Dear Sara,

Thank you for your correspondence and for reaching out to our office.

One of Mayor Chow's biggest priorities is to build more housing in Toronto to help address the housing crisis. She also supports the role of architects in building housing in our city. To that end, she moved the following motion that was approved by Toronto City Council at its meeting on July 24, 2025:

City Council direct the Chief Building Official and Executive Director, Toronto Building in collaboration with the Chief Planner and Executive Director, City Planning, to:

a. engage stakeholders in the **architecture**, building and planning sectors and develop a designfocussed procurement process to develop code-compliant designs meeting high thresholds of design, accessibility and climate resiliency for four-unit and six-unit homes, appropriate for neighbourhoods across Toronto, that the City would make accessible to the public; and

b. make pre-approved multiplex designs available to the public through the City's website by the second quarter of 2026.

We look forward to your sector being engaged as part of this work to help facilitate the construction of missing middle housing by providing additional options for homeowners.

In regards to the City of Toronto's Preapproved Garden and Laneway Suites Plan Program, this initiative was launched by Toronto Building to support this goal. Any future expansion of the Preapproved Plans, or the Certified Plans Programs will continue to be established and offered to the public in conformance with the regulatory framework of the Building Code Act and the Acts regulating the design professions.

The Program does not suggest or recommend any changes to the law regarding when an Architect is required for a project. As outlined on the <u>City's website</u>, a building permit may only be issued where the

proposed construction complies with the Building Code Act, the Ontario Building Code and other applicable law (including zoning).

The City makes it clear that in respect of the design of the building, the homeowner or designer who chooses to use a pre-approved plan as part of their building permit application will ultimately be taking responsibility for the design. The City advises that homeowners or their designer should satisfy themselves that the plan being used complies with applicable law.

As referenced in your letter, the Building Code permits permit drawings for detached houses, (including garden and laneway suites), to be prepared by the owner or an individual registered as a designer with the Ministry of Municipal Affairs and Housing and having completed the appropriate building code examinations.

While Architects may design build forms described above, the Building Code only requires residential occupancies that exceed 3 storeys in building height OR buildings that exceed 600 square meters in gross area and that contains a residential occupancy other than a dwelling unit or dwelling units (example large semi-detached house or row housing) to be designed/reviewed by architects.

The pre-approved drawings are under 3 stories in height, less than 600 square meters and contain a residential unit, therefore the legislation does not require these buildings to be designed by an architect.

The pre-approved drawings are prepared for homeowners to facilitate and enable them to submit for the required building permit and make it easier for them to comply with the Building Code. The use of the drawings is voluntary.

Should homeowners wish to go with alternative designs, they may still develop their own proposals, retain a Designer registered with MMAH, or retain an architect.

I understand that Toronto Building established the Program to make it easier to apply for and receive a building permit. This is one of a number of programs and service delivery changes introduced to expedite building approvals.

In 2024, the Division completed an organizational and service delivery transformation which is enabling the timely processing of applications and ensuring responsiveness to the needs of industry and the public. I understand that broad industry engagement, including with OAA members, was part of the program review.

In addition, the City has been undertaking significant work to speed up planning approvals. For example, the City has improved statutory review timelines for complex applications (including combined Official Plan Amendment and Zoning By-law Amendment, Zoning By-law Amendment and Site Plan Control) by over 80% compared to the previous five-year average. On site plan applications, the most recent timeline metrics, as of Q1 2025, show an average time to decision of 129 calendar days, compared to an average of 732 calendar days for applications submitted before July 1, 2023. Additional metrics can be found online <a href="here">here</a>.

I thank you again for your interest and commitment to addressing the housing crisis. We look forward to the architectural community being further engaged on this work.

Please do not hesitate to contact me with any questions or to discuss further.

All the best, Jen Jennifer Chan (she/her) Legislative Affairs and Implementation Liaison Office of Mayor Olivia Chow



Our office is committed to accountability and transparency. If you are requesting a meeting with the Mayor or a member of the Mayor's staff on behalf of a for-profit group or enterprise or a group that represents for-profit enterprises, you need to confirm that you are in compliance with the Lobbyists' Code of Conduct. Please contact the Office of the Lobbyist Registrar by phone at 416-338-5858 or by email at <a href="mailto:lobbyistregistrar@toronto.ca">lobbyistregistrar@toronto.ca</a>

Sent: July 8, 2025 4:11 PM

To: Mayor Chow <Mayor\_Chow@toronto.ca>

Subject: [External Sender] Letter from the OAA re: Expanded Certified Plans Program

Good afternoon -

On behalf of the OAA's Senior Vice President, Lara McKendrick, and all of its governing Council, I am sending along the attached letter for your attention.

The Association enjoys a longstanding, collaborative relationship with the City and we look forward to continuing our important work with you in order to promote the public interest.

Sincerely,



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