

December 7, 2022
Ministry of Municipal Affairs and Housing

**RE: Proposed Changes to Ontario Regulation 299/19: Additional Residential Units
ERO number 019-6197**

Please accept this Written Submission with respect to the ERO 019-6197 posting.

I am writing as an individual and as a Registered Professional Planner in the Province of Ontario with over 30 years of professional practice in this province. I'm also writing as an individual who has spent the majority of my professional experience working for municipalities as a land use planner responsible for the review of development proposals and the development of greenland networks within neighbourhoods. Over the course of my career, I have facilitated the development of numerous parks, trails and open space systems and housing through subdivision approvals while attempting to safeguard nature and balance the competing interests of the public and developers. My deep experience of how our land use planning processes work as a manager and director provides me with a broad understanding of the mechanics across the Acts and spectrum of changes being proposed.

In principle, I support the concept of allowing for more housing units (additional dwelling units ADUs) within existing homes providing that the Ontario Building Code and Fire Code are met. The issues to be addressed for gentle density to occur without major disruption to neighbourhoods is the need to ensure adequate parking and open space is available for these ADUs to be successful.

Typically parking is addressed through site plan control. The proposal to change how municipalities ensure provision of exterior amenities including parking and eliminating site plan control for developments of less than 10 units mean this issue will not be addressed. In large cities with established public transportation options this is less of a concern. The addition of parking often comes at the cost of green space and permeable surfaces which in turn affects urban run-off. To maintain resiliency municipalities should have the ability to require permeable surfacing and other green infrastructure as part of the addition of ADUs through site plan control.

Further, it should be up to the municipality who know the concerns of the local residents whether parking is required or not. The approach of one size fits all will not work in smaller urban areas.

Open Space (parkland and greenspaces) are determined when neighbourhoods are first laid out. With an increase in density there needs to be adequate space for residents to have access to greenlands. The changes recommended to parkland provisions in the Planning Act as part of Bill 23 should not proceed.

Many older neighbourhoods (prior to the 1950s) were developed prior to parkland standards being adopted. To address this deficiency, municipalities and the province spent

considerable money acquiring lands and developing parklands under a program called “Neighbourhood Improvement Plans (NIP)” during the 1960s and 70s to retrofit older neighbourhoods and provide much needed open space. Changing the standards at this time will lead to the same type of program being required some 20 years in the future.

Allowing ADUs to proceed without addressing parking and parkland standards will not address climate change, resiliency needs to be addressed as part of the overall implementation.

The addition of ADUs may address the rental market; however they do not address home ownership and the affordability of individual units. Rather adding an ADU to a home will increase the assessment and market value making it harder for lower income families to enter the housing market. The housing market and its capitalist base is the issue. The changes proposed by the Province do not tackle the real estate market which is driving affordability.

The Provincial efforts to streamline and find efficiencies in processes within the land use planning realm alone will not address housing supply and affordability. Other major market forces such as lending rates, real estate commissions and market forces and insurance industry practices have to be tackled

The need to address affordability and increase housing options for Ontarians is well known. I along with many other urban planners are concerned that the changes will have significant adverse impacts on residents quality of life and municipalities fiscal ability to provide livable communities.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Faye Langmaid".

Faye Langmaid, FCSLA, MCIP, RPP