



Waterloo Region Home Builders' Association

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[Via electronic submission](#)

To: PlanningConsultation@Ontario.ca

Ministry of Municipal Affairs and Housing
Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON
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Re: **ERO 025-0462 – Proposed Regulations – Complete Applications**
(Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025)

The Waterloo Region Home Builders' Association (WRHBA) is the recognized leader and the voice of the new residential home construction, land development, and professional renovation industries in the Regional Municipality of Waterloo, ON. We are an association of knowledgeable, trusted, resourceful, and local professionals, and together, we create vibrant, thriving, and sustainable communities across our regional area comprised of three municipalities and four townships. WRHBA member companies construct over 90% of all new residential construction, making it one of the most significant economic engines driving the Region's economy, creating over 22,000 jobs, 1.5 billion in wages, and three billion in investment value.

As an Association, we are invested in bringing insight to public policy decision-makers at all levels of government on matters that affect the residential development and construction industry in addressing housing affordability and choice for consumers.

Proposed Regulations - Complete Applications

We appreciate the opportunity to comment on the Ministry of Municipal Affairs and Housing's (MMAH) effort to streamline the planning approvals process through limiting the studies and reports that an approval authority can require as part of a complete planning application. The WRHBA commends the government for addressing this important matter and any initiative to reduce the cost, regulatory burden and timeline for the approval planning applications that enable the construction of new housing is welcome.

In reviewing the proposed regulations affecting complete applications, we are encouraged that costly and often unnecessary studies and planning reports will no longer be required as part of a complete application process. Specifically, the following topics would no longer be required as part of a complete planning application:

- Sun/Shadow: information and material related to the impact of shadows cast by a proposed development on the subject land and on surrounding lands including streets.
- Wind: information and material related to the potential impacts of a proposed development on wind conditions in surround areas.
- Urban Design: information and materials concerning the urban design of a proposed development, including how a proposed development aligns with municipal urban design guidelines or policies.
- Lighting: information and material related to lighting and lighting levels on the site, including the location and type of lighting fixtures proposed on the exterior of the building and on the site.

Under the current requirements and practices, costly and time-consuming studies are required to address the listed topics before a complete planning application can be made. Through the municipal review and approvals process, it is inevitable that changes to the design and/or layout of a proposed development will occur, necessitating that those studies be updated/revised and resubmitted for review and approval prior to the final approval of the planning application. This adds unnecessary cost and time to virtually every planning approval for much needed housing in Ontario.

The listed studies (sun/shadow, wind, urban design and lighting) should only have to be prepared and submitted after other fundamental planning, engineering and site design elements (access, environmental protection, etc.) have been reviewed and addressed. While doing so will likely reduce both the cost and time associated with the review and approval of planning applications, MMAH should consider additional changes and clarifications as follows:

- Sun/Shadow and wind reports could be eliminated altogether for planning applications that support development proposals that are within the height, density and general setbacks permitted by a municipal zoning by-law. In dense urban settings and other areas that permit development that has potential sun, shadow or wind impacts, often little can be done to address these matters without affecting density and/or height and thereby increasing overall housing costs.
- Urban Design requirements should be focussed solely on ensuring that matters relating to public safety such as site and building ingress/egress; pedestrian infrastructure such as walkways; and site function.
- Lighting reports should be focussed solely on ensuring adequate and safe spaces while limiting light spillage to adjacent sites.

In addition to when certain studies can be required and what they address, the Ministry should also clarify through regulation what studies are required as part of a complete application. Such studies should be limited to the essential planning, engineering and environmental review necessary to plan and build a safe and functional housing supply. Thus, required studies should be limited to the following:

- Planning reports confirming conformity with the appropriate planning policies and regulations, including justification for any deviations or variances to the requirements.

- Engineering reports confirming the availability of services and the requirements, including required upgrades, to service the development, including sanitary, water and storm sewer connections.
- Engineering reports addressing the appropriate grading of the lands as well as the consideration of storm water management, important hydrologic functions and soil stability.
- Environmental reports that address appropriate buffers and environmental protection measures to protect significant and/or designated natural features on or adjacent to a site.
- Heritage studies for designated properties having significant built heritage features.

Clarifying the type and scope of required studies will bring more predictability to the approvals process, providing both guardrails and certainty to the planning and development process.

Another key aspect of the proposed regulation is the identification of certified professional consultants whose reports and studies would be accepted as final submissions by a municipality as part of a complete planning application. Such consultants should be in professions that are recognized by the province through enabling legislation which guide the important aspects of those professions. Recognized professionals should include:

- Professional planners regulated by the Ontario Professional Planners Institute (OPPI) and having the designation Registered Professional Planner (RPP).
- Professional engineers regulated by Professional Engineers Ontario (PEO) and having the designation Professional Engineer (P. Eng)
- Professional Landscape Architects regulated by the Ontario Association of Landscape Architects (OALA).

These professions are both recognized and regulated through provincial legislation and rigid professional standards and codes of ethics. Accordingly, studies and reports submitted by these professionals in support of planning applications should be accepted by the approval authorities.

In closing, we appreciate the opportunity to comment on the proposed regulations and look forward to appropriate guidance from the province on planning application matters that will certainly help to speed up the delivery of new homes and reduce costs to the future home buyer.

Sincerely,

WATERLOO REGION HOME BUILDERS' ASSOCIATION



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c: WRHBA Board of Directors
WRHBA Member Companies