



The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

**Ontario Public Health Association**  
l'Association pour la santé publique de l'Ontario  
Established/Établi 1949

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- Constituent Societies**
- Alliance for Healthier Communities (AHC)
  - Association of Public Health Epidemiologists in Ontario (APHEO)
  - Association of Supervisors of Public Health Inspectors of Ontario (ASPHIO)
  - Canadian Institute of Public Health Inspectors - Ontario Branch (CIPHI-O)
  - Community Health Nurses' Initiatives Group (RNAO)
  - Health Promotion Ontario (HPO)
  - Ontario Association of Public Health Dentistry (OAPHD)
  - Ontario Association of Public Health Nursing Leaders (OAPHNL)
  - Ontario Dietitians in Public Health (ODPH)
  - Ontario Public Health Libraries Association (OPHLA)

**Charitable Registration**  
Number 11924 8771 RR0001

December 9, 2022

To: PlanningConsultation@ontario.ca

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

Thank you for the opportunity to comment on proposed changes to the Planning Act as outlined in ERO 019-6197 and as related to Bill 23, the proposed More Homes Built Faster Act.

As noted in our November 16<sup>th</sup> submission to the Legislative Assembly of Ontario, Standing Committee on Heritage, Infrastructure and Cultural Policy on Bill 23, the Ontario Public Health Association (OPHA) fully supports the need for Ontario to find more affordable housing opportunities for its residents and create healthy, equitable and climate-resilient communities. Public health agencies have long recognized the connections between healthy environments and population health, and thus the importance of healthy public policy across all sectors to strengthen health protection and equity. This includes policies related to housing, the built and natural environment, land-use planning, climate-resiliency including mitigation and adaptation, and ecosystem protection.

**OPHA supports action to create more rental and ownership types of housing that prioritizes affordable, healthy and environmentally sustainable housing.** Actions such as intensification and transit-oriented development can be health and equity promoting, without compromising other vital attributes required for healthy and equitable communities including: access to and protection provided by parkland and other greenspace, access to affordable, low-carbon, sustainable and active transportation, and healthy, energy-efficient housing units.

**OPHA supports changes to the Planning Act and Ontario Regulation 299/19: Additional Residential Units, that strengthen the provision for additional dwelling units on existing residential properties in settlement areas with municipal water and sewage services, and where additional units are affordable and will not diminish access to greenspace.** Additional residential units can provide a degree of affordable rental housing and additional income for home-owners and supports intensification and higher densities around transit. OPHA also supports inclusionary zoning policies that require new development to include affordable housing units,

creating mixed-income housing. Prohibiting exclusionary single-family zoning policies, alongside allowing additional residential units, are measures that support affordable higher density, including duplexes, triplexes and four-plexes, next to existing density and close to transit and other active transportation routes.

**OPHA feels that more information is required on proposed amendments to O.Reg. 299/19** (e.g. “provisions that are no longer needed”) and how O.Reg. 299/19 amendments relate to the Government of Ontario’s proposal for a potential new regulation related to municipal rental replacement by-laws (Proposal Number 22-MMAH017)<sup>i</sup>. While OPHA supports changes that would accelerate additional residential units by allowing up to 3 units per lot in many existing areas without the need for rezoning, we would like to see the details of an updated “additional residential unit” framework to ensure it does not take away from other essential aspects of healthy, climate-resilient and liveable communities. For example, **while OPHA supports additional residential units, we do not feel that this has to come at the expense of parkland dedication, as proposed in the amendment.** As the Planning Act clause 42(1.3) already provides for parkland exemption for second and third residential units on a parcel of land on which residential use is permitted, we are not clear on the rationale for proposed changes to the Additional Residential Units regulation to “remove barriers” by prohibiting municipalities from imposing parkland dedication. We are concerned that this exemption may be applied to new development proposals for additional residential units on multiple, adjacent parcels of land, thus reducing access for residents in growing communities to parks and green space.

Thank you for considering our concerns and recommendations with respect to proposed changes to the Planning Act as outlined in ERO 019-6197. We would welcome the opportunity to meet with the government to discuss the proposed changes and solutions that address concerns related to this proposed legislative change.

Sincerely



John Atkinson

Executive Director

Ontario Public Health Association

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<sup>i</sup> <https://www.ontariocanada.com/registry/view.do?postingId=42808&language=en>

**More about the Ontario Public Health Association**

OPHA has established a strong record of success as the voice of public health in Ontario. We are a member-based, not-for-profit association that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public’s health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research and knowledge exchange. Our membership represents many disciplines from across multiple sectors.

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