



Consultation – Proposed Regulations– Complete Application

WoodGreen Community Services
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WoodGreen Community Services supports the Government of Ontario's efforts to make it easier and faster to build new homes and infrastructure in Ontario through Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025.

As the largest non-municipal affordable housing developer in Toronto with an ambitious mandate of growing our pipeline from 1,700 units to 5,000 by 2030, it is critical that we cut red tape, reduce fees, and taxes to drive down the cost of building and accelerate permitting approvals to build affordable housing faster.

These steps are crucial in supporting Purpose-Built Rental providers who work in collaboration with non-profit developers through co-development joint venture projects that build mixed income communities.

Schedules 3 and 7 of Bill 17 propose to amend the Planning Act and the City of Toronto Act, 2006 to limit complete application studies/reports requirements to what is currently identified in municipal official plans. Bill 17 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.

The changes would enable the Minister, by regulation, to:

- prescribe a list of subject matters for which studies cannot be required as part of a complete application;
- identify the only studies that could be required as part of a complete application;
- specify certified professionals from whom municipalities would be required to accept studies.

Collectively, the proposed changes would have the effect of reducing the number of studies that make up a complete application.

WoodGreen Community Services Recommendations:

WoodGreen Community Services recommends that each property be assessed based on its unique site characteristics, and required plans and reports assigned accordingly. Where detailed reports have been submitted at the Official Plan Amendment ("OPA") and Zoning By-law Amendment ("ZBA") stages, they should not be requested again at the Site Plan Control ("SPA") stage. We support the inclusion of select detailed plans and studies at the OPA and ZBA stage, where they meaningfully contribute to shaping viable project outcomes. However, it is essential to ensure that this work is not duplicated during the subsequent Site Plan Control (SPA) process. By building on the analyses completed during the OPA/ZBA phase and concentrating on project-specific studies at the SPA stage, the planning approval process can be streamlined, minimizing redundancy and reducing administrative costs for the City.

In alignment with other sector organizations including Ontario Home Builders Association (OHBA), WoodGreen Community Services recommends for the Government of Ontario to provide a definitive "positive" list of studies that may be required for a planning application to



be deemed complete. Instead of an open-ended “negative” list of prohibited studies, this list of “positive studies” can be more effective in the application process.

Current Barriers for a Complete Application

ZBA and **OPA** applications are requested on behalf of local municipalities when a proposed land use or development does **not conform to existing planning rules**.ⁱ Municipalities can require various studies and reports, leading to delays and complications in the application process. WoodGreen’s recommendations highlight that certain studies required for planning applications should be removed due to redundancy of work.

Before ZBA and OPA applications, a Pre-Application Consultation (PAC) meeting happens between the applicant and municipal staff. PAC meetings ahead of ZBA/OPA applications are meant to reduce overall time to a planning decision. However, in practice, they lead to additional work upfront and redundancy.

There is a disconnect between planning expectations and actual outcomes in Ontario’s development approval process. Planners often request preliminary information from the applicant regarding conceptual plans, arborist reports, concept landscape plans, servicing overview, and even preliminary wind studies. Feedback is provided to the applicant on these, which is meant to scope the formal review process and narrow down what needs to be formally reviewed. The goal is to streamline the process once the full application is submitted.

In reality, this does not happen. The OPA/ZBA process still takes 18-24 months for approval, depending on project specifics. These approvals depend on reviews by multiple departments, approval by council, or design changes based on feedback.

Recommended Reports for ZBA and OPA

WoodGreen acknowledges that certain reports are necessary for ZBA/OPA. This includes the following:

- **Peer-reviewed studies** including Odour/Air Quality Studies to assess emissions and air quality. Compatibility Studies to ensure the development fits with existing or planned surrounding uses. Noise Studies to analyze environmental noise impacts.
 - Certified Professional Positions: Noise Impact Engineers, Air Quality Scientists/Engineers
- **Archaeological Assessment**, when required on sites where the property has been identified as having potential for archaeological value that should be managed or preserved.
 - Certified Professional Positions: Archaeologists
- **Planning Rationale & Community Services Study**, to assess the surrounding community and alignment with the Provincial Policy Statement, Official Plan, and zoning.



- Certified Professional Positions: Professional Planners
- **Energy Strategy Report**, for development sustainability goals. This defers from the site plan full Energy Model Report, which should only be requested during the planning stage.
 - Certified Professional Positions: Sustainability Engineers
- **Pedestrian Level Wind Study** as a Desktop Model only, assessing how wind could be impacted by the height of the building.
 - Certified Professional Positions: Wind and Microclimate Engineers
- **Rail Safety Report** to assess land use compatibility near railway corridors, eligible properties within 30 metres of a rail corridor.
 - Certified Professional Positions: Rail Safety Engineers
- **Servicing Report** providing an overview for water, sanitary, and storm infrastructure capacity. A full Storm Report can occur at the Site Plan stage as long as an overview of capacity requirements and any infrastructure upgrades are outlined.
 - Certified Professional Positions: Civil Engineers
- **Sun/Shadow Study**, which is usually part of architectural submission, is a visual assessment showing where building shadows fall and their community impact.
- **Toronto Green Standard (TGS) Checklist**, showing commitments to energy savings and environmentally friendly performance in the early stages of the planning process.
- **Arborist Report and Tree Preservation Plan**, assessing tree health and ensuring trees on the site or in proximity of the development be removed, protected, or relocated.
 - Certified Professional Positions: Professional Arborist, Landscape Architect
- **Heritage Impact Assessment**, assessment for properties designated under the Ontario Heritage Act.
- **Geotechnical Report**, assessing soil and ground stability for construction.
 - Certified Professional Positions: Geotechnical Engineer
- **Hydrogeological Report**, assessing subsurface hydrologic conditions to determine groundwater conditions for development.
 - Certified Professional Position: Hydrogeologist
- **Contaminated Site Assessment**, also known as a Phase I or II Environmental Site Assessment, flag contamination risks for water or soil.
- **Environmental Impact Study**, assessment of how a development might affect nearby wetlands, woodlands, endangered species habitat. Required when in proximity to natural heritage features.
 - Certified Professional Positions: Environmental Engineer



Recommended Reports for Site Plan Stage

With most of the detailed reporting/approval happening at the ZBA/OPA stage, the remaining reports and plans to be reviewed at the Site Plan stage should be minimal. However, often the same reports in ZBA/OPA stage are requested at the Site Plan Control stage, which results in redundancy, added time, and additional costs for developers and the municipality.

WoodGreen recommends that the following reports below should only be required at the Site Plan stage for designs and implementation of the project details.

- **Stormwater Management Report**, that explains how stormwater through rain and snow will be managed on-site during and after development. Including draining areas, volume and rate calculations.
- **Energy Model Report**, including a review of HVAC performance, lighting systems, and renewable energy use.
- **Vibration studies**, monitoring ground vibrations and predicting any future impacts for occupants in the building.
- **Soil Volume Plan**, soil available and growing for trees or on-site planting.
- **Wind Study** as a full model study. Assessing wind speed for balconies, door entrances, patios.
- **Surrounding Utility Investigation**, the process of identifying underground utilities.

Average approval times for Site Plan Control in the city of Toronto are two years, which delays permit issuance and impacts projects schedules. This could be expedited by the elimination of duplicative studies at the Site Plan stage.

About WoodGreen Community Services

WoodGreen is one of the largest social service agencies in Toronto, serving 37,000 people each year. We offer over 75 programs and services tackling the social determinants that affect the health and well-being of individuals in our community.

ⁱ Official Plan and Zoning By-law Amendment. *City of Toronto*. <https://www.toronto.ca/city-government/planning-development/application-forms-fees/building-toronto-together-a-development-guide/official-plan-and-zoning-by-law-amendment/>