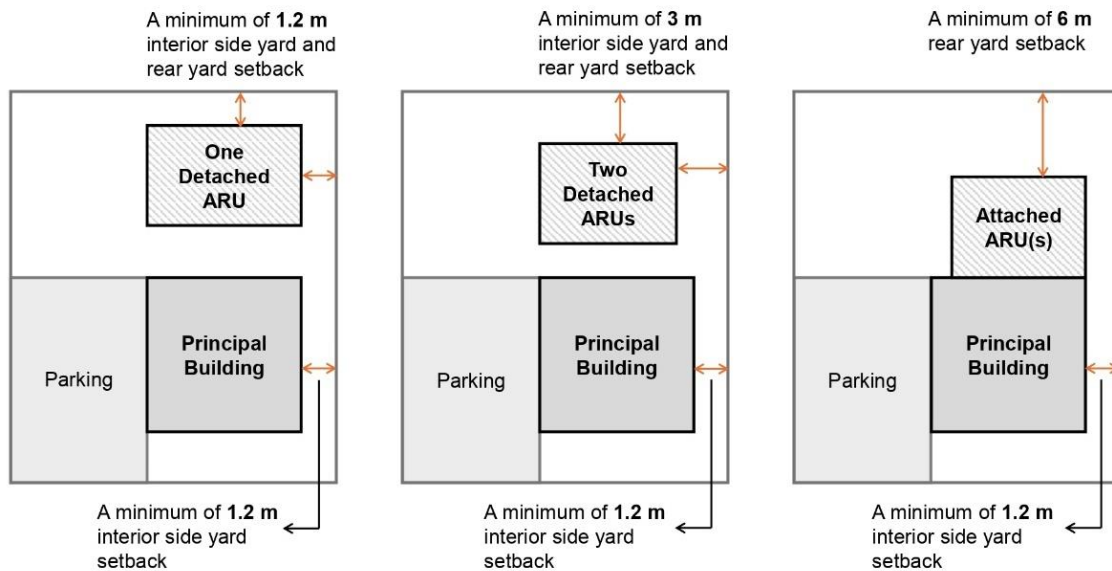
## 2.2 Including Supportive Zoning Regulations to Ensure Responsible Growth and Enhance Clarity

Recommended amendments related to this theme are the same as the proposed preliminary zoning changes. Two new ARU-related provisions are recommended to be added. The first recommended amendment is to update the definition for “Additional Residential Unit” to include a list of dwelling types that would allow ARUs. These dwellings include singles, semis, duplexes, triplexes, fourplexes, stacked townhouses, rowhouses, and street fronting rowhouses. The second amendment proposes adding a regulation to specify the number of permitted ARUs and the associated building configurations in fully serviced residential areas. This new provision would allow for up to three units attached to or within the primary dwelling, and up to two units in detached structures. The potential to allow up to three ARUs within a detached structure will be considered at a later stage as part of future housekeeping changes, if deemed necessary.

Given that the updated zoning by-law would permit up to two residential units within a detached accessory building, staff recommend a minimum 3-metre interior side yard and rear yard setback for two-storey detached ARUs. This setback would provide an adequate

buffer from adjacent lots and address privacy concerns. **Figures 5 and 6** illustrate the required rear yard and side yard setback depending on the type (attached or detached) and number of ARUs. If an ARU is attached to the principal building, it will be subject to the setbacks required for the associated zone, which is a minimum 6 m rear yard setback and 1.2 m side yard setback. For detached ARUs, the required setback will be either 1.2 metres or 3 metres, depending on whether one level or two-level structure is being proposed.

**Figure 5 & 6: Rear Yard and Side Yard Setback Requirements Based on the Number and Type of ARU(s)**



In addition to the increased setbacks for two-level detached ARUs, it is recommended to prohibit any rooftop amenity space above the second storey of a detached ARU unless it meets the maximum building height. This provision is intended to prevent overlook onto neighbouring properties and address potential privacy concerns.

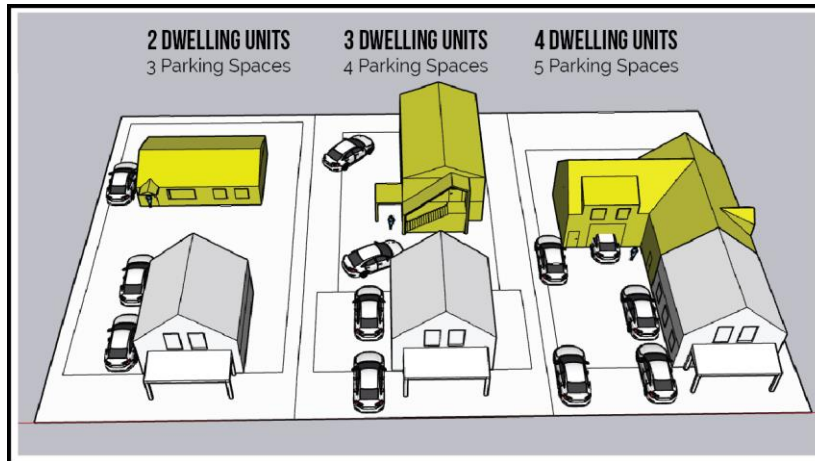
### 2.3 Zoning Standards to Remain Unchanged

Except for the amendments noted above, no changes are being proposed to the zoning requirements for parking, landscape open spaces, unobstructed access, lot frontage, and lot area. The intention behind maintaining these regulations is to ensure that future infills remain gentle and to minimize impacts on existing developments. Meanwhile, these required standards, along with site-specific conditions, can influence the potential uptake of the four-unit initiative. For instance, based on the minimum parking requirements outlined in **Table 3**, at least five parking spaces would be required for four dwelling units, assuming the primary dwelling unit fronts a public street and includes three ARUs. While larger lots may be able to achieve these parking requirements, smaller lots are unlikely to accommodate sufficient parking for more than three dwelling units (see **Figures 7 and 8**). Staff also note that minimum parking requirements would be higher for other housing forms such as condominiums and similar developments on private streets, as they must provide 2 parking spaces per dwelling unit plus an additional 0.35 visitor spaces per unit. Unless these unit types are planned to accommodate the additional parking at the development stage, they will not support this intensification and the ARUs will not be permitted.

**Table 3: Minimum Required Off-Street Parking Spaces Based on the Housing Form**

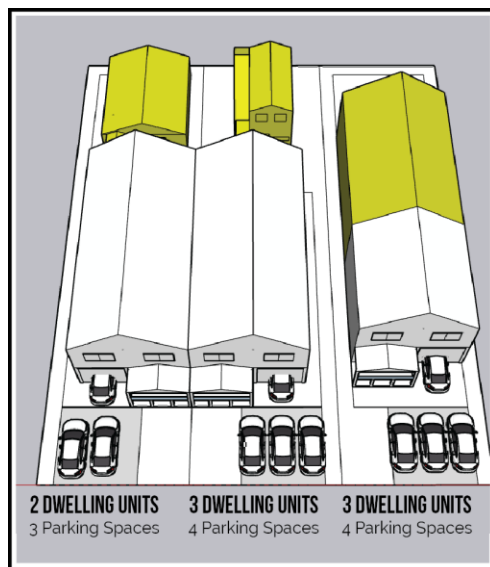
Housing Form	Minimum Required Off-Street Parking Space Regulations
Additional Residential Unit	1 space per unit
Dwelling unit with frontage on a public street	2 spaces per unit
All other housing forms	2 spaces for unit (for residents) +0.35 visitor spaces per unit

**Figure 7: Minimum Parking Requirements Based on the Number of Dwelling Units (Larger Lots)**



Assuming the primary dwelling fronts a public street, the minimum parking requirements for lots containing two, three, and four dwelling units are illustrated in this 3D visualization.

**Figure 8: Minimum Parking Requirements Based on the Number of Dwelling Units (Smaller Lots)**



A similar illustration for smaller lots is shown. As indicated, these parcels lack sufficient space to meet the minimum parking requirements for more than three dwelling units.

### 3. Consistency of the Four Units Initiative with the PPS (2024) and the County of Brant Official Plan (2023)

Tables below demonstrate the consistency of the four units as-of-right initiative with the PPS (2024) and the County's Official Plan, *Simply Grand Plan* (2023).

Provincial Planning Statement (2024)	Section Number	Consistency Analysis
Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.	2.3.1.1	Primary settlement areas of Paris and St. George, where municipal servicing is already available is the focus of enabling four units as-of-right.
Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents by permitting and facilitating all types of residential intensification.	2.2.1. b.2	The four-unit initiative would encourage residential intensification in already developed areas, providing a greater range of housing options and densities for both the existing and future residents of Paris and St. George.
Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.	2.3.1.3	The proposed zoning bylaw amendments support intensification by encouraging a broader range of non-traditional, creative, and diverse housing developments within primary settlement areas. Enabling four units in low-density residential areas of Paris and St. George would also help the County in receiving federal funding for housing-enabling infrastructure projects.
Land use patterns within settlement areas should be based on densities and a mix of land uses which: a) efficiently use land and resources; b) optimize existing and planned infrastructure and public service facilities;	2.3.1.2. (a) and (b)	Enabling four units as-of-right in fully serviced areas ensures maximizing the use of existing and planned infrastructure, while encouraging gentle infill in established settlement areas.



Official Plan (2023)	Section Number	Consistency Analysis
Appropriate water and sanitary sewage systems shall be provided for development or redevelopment of housing within designations which permit residential uses.	Part 5, subsection 1.8.1	Adequate municipal water, sanitary services, and capacity shall be provided to the satisfaction of the County of Brant. Developments or redevelopments that cannot meet such servicing requirements will not be supported by the County staff.
The County shall encourage innovative and compatible housing development that exhibits sustainable and high standard of design, in compact built form, which may represent non-traditional additions to the County's housing stock.	Part 5, subsection 1.8.2	The proposed amendments provide more permissive and flexible zoning regulations to support the construction of innovative and non-traditional housing. Additionally, maintaining requirements for parking, landscape open spaces, unobstructed access, lot frontage, and lot area would ensure that future developments are compatible with the existing development. Increased setbacks for two-level detached structures and the prohibition of rooftop amenity spaces would also mitigate potential negative impacts on the surrounding development.
The County shall develop zoning and other implementation standards that are flexible and permit a range and mix of housing forms, types, sizes, and tenures to help eliminate barriers to housing, specifically affordable housing, attainable housing, and community housing.	Part 5, Subsection 1.8.3	The amendment to increase the permitted uses within Urban Residential Zones would eliminate restrictive zoning regulations, providing more flexibility to permit a range and mix of housing options.
The additional residential unit shall only be permitted on properties of a size where the site conditions are suitable for the long-term provision of such services with no negative impacts, as may be confirmed by a hydrogeological assessment prepared by a qualified professional.	Part 5, subsection 1.9.2	The four-units-as-of-right initiative would maximize opportunities for delivering more innovative and diverse housing options in fully serviced areas. All development proposals must comply with zoning regulations and meet servicing requirements to proceed with approval.



## Summary and Recommendations

Allowing up to four residential units as-of-right in fully serviced, low-density primary settlement areas is a required step for the County to qualify for federal funding programs, including the CHIF. If approved, CHIF funding could support infrastructure upgrades in Paris and St. George, helping to expand capacity for future housing developments. The four units as-of-right initiative is consistent with the Provincial Planning Statement (2024) in promoting the provision of a range and mix of housing options, permitting and facilitating residential intensification within previously developed areas, and optimizing existing and planned infrastructure. Additionally, this initiative advances key objectives for complete communities in the County of Brant Official Plan (2023), particularly by encouraging housing options across a wide range of prices, occupancy types, and tenures to meet the needs of a growing and diverse community. It also aligns with policies that encourage innovative, compatible, sustainable, and high-quality housing in compact built forms and supports enabling more flexible zoning standards to help eliminate barriers to housing.

The recommended amendments are similar to the preliminary changes suggested in the information report, with some additional revisions to the permitted uses in Urban Residential Zones, as well as the maximum lot coverage and structure height for accessory structures within these zones. These revisions aim to promote diverse and innovative housing options while ensuring compatibility with surrounding development and supporting responsible growth. This step is only one element to support housing options and there are other factors, some outside of municipal control, such as development charges, servicing, and other internal and external considerations that may influence the uptake of this initiative. Nevertheless, enabling four units as-of-right in fully serviced settlement areas can help update land use-related regulations to keep up with the growing demand for more affordable, diverse, and creative housing options.

## Next Steps

Following the May 13<sup>th</sup> public meeting and the passing of the recommended zoning by-law amendments, a notice of passing and final summary of the project will be posted on the Engage Brant project page. The standard 20-day appeal period would then commence providing any person in Paris or St. George who made verbal presentations at the public meeting or submitted written comments prior to the passing of the zoning by-law to appeal the by-law amendment to the Ontario Land Tribunal. Provided no appeals are received, the bylaw would be considered to have been in force as of the date it is passed. Policy Planning staff will continue to track the implementation of this project, including the need for any further changes and will return to Council with future housekeeping changes as may be necessary.

## **Attachments**

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Attachment 1 – Draft Amendments Chart

Attachment 2 – Amending By-Law

**Reviewed By**

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Jeremy Vink, Director of Planning  
Brandon Kortleve, Manager of Policy Planning

**Copied To**

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Senior Management Team  
Alysha Dyjach, General Manager of Development Services  
Mark Maxwell, Director of Engineering and Infrastructure Planning  
Heather Mifflin, Director of Finance, Treasurer

**By-law and/or Agreement**

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By-law Required	Yes
Agreement(s) or other documents to be signed by Mayor and /or Clerk	No