

Ministry of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> floor  
Toronto, Ontario M7A 2J3  
Date: June 26, 2025

**RE: 025-0462 Proposed Regulation – Complete Applications**

This letter represents the City of Ottawa's comment on [ERO 025-0462](#). These comments should be read together with the City of Ottawa's comments submitted through ERO 025-0461 pertaining to the *Planning Act* changes proposed in Schedule 7 of Bill 17.

Schedule 7 of Bill 17 amended the *Planning Act* to remove a municipality's discretion to require studies for development applications through their official plan as well as require that studies submitted by certain professionals be deemed adequate for the purpose of deeming an application complete.

In its submission to ERO 025-0461, the City of Ottawa expressed concerns with these changes. Specifically, how they could cause delay within the City's timelines for decisions. In addition, this approach may necessitate conditions on approval, where deficient or inadequate studies from professionals would have been identified earlier in the process.

**Complete Application Requirements**

***Proposed Limitation on Shadow, Wind, and Urban Design Submissions as Part of a Complete Application***

The proposed regulations would limit the City's ability to request Urban Design Briefs, Wind Studies, and Sun/Shadow Analyses as part of a complete application. While intended to streamline the process, this change may limit municipalities' ability to assess proposals comprehensively.

The City sees ongoing value in these studies, which support the creation of livable, inclusive, and sustainable communities — goals reflected in both the 2024 Provincial Planning Statement and the City's Strategic Plan.

These materials also help ensure quality urban design outcomes, supporting informed decision-making and alignment with City policies from the outset.

The City would appreciate clarity that Tree Conservation and Tree Information Reports will still be permitted by any future regulation. If no longer permitted, it could impact the City's ability to meet its tree canopy and environmental protection objectives.

Completion of these studies at the time of application submission helps applicants carefully consider Provincial and City policies and guidelines at the conception of a project, ensuring that review by municipal staff and engagement with the community, where needed, is efficient and streamlined.

The ERO posting points to “inconsistency in the scope, type and number of studies required” as a rationale for the proposed regulation. However, the City of Ottawa has clear [terms of reference](#) for each study type published on Ottawa.ca, to ensure that expectations for applicants are clear and consistent.

The City of Ottawa believes there is value in allowing these categories of submissions in development applications. Determining their necessity should remain within the municipality's authority, guided by local context considerations and planning priorities.

### ***Province-Wide Set of Studies***

The City proposes the list of topics or studies that should be identified as being permitted to be required by municipalities as part of a complete application be reflective of the list within the [Information and Materials for Planning Applications \(By-law No. 2023-297\)](#). The City publishes a corresponding [terms of reference available on ottawa.ca](#) for each of the materials.

Adopting a more limited list could reduce municipalities' ability to consider important local factors, such as tree retention, slope stability, and rail impacts.

### ***Comment on the proposal***

The City has experienced a wide variety of completeness for documents submitted by professionals. At times, key markers of a completed material, such as a surveyor's stamp on a subdivision for example, were missing. Starting the review without documents being in an approvable state runs the following risks:

- Applicants may not provide revised documentation within the approval timeline – leading the City to exceed its approval target.
- Applicants may be more prone to rely on the municipality to do quality assurance on their documentation, knowing that the City must accept them as complete. The City has no recourse to address this issue.

Both of the above risks may introduce delay given that applications of lesser quality will take more time and effort to review and provide feedback, which could run the risk of taking away time from processing higher quality applications.

### ***Prescribed professionals***

The Province has requested municipalities feedback on the following question, “Which certified professionals (e.g., professional engineers) should be included in the list of

*professionals whose reports/studies would be required to be accepted as final submissions by a municipality as part of a complete planning application?"*

If the province is to move forward with professionals, the City proposes the following, as it relates to their discipline:

- Planner, full Member of the Canadian Institute of Planners (MCIP)
- Professional Engineer or Certified Engineering Technologist
- Hydrogeologist
- Registered Professional Forester (RPF)
- Landscape Architect
- Architect registered with OAA (Ontario Association of Architects), or a qualified professional with a BCIN license
- For heritage matters, member of the Canadian Association of Heritage Professionals
- Professional Geoscientist / Geologist
- Professional Agrologist or Member of the Ontario Institute of Agrologists
- Archaeological assessments must be carried out by licensed archaeologists. The Ontario Ministry of Tourism, Culture and Sport publishes a list of all archaeologists licensed in Ontario.
- holders of a valid Certificate of Authorization, issued by the Registrar of the Association of Ontario Land Surveyors

Sincerely,

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