

Tecumseh HAF

Initiative 1

Final Report

May 2025



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1 Introduction and Basis of the Study

The Town of Tecumseh's Housing Accelerator Fund Initiative 1 ("HAF 1") is a Town-led study focused on how to respond to the ongoing housing crisis and expand housing choices in existing neighbourhoods and in new greenfield neighbourhoods. As part of the Town's HAF Agreement, the Town committed to studying a regulatory framework to permit up to four units on residential lots, through:

- Permitting up to three Additional Residential Units ("ARUs") on existing residential lots; and/or
- Permitting purpose-built four-unit dwellings (fourplexes).

This Report will put forth options for amendments to the Town's Zoning By-law and Official Plan for only the ARU approach (permitting up to three ARUs) in order to promote gentle-density and a context-sensitive way of increasing housing options.

1.1 Purpose of this Report

This Report has been prepared to provide a comprehensive update to Council and the community following the Public Meeting of Council held on March 11, 2025. The Report serves several purposes:

- To provide an overview of additional research completed since the public meeting, including a review of Provincial legislation, Canadian legal precedent, and best practices from other Canadian municipalities.
- To respond to public and stakeholder feedback following the release of the Discussion Paper and the Directions Report completed earlier in this Study, addressing questions and points of clarification.
- To set out a range of policy and regulatory options for Council's consideration, outlining potential amendments to the Town's Official Plan and Zoning By-law to permit up to four dwelling units per residential lot in the Town's low density residential areas.

An ARU refers to a housing unit that is “additional” to a single-detached house, semi-detached house, or a townhouse. Currently, the Province requires that the Town permit up to two ARUs (for a total of three residential units) per lot. Figure 1 and Figure 2 below illustrate two examples of how a lot containing a single detached home could accommodate ARUs:

More information and analysis can be found in the Discussion Paper and Directions Report previously completed as part of the Study. Details on the work completed to date on the Study can be found in Section 1.3 below.



Figure 1: A Single Detached Dwelling with 3 ARUs on a lot (J.P Thomson Architects, Ltd.).



Figure 2: A Single Detached Dwelling with 2 ARUs on a lot (J.P Thomson Architects, Ltd.).

1.2 Housing Need in Tecumseh

Access to affordable and diverse housing options is critical to supporting a complete, inclusive, and resilient Town. In Tecumseh, the existing housing stock is predominantly made up of low-density dwellings, with single detached houses and semi-detached houses accounting for 86.6% of all private dwellings in 2021. At the same time, the Canadian Census revealed that only 3% of homes in Town are one-bedroom units, in comparison to the national average of 14.2%. This shortage of smaller unit types limits opportunities for many residents, including younger adults, seniors, and those who live alone.

The Town of Tecumseh Resident Satisfaction Survey completed by Nanos Research in March of 2025 found that while Tecumseh is widely viewed as a desirable and high-quality place to live (See Figures 3 and 4), residents are increasingly concerned about declining housing affordability (see Figure 5).

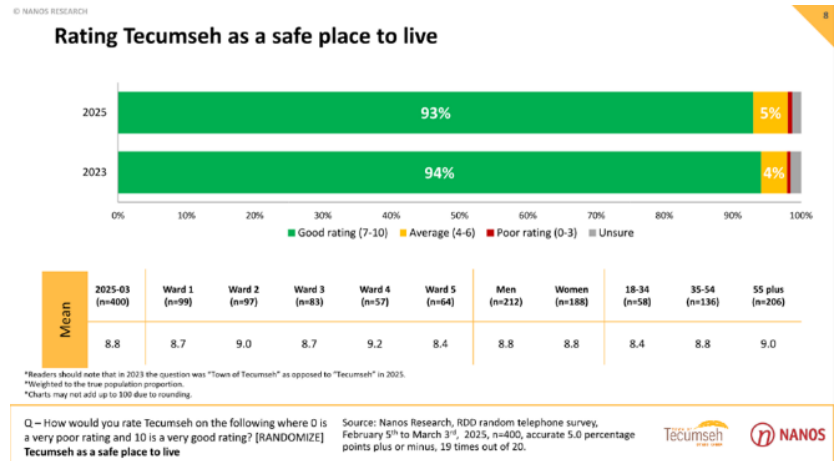


Figure 3

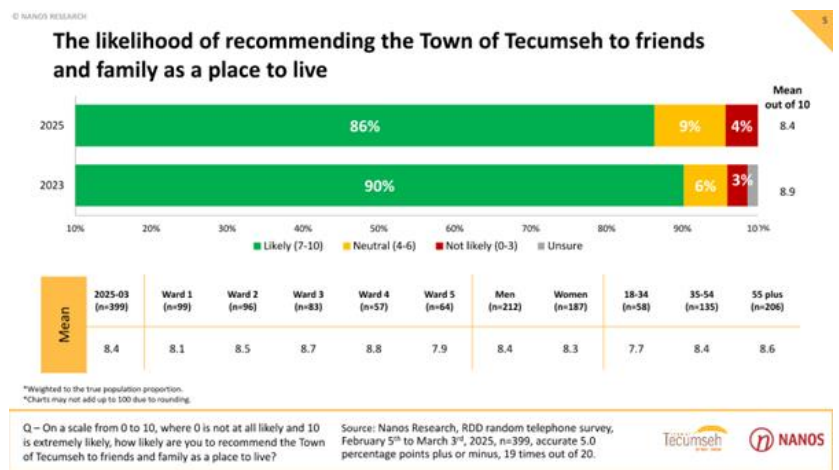


Figure 4

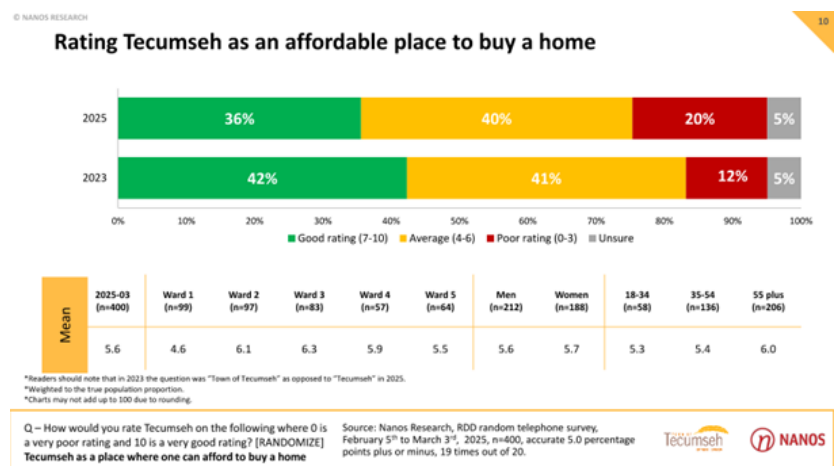



Figure 5

Three key challenges contribute to housing affordability in Tecumseh:

- a constrained supply of housing;
- a predominance of owner-occupied single-detached dwellings (the least affordable type of housing); and
- the high cost of providing serviced residential land, which can exceed \$6,000 per linear foot of roadway
- increased building and labour costs.

More information and specific details on housing affordability issues in the Town can be found in the Discussion Paper and Directions Report completed earlier in this Study.

 2025 Town of Tecumseh Resident Satisfaction Survey Results, Nanos, March 2025.
[filestream.ashx](#)

1.3 Tecumseh Housing Accelerator Fund Agreement

HAF 1 is not intended to be the only solution to the need for housing supply and is just one of nine initiatives in the HAF Agreement that was executed in February of 2024 with Canada Mortgage and Housing Corporation (CMHC).

In executing this agreement, Tecumseh Council committed to implementing the following nine initiatives:

1. Pre-zoning lands to allow up to four housing units as-of-right as part of all low-density residential districts.
2. Pre-zoning lands within the Town's Main Street Community Improvement Plan (CIP) Area.
3. Implementing land use changes permitting residential intensification & mixed-use development/ redevelopment in the Manning Road Commercial District.
4. Implementing revised parking requirements such as reduced or eliminated parking spaces for new developments.
5. Implementing incentives (reduced development charges and other fees) & a Property Tax Equivalent Tax Program for new rental/ affordable housing in Main Street CIP Area.
6. Preparing a user-friendly Information Kit on how to add an ARU, provide illustrative design guides, outline stream-lined permit process
7. Eliminating building permit fees for ARUs for a 3-year period
8. Implementing a new e-processing system for all planning-related applications
9. Creating a Housing Advisory Panel to Advise Council on Housing-related Matters

As of March 31, 2025, the Town has completed all HAF Initiatives, apart from HAF 1, which it intends to complete before the July 25, 2025, deadline.

1.4 Summary of Work

Completed for HAF 1

The development of options for HAF 1 has involved technical work along with public engagement and consultation by Town staff, along with consultants MillerSilani Inc. and WSP.

Prior to this Final Report, two other documents were prepared:

- A **Discussion Paper** (July 2024), which laid out the basis and key drivers for the HAF 1 study and examined a variety of housing forms that could potentially be supported in the Town; and
- A **Directions Report** (January 2025), which analyzed key concerns and issues needing consideration in the final Official Plan and Zoning By-law Amendments, and which laid out a recommended approach to implement HAF 1.

The Discussion Paper and Directions Report were posted to the Town's website and PlaceSpeak in August 2024 and January 2025, respectively, for public awareness and to provide an opportunity for community feedback.

The Town and consultant team have engaged with Council and the public on several occasions to provide information and education and gather feedback around HAF 1. This included the following activities:

- Presentation to Council on July 9, 2024 to share the findings of the Discussion Paper;
- Public Open House on August 15, 2024 to share the findings of Discussion Paper;
- Council Orientation Session on December 10, 2024 to present the Directions Report and several options for implementation;
- Public Open House on February 26, 2025 to present the Directions Report and several options for implementation; and
- Presentation to the Town's Housing Advisory Panel on March 5, 2025.

On March 11, 2025, a Statutory Public Meeting was held to present the recommended implementation approach. Town staff and the consultant team proposed that the Town's Official Plan and Zoning By-laws be amended to allow a maximum of three ARUs in association with a single detached dwelling. This would permit up to a total combined maximum of four dwelling units per lot subject to the following qualifications:

- sufficient frontage (minimum 80 feet);
- capable of providing the required off-street parking and driveways; and
- able to maintain appropriate landscaped open space areas in front yards.

Based on public feedback and Council direction, the Town determined that additional research and consideration was needed before Council could make a decision on the proposed amendments. As noted above, this Report is summarizing that additional work.

2 Provincial and Legal Requirements

This Study and its eventual outcome are based on two critical legal requirements that the Town has to abide by.

- 1. Three units per lot are already permitted throughout the Town as-of-right.**
- 2. The Town cannot make any planning decisions based on who might live in a home.**

2.1 Provincial Requirements for ARUs

In 2022, the Province of Ontario made changes to the *Planning Act* to require municipalities to permit, as-of-right, up to three residential units on any property where a single-detached house, a semi-detached house, or a townhouse is permitted and serviced by municipal water and sewage.

Municipalities must permit either:

- Two ARUs in addition to a primary residential unit within the single-detached house, semi-detached house, or townhouse; or
- One ARU in addition to a primary residential unit within the single-detached house, semi-detached house, or townhouse, and a second ARU in a detached building on the property.

The Province has also directed that municipalities may not require more than

one parking space for each of these ARUs.

In December 2024, the Province enacted changes to Ontario Regulation 299/19 to apply additional restrictions around ARUs. This included requiring that municipalities permit lots containing an ARU to have maximum lot coverage of 45%. For example, if the Town's Zoning By-law sets out a maximum lot coverage of 30% for single-detached houses, the Province would require that lot to have a maximum lot coverage of 45% if it contains an additional residential unit.

2.2 “Zoning for People”

Under the *Planning Act*, municipalities are authorized to regulate the “use” of land but not the “user” of the land. When establishing Official Plan policies or Zoning By-Law regulations for ARUs, the Town can set standards for attributes such as lot coverage, height, and parking, but cannot and should not consider who will be living in a building.

This principle was enshrined in Canadian legal precedent through the Supreme Court decision *Bell v. R.*, 1979.

Section 35(2) of the *Planning Act* restricts municipalities from passing a by-law that has the effect of distinguishing between persons who are related and persons who are unrelated in respect of the occupancy or use of a building or

structure or a part of a building or structure, including the occupancy or use as a single housekeeping unit.

Accordingly, when considering any planning decision, including changing permissions for ARUS, the Town cannot make any restrictions based on who might live in a residential unit. For example, the Town cannot enact zoning that would limit the supply of rental housing in a specific area. The focus of zoning must remain on ensuring land use compatibility and enabling a diverse range of housing options that meet community needs.

3 What We Heard

As part of HAF 1, the Town welcomed written comments from the public, which have been received in the form of emails, as well as providing opportunity for in-person deputations at several Council meetings. The Town recognizes the importance of continued engagement, clear communication, and design considerations to support the implementation of HAF 1.

A summary of both written and verbal feedback, along with responses from the Town and consultant project team, can be found in Appendix A to this Report.

3.1 Written Comments

A number of residents voiced strong support for the proposed zoning changes, citing personal experiences with housing inaccessibility. These individuals emphasized:

- The urgent need for more affordable housing options to accommodate younger residents, renters, and multi-generational families.
- Calls for bold leadership to ensure long-term housing supply and generational equity.
- Support for well-designed fourplexes that respect neighbourhood character while offering more inclusive housing options.

- That many supportive residents are unable to attend public meetings due to work, caregiving, or other commitments.

Other residents expressed opposition to and hesitation towards proposed ARU permissions, including:

- The perceived erosion of community character, privacy, greenspace, and quality of life.
- The feeling that Tecumseh should not have to contribute to increasing housing supply compared to bigger cities like Windsor.
- Increased traffic, parking congestion, and pressure on municipal services.
- Impacts on property values and fears of declining home investment.
- Perceptions that renters and higher-density developments will lead to transient populations and reduced care for properties.
- Skepticism that the funding received meaningfully offsets the long-term impacts of densification.
- Calls to focus intensification in new development areas rather than in existing neighbourhoods.

This feedback reflects differing opinions on how Tecumseh should address housing affordability challenges, though residents all share a common concern for the long-term livability and sustainable growth in the Town.

3.2 Verbal Comments

As noted in Section 1.3 of this Report, at the Public Meeting of Council on March 11, 2025, several community members shared a range of questions and comments about the proposed Zoning By-law amendment to permit up to three ARUs on certain lots. Appendix A of this Report includes a summary of the comments at the March and intends to provide clarity and context on how these issues have been considered throughout the development of the proposed Zoning By-law.

4 What We Learned

The HAF 1 study has been an evolving process for the Town, which has been taking place in period of increasing economic uncertainty for residents of the Town, the Windsor-Essex region, and Canada as a whole. Housing affordability continues to be one of the foremost challenges facing Canadian municipalities, including Tecumseh.

4.1 Other HAF Recipients

Through the preparation of this Final Report, the Town and consultant team took a closer look at the approaches of other HAF recipients to implementing planning frameworks for four units on a lot. The HAF has consisted of two application intakes to date. More than 150 municipalities or First Nations were recipients of the 2023 intake (including Tecumseh), of which more than 50 have already adopted zoning changes to permit four units on a lot, in various approaches.

A detailed matrix of these approaches can be found in Appendix B.

Generally, the following observations were made based on the research of other HAF recipients:

- A variety of sizes and contexts of municipalities are implementing permissions for four units per lot, not just big cities. This includes other small communities like Gander, Newfoundland, or Sylvan Lake, Alberta. It also includes other municipalities on the edges of larger urban centres, like Woolwich, Ontario, Riverview, New Brunswick, and New Westminster, British Columbia.
- Many municipalities across Canada are choosing to permit four units on a lot through ARUs or their equivalent, rather than fourplexes. For example, in Whitby, Ontario, four units are permitted throughout Town through ARUs in single-detached houses, semi-detached houses, and townhouses, but fourplexes are only permitted in medium density zone.
- A number of municipalities are restricting four units to lots of certain minimum area and/or lot frontage or width. For example, Squamish, Coquitlam, Richmond, and Campbell River, British Columbia require that lots must be 280m² to accommodate four units, Thunder Bay, Ontario requires that lots must be 540m², and Cornwall, Prince Edward Island requires that lots must be 560m².
- While not every municipality is setting minimum lot dimension requirements for four units, many municipalities set minimum landscaped open space areas per

lot. For example, both Waterloo and Kitchener, Ontario require that a minimum of 30% of the lot area be landscaped.

- Additionally, many municipalities have set maximum driveway width for residential lots. For example, both Pemberton, British Columbia, and Whitby, Ontario set a maximum driveway width of 6.0 m.
- No HAF recipient that the project team reviewed has permitted four units only in greenfield/new development areas.

In 2024, a second intake of applications for HAF funding was held. Recipients have been announced periodically thus far in 2025, including the nearby Municipalities of Lakeshore and Chatham-Kent, as well as many other smaller Ontario municipalities. These communities have also signed HAF agreements committing to permitting up to four units as-for-right in their respective low density residential areas.

4.2 CHMC Gentle Density Guidance

In April 2025, CMHC and Small Housing released the Gentle Density Bylaw Guide (“the Guide”) to provide guidance on how municipalities can help support affordable housing and implement small-scale, multi-unit housing. This Guide aligns with the Town of Tecumseh’s approach to permitting ARUs (ARUs), which the Guide refers to as Accessory

Dwelling Units (ADUs). The Guide emphasizes the concept of “gentle density,” which refers to modest increases in residential density that are compatible in scale and form with existing neighbourhoods.

The Guide also sets out a series of phases to incorporate Gentle Density Housing. The phases include: 1) Understand housing needs and goals; 2) Determine current conditions; 3) Propose gentle density housing options; 4) Consult on options and action; and, 5) Develop plan for implementation. Although the Gentle Density Bylaw Guide was not released at the time of Tecumseh HAF 1, the approach taken aligns with best practices by emphasizing community engagement, housing needs assessment, and context-sensitive gentle density solutions.

4.3 ARU Construction in Tecumseh and Southern Ontario

The Town of Tecumseh has to date had gentle uptake of ARUs with a total of 22 units developed since Bill 23, the *More Homes Built Fast Act* was passed on November 28, 2022. This data is based on the Town’s Zoning By-laws’ current definition of an ARU as a self contained residential unit with kitchen and bathroom facilities within a primary single detached dwelling, semi-detached dwelling or townhouse dwelling unit or within a detached building on the same

lot that accommodates the primary single detached or semi-detached dwelling. Across Essex County, ARUs have seen moderate uptake as illustrated in Table 1 below.

Table 1: ARU Uptake in Essex County

ARU Building Permits Issued by Year						
Municipality	2022	2023	2024	2025 (As of April)	Municipality Total	Avg. per Year*
Tecumseh	4	7	9	2	22	6.6
Amherstburg	12	14	27	12	65	19.5
Essex	9	13	15	8	45	13.5
Kingsville	6	6	8	4	24	7.2
Lakeshore	0	2	6	0	8	2.4
LaSalle	7	7	25	10	49	14.7
Leamington	0	7	12	6	25	7.5
REGIONAL TOTAL	38	56	102	42	238	71.5

*The average was pro-rated for 2025.

5 Implementation

Based on the previous work completed through this Study, the commentary from members of the public, and additional research conducted to complete this Final Report, it is recommended that the implemented approach continue to focus on permitting ARUs in the Town, rather than purpose-built fourplexes or triplexes. As noted above, the distinction in these housing types can be found in the Discussion Paper.

5.1 Rationale for ARUs over Fourplexes

ARUs are an excellent means of increasing housing supply and growing sustainably since they utilize existing infrastructure, eliminating the need for expanding the Town's roads, sidewalks, servicing, and other amenities such as parks and transit that are typically required for greenfield development. The Town controls the development of ARUs through zoning provisions, while property owners maintain discretion over whether and how to construct units on their properties. No property owner will be required or pressured to make changes to their properties.

It is also important to distinguish ARUs from other forms of gentle density housing such as duplexes, triplexes, or fourplexes. ARUs are self-contained residential units that are located within a single-detached, semi-detached or

townhouse dwelling, or within an ancillary building such as a garden suite. Duplexes, triplexes, and fourplexes are purpose-built multi-unit detached housing forms where two, three, or four residential are designed as one building. Further, fourplexes are usually easily recognizable as a multi-unit dwelling and generally take up a more significant proportion of a given lot's area than a single-detached dwelling with three ARUs. Given the higher lot coverage required for a fourplex, they tend to have a larger impact on parking and landscaped space. Fourplexes often require more parking spaces to accommodate multi-units, which in turn reduces the amount of green space or landscaped areas available on site. Given the difficulty of meeting these parking/landscaping requirements, as well as a desire from the community to maintain the existing look and feel of neighbourhoods, ARUs have been selected as the implementing built form, rather than fourplexes. ARUs are a simple way to increase housing options within existing neighbourhoods, whereas duplexes, triplexes, and fourplexes may only be permitted in certain land use designations or zones.

As a form of gentle intensification, ARUs can also enable multiple family members or people per lot in their own units rather than as communal living within one unit. The opportunity to add ARUs can serve as a practical solution to support multi-generational households and aging in

place. Furthermore, ARUs can support residents who are entering the housing market to offset costs through ‘mortgage helper’ units while contributing to the supply of affordable ARUs.

In addition to contributing to housing affordability and improving housing options, ARUs will help accommodate modest increases in density within low-density neighbourhoods. Across Tecumseh, neighbourhood densities average approximately 2.45 units per gross acre, with household sizes declining from 3.7 persons/ household in the early 1970’s to 2.6 persons/ household now. It was also highlighted that community safety is expected to remain strong, with the increased residential presence potentially enhancing neighbourhoods. In concluding, it was emphasized that the Town will continue to monitor implementation and can make refinements to the regulatory framework for ARUs over time, based on experience. The current options were developed to balance the Town’s housing objectives with community input, infrastructure capacity, neighbourhood character, and municipal best practices.

5.2 Conditions for All Options

As noted in Section 1.3, following the March 11 Public Meeting and based on Council direction, the consultant team and Town staff re-examined the recommendations and proposed amendments in light of public comments and additional research. Rather than recommending a specific implementation approach through this Report, a suite of options is presented in Section 5.2.2 below to permit three ARUs Town-wide, with varying levels of restrictions. Certain conditions, however, will apply no matter which option is selected: these are described in Section 5.2.1.

- For all options, there is no change to existing zoning provisions for maximum building height or minimum setbacks. Dwellings containing ARUs will be subject to the same provisions as the same dwelling type without an ARU.
- Per Provincial requirements, two ARUs (for a total of three units) will be permitted within all Residential Zones throughout the Town, on lots with single-detached, semi-detached, and townhouse dwellings. This is already in effect legally, and the Town’s new Comprehensive Zoning By-law will be updated to reflect the requirements.

- A third ARU (for a total of four units) will **only** be permitted on a lot with a single-detached dwelling. This condition was determined earlier in the HAF 1 Study to mitigate the complexity of parking and access for four units in a semi-detached or townhouse dwelling.
- No ARUs will be permitted on lots without full municipal water and wastewater services. This condition aligns with the provisions of the *Planning Act*, and is intended to prevent strain on

private services like wells and septic systems, as well as environmental effects of that strain.

- No ARUs will be permitted on lots within the flood-prone areas shown on Schedule “D” of the Town’s Official Plan (see Figure 3).
- Per Provincial requirements, the maximum lot coverage for lots containing ARUs will be 45%.
- A minimum of one parking space will be required for each ARU. This condition is intended to mitigate

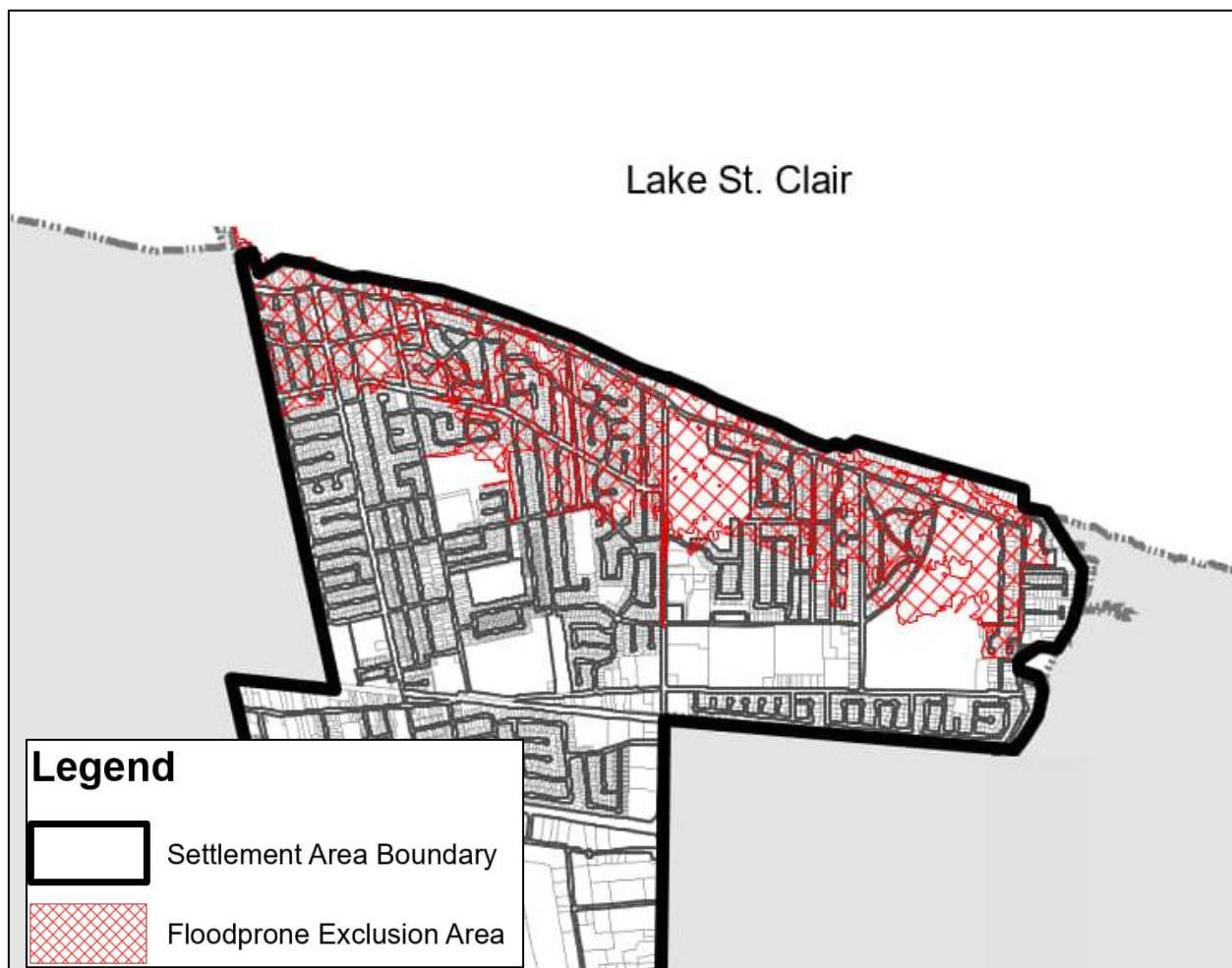


Figure 6: Natural Hazards - Floodprone Exclusion Area.

impacts on street parking from ARUs.

- On any lot which contains an ARU, the maximum permitted width of a driveway (for the entire length of the driveway) will be 40 percent of the lot width.
- Additional zoning provisions for ADUs as noted in the Directions Report will be implemented. These provisions are not unique to the HAF 1 initiative and are intended to be separately implemented in the Town's Zoning By-Law.

5.3 Options

A range of options that Council can consider to amend the Town's Official Plan and Zoning By-laws to permit up to four dwelling units on residential lots in the Town's low density residential areas are set out in Table 2 below. These options have been developed to balance the need to maintain the look and feel of the Town's residential neighbourhoods with the need to increase housing affordability and provide increased housing choices for Tecumseh residents.

Each of these options falls on a spectrum of approaches to ARU permissions in the Town that ranges from least permissive (Option A) to most permissive (Option B) and each of these options incorporates the base conditions that are set out in subsection 5.2 of this Report.

Table 2: Recommended Options for Gentle Density in Tecumseh

Option	Details
A	Up to three ARUs will be permitted on lots with a minimum 24.4 metre (80 foot) frontage.
B	Up to three ARUs will be permitted on lots with minimum 18.0 metre (60 foot) frontage.
C	Up to three ARUs will be permitted on all lots. A minimum of 30% of the lot area will be landscaped open space.
D	Up to three ARUs will be permitted on all lots. The minimum landscaped open space requirement of the given zone will apply.

At this time, it is not feasible to determine the total number of residential lots that could accommodate ARUs based on minimum lot width and landscaping requirements due to the number of variables involved and site-specific context of each lot. Each lot would need to be analyzed on a case-by-case basis considering factors such as building placement, existing structures, lot configuration, lot coverage, and other zoning requirements.

However, approximately 1,900 lots are fully excluded from all options due to their location in the flood prone exclusion area.

All these options will implement a key housing goal of the Town, being to increase the supply and diversity of housing and improve affordability for both renters and owners. Maximum building heights and setbacks would be maintained for main buildings, and appropriate setbacks and building heights are being established for detached ARU units. In addition, the proposed amendment will ensure there is adequate parking, landscaped open space or increased lot sizes to support the potential new dwelling unit. Finally, these options are aligned with numerous examples of best practices from across Canada, are appropriate for Tecumseh neighbourhoods, and represent good planning.

6 Next Steps

A copy of this Final Report will be posted on the Town's website and Place Speak platform. A Public Open House will be held in early June 2025 followed by a second Statutory Public Meeting in late June 2025, where members of the public will have the opportunity to provide further comment.

Appendix A – Detailed Comments and Responses

The comments below are not comments quoted verbatim from any single member of the public, but reflect consolidation of comments that were heard from multiple members of the public. Each comment or question includes a response from the combined project team of WSP, MilerSilani, Inc., and Town staff.

There is no need for this type of housing in Tecumseh, and no one is asking for permission to construct 4 dwelling units on a single lot.

The vast majority of the Town’s existing housing stock (over 80 percent) consists of single detached homes, with less than 3 percent of all dwellings being apartment type dwellings located in low-rise buildings such as ARUs, duplexes, triplexes, fourplexes and small-scale apartment buildings.

To meet the anticipated growth in population, the Town of Tecumseh will need to add between 5,500 and 7,900 new dwelling units to the community’s existing housing stock over the next three decades. The Town will also require a broader range of housing types, as compared to historical trends, to meet evolving housing needs, increasing the share of apartment style and townhouse dwelling units with more than 60 percent of future housing units forecast to be medium and high density built forms.

Additional Residential Units (ARUs), built as new apartment units on existing low density residential lots, are part of the broad housing mix that will be needed in Tecumseh, in addition to townhouses being constructed in new neighbourhoods, and the larger-scale low-rise and mid-rise apartment buildings being built along transit corridors and in existing and planned new Mixed-Use Districts.

Renters don’t care about their properties, and additional rental housing should not be allowed in Tecumseh neighbourhoods.

All dwelling units in the Town of Tecumseh can either be “owner-occupied” or “tenant-occupied”, including single-detached, semi-detached, townhouse, and apartment type housing units.

Municipalities are prohibited from “people zoning”, and municipal zoning by-laws cannot be drafted/adopted to permit and/or prohibit dwellings by the type of tenure. The Town cannot prohibit rental housing in its neighbourhoods.

Eleven percent of all existing Tecumseh households (approximately 1,000 households) are tenant-led households (renters), and there is no empirical evidence that these households don’t care about where they live.

Residents don't want existing neighbourhoods to change, and none of this belongs in existing neighbourhoods. The Town should start fresh with new rules and regulations that would permit fourplexes on vacant lands located south of County Road 22.

Tecumseh neighbourhoods have changed over the last two decades, with new semi-detached, townhome, ARU, and small-scale apartment type buildings having been constructed in the Town's existing residential neighbourhoods. This new housing has expanded housing choices available to Tecumseh residents, and is enabling more residents to continue to live in safe, vibrant and thriving neighbourhoods.

As a result of Provincial legislative changes, up to two additional residential units (ARUs) are currently allowed as-of-right on all existing low density residential lots in the Town's urban area. The proposed OPA and ZBA would allow homeowners to add one additional ARU on larger lots, provided they meet new regulations that are intended to preserve the "look and feel" of the existing neighbourhoods. The change that would result from this proposed OPA and ZBA is anticipated to be incremental, small-scale, and gradual.

It should be noted that the Town is moving forward with infrastructure investments and new land use planning regulations that would allow developers and builders to subdivide, service and build a number of new neighbourhoods on vacant lands located south of County Road 22. This new planned residential development, together with the new housing units that could be created within the Town's existing neighbourhoods and in the Town's Mainstreet and Mixed Use Districts, are all needed to meet anticipated growth, evolving housing needs, and to improve housing affordability Town-wide.

People who can't afford to live in Tecumseh, shouldn't live in Tecumseh.

One in ten households in Tecumseh are currently spending more than 30 percent of their income on housing. Households that spend more than 30 percent of their income on housing are considered to have a housing affordability problem.

In accordance with the Provincial Planning Statement (2024), municipalities are required to plan for an appropriate range and mix of housing options and densities to meet existing and projected future needs for their respective communities. The Town is also required to permit and facilitate all housing options (including "gentle density" residential intensification) to meet the social, health, economic and well-being of current and future residents;

In keeping with the Provincial Planning Statement, the Town is required to plan for and to permit housing that will be affordable and is of a size and built form that meets households of all sizes and income levels.

ARUs are one of the more affordable housing types to design and construct, and they represent a housing option that is needed in Tecumseh to meet the current and future housing needs of this community, particularly for multi-generational households, seniors and young families.

Traffic and noise will increase as a result of this type of housing being built in existing neighbourhoods.

While increasing the number of households in a neighbourhood may be perceived to increase traffic, the Town does not expect a significant increase in development of new units in the short term, meaning, that the take-up of four units will be slow and traffic increases will be gradual with, perhaps, a few more cars/trips in a neighbourhood per day. The Town also regularly analyzes and updates road infrastructure needs, and any increased pressures on road capacities or intersections will be monitored and addressed on an ongoing basis. However, based on recent modelling, modest increases, can be supported by the existing road infrastructure.

Regarding noise, the Town has an existing Noise Control By-law 2023-110, which regulates noise in several areas of the Town, including residential neighbourhoods. By-law 2023-110 sets clear standards for the level of noise permitted in these areas, as well as prohibited times for certain noise types, (e.g., amplified speakers, loud voices, etc.), and sets penalties for any infringement on the By-law.

Allowing 4 dwelling units on a single lot could result in 16 cars per lot, which is unacceptable.

Under current conditions for a single detached dwelling, most households in Town do not have four cars as of today based on the census from Statistics Canada, since the vast majority of households in the Town are comprised of two or fewer people. The proposed Zoning By-law amendment maintains the parking requirement of two parking spaces for the primary single-detached dwelling, and a minimum of one parking space for each Additional Residential Unit.

This type of development will result in trees being removed and a loss of green space, which will negatively impact residents' mental health and well-being.

The Town acknowledges the importance of greenspace and a healthy tree canopy across the Town for physical and mental health of residents. The Town of Tecumseh's Urban Forest Project aims to plant trees in neighbourhoods across Town to increase our green infrastructure and promote cleaner air, reduce stormwater runoff and improve the tree canopy.

The proposed Zoning By-law amendment maintains the existing requirement for landscaped open space in front yards, precisely to eliminate or mitigate impacts on trees or other vegetation. The intent is that the tree canopy that exists today, should exist as more units are developed in the same building envelope.

No one will respect or follow the proposed rules being proposed as part of the new zoning by-law regulations, and as a result these proposed new rules will not provide any protection for existing neighbourhoods.

A building permit will be required to construct ARUs, which in turn requires review of the proposed development for conformity the Town's Zoning By-laws. Any construction of a building (ARU or otherwise, including under current regulations) without a permit contravenes the Town's by-laws, and is subject to by-law enforcement and associated penalties.

Fourplexes belong on Arterial Roads such as Lesperance Road, and not on rural Roads such as Dillon.

The Town's Official Plan identifies that high density residential development (such multi-unit/multi-storey apartments) should be located adjacent or in close proximity to arterial roadways. The residential density and form of development contemplated by the HAF 1 initiative is not classified as high density development. All local municipal roadways within the Town's urban settlement areas can accommodate this type of gentle residential intensification.

Allowing fourplexes in existing Tecumseh neighbourhoods will have a negative impact on property values.

There is no professional evidence supporting this assertion nor is it an accepted independent variable used in professional land use planning analysis. It is appropriate, however, to consider issues of compatibility, good urban design and proper integration in the process of evaluating potential impacts. Permitting three ARUs on large lots while meeting prescribed criteria intended to preserve the "look and feel" of the existing neighbourhoods can be compatible, result in good urban design and be properly integrated with surrounding residential land uses.

Tecumseh does not have sufficient sewage capacity for all this proposed new housing.

In February 2024, the Town completed the Sanitary Model Recalibration and Basement Flood Risk Mitigation Study. The objective of this study was to provide recommendations to mitigate basement flood risk within the mainly urbanized residential areas of the Town's northern settlement area. This included the assessment of sanitary sewer capacity, sanitary pump stations and outlet to the City of Windsor sanitary system. There were over

117 km (98% of the Town's system) of sanitary sewers modeled for this project spanning a 16.7km² area. This study focused on existing developed areas and included provisions for future conditions, ultimate build-out of the Town's northern Settlement Area, infills and redevelopment, and Additional Residential Units (ARUs).

Property taxes are going to increase because the Town is expanding.

Residential intensification and infill development within existing neighbourhoods is more financially sustainable than lower density development in greenfield areas as it utilizes available capacity of existing municipal services and makes more efficient use of public amenities. The experience to date with assessment related to ARUs is that the assessed value of the property increases resulting in a corresponding increase in taxes paid by the property owner on which the ARU is situated. Accordingly, more tax dollars are contributing to the maintenance of existing municipal services and amenities thereby reducing the tax burden on the balance of the Town.

High density housing will ruin Tecumseh. Tecumseh is a Town, not a City.

As previously noted, the residential density and form of development contemplated by the HAF 1 initiative is not classified as high density development (such as apartment buildings).

The PPS, the County of Essex Official Plan and the Tecumseh Official Plan all establish a strong case for residential infill and intensification and providing for a mix and range of housing types and tenures. The Town's current housing mix is dominated by low density, single unit detached dwellings. The proportion of single unit detached dwellings Town-wide is approximately 80 percent of all housing stock.

A diverse housing stock is essential to meeting the varied needs of all citizens within a community, regardless of its geographic size or population. For instance, the aging population (which is a current significant demographic trend) will not be entirely well served by the existing predominately single unit detached housing supply. A greater diversity of smaller units requiring less maintenance and located shorter, walkable distances from other key destinations and transit will be necessary.

While we recognize that Tecumseh is a Town, not a City, many of the policy tools and land use permissions in municipalities can be applied and scaled to similar development contexts. As Tecumseh continues to grow, it is important to learn from other municipalities in order to meet the Town's housing needs and growth pressures.

Tecumseh does not have sufficient firefighting resources to deal with all of the planned new residential development.

The Town of Tecumseh's Fire Services' resources are funded through the yearly municipal budget. Firefighting resources are reviewed yearly and adjusted through the municipal budget process in response to any growth experienced in the municipality, be it residential or non-residential in nature.

How did the Town source data and calculate numerical projections?

The Town used a variety of data sources including Essex County projections, Provincial Population Projections, Canadian Census data, and the Town's Building Permit data. Wherever possible, this Study uses the latest numbers and figures, however, some data sources such as the Canadian Census, are only completed once every five years, with the most recent one taking place in 2021. For the Essex County population projections, we elected to use the higher population figures to better reflect the Town's growth potential and ensure that housing options are responsive to future needs.

Why does the Study focus on other housing options and not include the advantages of single detached dwellings?

The intention of the Study is to emphasize the importance of a range of housing options, both housing forms and tenures, to improve affordability. Single detached dwellings are the dominant built form in the Town of Tecumseh and their advantages are well understood. The focus of the report is on ARUs and multi-unit housing options because they help expand housing choices, address affordability, can be integrated into the Town's existing built form, support complete communities, promote sustainable growth, and make better use of existing infrastructure and land. The report aims to address the current gaps in the housing market

Appendix B – HAF Best Practices

Municipality	Province	Population	Details
Sylvan Lake	Alberta	15,995	<p>Up to four dwelling units permitted per lot through combinations of primary dwellings, secondary suites, and accessory dwelling units (ADUs).</p> <p>Increased neighborhood density cap from 10% to 30%.</p> <p>Eliminated minimum lot width criteria for secondary suites.</p> <p>Expanded permitted zones for secondary suites to include R1, R1A, R2, RMB, and R5.</p> <p>Allowed discretionary use in duplex units in R5A and R2 districts.</p> <p>Permitted discretionary use in row housing (walk-out end units only) in R3 and R2 zones.</p>
Banff	Alberta	8,305	<p>Up to four dwelling units permitted per lot in residential zones.</p> <p>Minimum Landscaped Area: A minimum of 40% of the site shall be landscaped.</p> <p>Maximum Driveway Width: A driveway shall not be wider than 3.6 meters for the first 2.0 meters inside a property line abutting a public roadway other than a lane for residential developments</p> <p>Parking Requirements: Removed minimum on-site parking requirements for new housing developments, including additional dwelling units.</p> <p>Maximum Height: 13.5 meters (4 storeys).</p>
Comox	British Columbia	14,806	<p>Units Permitted: Up to four dwelling units.</p> <p>Increased maximum building height from 10 meters (3 storeys) to 13.5 meters (4 storeys).</p> <p>Reduced vehicular parking requirements for lots with three and four dwelling units.</p>
Campbell River	British Columbia	35,519	<p>Up to four dwelling units permitted.</p> <p>Lots must be at least 280 m² to accommodate four dwelling units.</p> <p>Reduced vehicular parking requirements for lots with three and four dwelling units.</p>
New Westminster	British Columbia	78,916	<p>Up to four dwelling units permitted.</p> <p>Increased maximum building height from 10 meters (3 storeys) to 13.5 meters (4 storeys).</p>

Municipality	Province	Population	Details
Duncan	British Columbia	5,047	Up to four dwelling units permitted per lot in residential zones
Pemberton	British Columbia	3,407	<p>Up to four dwelling units per lot in designated residential zones</p> <p>Minimum landscaped area: Not specified Maximum driveway width: 6.0 meters (from street pavement to front property line) Parking requirements: Maximum of 3 off-street parking spaces per lot Building specifications: Maximum lot coverage 40%, maximum building height 10.5 meters, minimum setbacks — front 6 meters, rear 5 meters, interior side 1.5 meters, exterior side 4.6 meters</p>
Ucluelet	British Columbia	2,066	At least one secondary suite or accessory dwelling unit (ADU) permitted on all single-family lots.
Tofino	British Columbia	2,516	Units permitted: Up to 4 dwelling units per lot in designated residential zones, following recent zoning by-law amendments.
Whitby	Ontario	138,501	<p>Four units permitted throughout Town through ADUs in singles, semis, and townhouses, but not fourplexes, which are only permitted in medium density zone.</p> <p>ADUs not permitted in hazard areas</p> <p>Parking requirements: 1 per ADU, 2 for principal dwelling Minimum landscaped open space: 30% Maximum driveway width: 6.0 m (7.5 m for a lot with 2 or more spaces in a garage)</p> <p>No specific ADU lot/building standards</p>
Squamish	British Columbia	23,819	<p>Standard Lots ($\geq 280 \text{ m}^2$): Up to 4 units per lot</p> <p>Lots $< 280 \text{ m}^2$: Up to 3 units per lot</p> <p>Lots within 400 m of Frequent Transit: Up to 6 units per lot</p>

Municipality	Province	Population	Details
Victoria	British Columbia	91,867	Units permitted: Up to 4 dwelling units per lot in designated residential zones, following recent zoning by-law amendments.
Kelowna	British Columbia	144,576	Core Areas: Up to 6 units per lot, subject to lot size and other criteria
Coquitlam	British Columbia	148,625	Units permitted: Up to 4 dwelling units per lot on properties larger than 280 m ² . Minimum lot area: More than 280 m ² for 4 units.
Abbotsford	British Columbia	153,524	Units Permitted: Up to 4 units per lot
Richmond	British Columbia	209,937	Units permitted: Minimum of 4 dwelling units per lot on properties larger than 280 m ² . Minimum lot area: More than 280 m ² for 4 units. Parking requirements: For areas allowing 3–4 units per lot, the province suggests reducing minimum parking requirements.
Burnaby	British Columbia	249,125	Units permitted: Up to 4 dwelling units per lot, depending on lot size; up to 6 units permitted on lots within 400 meters of frequent transit service. Minimum lot area: More than 280 m ² for 4 units; more than 281 m ² and within 400 m of frequent transit for 6 units. Minimum landscaped area: Not specified. Maximum driveway width: Driveways must taper to the lesser of 6.0 meters or 40% of the lot frontage at the property line. Parking requirements: No on-site parking required for lots within 400 meters of frequent transit service. Building specifications: Maximum building height of 12 meters (4 storeys); maximum lot coverage up to 60%.

Municipality	Province	Population	Details
Surrey	British Columbia	568,322	<p>Units Permitted:</p> <p>Lots < 280 m²: Minimum of 3 units</p> <p>Lots ≥ 280 m²: Minimum of 4 units</p> <p>Lots ≥ 280 m² within 400 m of frequent bus service: Up to 6 units</p>
Vancouver	British Columbia	662,248	<p>Units permitted: Up to 4 dwelling units per lot on properties larger than 280 m², in compliance with provincial legislation.</p>
Fredericton	New Brunswick	63,116	<p>Units permitted: Up to 4 dwelling units per lot on fully serviced residential properties. This includes the principal dwelling and up to three secondary dwelling units (SDUs), such as basement suites, garden suites, or garage apartments.</p> <p>Minimum lot area: Varies by zone. For example, in the R-4 zone, a four-unit dwelling requires a minimum lot area of 920 m² and a minimum lot frontage of 25 meters.</p> <p>Minimum landscaped area: 45 m² per dwelling unit at grade.</p> <p>Maximum driveway width: Driveways must have a minimum width of 6 meters and a maximum width of 8 meters.</p> <p>Parking requirements: Reduced parking requirements for developments up to 4 units, including provisions for tandem parking and parking in the required front yard (on a driveway only).</p> <p>Building specifications: Secondary dwelling units must be small (maximum 75 m²) and meet specific criteria, such as sharing water</p>

Municipality	Province	Population	Details
			and sewer lines with the main house. If more than one secondary unit is added, the property must be owner-occupied at the time the new units are created.
Saint John	New Brunswick	69,895	Units Permitted: Up to 4 units per lot in Primary Development Areas; up to 6 units in Intensification Areas.
Riverview	New Brunswick	20,584	Units Permitted: Up to 4 units per lot on local streets; up to 6 units on collector or arterial streets with conditions.
St. John's	Newfoundland and Labrador		Units Permitted: Up to 4 units per lot in certain zones.
Gander	Newfoundland and Labrador		Units Permitted: Up to 4 units per residential lot permitted as-of-right.
Chester	Nova Scotia		Units Permitted: Up to 4 units per lot by permit; 5–12 units per lot possible through Site Plan Approval.
Halifax	Nova Scotia		Units Permitted: Up to 4 units per lot city-wide
Woolwich	Ontario	26,999	Increased maximum building height from 10 meters (3 storeys) to 13.5 meters (4 storeys). Reduced vehicular parking requirements for lots with three and four dwelling units.
Thunder Bay	Ontario	108,843	Up to six units permitted per lot in all residential zones (amended from four units per lot in April 2024) in various housing forms (including apartment) Minimum landscaped area: 3.0 m of lot frontage, 20% of lot area Maximum driveway width: 6 m Parking requirements: 1 per home (unit) Four units minimum lot area: 540 m ² Four units minimum lot frontage: 18.0 m Maximum height: 10 m Maximum lot coverage: 40%
Ajax	Ontario	126,666	Four units permitted in R1 to R3 zones (low-density) as quadplexes or up to three accessory dwelling units

Municipality	Province	Population	Details
			<p>Minimum landscaped area: N/A</p> <p>Maximum driveway width: Zone-specific, between 3.0 and 7.8 m</p> <p>Parking requirements: 2 (detached), 1 per unit (duplex, triplex, quadrex), 1 for each ADU after the first</p> <p>Maximum height: 11 m</p> <p>Maximum lot coverage: 45% for duplex, triplex, quadrex, or where there is an ADU</p> <p>No additional criteria for four units.</p>
Richmond Hill	Ontario	202,022	<p>Four units permitted City-wide as Additional Residential Units</p> <p>ARU other regulations:</p> <p>Up to 2 ARUs permitted in an accessory building</p> <p>ARUs not permitted in floodplain, NHS, or other open space zones</p> <p>Maximum of 2 entrances above grade</p> <p>Other regulations are buried in the City's existing ZBLs, which are not available online</p>
Milton	Ontario	132,979	<p>Four units permitted in RLD (Residential Low Density) zones through Additional Residential Units, but not "quattroplexes" which are permitted in higher density R zones</p> <p>3 ADUs permitted in detached, semis, townhouses</p> <p>ADUs not permitted in hazard lands</p>
Guelph	Ontario	143,740	<p>Four units permitted through ADUs in single detached dwellings</p> <p>Parking requirements: 3 (Fourplex/3 ADUs), 2 (Triplex/2 ADUs), 1 (Duplex/1 ADU)</p> <p>Maximum Driveway width: Varies</p> <p>Minimum Landscaped Open Space: N. A</p> <p>No specific ADU lot/building standards</p>
Waterloo	Ontario	121,436	<p>Four units permitted City-wide through ARUs</p> <p>ARUs permitted in Detached, Semis, Freehold Townhouses, and accessory buildings (Coach House)</p> <p>Parking requirements: 1 for 1 unit, 2 for 2/3</p>

Municipality	Province	Population	Details
			<p>units, 3 for 4 units</p> <p>Maximum lot coverage: 45%</p> <p>Minimum landscaped open space: 30% of lot area</p> <p>Maximum driveway width: 7.0 m (7.6 m on a Regional Highway)</p> <p>No additional lot requirements for ARUs</p> <p>Maximum height: 13.5 m (4 units), 10 m for all other instances</p>
Edmonton	Alberta	1,010,899	Up to 8 units per lot permitted city-wide in the new RS (Small Scale Residential) zone, which replaces former single-family zones
Kingston	Ontario	132,485	<p>Units permitted: Up to 4 dwelling units per lot in designated residential zones.</p> <p>Minimum lot area: Varies by dwelling type; for example, 159 m² per unit for townhouses, 99 m² per unit for back-to-back townhouses.</p> <p>Minimum landscaped area: Not specified.</p> <p>Maximum driveway width: Not specified.</p> <p>Parking requirements: Varies; for certain exceptions, 1.5 parking spaces per dwelling unit are required.</p> <p>Building specifications: Maximum building height for back-to-back townhouses is 11.5 meters.</p>
Winnipeg	Manitoba		Units Permitted: Up to 4 units per residential lot permitted as-of-right city-wide.
Edmundston	New Brunswick	16,437	Units Permitted: Permits the addition of accessory dwelling units.
St. Catharines	Ontario	136,803	Units Permitted: Up to 4 units per lot through ARUs; fourplexes permitted in medium-density zones.
Barrie	Ontario	147,829	<p>Units permitted: Up to 4 dwelling units per lot in designated residential zones.</p> <p>Minimum lot area: Varies; for example, 342 m² for certain residential zones.</p> <p>Minimum landscaped area: A continuous landscaped buffer area with a minimum width of 3 meters is required along certain lot lines.</p> <p>Maximum driveway width: Not specified.</p> <p>Parking requirements: Typically 1.5 parking spaces per dwelling unit; may vary by zone.</p>

Municipality	Province	Population	Details
			Building specifications: Maximum building height varies by zone; for example, 13.5 meters in certain
Kitchener	Ontario	256,885	<p>Units permitted: Up to 4 dwelling units per lot in designated residential zones.</p> <p>Minimum lot area: 350 m².</p> <p>Minimum lot width: 12.0 meters.</p> <p>Minimum landscaped area: 30% of the lot area; minimum rear yard landscaped area of 40%.</p> <p>Maximum driveway width: For lots wider than 10.4 meters, driveways may extend up to 50% of the lot width or 8 meters, whichever is less.</p> <p>Parking requirements: 0.3 parking spaces per dwelling unit; for 4 units, this equates to 1.2 spaces, typically rounded up to 2 spaces.</p> <p>Building specifications: Maximum building height of 11.0 meters; maximum building length of 20.0 meters; minimum setbacks—front yard 4.5 meters, interior side yard 1.5 meters, rear yard 7.5 meters.</p>
Mount Pearl	Newfoundland and Labrador		Units Permitted: Up to 4 dwelling units per lot.
Vaughan	Ontario	323,103	Units Permitted: Up to 4 units per lot; specific details on ARUs and fourplexes are under review.
London	Ontario	422,324	<p>Units Permitted: Up to 4 separate units per lot permitted city-wide. No limit on the number of total bedrooms.</p> <p>For near-campus neighbourhoods, the bedroom limit was amended from three to five, with added provisions to further increase the bedroom limit when creating additional residential units, where permitted.</p>
Hamilton	Ontario	569,353	Expanded Permissions: Triplex and Fourplex dwellings are now permitted in the existing Low Density Residential (R1) Zone, Low Density Residential – Small Lot (R1a) Zone, and the new R2 Zone.
County of Antigonish	Nova Scotia		Units Permitted: 4 to 6 dwelling units per lot permitted by Site Plan Approval.

Municipality	Province	Population	Details
Mississauga	Ontario	717,961	Units permitted: Up to 4 dwelling units per lot in designated residential zones, following recent zoning by-law amendments. Minimum lot area: Varies by zone; for example, 275 m ² for interior lots in RM1-3 zones. Maximum driveway width: Varies by zone; for example, 6.0 meters in RM1-3 zones.
Toronto	Ontario	2,794,356	Units Permitted: Up to 4 units per lot (multiplexes) permitted city-wide.
Summerside	Prince Edward Island		Units Permitted: Up to 4 units per residential lot permitted city-wide. Minimum lot area: R1 Zone: 690 m ² R2 Zone: 630 m ² R3 Zone: 480 m ² R3r Zone: 318 m ² Building specifications: Maximum building height: 10.5 meters (approximately 3 storeys) Minimum front yard setback: 6 meters Minimum side yard setback: Varies by zone; for example, 2.5 meters in R1
Charlottetown	Prince Edward Island		Units Permitted: Up to 4 units per existing residential lot permitted as-of-right. Minimum lot area: Varies by zone. For example: R-3 Zone: Minimum lot area of 600 m ² (6,458.4 sq ft) for interior lots and 700 m ² (7,534.7 sq ft) for corner lots. R-4A Zone: Minimum lot area of 550 m ² (5,920.3 sq ft) for interior lots and 650 m ² (6,996.8 sq ft) for corner lots. Parking requirements: Varies by zone and

Municipality	Province	Population	Details
			<p>location. For example:</p> <p>In buildings with more than three dwelling units located south of Euston Street or in the 500 Lot Area, parking shall be 1 space for every two dwelling units, with no parking lot to have less than three parking spaces.</p> <p>Building specifications:</p> <p>Maximum building height: 12.0 meters (39.4 ft) in most residential zones.</p> <p>Minimum front yard setback: 6.0 meters (19.7 ft).</p> <p>Minimum side yard setback: 1.83 meters (6.0 ft).</p> <p>Minimum rear yard setback: 6.0 meters (19.7 ft).</p>
Cornwall	Prince Edward Island		<p>Units permitted: Up to 4 dwelling units per lot are permitted as-of-right in designated residential zones (R1, R2, R3)</p> <p>Minimum lot area: Generally around 560 m² for lots permitting four units (varies slightly depending on location and services).</p> <p>Minimum landscaped area: Not specifically mentioned</p> <p>Maximum driveway width: Not specified.</p> <p>Parking requirements: 1 parking space per unit minimum; reductions considered near transit and central areas.</p> <p>Building specifications: Maximum height typically 10.5 meters (around 3 storeys); standard setbacks of approximately 6 meters (front), 2 meters (side), and 6 meters (rear).</p>
Stratford	Prince Edward Island		Units Permitted: Density of units on a lot may be increased by 20% under certain conditions.
Three Rivers	Prince Edward Island		Units Permitted: Multiple dwelling units permitted per lot, subject to zoning provisions.

Municipality	Province	Population	Details
Regina	Saskatchewan		Units Permitted: Up to 4 units per lot within the City's intensification boundary; up to 2 units outside this boundary.
Saskatoon	Saskatchewan		Units Permitted: Up to 4 dwelling units per residential site city-wide.
Whitehorse			Units Permitted: Up to 4 units per lot in all urban 'single detached' zones.