

October 23, 2024

Ministry of Municipal Affairs and Housing  
777 Bay Street, 5<sup>th</sup> floor  
Toronto, Ontario, M7A 2J3



Via e-mail: [planningconsultation@ontario.ca](mailto:planningconsultation@ontario.ca)

**Re: Proposed Amendment to Ontario Regulation 299/19 Additional Residential Units, made under the Planning Act**

To Whom It May Concern:

The Residential Construction Council of Ontario (RESCON) welcomes the opportunity to provide comments with respect to the consultation on the Proposed Amendment to Ontario Regulation 299/19 Additional Residential Units, made under the Planning Act.

RESCON is Ontario's leading association of professional residential builders, committed to providing leadership and fostering innovation in the industry. RESCON represents builders of high-rise, mid-rise and low-rise homes, who construct the majority of Ontario's new housing.

RESCON is supportive of the broader principles and policies outlined in this consultation, including measures that accelerate the implementation and uptake of the province's additional residential unit (ARU) framework. More specifically, these measures include the removal development charges, parkland requirements, minimum unit sizes and parking requirements.

Consumers are facing the most severe housing affordability crisis Ontarians have ever experienced. We endorse the primary focus of the proposed consultation as the removal of barriers will help facilitate the creation of additional residential units, ultimately helping build the homes Ontario needs.

However, under this consultation, we are concerned with one proposed aspect, being the building distance separation provisions. This proposed amendment would regulate the building distance separation requirements associated with an ARU to a maximum of 4 metres. While we recognize the intention behind limiting the separation to a maximum of 4 metres, we feel this could be a restrictive factor as it does not take into account the variability of property sizes, and should warrant further consideration. Considering both urban and suburban lot sizes, a one size fits all approach to regulating the ARU separation distance may in fact be more restrictive for certain properties. Larger lot sizes offer more flexibility in terms of ARU positioning, layout and design. Increasing the building separation distance, could allow for the better placement of ARUs and enable homeowners to maximize their property's potential. A flexible separation distance would encourage more innovative approaches, allow the ARUs to better fit the aesthetic of a property and potentially increase the uptake of ARUs. It is essential that the implications of lot size are considered when moving forward with this legislation. Increasing the maximum distance or adding a lot size consideration to the ARU framework, would ultimately support the building of ARUs and provide more housing for Ontarians.

We appreciate this opportunity to share our comments with respect to the consultation on Additional Residential Units. We encourage the provincial government to continue in every way possible to promote policies, regulations, and legislation that support the construction of residential housing at a time when the housing affordability and supply crisis is substantially impacting the ability of the housing sector to affordably construct residential homes across Ontario.

As always, we are available to collaborate and assist the provincial government, and all levels of government, as we work together to address our collective housing challenges.

Yours truly,

A handwritten signature in black ink, appearing to read 'MLR' or similar, written in a cursive style.

Richard Lyall  
President  
RESCON