

May 14, 2026

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

Minister Flack

Re. County of Dufferin Response to the Ministry of Municipal Affairs and Housing Proposed Changes to Specify Additional “Prescribed Professions” for the Purposes of a Complete Application.

On behalf of the County of Dufferin, staff are pleased to provide written comments pertaining to the proposed addition of certified professionals for the determination of a complete application. It is our belief that the following comments will assist the Ministry of Municipal Affairs and Housing (‘MMAH’) in strengthening the proposed framework to ensure that planning application processes across Ontario are efficient, streamlined, and supportive of growth.

The County of Dufferin recognizes the importance of streamlining planning approvals to support housing, economic development, and infrastructure priorities. We appreciate the province’s efforts to explore innovative approaches, such as the addition of certified professionals, to reduce initial application costs and improve review timelines.

Through the County of Dufferin’s review of the proposed addition of certified professionals, the following comments, questions, and suggestions are provided.

- The County appreciates the MMAH’s desire to streamline municipalities determination of what reflects a ‘complete’ application. While we understand that this process may improve efficiency early in the planning application process, this likely does not mean the entire process will be accelerated. If the materials submitted still require revisions and updates, municipalities will likely still require those be implemented as part of comments provided under the first circulation of materials. This, in turn, may only lead to situations whereby municipalities are required to present reports recommending deferral in order to achieve regulatory timelines under the *Planning Act* and ensure technical studies and drawings are properly revised.

- In addition to engineers and landscape architects, the County of Dufferin recommends considering inclusion of other certified professionals that reflect the County's Official Plan and local development context:
 - Professional Biologists / Ecologists
 - Licensed Archaeologists / Heritage Conservation Professionals
 - Agricultural Specialists
- Clarification regarding which studies require specific certified professionals for different application types (e.g., official plan amendments, zoning by-law amendments, site plan control, consents) would improve transparency
- Municipalities may require more time and guidance to implement acceptance of additional certified professionals. Therefore, transition timelines, guidance materials, and digital submission tools would help support smooth adoption. Providing clear examples or references for when each certified professional is required could improve consistency.

The County of Dufferin appreciates the opportunity to provide comments on the proposed changes to the list of certified professionals for the determination of a complete application. We support measures that improve efficiency, predictability, and transparency in the planning process while ensuring municipalities retain the ability to request information necessary to assess proposals in their local context. It is our hope that the feedback provided above will assist the Ministry of Municipal Affairs and Housing in refining the proposed framework for a complete application.

Respectfully submitted,



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