

*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.*

Standing Committee on Heritage, Infrastructure and Cultural Policy  
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[Sent by email to: [schicp@ola.org](mailto:schicp@ola.org)]

April 22, 2026

**Re: Bill 98, *Building Homes and Improving Transportation Infrastructure Act, 2026***

Dear Chair and Members of the Committee,

The Ontario Association of Architects (OAA) is pleased to provide feedback on the proposed amendments to various acts through Bill 98, *Building Homes and Improving Transportation Infrastructure Act, 2026*.

### **Streamlining and Standardizing Official Plans**

Regarding proposed changes to streamline and standardize Official Plans, the Association encourages government to move forward with this approach. The OAA has repeatedly pointed out that predictability in the planning approval process is important to all stakeholders, including building users. Predictability can support the creation of more housing by enabling Architects, developers, and builders to forecast the time and costs associated with approval processes, which also helps mitigate unexpected procedural delays.

As pointed out by the Ontario Professional Planners Institute (OPPI), standardization and predictability can also mean fairer and more transparent decision-making. The OPPI has previously called for government to create shorter, more flexible Official Plans, including a streamlined table of contents template as a guideline for municipalities. The OAA is encouraged to see this recommendation mirrored in Bill 98 and applauds government for proposing this change.

### **Bold and Transformational Changes to Site Plan Control**

The OAA has long called for a review of the site plan approval process and is encouraged to see government taking action. As noted in the [2024 Altus report](#) commissioned by the OAA, site plan delays are costing the Ontario economy as much as \$3.5 billion annually. This is a nearly four-fold increase from the findings of the [2018 Altus report](#), which estimated delays at approximately \$900 million. For a process that accounts for 73% of the time and nearly 60% of the costs associated with the overall planning approval process, reform has been long awaited.

The Association applauds government's consideration of "bold and transformational" changes to Site Plan Control. In particular, if site plan remains a planning tool in Ontario, the OAA urges government to move forward with limiting rounds of circulation to three. The OAA has long advanced the position that government should enforce the legislated 60-day timeframe for site plan approval and sees three rounds of circulation as a step in the right direction.

Additionally, the OAA supports government's proposal to require an arbitration process as an alternative to Ontario Land Tribunal (OLT) appeals. In its submission on Bill 108, *More Homes, More Choices Act, 2019*, the Association posited that "...the *Planning Act* should be amended to allow for an appeal to be made not only to the [OLT] but also before an independent adjudicator. The costs associated with the independent adjudicator should be borne by the applicant unless a determination is made in the applicant's favour. In this case, the costs should be borne by the municipality. Applicants should be limited to one resubmission."

Other Site Plan recommendations that the OAA has long been advancing include two items suggested in government's Housing Affordability Task Force report:

- extending Site Plan exemptions to developments with 30 or fewer dwelling units (from the current requirement of 10 or fewer); and
- increasing the total number of dwelling units allowed on a residential lot from three to five, thereby increasing density and supporting gentle intensification.

The OAA believes these improvements, taken together with the other bold and transformational changes government is considering, will help streamline the approval processes and support the development of much-needed housing across Ontario. The time to act is now. Ontarians deserve access to affordable and attainable housing.

### **Enhanced Building Standards**

The OAA encourages government to continue its work to reform Site Plan, recognizing that reducing the scope of Site Plan is an important part of this. The Association also strongly believes that the spirit of enhanced building standards, such as municipal green standards, should be maintained.

To this end, the OAA strongly recommends that government consider the integration of a province-wide green standard in the Ontario Building Code. Via a posting on the Environmental Registry of Ontario, government has made explicit its intent to streamline the Ontario Building Code, "...so it better meets modern changes, while maintaining Ontario's high health and safety standards[.]"

At this juncture of great transformation and change, Ontario is uniquely positioned to advance efficiency and quality together by introducing an energy step code into the Building Code. Rather than reinventing the wheel, the province should consider adopting the Toronto Green Standard as a reference code that could be included in the Building Code and uniformly applied province wide. The built environment is a

key contributor to greenhouse gas emissions and has a significant role to play in achieving emission reduction targets.

In the meantime, climate action standards currently in place—such as the Toronto and Whitby Green Standards—should not be lost. Instead, the OAA urges government to create a carve-out for green development standards until they can be integrated into the Building Code.

Objective, tiered performance metrics help everyone understand energy use in buildings, and position Ontario to achieve emissions reductions. Municipal green standards are an important step in this—OAA members call the Toronto Green Standard one of the most effective tools available to pitch climate considerations to their clients. However, enshrinement of these standards in the Building Code will ensure application and acceptance of the standards consistently across Ontario.

### **Ontario Building Code Review Advisory Committee**

If government is to establish an expert third-party advisory body to review the Ontario Building Code, the OAA encourages it to consider the involvement of Architects, in addition to engineering, construction, and code specialists. Architects can support this process and offer their expertise to identify where rules can be streamlined and modernized.

Architects are key stakeholders in the application and interpretation of the Building Code and are legally and professionally bound to comply with it under the *Architects Act* and associated regulations. This obligation applies to all work they undertake, regardless of project size, complexity, or procurement model; it also places them in a position of continuous engagement with life safety, accessibility, and performance requirements embedded in the code.

As a result, Architects develop a deep, practice-based understanding of how building standards function in real-world conditions, not just in theory. They are also frequently responsible for providing confirmations to municipal building departments regarding compliance milestones, including whether a building is suitable for occupancy. Given this direct accountability at critical points in the construction and approval process, the architecture profession brings an informed, systems-level perspective that is essential to any meaningful examination or enhancement of provincial building standards.

The OAA enjoys a longstanding, collaborative relationship with the provincial government. On behalf of the Association, I look forward to continued work with the Ministry of Municipal Affairs and Housing and all of government to ensure the public interest is protected and promoted through the development of Bill 98, *Building Homes and Improving Transportation Infrastructure Act, 2026*.

Please do not hesitate to contact the Association if you require additional information.

Yours truly,



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President