



Ontario Association of Architects

February 28, 2019

The Honourable Steve Clark, MPP
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON
M7A 1S5

Dear Minister:

As you are likely aware, the Ontario Association of Architects (OAA) is the self-regulating body for the profession of Architecture in Ontario, dedicated to promoting and increasing the knowledge, skills and proficiency of its members. The OAA also governs the practice of architecture and administers the *Architects Act* in Ontario in order that the public interest may be served and protected.

The OAA has long been committed to working with government and other stakeholders, and it is for that reason that I write to you today. Although we welcome a review of the Growth Plan for the Greater Golden Horseshoe, the OAA is opposed to the proposal to allow municipal settlement boundary expansions of up to 40 hectares outside the municipal comprehensive review. The possibility for such expansion, and potential development, will create higher infrastructure and associated maintenance costs, and can lead to increased levels of low-density growth. With the current housing accessibility and affordability crisis in the Greater Golden Horseshoe (GGH), municipalities need to focus on creating more opportunities for infill housing and medium-density development that is easily accessible and close to transit. This is not possible with further expansion. In focusing on infill, municipalities can promote and create more of the “missing-middle” housing developments needed to provide an adequate level of affordable housing across the GGH.

As the OAA noted in its submission on *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan*, further encroachment into greenbelts and adjacent watersheds needs to be weighed against the substantial benefits these natural areas provide. Greenbelts and adjacent watersheds are a critical component in our system of strategies required to manage storm water and, in particular, relieve the burden on aging infrastructure. As such, municipal settlement boundary expansions should not be sanctioned.

The OAA is also opposed to the reduction in intensification and density targets. Maintaining current intensification and density targets reduces the cost of building required infrastructure and the associated maintenance costs. Maintaining current density requirements also helps promote the construction of more gentle density and encourages the construction of mid-rise developments that are characteristic of the “missing-middle”. Mid-rise developments will play an important role in providing more housing opportunities for the thousands of people across the province searching for housing that is affordable and properly located to suit their needs.

Thank you very much for the opportunity to comment on the proposed amendments to the Plan for the Greater Golden Horseshoe, 2017 and please do not hesitate to contact the OAA about these issues or anything else moving forward, as we remain a ready and willing resource for you and your Ministry.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Kurtin". The signature is fluid and cursive.

Kathleen Kurtin, Architect
OAA, MRAIC
President

