

**Opportunities to increase missing middle housing and gentle density, including supports for multigenerational housing**

Submission from Architectural Conservancy Ontario

April 29, 2022

During Heritage Week in February 2022 ACO met with MPP’s with a message to Keep Fix Reuse Ontario’s building stock. (Our presentation material is appended)

**Keep Fix Re-use:** ACO supports proposals to make it easier to build secondary suites, infill housing, laneway housing and other forms of missing middle and gentle density around existing building stock. Our concern is ensuring that, rather than resulting in losses, the proposals for new housing create incentives for reuse.

**Incentivize Building Reuse:** In the U.S. and Europe grants or tax incentive programs have been highly successful in the conversion of existing building stock for housing. Creating incentives that encourage the repurposing of existing buildings as well as disincentives for demolition will ensure conservation of the cultural and environmental resources in our existing neighbourhoods.

**Disincentivize Demolition:** Demolition and landfill is wasteful of increasingly scarce material resources. In cases where repurposing of an existing resource is impractical, removal of the resource should be through deconstruction and stockpiling of all re-usable building materials, contributing to a circular economy. The City of Victoria in British Columbia has implemented such deconstruction and waste diversion policies.

**Material and Labour Shortages:** The construction and renovation industry is experiencing ongoing labour and material shortages, even more reason to encourage conservation and repurposing of existing resources to achieve Ontario’s affordable housing goals.

**Neighbourhood Character and Investment:** Ensuring that new development is compatible with existing neighbourhood character creates certainty for individual homeowners/investors as well as for developers. Municipalities have an important role to play in facilitating new affordable housing without destabilizing existing communities.

An example of a neighbourhood compatible building type is 68 Kendal in Toronto, an eightplex, of 3 stories plus a ½ basement. It offers generous accommodation, two units per floor around a single entrance stair with an exterior fire-escape at the back.

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| A picture containing outdoor, tree, sky, street  Description automatically generated | *68 Kendal Avenue, 3 storey 8 plex, designated under the Ontario Heritage Act* |

**3 Stories as-of-right rather than 4**: Generally, the kinds of projects which are proposed to be as-of-right will be compatible with existing neighbourhood character. Keeping in mind that the Ontario Building Code permits mezzanines above the uppermost floor of a building, we would suggest that 3 stories be the maximum permitted as-of-right.

**“New” Building Types/ New Developers:** If well implemented, the facilitation of small-scale property development could create a new class of investors in neighbourhoods, utilizing housing types like Brownstones or new types of walk up apartments. There are many building types found in Europe, or New York City that are not currently buildable in Ontario. One of our members, an architect, shared an experience from her practice of a very reasonable development proposal to convert a heritage home at 450 Pape in Toronto and add additional units on the back that was frustrated in excessive Site Plan requirements, as well as an OMB appeal, forcing the small developer to abandon the project.

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| A road with trees and buildings on the side  Description automatically generated with low confidence | *2014 Proposal for alterations to 450 Pape, frustrated in process, image courtesy Catherine Nasmith Architect* |

**Ontario’s Main Streets:** Most old main streets buildings are 20-40 feet wide with a single stair case leading to one or two apartments above the store. (Not currently permissible under the OntarioBuilding Code) Regulatory changes could permit the rebirth of this building type, strengthening traditional downtowns as places for owner occupied small businesses across Ontario.

ACO would welcome the opportunity to engage in further consultations to ensure that Ontario makes the best use of its existing building stock to solve the acute need for new housing.

Sincerely,

Diane Chin

ACO Chair