



Greater Ottawa Home Builders' Association  
Association des constructeurs d'habitations d'Ottawa

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Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay Street, 13th floor  
Toronto, ON M7A 2J3

**Re: ERO 025-0462 Proposed Regulations – Complete Application**

Please accept the below from the Greater Ottawa Home Builders' Association (GOHBA) and its members as a submission to the government's request for feedback on *Proposed Regulations– Complete Application* (ERO 025-0462). We also support the comments of the Ontario Home Builders' Association and our fellow municipal HBAs across the province.

To build 1.5 million homes we need a coordinated effort between the Federal Government, Provincial Government, municipalities and our members. We all have a role to play and by working together we can be successful. We need a consistent and stable regulatory and policy environment.

The planning and permitting processes across Ontario have become a patchwork of rules and demands as each of the 444 municipalities impose their own set of studies, submission requirements and timeframes, often above and beyond what's legislated.

This lack of consistency in the development application process – especially with neighbouring municipalities - hampers our ability to build at the scale that is required because it inhibits business growth and productivity in the residential construction industry.

Building companies naturally gravitate to jurisdictions that have less red tape and less costly development fees. They will naturally shy away from expanding into new communities if it requires navigating a Byzantine-like development application regime. Despite these realities, municipalities (like the City of Ottawa) put up and maintain barriers that disincentivize the construction of new homes and growth in comparison to their neighbouring communities.

GOHBA members want to build homes that families can afford, and the province can help reduce red tape and timelines by **harmonizing and streamlining the approvals process and ensuring consistency and effectiveness in every municipality across the province.**

We provide the following specific comments in support of the above.

## Complete Application Requirements

GOHBA is supportive of the government ensuring more consistent rules across municipalities on the information and studies that may be needed for planning applications.

As an example, the City of Ottawa has a list of 42 technical studies in its Development Application Study Policy Bylaw that it is currently in the process of incorporating into its Official Plan to be consistent with the 2024 PPS, but it is doing so in direct opposition to the intent and spirit of Bill 17 (as well as Bills 109 and 185) - to streamline the application process and expedite housing supply growth.

GOHBA recommends that the government **provide a definitive list of studies that can be included by a municipality for an application to be deemed complete**, versus a list of topics that cannot be required.

While we support the notion that technical studies on sun, shadow, wind, urban design and exterior lighting are unnecessary for development applications, our rationale is that a positive list of included studies is irrefutable and cannot be added to, while a negative list of excluded topics has to be impossibly comprehensive.

GOHBA supports the retention of studies that serve to protect the health and safety of the inhabitants (not already captured in the building code), including damage to property on the site and neighbouring sites, and protection of natural features. E.g, Grading and Drainage Plans, but not Landscape Plans.

## Proposed Contents of a Regulation

GOHBA also recommends limiting the application of retained studies to very specific circumstances, and scoping the requirements contained in the Terms of Reference (ToRs) for retained studies as well.

The barriers to quicker and less expensive approvals are compounded not only by the number and breath of studies but also by unnecessary terms and requirements in those technical studies that increase workloads for both applicants and municipal staff, ultimately leading to increased costs and delays in construction for all types of housing.

Therefore, GOHBA supports reducing the number of technical studies required for a development application, but at the same time we urge the government to **also dictate the language of the remaining ToRs to ensure consistency in interpretation and application across the province**.

Excessive and unnecessary terms and requirements leads to protracted exchanges between a municipality and applicants to discern and fulfill “outstanding” requirements, consequently shifting the focus from reviewing applications for their substantive content to a more laborious emphasis on completeness.

In our work, GOHBA has identified three prominent themes in technical studies that increase timelines and costs:

- 1) **Clarity:** Often there are instances where the language used in a ToR is unclear, leading to ambiguity about requirements and leaving room for interpretation and arbitrary requests by staff and file reviewers. It is imperative that ToR language is clear and ensures consistency in submission standards.
- 2) **Duplication:** Certain requirements in some of the ToRs overlap with content already requested in other ToRs or application processes. This redundancy unnecessarily increases the effort, cost and time to complete the required studies. Overlapping studies/requests should be removed to maintain an efficient and streamlined process.

This is particularly evident in Ottawa when developments are faced with overlapping but separate studies such as: Urban Design Brief, Urban Design Review Panel Report, and Planning Rationale; or separate Agrology and Soil Capability, Geotechnical, Hydrogeological and Terrain Analysis, and Slope Stability studies.

- 3) **Unnecessary Details:** GOHBA has particular concern that many of Ottawa's ToRs are excessively convoluted with requirements that are ambiguous and subjective, and therefore overly challenging to fulfill.

Finally, GOHBA recommends that, **as part of the Minister's regulation-making authority, the government clarify and confirm that identified technical studies are the only ones allowed to be requested and considered at all by a municipality in evaluating and approving development applications.**, in addition to deeming an application complete for submission.

There is concern that if the proposal is only applicable to a file being "deemed complete", municipalities will still request unnecessary studies – like Urban Design – and use them to delay or deny applications.

This would be completely against the intent and spirit of Bill 17.

### **Certified Professionals**

GOHBA is supportive of regulation-making authority on specifying certified professionals from whom municipalities would be required to accept studies.

Currently municipal engineers cannot rely on a consultant's professional stamp for submissions, and are required to complete their own peer review due to liability concerns. This review can add 2-3 months to the approval process.

**Municipalities should accept reports from professional Engineers, Architects, Consultants and Others with a relevant designation (like a BCIN) and not conduct further review (often done by non-qualified staff).**

This would help eliminate unnecessary reviews of all documentation submitted by professionals (e.g., Joist, Truss, HVAC and structural letters, etc), and streamline the process by not requiring review if packages submitted include all required elements (i.e. as per building code).

GOHBA supports the province eliminating this additional time and soft cost (which would improve affordability) by defining that liability should be on the engineer or professional stamp/sign off at submission, and that municipal staff are not liable for civil submissions.

This measure would also fulfill the second part of Recommendation #21 from the Housing Affordability Task Force Report (*...if a member of a regulated profession such as a professional engineer has stamped an application, the municipality has no liability and no additional stamp is needed*).

### **Additional Comments**

#### **Standardize Study Requirement Listings In Official Plans Across Municipalities**

Currently, municipalities list requirements in inconsistent ways, making it difficult to determine necessary reports.

To improve transparency and efficiency, GOHBA recommends:

- Requiring municipalities to categorize study requirements systematically by application type, using a standardized framework.
- Implementing clear documentation categories (e.g., plans/drawings, forms, studies/reports, and other documents) to improve accessibility and understanding.

#### **Establish Minimum Standards of Information for Staff Recommendation Reports**

Municipalities often provide minimal data on key milestone dates or submitted documents in staff reports, reducing transparency for decision-makers and applicants.

GOHBA recommends setting a standardized list of minimum required information in municipal staff recommendation reports, including:

- First submission date
- Complete application date
- Date of public notice
- Number of resubmissions
- Number of studies submitted
- List of studies submitted
- Related application file numbers

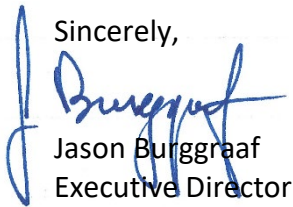
## **Conclusion**

Requiring unnecessary studies - often with excessive and unnecessary terms and requirements - delays applications from being deemed complete. GOHBA supports the provincial government's efforts to harmonize and streamline the approvals process and ensure consistency and effectiveness in every municipality across the province by reducing red tape.

We believe our additional recommendations support and enhance the government goal of quicker and less expensive approvals.

We thank the Ministry for the opportunity to comment. We are pleased to answer questions or provide further information as requested.

Sincerely,

A handwritten signature in blue ink, appearing to read "Burggraaf", is written over a faint, light blue rectangular stamp. The signature is stylized and cursive.

Jason Burggraaf  
Executive Director