



Ontario Association of Architects

February 27, 2019

**A Letter to Members Regarding Site Plan Approval**  
OAA Reaffirms Support for Design Review Panels

To the members of the OAA,

Over the past few weeks, the OAA has heard concerns, from members and the planning community, over changes the OAA has [proposed to the Provincial government](#) regarding the Site Plan Approval process. In particular, some have suggested that the OAA is seeking to eliminate Design Review Panels and to sacrifice design quality for the sake of cost savings and expediency in the development process. Neither could be farther from the truth.

To begin, I would like to clarify that the proposed changes from the OAA are not about reducing the quality of architecture. Nor are they meant to erode or eliminate Site Plan Approval or Design Review Panels. The changes recommended by the OAA are intended to improve the system while restoring control over architecture back to the architectural profession, as is consistent with the *Architects Act*.

For nearly a decade, the OAA has heard concerns from members related to the Site Plan Approval process. In response to these concerns, the OAA commissioned an extensive independent study from the community-planning firm Bousfields Inc. in collaboration with Altus Group Economic Consulting. The findings, released in 2013, were significant and alarming.

- On a 100-unit condominium, each month of Site Plan Approval delay cost the homebuyer nearly \$2,400 per unit per month. The total monthly cost to all stakeholders was between \$396,000 and \$480,000.
- On a 50,000-square-foot office building, each month of Site Plan Approval delay cost the business over \$7,000. The total monthly cost to all stakeholders was between \$123,000 and nearly \$140,000.

The 2013 report did not quantify the cumulative impact on the province, and both politicians and media subsequently asked the OAA to provide that figure. A followup report by Altus Group found that the economic impact of Site Plan Approval delays costs Ontario up to \$900 million a year—a figure that may actually exceed \$1 billion annually due to the conservative nature of the economic model.

The current Site Plan Approval process is incredibly unpredictable, slow and costly. While there are numerous factors delaying the approval process, we have heard very clearly that subjective opinions regarding design do contribute significantly to delays while often adding significant costs—in terms of both carrying costs and design and construction. In its current form, the Site Plan Approval process is causing harm to Ontario. As a regulator entrusted by the government to serve and protect the public interest and to regulate the practice of architecture, the OAA felt compelled to respond.

Prior to 2006, the *Planning Act* excluded “the colour, texture and type of materials, window detail, constructions details, architectural detail and interior design of buildings” from the Site Plan Approval process. This original clause—one which was presumably there for decades—is what we refer to as design exclusions. Following pressure from municipalities, these exclusions were removed from the *Planning Act* in 2006 giving municipalities significant control over the practice of architecture—at times, possibly in contravention of the *Architects Act*.

In the OAA’s 2006 submission to government, the OAA advocated for Design Review Panels as a more responsible way to influence the design process while strongly cautioning the province against enacting design control provisions. Our current submission remains consistent with the OAA’s position from more than a decade ago. Again, this is not to say the OAA supports eroding or removing Site Plan Approval. The OAA supports a strong and robust Site Plan Approval process insofar as it focuses on issues more directly related to the public realm.

Regarding Design Review Panels, I would like to state that the OAA unequivocally supports the important work these panels deliver to municipalities. The OAA has actively worked with a number of municipalities over the years to help them establish Design Review Panels and will continue to do so. Design Review Panels existed prior to the changes to the *Planning Act* in 2006, and they will continue to exist even if the government adopts the recommendations. The two items are simply not connected and the confusion generated by recent comments has been unfortunate.

We have an opportunity to fix what has increasingly become a broken process, and the OAA is optimistic in our ability to do so to the benefit of the province, the public, our communities and our members.

Regards,



Kathleen Kurtin  
OAA, MRAIC  
President

