

May 10, 2024

Planning Policy Branch
Ministry of Municipal Affairs & Housing
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

Re: Feedback on Zoning By-Law Barriers to the Creation of Additional Residential Unit

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide feedback on the Ministry of Municipal Affairs and Housing's request for feedback on zoning by-law barriers to the creation of additional residential units (ARUs) as part of ERO 019-8366.

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the Province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions.

OPPI supports recent legislative changes that require municipalities to allow ARUs 'as-of-right' on all residential lots across Ontario. This measure enables more gentle density and expands housing options in neighbourhoods in support of the government's policy objectives. It is a key tool in helping address the housing crisis and increasing the number of ARUs in existing residential dwellings. This approach is one of the few ways in which new residential units can be created in a relatively short timeframe at a reasonable cost.

OPPI does not have concerns with providing the Minister with regulation-making authority with respect to zoning requirements for ARUs. We appreciate that zoning standards that define the development envelope can impact the feasibility of ARUs. However, it is very difficult to develop a singular province-wide set of zoning by-law standards that would be appropriate for urban, suburban, and exurban areas; and therefore, we would support a provincial approach that provides appropriate flexibility to these differing areas. For example, the neighbourhood context for aspects such as yard setbacks are very different on a street within the Old City of Toronto compared to an exurban area at the outskirts of Caledon.

OPPI supports streamlining and removing prohibitive barriers but unfortunately there is no 'magic answer' that can work across the Province. **Instead, it would be helpful for the Province to produce guidelines for municipalities and landowners on some best practices in establishing regulations for ARUs, and which could be considered as part of Official Plan five-year reviews and Zoning By-law Updates.**

Should the Province seek to develop these ARU guidelines or best practices for different types of settings (i.e., urban, suburban, exurban), OPPI would be happy to convene a group of experts to assist the government with this work.

Regarding other changes that would help support the development of ARUs, **it may be helpful to have incentives which would help individual homeowners to create new ARUs. Such programs could include financial incentives such as loans (forgivable) or grants.**

Also, enhancing the capacity of the modular home building sector would be helpful to reduce costs, improve availability, and make it easier for homeowners to locate new garden suites on their lots.

If you have any questions or would like to setup a meeting to further discussion our submission, please contact OPPI's Executive Director Susan Wiggins at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Claire Basinski, MCIP, RPP, CP3
Chair



Susan Wiggins, CAE, Hon IDC
Executive Director