

June 26, 2025

Province of Ontario – Ministry of Municipal Affairs and Housing

**Re: Proposed Regulations – Complete Application**

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario (ERO) posting 025-0462 regarding a proposed regulation under the Planning Act and the City of Toronto Act, 2006, to regulate complete application requirements (study/report requirements) and submissions from certified professionals. Schedule 3 and 7 of Bill 17, which received royal assent on June 5<sup>th</sup>, 2025, amends the Planning Act to limit complete application (studies/reports) requirements to what is currently identified in municipal official plans, except where the Ministry of Municipal Affairs and Housing approved the changes. Bill 17 also includes regulation-making authority that would enable the Minister of Municipal Affairs and Housing to further regulate the reports or studies required as part of a complete application. Collectively, the proposed changes would have the effect of reducing the number of studies that make up a complete application when proponents submit development proposals to municipalities.

The Simcoe County District School Board (SCDSB) is supportive and understands the critical need for additional residential housing forms and is supportive of the intent to plan for comprehensive, complete communities in a way that is socially, environmentally, and fiscally responsible. As a legislated commenting agency as well as an active participant in the development process, the SCDSB has a unique perspective on the proposed changes. The intent of this letter is to outline and provide feedback on amendments of interest to the SCDSB. Comments are provided in the following table:

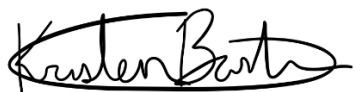
#	Proposed Content of a Regulation	SCDSB Comment
1.	Prescribe a list of subject matters for which studies cannot be required as part of a complete application; including: <ul style="list-style-type: none"> <li>- Sun/shadow</li> <li>- Wind</li> <li>- Urban design</li> <li>- lighting</li> </ul>	<p>SCDSB planning staff respectfully request that Planning Justification Briefs/Reports be included in the regulation as a matter that <u>cannot</u> be required as part of a complete application for a Site Plan Control submission. Site plan control is used to manage specific site elements and can only be pursued where the land use designation and zoning permit the proposed use. As such, a planning justification is unnecessary.</p> <p>The SCDSB respectfully requests that sun/shadow studies continue to be a matter for which studies can be required as part of a complete application. Given the real impacts that sun and shadows have on people in the built environment, it is prudent to ensure that effects have been measured and</p>

		<p>mitigated where appropriate. If the province is of the opinion that sun/shadow studies are being required in inappropriate circumstances, the board would recommend that the regulation stipulate that sun/shadow studies may only be required for development applications that are proposed adjacent to a sensitive use or a public space. The board is concerned that removing sun/shadow studies entirely would have negative impacts on school sites and play areas as adjacent parcels densify, causing: overlook concerns in relation to the presence of students, winds and shadows on play areas that reduce their ability to be used throughout the year, and negative impacts to sidewalks around schools that are used for active transportation and so become inhospitable to student use.</p> <p>The SCDSB also requests that clarification be provided about the process for municipalities asking for exceptions from the Ministry of Municipal Affairs and Housing to request additional studies.</p>
2.	Topics or studies that should be identified as being permitted to be required by municipalities as part of a complete application.	<p>The SCDSB has previously identified a conclusive list of studies that should be permitted to be required by municipalities as part of a complete application pertaining to a proposed school or school addition:</p> <ul style="list-style-type: none"> <li>- Stormwater management</li> <li>- Site grading</li> <li>- Pedestrian and vehicular traffic impact assessment</li> <li>- Archaeological assessment</li> <li>- Environmental impact study</li> <li>- Functional servicing assessment</li> <li>- Environmental site assessment</li> </ul>
3.	What certified professionals 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.	<p>SCDSB planning staff respectfully request clarification regarding “final submissions”. Does this mean that the municipality would no longer be able to request revisions or subsequent submissions through an internal or peer review process?</p>

With the Province’s stated goal to construct 1.5 million new homes by 2031 comes the need to ensure Public Service Facilities are sufficient to meet the needs of the residents of these new homes. The Simcoe County District School Board is supportive of the government’s proposals to expedite the approvals process for facilities like schools, which will support the board in its efforts to accommodate growth and ensure that every student has access to quality education.

Should you require additional information, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Bartmann". The signature is written in a cursive style with a large, looping initial "K".

Kristen Bartmann, MPLAN  
Planner  
Simcoe County District School Board