

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.

Ministry of Municipal Affairs and Housing
Planning and Policy Branch
777 Bay Street, 13th Floor
Toronto, Ontario
M7A 2J3

October 8, 2024

Re: ERO number 019-9210—Proposed amendment to O. Reg 299/19 Additional Residential Units (ARUs), made under the *Planning Act*

To Whom It May Concern:

The Ontario Association of Architects (OAA) supports amending the Additional Residential Units (ARUs) regulation (O. Reg 299/19). This change would support the creation of more housing units and advance housing affordability across the province.

In its submission on Bill 23, *More Homes Built Faster Act, 2022*, the Association supported government's proposal to advance gentle intensification through as-of-right conversions of single-family homes to up to three dwelling units, including a garden or laneway suite.

At that time, the OAA cautioned this was a good step, but that the government should also consider the recommendations made by its Housing Affordability Task Force. In particular, the Association urged the development of a more permissive system for land use and approvals.

The OAA remains steadfast in its position that intensification can help advance affordability. The Association continues to urge government to adopt its Housing Affordability Task Force report recommendation of increasing the as-of-right residential housing up to four units and up to four storeys on a single residential lot.

Since the passage of Bill 23, municipalities such as the City of Toronto have demonstrated their commitment to intensification. It allows up to five dwelling units as-of-right on single-family residential lots, including up to four units in the main house as well as a laneway or garden suite.

Government can look to Toronto for effective ways to introduce gentle density. City bylaws, developed via the Expanding Housing Options in Neighbourhoods initiative, create great opportunities for change. However, to make advances across Ontario, we need province-wide legislation that enables the further creation of ARUs. The OAA continues to urge government to seek opportunities to advance housing affordability by way of urban intensification.

In its submission on Bill 185, *Cutting Red Tape to Build More Homes Act, 2024*, the OAA noted its support of *Planning Act* changes that would help create additional residential units by providing authority for creating regulations to eliminate practical barriers to the building of additional units. These changes would prevent authorities having jurisdiction from limiting opportunities for further intensification.

The changes contemplated in this regulatory amendment are a step in the right direction, especially overriding floor space index (FSI) requirements, angular plane requirements, and minimum lot size requirements, as well as restricting building distance separation requirements associated with any building containing ARUs to a maximum of 4 metres. The OAA also urges government to consider going further on lot coverage by further removing obstacles to these units.

Overall, the OAA is encouraged by this proposal and applauds government for continuing to implement the recommendations of the Housing Affordability Task Force. If passed, the proposed amendment to O. Reg 299/19 Additional Residential Units, made under the *Planning Act*, will enable the creation of more housing across Ontario by eliminating obstacles to intensification.

The OAA enjoys a longstanding, collaborative relationship with government, and looks forward to continued collaboration in order to protect the public interest. Please do not hesitate to contact me directly for any further questions or requests.

Sincerely,



Settimo Vilardi, Architect
M.Arch., OAA, FRAIC
President