

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.

Her Worship Olivia Chow
Mayor, City of Toronto
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City Hall, Second floor, West
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Sent via email to: mayor_chow@toronto.ca

July 8, 2025

Madam,

On behalf of the governing Council of the Ontario Association of Architects (OAA), which regulates the architecture profession to protect the public interest, I am writing you this open letter to both express concern over recent statements and offer some important points of clarification.

The OAA has heard from numerous Architects, including those who practise in Toronto, who have shared their worry about your comments last week regarding steps the City is taking to reduce design costs and speed up building permit approvals. We are amid a housing affordability crisis that requires practical and immediate solutions, but the OAA too was quite confused and surprised by your remarks. They seem to suggest new changes to the law concerning when an Architect is required for a project, and they unfairly place blame on our profession for delays and cost increases.

Neither of these items are true and only create confusion for the public.

Under the provincial *Architects Act*, an Architect has generally **never** been required for work involving laneway or garden suites. When undertaking such projects, a homeowner can retain a variety of design professionals to obtain a building permit, whether an OAA member like an [Architect](#) or [Licensed Technologist](#) or a member of the public who holds a BCIN.

As the City prepares to implement the expanded "Certified Plans Program," the OAA strongly recommends checks and balances be put in place to ensure projects that **do** require an Architect do not get erroneously pulled into this program.

While small projects such as garden and laneway suites have never been within the protected scope of Architects' work, members of the profession have always had the authority to design these kinds of projects if a client retains them to do so. As an Architect myself, I recognize I have a bias in terms of sharing the myriad reasons why someone would choose to hire one of my peers.

That notwithstanding, I want to make it clear that architectural fees do not drive up the cost of housing. They are a fraction of the overall expenses to design and build a home, and this investment will pay for itself over time. Moreover, Architects can add



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value to projects by identifying risks and innovative design solutions while still on paper rather than having to troubleshoot them in the construction phase of a project.

I am quite concerned the City's comments are not only placing blame on Architects for high costs but also diverting attention from the real problem of administrative efficacy at its Building Department. Whether there are Architects involved or not involved, whether the project comes from a catalogue or is bespoke, there is no bearing on how quickly Toronto can process permit applications.

A [recent report](#) commissioned by the OAA looked at a similar problem through the lens of site plan approvals for other types of projects across the province. It found many municipalities are taking too long to process site plan applications, costing the Ontario economy \$3.5 billion annually.

Returning to the specific issue of laneway houses and garden suites, a design catalogue may be an effective tool to address housing affordability in some cases, but it is not a universal fix. Such catalogues can serve as a starting point between the client and their designer (be they an Architect, Licensed Technologist or BCIN holder) to discuss fundamental requirements for the new home while also providing visual reference for typical room sizes and layouts to assist the design process to move more swiftly. My fellow OAA Councillor, Settimo Vilardi, has [written about this topic](#) as well.

As a regulator that works in the public interest, the OAA sees the current housing crisis as a critical challenge, alongside climate action. The architectural profession stands ready to work with others in offering new approaches. Our Association has also always enjoyed a strong and cooperative relationship with the City of Toronto, and I would be more than happy to discuss any of these items further or answer any questions you or your staff may have.

Sincerely,



Lara McKendrick, Senior Vice President and Treasurer
B.Arch., Architect OAA, AAA, MRAIC

Per: Ted Wilson, President
B.Arch., Architect OAA

CC: OAA Council

