

Thursday, May 14, 2026

Minister Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Flack,

Re: OPPI Feedback on ERO 026-0313: Streamlining the information and material that planning authorities can require as part of a complete application

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry's proposal to streamline the information and material that planning authorities can require as part of a complete application.

OPPI was pleased to be part of the concept development and discussions related to Core and Contingent Studies that a municipality can request as part of a Complete Application. The feedback we are providing today comes from members of our Government & Public Relations Committee who were not part of the original working group. A fresh set of eyes from members of the planning community who do this work every day.

To ensure we provide helpful guidance, we have used your guiding questions to respond.

Do you have any feedback on the objectives identified for each of the types of studies listed in this proposal? Are they broad enough to support planning authorities in obtaining sufficient information to evaluate applications, comply with applicable legislation, and determine consistency with provincial policies or conformity with provincial and municipal plans? Is there anything missing?

Below, please find comments on a number of studies we feel need addressing prior to finalizing the list of Core and Contingent studies.

- **Core Study – Architectural design package including elevations.** The level of detail will vary depending on the type of application (e.g. a Concept plan will suffice for an Official Plan Amendment) but there needs to be drawings included in any planning application that communicates to planning authorities and the public “this is what is proposed here”.
- **Core Study – Construction Management Plan** that describes the activities that will or are likely to occur during construction, to ensure that those activities will not have an adverse impact on public health and safety, public road allowances and adjacent properties.
- **Contingent Study – Sub-Watershed Plan** and/or Update to Existing Subwatershed Plan. With the Province allowing privately initiated settlement area expansion applications to be made at any time, as well as a growing trend towards privately

initiated Secondary plan applications for designated greenfield areas, there is a requirement for applicants to demonstrate that urbanization of large swaths of rural/agricultural land is consistent with the natural heritage, water and hazard policies of the Provincial Planning Statement (specifically, Sections 3.6.8, 4.2.1 and 5.2).

- **Contingent Study – Sun/Shadow Study** which provides a visual model and written description of the impact of shadows cast by a proposed development on adjacent properties (e.g. residential, commercial, employment and institutional areas) and the public realm (e.g. sidewalks, open spaces, parks and plazas).
- **Contingent Study - Housing Assessment (Settlement Area Expansion)** – This study is to assess whether there is a need for the mix and type of housing proposed for the settlement area expansion that cannot be accommodated within the existing urban area and what the impact of the proposed expansion would have on the Official Plan’s growth forecasts and growth policies (including intensification targets). Direction for this assessment is provided in Section 2.3.2.1 a) of the Provincial Planning Statement. This Assessment should be completed by a registered land economist.
- **Contingent Study – Employment Area Removal Assessment** – This would fall outside of an Economic Viability Assessment and would be required as part of an application to remove an Employment Area from an Official Plan to assess whether the removal satisfies the specific criteria of 2.8.2.5 of the PPS which include whether it impacts the municipalities ability to have sufficient employment land to the OP’s time horizon.
- **Contingent Study - Servicing Options Report** - This requirement ties into OPPI’s comments on communal water/wastewater systems that there are limited situations where they may be appropriate from a land use and source water perspective.
- **Contingent Study – HydroG Report** - Scope should also include assessment/characterization of surface and groundwater conditions, not just impact assessment

Should the list identify the types of applications that the information and material could be required for (i.e., official plan amendment, zoning by-law amendment, site plan control, plans of subdivision/condominium, consents)? If so, why?

Yes, this should be provided through a guidance document instead of regulations. This will ensure that if updates are required, the guidance document is updated rather than legislative changes being required as part of implementation. OPPI has previously provided suggestions on this approach, and OHBA members support it, particularly if it includes clearer direction on timing. Specifying the required studies is helpful and applicants will benefit if they know when in the process the study will be required by the municipality. Greater clarity and predictability will ensure not only improved efficiency but also a collaborative process between the developer and the municipality; something that both sides desire each and every time.

Are there studies listed that should only be required for certain types of applications? If so, which ones and why?

Through our previous consultation with the Ministry and OHBA, OPPI supports a refined list of studies that are applicable at various stages throughout the planning process. This will ensure the right studies are asked for at the right time, based on the local context and circumstances.

Should planning authorities maintain the ability to develop terms of reference to specify the breadth of information required for each of the types of studies included in the provincial list? Please elaborate on your response.

Yes, Terms of Reference provide clarity and certainty to both planning authorities and the development industry on what is expected to be submitted as part of any of these studies. Planning Authorities should have the ability to approve Terms of References.

We strongly encourage the Province to work with OPPI to prepare guidelines on the most commonly used Terms of Reference (Core) so that they can easily be adopted or incorporated into the development review process for municipalities across Ontario. This will significantly improve consistency in development review across the province.

The province might also consider including minimum standards for studies as well (to help address submission quality) as well as requirements for pre-consultation to identify and scope study requirements.

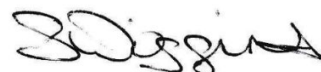
Thank you for the opportunity to provide feedback on ERO 026-0313. We would be happy to continue the dialogue with MMAH staff working on this project, in particular as it relates to the development of standardized Terms of Reference for Core Studies.

If you have any questions or would like to schedule a meeting, please do not hesitate to contact us at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



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Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
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cc. Laura Evangelista, Director, Planning and Housing Policy Branch
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