

November 17, 2025

Attn: Ministry of Municipal Affairs and Housing

RE: Consultation on Enhanced Development Standards – Lot Level (outside of buildings)

ERO number: 025-1101

Organization: City of Kitchener

Discussion Questions

1. What is your interest in and/or experience with the implementation of enhanced development standards at the lot level (outside of buildings)? For example, are you a municipal staff member, homebuilder, planner, Indigenous representative, or member of the public?

This response was prepared by municipal staff members at the City of Kitchener. Our interest is in ensuring that development standards outside of buildings continue to support the health, safety, and well-being of residents, while enabling local flexibility to address unique economic and housing needs.

2. In your experience, are enhanced development standards applied consistently across municipalities? Please provide examples where possible.

Locally, Kitchener is working collaboratively with area municipalities to advance consistency on site standards such as landscaping, stormwater management, and active transportation. This regional approach streamlines approvals while respecting local context, which is essential for effective implementation.

3. What types of standards should municipalities be allowed to apply outside of buildings and how do these requirements maintain the health and safety of the site if at all?

Municipalities should retain the authority to apply site standards related to:

- Site grading
- Stormwater management
- Lighting
- Landscaping
- Transportation

These requirements are critical for supporting health and safety, both for daily living and during extreme weather events. For example:

- Bicycle parking reduces construction costs for housing and supports healthy transportation options.
- Bioswales and permeable paving are part of a suite of options for stormwater management, allowing developers to select context-appropriate solutions.
- Tree planting and landscape standards help manage stormwater, reduce heat-related health issues, and lower energy costs for homeowners.
- Lighting standards enhance pedestrian safety and promote dark-sky principles.

The City's approach is performance-based, allowing flexibility for developers to choose options that best suit the site context and consider costs.

4. Do you/your organization have information about the short- and long-term costs of enhanced development standards at the lot level?

The City does not have specific research on the short- and long-term costs of these standards. However, such requirements have been standard practice for decades, providing clear health and safety benefits.

5. Do you have any additional comments or suggestions relating to site plan control or other related subjects?

We recommend ongoing consultation with municipalities to identify best practices for streamlining approvals and providing flexibility based on site conditions. The City of Kitchener values collaboration with the development community and strives for safe, healthy communities.

While streamlining and consistency are important, it is critical that municipalities retain the ability to implement standards that reflect local needs and priorities.

To reinforce this position, on October 6, 2025 the City of Kitchener Council formally passed a resolution urging the Province to ensure local decision makers have flexibility to adapt policies based on local economic and housing needs, as recommended by the Association of Municipalities of Ontario.

We urge the Province to continue meaningful consultation with municipalities and to ensure that any changes to development standards preserve local flexibility and expertise.

This approach will best support Ontario's goals for efficient, timely, and affordable development while maintaining the health and safety of our communities.