

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.

As the regulator of architectural practice with a mandate to serve the public interest, the Ontario Association of Architects (OAA) shares a common goal with the provincial government in helping solve our housing affordability crisis. In this context, the OAA has reviewed [Bill 60, Fighting Delays, Building Faster Act, 2025](#), which is following an expedited legislative process.

While the Association is encouraged to see some strong steps forward, it urges the Province to closely examine other possible consequences of the bill's contemplated revisions to the *Construction Act* and *Planning Act*. In this document, the OAA identifies welcome changes and shares concerns over some of the sweeping omnibus bill's impacts related to the built environment.

Construction Act

In Schedule 2 of Bill 60, there are technical amendments regarding the *Construction Act* that are intended to refine and clarify the new annual release of holdback requirement. **The OAA is pleased to see the decoupling of annual holdback release from lien expiry through the creation of a clearer timeline for payment of holdback on an annual basis and the restoring the existing (and separate) timelines for lien preservation, perfection, and expiry.** The Association encourages the government to implement these changes swiftly to further simplify a very complicated piece of legislation.

Planning Act

Through an amendment to the *Planning Act* effective on Royal Assent, Bill 60's Schedule 10 contemplates giving regulation-making authority to the Ministry of Municipal Affairs and Housing (MMAH) to allow variations to be permitted "as-of-right" from additional prescribed performance standards (e.g. height) on specified lands (e.g. urban residential lands).

The OAA remains steadfast in its position that intensification can offer new approaches to advance affordability. It applauds the government for these legislative amendments that help eliminate practical barriers to the creation of more housing. In its [submission on amendments to O. Reg 299/19 - Additional Residential Units](#), the Association suggested the Province continue to seek opportunities to advance housing affordability by way of urban intensification, and these contemplated as-of-right variances may help achieve this.

Bill 60 also proposes exempting all Official Plan amendments that authorize residential uses on all the lands within a Protected Major Transit Station Area (PMTSAs) from Ministerial approval, bringing them more quickly into force. **As the OAA strongly believes housing affordability can be improved by promoting urban intensification, it supports these legislative amendments that foster residential density and advance transit-oriented development.**



In 2019, the OAA commissioned research to better understand the design and regulatory opportunities that address housing affordability in growing communities across Ontario. The independent report, *Housing Affordability in Growing Urban Areas*, prepared by SvN Architects + Planners and available on the [OAA Website](#), found that increased housing supply in Ontario can be achieved through:

- infill development and intensification in existing neighbourhoods;
- expansion of permissions for gentle density development, such as duplexes, triplexes, four-plexes, and secondary suites;
- low- to mid-rise intensification along corridors; and
- mid- to high-rise intensification in centres.

Transit-oriented developments can facilitate more widespread and uniform increases in urban density, enable the growth of transit and walkable communities, and promote commercial and mixed-use development in existing low-density neighborhoods.

Despite these encouraging changes, **the OAA strongly urges the Province to maintain green development standards at the lot level outside buildings until these requirements can be fully integrated into Ontario's Building Code.**

The Association appreciates that cutting red tape may help advance housing affordability, but this should not come at the expense of the strides that have made to address the climate crisis.

With plans in place via Bill 60 to undertake a review of the province-wide Building Code, Ontario is uniquely positioned to use this time of great change to introduce an energy step code. Objective, tiered performance metrics help everyone understand energy use in buildings, and position Ontario to achieve its climate targets. Municipal green standards are an important part of this—members of the architectural profession have called such standards one of the most effective tools suggesting climate considerations to clients. Their enshrinement in the Building Code would ensure consistent application and acceptance across the province, but until this happens, it is short-sighted to remove these lot-level development standards.

Conclusion

The OAA enjoys a longstanding, collaborative relationship with the provincial government, and looks forward to continued collaboration. It will continue to monitor the development of Bill 60, along with other bills or legislative developments that have an impact on Ontario's built environment.

The Association seeks to provide consultation to all levels of government to fulfil its regulatory responsibility of protecting the public interest when it comes to the practice of architecture. To read various correspondence between the OAA and the Province, you can search through the [Government Relations \(GR\) Portal](#).

