

June 5, 2025

Attn: Ministry of Municipal Affairs and Housing

**Re: Proposed Regulations - Complete Application
Environmental Registry of Ontario Posting: 025-0462**

The City of Kitchener is committed to expediting development approvals to facilitate faster housing construction. Since 2023, Kitchener has established itself as a provincial leader in optimizing development processes, consistently adhering to all legislated planning timelines.

These proposed changes, while aimed at expediting approvals, may lead to broader implications on the quality and detail of development assessments. A balanced approach that maintains efficiency without undermining the essential aspects of planning processes is crucial to ensure that developments align with municipal policies and address community concerns effectively.

For clarity, Kitchener only requires studies that are essential and pertinent for the support of development proposals. Furthermore, Kitchener has not identified any substantial concerns from the local Development Industry regarding our customary practices in this area.

Sun/shadow studies, wind studies, urban design briefs, lighting plans/studies, etc. are relied upon by staff to evaluate a development proposal for conformity with Council approved guidelines and regulations (i.e. Official Plan, Urban Design Manual, Heritage Conservation District Plans). Additionally, these studies are relied on during the technical review process to address any concerns raised during the public engagement process and offer a transparent response to the public on how their concerns can be effectively mitigated and resolved through the detailed review (site planning process). Concerns or questions received through the consultation process are easily addressed using these supporting studies, giving local planning authorities the confidence to make informed decisions on development applications. Kitchener has publicly posted all plans and studies received with a development application to increase transparency and reduce concerns through the engagement process.

The development approvals in Kitchener typically involve a two-step process, consisting of subdivision and site plan. Detailed studies are required only after the fundamental aspects of a development are confirmed, which minimizes resubmissions by developers and reduces initial effort.

Furthermore, the Cities of Kitchener, Waterloo, and Cambridge have worked together to develop consistent and streamlined terms of reference for all studies - adding additional predictability and efficiency for the development industry.

In conclusion, Kitchener recognizes the importance of getting housing built faster. The city strives to achieve a balance between procedural efficiency and maintaining the integrity of technical reviews. This approach ensures that development proposals are evaluated promptly, fairly, and in a manner that maximizes productivity.

Q. 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

Kitchener has a trusted and collaborative review process that leverages the expertise of the Development Industry. We have no objections to studies that are prepared by a qualified person (Engineer, Landscape Architect, Lighting/Electrical Engineer/Technician, Urban Designer, Heritage Professional (a member in good standing with the Canadian Association of Heritage Professionals), Licensed Architect, Licensed Building Designer, Licensed Arborist, Registered Professional Planner, Transportation Planner/Engineer) as part of a complete application. For the purposes of reports/studies submitted to address the conservation of cultural heritage resources, a qualified person should be an individual who is a member in good standing with the Canadian Association of Heritage Professionals (CAHP). An alternative maybe be someone who has completed a Bachelor's degree in a related field (e.g., architecture, heritage conservation, planning) and has a minimum of 4 years of direct heritage conservation experience.

Kitchener consistently demonstrates the capability to review all studies within the designated timeframes and collaborates effectively with the study's author when additional information is needed.

It is important to know that all customers at the City of Kitchener have varying levels of sophistication and experience with development applications. Kitchener has an excellent working relationship with the professional members of the Development Industry, however our requirements outlined in the City of Kitchener Official Plan should be scalable for the full range of customers.

Kitchener did not amend the existing pre-submission process as a result of recent legislation changes regarding prescribed timeframes. Kitchener is aware that other local planning authorities have amended their pre-submission processes and added additional upfront requirements. On the contrary, Kitchener eliminated requirements and streamlined the development review process. An efficient review process relies on high quality and comprehensive studies and reports to be submitted with a development application in order to make quick and informed recommendations and decisions.

In Kitchener's experience, complete and comprehensive studies help to address potential impacts raised during the public engagement process. Comprehensive submissions support informed and efficient decision making by local planning authorities.