



October 23, 2024

**Re: Additional Residential Units (ARUs): Proposed Amendment to Ontario Regulation 299/19 under the Planning Act (ERO 019-9210)**

Thank you for the opportunity to provide feedback about this proposed regulation, which is pursuant to Bill 185, the **Cutting Red Tape to Build More Homes Act, 2024**, and intends to change development charges and Ontario's land-use planning framework to give more powers to the minister and remove barriers to additional residential units, such as basement suites, laneway suites and garden suites.

The Cliffcrest Scarborough Village SW Residents Association takes the position that **this proposal is an overreach of jurisdictional powers, is irrational and takes the control away from municipal planning departments who are best positioned to know and understand the realities and needs on the ground.**

Furthermore, while the Province sets the land use planning framework through the Planning Act, regulations and policy statements (PPS), municipalities have been responsible for developing and implementing the municipal Official Plan and zoning bylaws, relying on community input. In effect, **this proposal would also remove democracy from city planning.**

We have been experiencing first-hand the effects of Bill 23, which is replacing affordable housing with investor-owned monster homes and unregulated multi-tenant housing across Scarborough and exacerbating our underfunded infrastructure, availability of transit, lack of medical and business services, as well as an unprecedented loss of canopy and green space.

The changes already made through Bill 23 (the More Homes Built Faster Act, 2022), allow "as-of-right" the use of up to 3 units per lot in many existing residential areas (i.e., up to 3 units allowed in the primary building, or up to 2 units allowed in the primary building and 1 unit allowed in an ancillary building such as a garage). This as-of-right permission applies province-wide to any parcel of land where residential uses are permitted in settlement areas with full municipal water and sewage services (excepting for legal non-conforming uses such as existing houses on hazard lands). Changes were also made to remove certain barriers (i.e., development charges, parkland requirements, minimum unit sizes and parking requirements) to encourage the creation of more additional residential units.

More specifically, on the elements of the proposed regulation:

1. **We oppose the proposed removal of angular planes.** Angular planes are imperative to provide proper transitions to adjacent family homes (as per Official Plan) and help mitigate loss of privacy as well as the shadowing impacts of buildings
2. **We oppose the at least 45% lot coverage proposed.** There is no rationale for this proposal. An incremental increase, e.g., 10%, is recommended.
3. **We oppose the proposed removal of FSI.** FSI measures density and needs to be maintained. In addition, there is no rational argument for an increase in the case of a basement apartment.
4. **We oppose the proposed removal of minimum lot size.** There is no rationale for why this would be an exception for ARUs.
5. **We oppose the proposal to restrict building separation requirements to a max of 4 meters.** This overreach has no basis and could never account for the realities on the ground.

Sincerely,

Marina Tadenc

On behalf of Board of Directors

Cliffcrest Scarborough Village SW Residents Association (CSVSWRA)