



Ontario
Home Builders'
Association

20 Upjohn Rd., Suite 101 (416) 443-1545
North York, Ontario Toll Free 1-800-387-0109
M3B 2V9 Fax: (416) 443-9982
<http://www.ohba.ca> info@ohba.ca

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Presented to: PlanningConsultation@ontario.ca

Re: Opportunities to Increase Missing Middle Housing and Gentle Density (ERO # 019-5286)

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. The OHBA represents over 4,000 members organized within a network of twenty-seven local associations including builders, professional renovators, suppliers, trade contractors and many others within the residential construction sector. Increasing the supply and choice of new homes is central to our Association's purpose and the values of our membership.

The OHBA appreciates the opportunity to provide feedback on the various initiatives taken by the province through *Bill 109 More Homes for Everyone Act, 2022*. This OHBA response pertains to the posting on the *Environmental Registry of Ontario (ERO) #019-5286* which deals with increasing missing middle housing and gentle density. The OHBA has been engaged and also provided commentary on the *ERO positing # 019-5284* dealing with various provincial initiatives contained in *Bill 109*.

The term 'missing middle' describes a wide range of multi-unit housing types compatible in scale with single-detached neighbourhoods. The OHBA understands that these housing types would include laneway housing, garden suites, duplexes, triplexes, fourplexes, rowhouses, townhouses, and low and mid-rise apartments perhaps up to four or five storeys in height. Of importance in these circumstances is the cost of construction related to such units. The OHBA strongly feels that the ground-oriented units as described should be promoted as 'missing middle' housing units wherein lower construction costs would be attributable as compared to housing unit types of higher density forms.

In general, this type of gentle density could have more minimal impact on some existing neighbourhoods while providing additional housing options for Ontarians. Existing neighbourhoods that offer a variety of housing choices could accommodate people of all ages and abilities including,

- Young adults who can stay in the neighbourhoods where they grew up and remain in close proximity to family members,
- Maturing adults who can age-in-place and stay in their preferred community settings, and
- Multigenerational families including people with special care needs who can co-exist and share in the costs of housing at more manageable rates.

This type of intensification within existing neighbourhoods provides individuals of all ages and abilities with opportunities to live in complete communities, close to a range of transportation options and amenities, and in a community that meets their needs for daily living throughout an entire lifetime. Multigenerational housing could also support cultural and safety needs as the case may be.



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As municipalities plan for future population growth, infill and intensification provides an opportunity to accommodate growth while making efficient use of existing infrastructure and community services. In OHBA's view, the concepts of missing middle and gentle density are extremely important matters that require significant attention as these represent a segment of housing supply that is so desperately needed to accommodate household demands.

The implementation of gentle density is critical within municipalities in particular within built-up areas. However, its introduction has been met with considerable resistance and created significant tensions within existing neighbourhoods. The OHBA believes that the implementation of missing middle housing densities will be extremely challenging from a housing supply perspective in these areas. As such, missing middle housing may also need to be considered and accommodated within alternative locations outside of existing neighbourhoods in order to satisfy the demand for housing choices it would provide.

Further, the streamlining of approval processes related to the provision of missing middle housing must be examined critically. Generally, approval processes within municipalities need to be scrutinized and amended appropriately in order to facilitate missing middle development. The implementation of develop permit systems available in jurisdictions outside of Ontario should be considered and utilized accordingly.

The OHBA is supportive of missing middle housing notwithstanding the significant challenges associated with its implementation. Regardless, the OHBA strongly recommends that the province take bold steps to implement significant and positive measures and render this form of housing a reality. The OHBA appreciates the opportunity to provide commentary regarding *ERO posting # 019-5286* and would welcome the opportunity to discuss the implementation of this form of housing with staff of the *Ministry of Municipal Affairs and Housing*.