

Established in 1889, the Ontario Association of Architects (OAA) is the self-regulating body for the province's architecture profession. It governs the practice of architecture and administers the Architects Act in order to serve and protect the public interest.

The Honourable Steve Clark
Ministry of Municipal Affairs and Housing
College Park 17th Flr, 777 Bay St
Toronto, ON M7A 2J3

April 1, 2021

Re: Bill 257, Supporting Broadband and Infrastructure Expansion Act, 2021

Dear Minister,

The Ontario Association of Architects (OAA) is writing in response to the consultation entitled *Proposed changes to Minister's zoning orders and the Planning Act*.

Architects have expressed growing concern over the wider use and application of Minister's Zoning Orders (MZOs) since Bill 197 was introduced. In an attempt to respond to some of these concerns, the OAA took the unique step of issuing a Practice Tip—[PT.02.1 Legislative Overview – Minister's Zoning Orders](#)—cautioning members that **the issuance of an MZO changes neither professional roles and responsibilities, nor a member's duty of care or professional standards.**

The OAA recognizes that MZOs are an existing *Planning Act* tool intended to get something built quicker and easier in the face of a broken building approval process. While this goal may be laudable, the Provincial Policy Statement (PPS) cannot be ignored. The PPS gives direction on efficient land use as well as protection of the environment and resources in support of the government's goals. **Just as an MZO does not relieve architects of their professional obligations, the government should not set aside its own priorities and planning rationales.**

Instead of this site-specific work-around, the province should focus on a systemic fix that will benefit all Ontarians. The last time the government contemplated critical reforms to the Site Plan Approval process was in the first draft of Bill 66, *Restoring Ontario's Competitiveness Act*, 2018. **The close of this consultation will mark exactly two years since Bill 66 was first introduced, yet no improvements to Site Plan Approval have been proposed.**

The OAA has commissioned research, including [A Review of the Site Plan Approval Process in Ontario](#) (2013) and economic costing performed in [Site Plan Delay Analysis](#) (2018). The findings showed up to \$900 million annually lost through delays in the Site Plan Approval process. This inefficiency does not go unnoticed.

Largely on account of Site Plan Approval, which takes 72 per cent of the approval time, the World Bank ranks us as 64 out of 191 for "Dealing with Construction Permits" (*Doing Business: Measuring Business Regulations*). Sorted strictly by cumulative time, our 249 days drops our ranking to a dismal 169.

In comparison, the OECD high income average is 152.3 days. To be competitive with the United States (81 days), Ontario would need to move through the whole building

approval process in a third of the time. While certain stakeholders have reacted by saying that 152 days or even 81 days is impossible, our economic peers have shown this is entirely possible without sacrificing building quality or safety.

Reforming Site Plan Approval is critically needed from the standpoint of economic competitiveness, red tape reduction, and avoiding the sacrifice of environmentally sensitive land. And in the face of COVID-19 economic recovery, it can no longer be ignored.

The OAA looks forward to continuing this important conversation with you.



Susan Speigel, Architect
OAA, FRAIC
President