



Ontario Association of Architects

January 25, 2019

[Sent via email]

The Honourable Steve Clark, MPP  
Minister of Municipal Affairs and Housing  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON  
M7A 1S5

Dear Minister,

As you are likely aware, the Ontario Association of Architects (OAA) is the self-regulating body for the profession of architecture in the province, dedicated to promoting and increasing the knowledge, skills and proficiency of its members. Dating back to 1889, the OAA has governed the practice of architecture and administered the *Architects Act* in Ontario in order that the public interest may be served and protected. The OAA has long been committed to working with government and other stakeholders, and it is for that reason that I write to you today.

Like many of our partners in the building industry, the OAA is extremely concerned with the amount of time that it takes to begin construction on new housing. Prior to 2006, the Planning Act contained a set of design exclusions. Late in that year, the *Planning and Conservation Land Statute Law Amendment Act* removed this set of exclusions, beginning more than a decade of protracted fights between designers and municipalities, causing a significant increase in the time required for site plan approval, with no improvement to building safety.

Going back to our original deputation on the former Bill 51, the OAA argued that site plan approval should only focus on issues related to the public realm, not issues of architectural 'style.' Your government started on this path by proposing to restore the design exclusions subject to the passing of an open-for-business bylaw. However, with the recent announcement that Schedule 10 will be removed from Bill 66 (*Restoring Ontario's Competitiveness Act*), it is even more critical than before that these design exclusions be restored unconditionally to the *Planning Act*. In doing so, the ability for businesses to increase the speed at which they build housing will be greatly improved.

The OAA is very concerned about the cost of housing within the province. An independent report, prepared for the OAA in 2013 by Bousfields and Altus Economic Group, found that each month of delay associated with site plan approval added \$443 per unit for a prospective condominium buyer (in a 100-unit condominium), and more than \$7000 for a business owner (in a 50,000-square-foot office building). Respectively, the total cost to all stakeholders was estimated to be \$396,500–\$479,800 per month on the residential side and \$123,400–\$136,800 per month on the business side.

Following the release of that report, the OAA had been asked by government, media and other officials to quantify the cumulative impact of site plan approval delays for Ontario. An independent report by Altus Group released on July 19, 2018 estimated the annual total cost to stakeholders to be as high as \$900 million in Ontario. Due to the conservative modelling undertaken by Altus Group, the OAA anticipates this cost to the Province actually exceeds \$1 billion each year. These costs are borne by homeowners, businesses, industry and by the

government itself. Again, it is the OAA's contention that these costs would be greatly reduced by restoring design exclusions to the Planning Act.

Thank you very much for the opportunity to submit a simple but effective solution for increasing housing supply in Ontario. Please do not hesitate to contact the OAA about this recommendation or anything else moving forward, as we remain a ready and willing resource for you and your Ministry.

Sincerely,

A handwritten signature in black ink, appearing to read "John K. Stephenson". The signature is fluid and cursive, with the first name "John" being particularly prominent.

John K. Stephenson, Architect  
OAA, MAA, FRAIC  
Immediate Past President

