

CLEARED FOR CONSTRUCTION

Development approval and permitting in metro Milwaukee



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PREFACE AND ACKNOWLEDGMENTS

This report was undertaken to help local government officials, development professionals, business and civic leaders, and residents better understand how proposed development projects are reviewed, approved, and permitted across metro Milwaukee communities. We hope the report's findings contribute to thoughtful discussions on how to balance housing and economic development needs with responsible public oversight.

Report authors would like to thank the leadership and staff of the six cities that participated in this study for providing information and project data and patiently answering our questions. We would also like to thank the many area development professionals who shared their observations with us through interviews.

Finally, we would like to thank the Commercial Association of Realtors of Wisconsin (CARW) for commissioning this study, as well as the Greater Milwaukee Association of Realtors (GMAR), the Metropolitan Milwaukee Association of Commerce (MMAC), the Wisconsin Realtors Association (WRA), and Milwaukee Downtown (BID 21) for providing additional support that helped make this report possible. This research was also supported by a generous grant from Bader Philanthropies.





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INTRODUCTION

In the Milwaukee area and statewide, housing prices [have risen](#) much faster than household incomes for several years, while the pace of permitted housing projects [has not kept up](#) with existing demand. This has led local and state leaders to implement or consider a range of solutions to boost housing production, from modifying local zoning regulations, to creating [state loan programs](#) for qualifying developments, to [expanding](#) the types of projects that can qualify for local tax increment financing (TIF) assistance.

Another strategy that local governments could employ to help facilitate multi-family housing construction – and other types of development that bring jobs, services, and revenue to local communities – is to review and consider changes to their development approval and building permitting processes. While many aspects of these processes are tied to important priorities such as ensuring health and safety and conformity with local plans and policies, there may be opportunities to expedite timelines in some cases to advance projects more quickly and reduce their costs. Local governments have a financial incentive to facilitate development, given that annual increases in the portion of their tax levy used for operations are tied to net new construction.

To understand the current policies and practices of local governments in the Milwaukee area – and the amount of time it takes for development projects to advance through required approvals and permitting – we reviewed information and project data from six cities: Milwaukee, Waukesha, West Allis, Wauwatosa, Oak Creek, and Brookfield. In our analysis, we included all commercial development projects that involved new construction, additions, or alterations valued at \$5 million or more, which allowed us to capture the most impactful development projects across the selected communities, including most multi-family housing developments. We examined projects of that size that were issued building permits from January 2017 through mid-2025.

Our analysis included consulting with the staffs of all six cities, who provided both project data and written descriptions of their development approval and building permitting processes, and gathering additional data from municipal websites. We then analyzed the project data and synthesized our findings to identify similarities and differences across cities. We gained additional insight through a series of 10 interviews with development professionals, who shared their experiences in advancing projects across the metro area.

Though not comprehensive of all recent development activity in the selected cities, our analysis covers a total of 240 large commercial development projects that together were estimated to be valued at over \$4.2 billion when they were approved. Those projects also produced a combined total of more than 8,000 housing units.

We hope that this report raises awareness among local government and commercial development leaders about how development processes and timelines stack up throughout the metro area, what the main differences are across communities and project types, and where there may be opportunities to make improvements.



BACKGROUND

Before delving into our analysis, it is important to understand the common steps that developers typically must go through to advance proposed projects, though each municipality has somewhat different requirements that we discuss later. Below, we describe this process, which can be divided into two major steps. A brief glossary of commercial development terms used below or later in this report can be found at the end of this section.

Plan and Zoning Approval – Before a developer can apply for a building permit, their proposed project typically must be reviewed by municipal staff for compliance with local zoning and building codes. This includes submitting construction design documents, landscape drawings, a plat of survey (a map of the property showing legal boundaries, dimensions, and the location of any buildings or other physical improvements), and any other documents that may be required, such as a plumbing plan.

Some municipalities then require all commercial development proposals involving new construction or building alterations to be approved by their (locally appointed) plan commission or design review board and (elected) city council or village board. Others allow at least some projects that comply with all local zoning and building codes to be developed “by right,” meaning they can proceed automatically without the need for discretionary approvals from local officials beyond municipal staff. This can expedite projects and make their advancement more certain as it means they are not subject to votes, public hearings, or special conditions that could lead to delays or rejection.

When a proposed project does *not* align with local zoning or building codes, the developer must secure another type of approval before proceeding to a building permit application. Depending on how the proposal diverges from local policy, it may require a zoning code variance, a conditional or special use permit, or a zoning change. Whereas a variance or conditional use permit allows a project to differ in smaller ways from local zoning regulations, a zoning change permanently alters what development is allowed on a given property.

Building Permitting – Once a proposed project has received all required plan and zoning approvals, the developer can proceed to applying for a building permit, which authorizes them to construct a building or make alterations or additions to an existing one. Often, however, there is a period of time between when a project plan is approved by a municipality and when the developer applies for a building permit when the local government is not involved. During that time, the developer is typically working to finalize the development’s design and secure project financing.

The developer then submits their revised plans, which are typically reviewed again by all relevant city departments (e.g. building inspection, engineering, fire, planning/zoning) to ensure that any required revisions to the original plans have been made. Many larger cities have staff who can review most commercial development proposals for building code compliance, with the exception of those involving federal or state-owned buildings, hospitals, or nursing homes, which require state review. For smaller cities that do not have those specialized staff, all



proposed development projects are reviewed by the state or independent plan reviewers for code compliance.

When city staff approve the building permit, the applicant is notified. It is then up to the applicant to pay for the permit and any applicable fees. Permits are issued after payment.

Some municipalities allow developers to obtain an initial “footings and foundations” permit for larger development projects that allows contractors to proceed with excavation and development of foundations and other below-grade structural components. The remaining work on those projects cannot be completed, however, until the developer is approved for a standard building permit.

Definitions

Board of Zoning Appeals – independent agency authorized to review appeals from property owners regarding zoning decisions made by local officials, interpret zoning regulations, and grant variances when strict adherence to zoning laws would cause undue hardship

Building Code – regulations and standards that govern the design, construction, alteration, and maintenance of buildings to ensure public health and safety. These codes cover the structural integrity of buildings, fire safety, plumbing, electrical systems, and more.

Building Permit – an official approval by a municipal government authorizing an applicant to construct a building or make additions or significant alterations to an existing one. A building permit ensures that construction projects are safe and comply with all relevant building codes, zoning ordinances, and other regulations.

Building Permit Approval – when a municipality approves a building permit across all relevant departments, pending payment by the applicant

Building Permit Issuance – when the applicant pays for and receives a building permit

Certified Survey Map (CSM) – when a single parcel of land is divided into two, three, or four lots for sale or development, a certified survey map is created to show the layout of the new lots.

Comprehensive Plan – a long-term, foundational document that defines a municipality’s vision for its future and guides decisions regarding growth and development, land use, transportation, housing, and more. All municipalities in Wisconsin are required to have comprehensive plans, which are created with public input and implemented in part through zoning and other municipal policy.

Conditional or Special Use Permit – a zoning permission that allows certain land uses that are not permitted by right in a zoning district, provided specific conditions are met. These permits require a review process to ensure the proposed use is appropriate for the site.

Entitlement – government-issued legal approval needed to develop a specific piece of property for a particular use



Plan Commission - advisory body that helps guide the growth and development of a municipality by making recommendations on land use, zoning, and infrastructure planning. Plan commissions ensure that proposed development projects align with the community's goals and policies, facilitating public participation and overseeing the planning process.

Planned Unit Development (PUD) – a flexible zoning approach that allows for a mix of uses (e.g. residential, commercial, and recreational) within a single development. A planned unit development changes the underlying zoning of a given property.

Plat of Survey – a detailed, scaled map of a property created by a licensed surveyor that shows its legal boundaries, dimensions, and the location of any physical improvements such as buildings, fences, and driveways. A plat of survey serves as a crucial legal document for real estate transactions, resolving boundary disputes, and planning construction or improvements, as it clarifies easements and identifies potential encroachments.

Zoning/Zoning Code – municipal law controlling how land and buildings can be used and developed, dictating things like allowable land uses (e.g. residential or industrial), building height, lot size, and density. Zoning is intended to promote the health, safety, and general welfare of a community.

Zoning Appeal - a request for a higher authority (typically a board of zoning appeals) to review a decision made by a local zoning official. Appeals typically involve challenging an administrative decision, such as a denial of a permit, or seeking a variance to a zoning ordinance due to a hardship.

Zoning Variance – an exception to the zoning code requirements, typically granted when a property owner demonstrates a unique hardship due to the property's physical characteristics



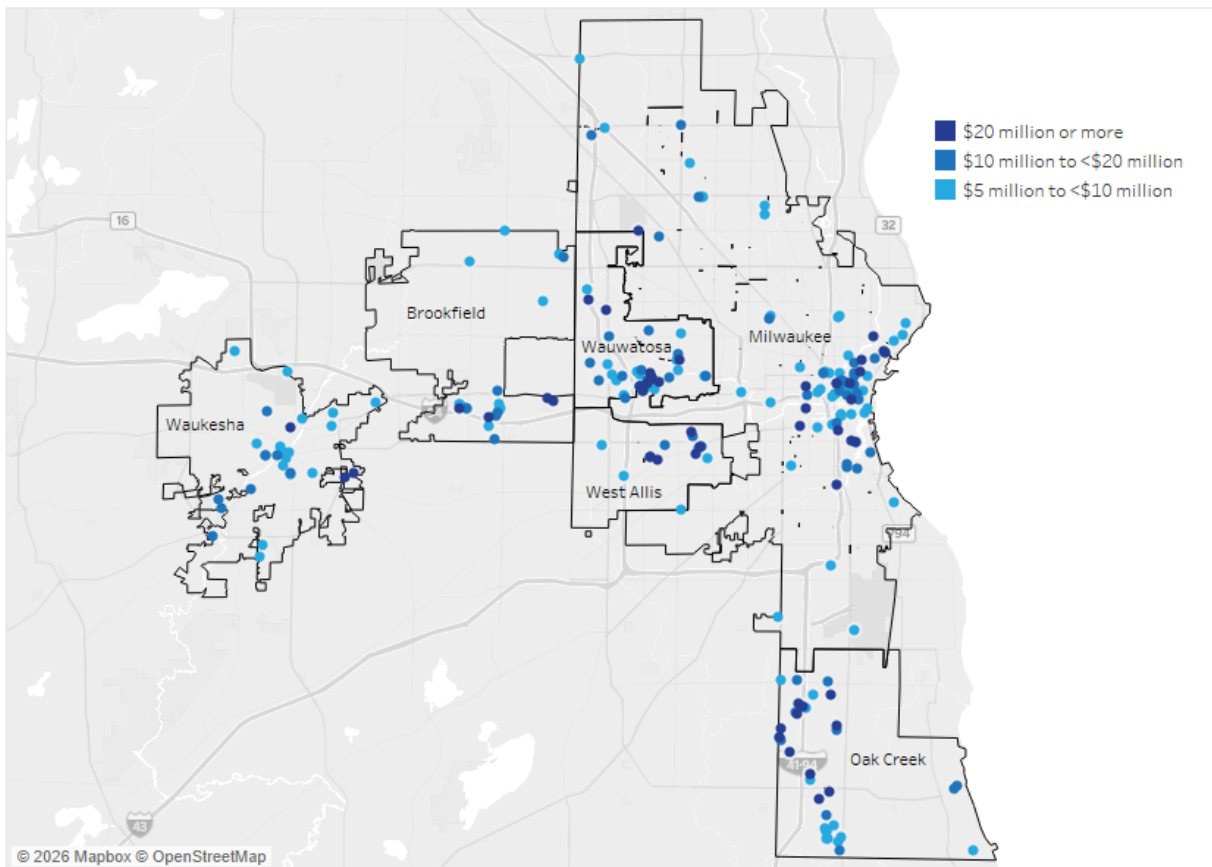
CITY SNAPSHOTS

The policies and processes that guide local development can seem opaque, and they vary by municipality. To shed light on how local governments in the Milwaukee area review and approve development projects, we requested and received written descriptions from six larger cities in the area that have experienced considerable recent development activity: Milwaukee, Waukesha, West Allis, Wauwatosa, Oak Creek, and Brookfield.

We also requested and received data from all six cities on all commercial development projects valued at \$5 million or more that were issued a building permit between January 2017 and mid-2025, which we supplemented with additional information collected from municipal websites. The data provide details about each project's location and estimated value, the approvals that were required for them to advance, and the dates when relevant applications and approvals were made. As shown below in Figure 1, a total of 240 projects met our criteria across the six cities.

It is also important to note that information about proposed development projects is not recorded in precisely the same manner by each city. This complicated our efforts to align and compare project data across the six cities and could introduce discrepancies that affect our findings. Perhaps the

Figure 1: Development Activity Clustered in Downtowns, Along Highways, and at Regional Medical Center
Large commercial development projects issued building permits since Jan. 2017 in selected cities, by estimated project cost



Source: Cities of Brookfield, Milwaukee, Oak Creek, Waukesha, Wauwatosa, and West Allis



greatest challenge was to identify the first date when proposed plans for each project were submitted to a city government for review. We aimed to make our analysis as consistent and fair as possible.

In this section, we describe each city's development plan approval and building permitting processes and then analyze project timelines. We focus on median timelines across groups of projects rather than individual or average project timelines to avoid distortions that can be caused by outliers. We consider various factors, including the types of approvals required (building permit only, additional zoning approval or permit, or zoning change), permit approval timing (pre-pandemic, peak pandemic, or post-pandemic), project scale (estimated cost), and land use type.

When measuring project timelines, we use the date when the application for a zoning approval or change was made (when applicable) or when the initial project plan was submitted to the municipality as the beginning of the process, and the date when the municipality approved the building permit as the end. **This includes any time that may occur between when the municipality approves the development plan and when the developer applies for a building permit, which is controlled by the developer and can be lengthy in some cases.** We summarize our key findings and observations at the end of this section and also analyze median project timelines with this developer-controlled period removed. For more information about how we analyzed project data, see our methodology summary in the **Appendix**.

Several factors may influence the median time it takes development projects to advance in each city. These include the complexity of zoning codes, the number and types of reviews and approvals that projects typically require, the mix of project types (e.g. residential versus other land uses), staffing levels in local planning and permitting offices, the reactions of residents and elected leaders to proposed projects, and the proportion of new construction projects versus alterations or additions to existing buildings, which may proceed more quickly.

While city policies and processes can impact how long a proposed development project takes to advance, it is also important to acknowledge that many other factors can affect project timelines that are not related to local government. Those include challenges related to purchasing land, securing project financing, and other changing market conditions. For example, the pandemic affected many development project timelines during our period of study, causing financing uncertainty, inflation, supply chain issues, and more.

City of Milwaukee

In Milwaukee, development occurs “by right,” meaning if a project complies with the city's zoning code, building permits can be considered without additional discretionary review by the City Plan Commission or Milwaukee Common Council. This is rather uncommon among local governments in metro Milwaukee; most of the other cities we examined require all (or nearly all) commercial development projects to be approved by an appointed plan commission or design review board, while some also require most or all projects to be approved by their elected city councils.



Standard Permit Review Process. Milwaukee's Department of Neighborhood Services reviews and approves building permit applications, ensuring zoning and building code compliance. Information about the permitting process is available on the city's [Development Center](#) website.

Once a building permit application is submitted, a plan examiner with the Department of Neighborhood Services is assigned to review the proposal for code compliance. This includes routing the plan to the city's Department of Public Works for stormwater and other necessary reviews. If requirements are met, permits are approved and issued once fees are paid. Permit records are tracked in the city's Accela [Land Management System](#). Review times fluctuate based on the workload of city staff, the completeness of submissions, and project size and complexity.

Some projects require additional approvals, including:

Board of Zoning Appeals. If a proposal does not meet zoning code requirements due to a prohibited land use, building dimensions, or design elements, a *variance* approval is required from the Board of Zoning Appeals (BOZA). *Special uses* (referred to as "conditional uses" in some municipalities) also require BOZA approval. When these issues are identified during plan review, the plan examiner issues a "BOZA referral letter" citing the specific approvals required for the project to proceed.

Applicants can then [apply](#) to BOZA for a hearing. The city's Zoning Advisory Group, consisting of staff from the departments of City Development, Neighborhood Services, and Public Works, reviews BOZA applications and schedules hearings. Hearings typically occur about eight weeks after applications, but timelines may be impacted by the completeness of submissions and the complexity of the project. Complex approvals may require two BOZA meetings, which can add another month to the timeline. A separate record is created in the city's Land Management System to track the BOZA process. If approved, the proposal moves forward with the standard permitting process.

Zoning Overlays. "[Overlay zones](#)" impose additional zoning and design standards in designated geographic areas of the city. Common types include Site Plan Review Overlay Zones, such as the Riverwalk Overlay Zone, and [Development Incentive Overlay Zones](#) (e.g. the Bronzeville Cultural and Entertainment District). Projects within these zones generally require City Plan Commission approval.

The Department of City Development reviews overlay zone applications for completeness and schedules City Plan Commission hearings. According to city officials, the typical [timeline](#) from application to City Plan Commission review is four to six weeks. Applicants usually seek overlay approval before applying for building permits, though parallel review is sometimes allowed.

Historic Preservation. Projects that would make alterations to locally designated historic structures or construct new buildings within locally designated historic districts must be approved by the city's [Historic Preservation Commission](#).

Architectural Review Areas. Projects within the Historic Third Ward or East North Avenue Architectural Review Board areas require design approval from those independent bodies.

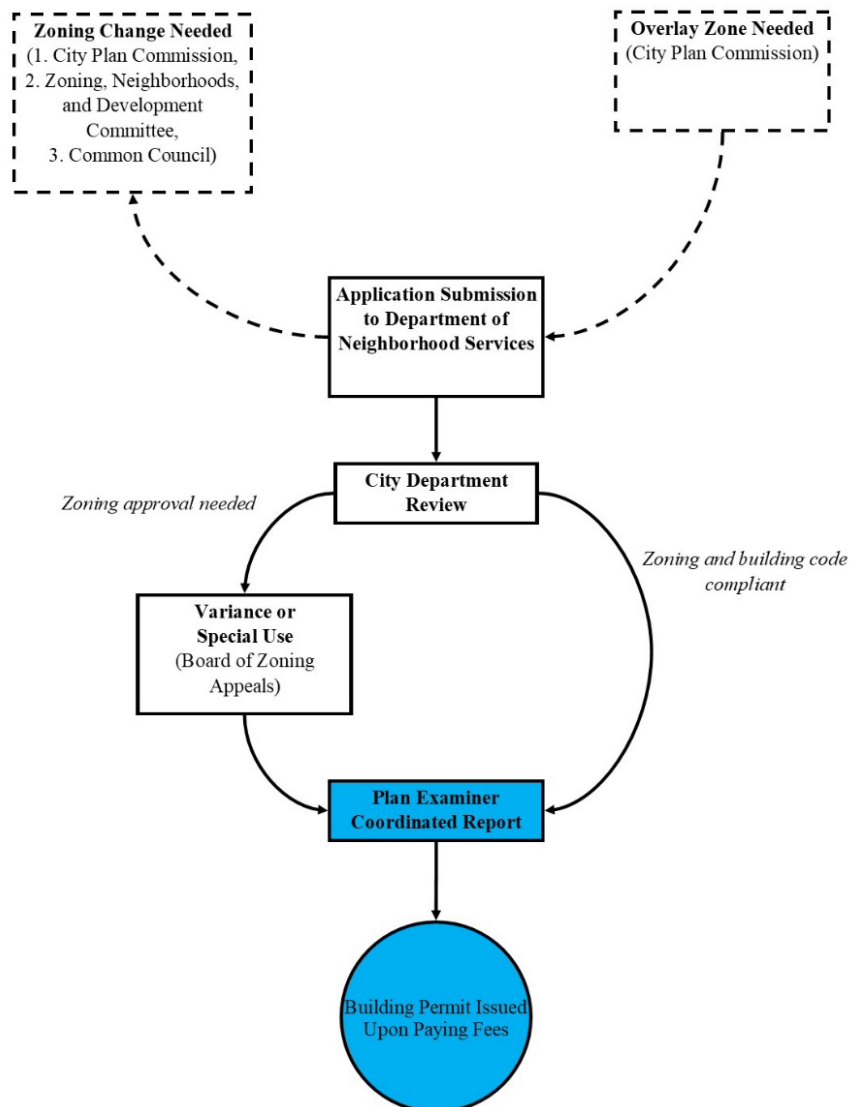
Zoning Changes. In some cases, a current or prospective property owner seeks to change the underlying zoning of a property to facilitate a potential future development. To do so, they must apply



for a [zoning map amendment](#), which is a legislative process that includes public hearings before the City Plan Commission, the Common Council's Zoning, Neighborhoods, and Development Committee, and finally the full Common Council. Per city staff, this entire [process](#) typically takes about three months and is required prior to the building permitting process. Individual legislative records for zoning changes are available within the city's [Legistar](#) system.

When existing zoning does not support a proposed development (e.g. a proposed mixed-use development in an industrial zoning district that prohibits commercial and residential uses), applicants also may request to rezone a property to a Detailed Planned Development, which is a custom zoning classification tailored to a specific project. This process includes the same steps as the zoning map amendment process. Detailed Planned Development approvals include land use and design standards and, once approved, permanently change the zoning of the underlying land. The applicant can then proceed with the city's standard permitting process.

Below is a visual summary of Milwaukee's typical development plan approval and building permitting process, which shows the steps most projects go through but does not capture every possible



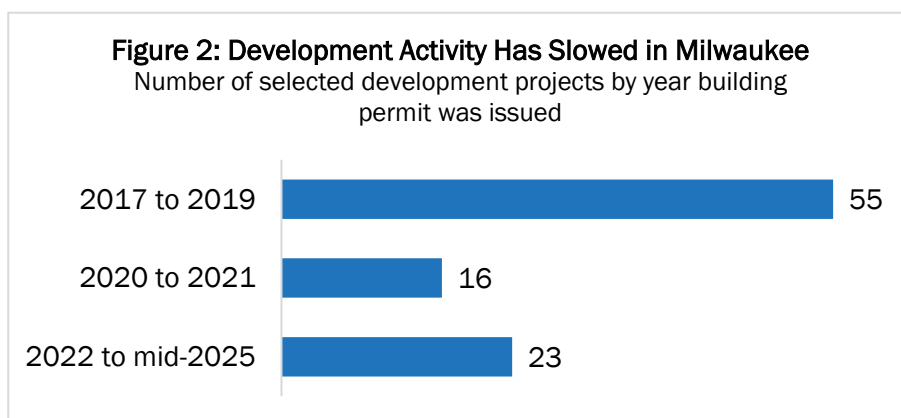
exception. Similar flowcharts for the other selected cities can be found in the **Appendix**. In the chart, dashed lines indicate steps that are only required for certain projects that do not comply with zoning standards or that are located in specific areas.

Project Analysis

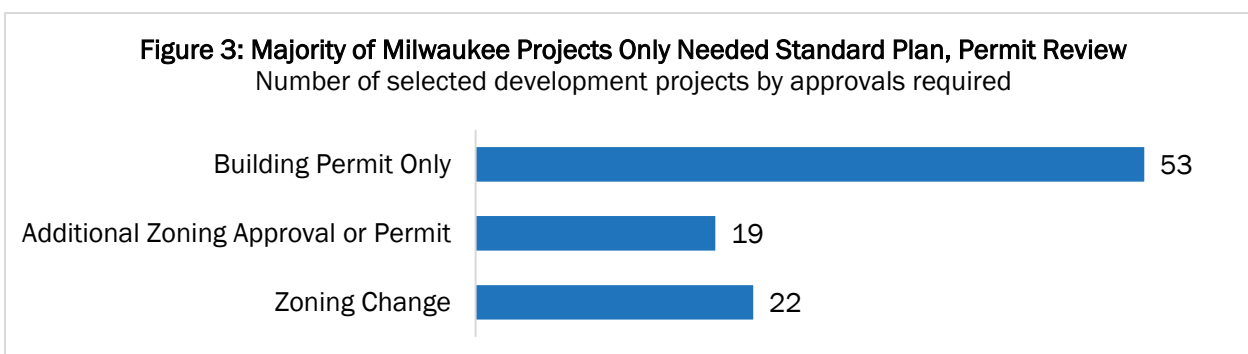
Perhaps unsurprisingly, given its size, the city of Milwaukee generated the highest number of development projects (94) that met our criteria and timeline among the selected cities. Together, those projects also had the highest estimated value (more than \$1.4 billion) and added the largest number of housing units (3,123) among those six cities.

Milwaukee Project Summary	
Total Projects	94
Combined estimated value	\$1.42 billion
Median project value	\$9.0 million
Combined housing units added	3,123

As shown in Figure 2, a majority (55 of 94) of the Milwaukee projects we examined were issued building permits in the pre-pandemic years of 2017 through 2019, indicating that commercial development activity in the city has remained slower even in the post-pandemic years. Just 16 projects that met our criteria were issued building permits during the two peak years of the pandemic (2020 and 2021), and 23 were permitted from the beginning of 2022 through mid-2025.



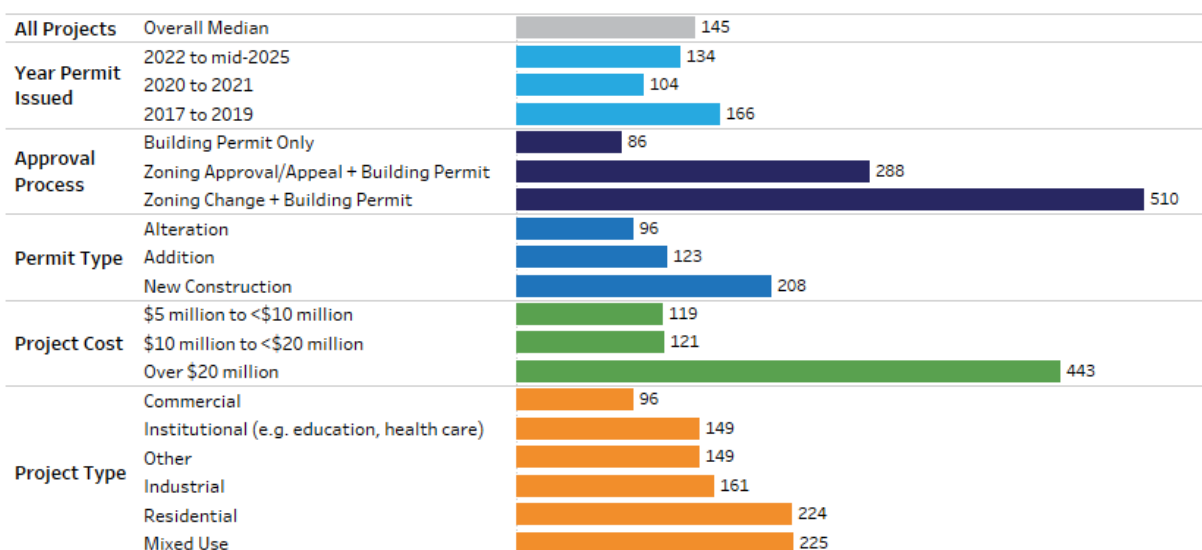
More than half of these projects (53 of 94) were approved and issued building permits without requiring an additional zoning approval (e.g. special use permit, overlay zone approval, or zoning change) beyond the city's standard permit review process (see Figure 3). In other words, the plans for those projects still needed to be reviewed and approved by city staff for compliance with zoning and building codes, but they did not need to be approved by any other appointed or elected city body such as the City Plan Commission or Common Council.



This streamlined process for many projects is one key factor behind Milwaukee's relatively short project timelines. The median number of days it took for the selected Milwaukee projects to advance from zoning change application or initial plan submission to final building permit approval was 145, which was the shortest among the five cities for which we have complete data. As shown in Figure 4, the 53 projects that only required a building permit took a median of only 86 days to advance, while the 19 that required an additional zoning approval took a median of 288 days and those involving a zoning change (such as a Detailed Planned Development) took a median of 510 days.

Figure 4: Projects Not Needing Special Zoning Approvals Advance Much More Quickly in Milwaukee

Median number of days from zoning change application (if applicable) or initial plan submission to building permit approval for projects valued over \$5 million and issued building permits since January 2017



Source: WPF analysis of city of Milwaukee data

In interpreting these figures, it is important to understand that they represent full project timelines, including the time during which the city was reviewing zoning and permit applications and any period of time in between zoning approvals and building permit applications when the city was not involved. As previously noted, during that time the developer is typically working to assemble financing (including potentially negotiating for city financing such as TIF), finalize the project design, bid the project out, etc. For example, projects that required a zoning change took a median of 510 days from zoning change application to building permit approval, which included a median of 121 days (or roughly one-quarter of the total) between zoning approvals and building permit applications.

According to city officials, one additional factor that likely contributes to longer project timelines in Milwaukee is the city's goal and efforts to facilitate mixed-income and affordable housing developments financed by Low Income Housing Tax Credits (LIHTC) allocated by WHEDA. The WHEDA tax credit allocation process requires developers to secure permissive zoning prior to application, then go through a lengthy WHEDA application process to apply for tax credits, then go through the traditional design/bidding/financing process associated with other complex development projects. City officials noted that some of the selected projects with the longest periods of time between zoning change approvals and building permit applications – when no city application reviews were occurring – were housing developments that received WHEDA tax credits.



Projects issued permits between 2017 and 2019 tended to take somewhat longer (a median of 166 days) to advance than those permitted during the height of the pandemic in 2020 or 2021 (104 days) or in 2022 or later (134 days). One factor could be the larger volume of project proposals that city staff and city bodies had to review during the pre-pandemic period.

The city's Department of Neighborhood Services also reports that it has improved its permitting operations and processes over the last couple of years, which could help to expedite project timelines. Specifically, the department says it has strengthened its office culture, morale, accountability, and accessibility through fortifying staff recruitment and retention strategies, expanding staff training opportunities, improving data collection and tracking practices, and offering walk-in appointments at the city's Development Center. Also, an upgrade to the city's land management system will soon allow applicants to track permit applications through a public portal.

We examined whether the permitting timelines for our selected development projects have gotten faster in recent years by narrowing in on the dates when building permit applications and approvals were made, excluding any time prior to building permit applications for projects that first required additional zoning approvals. We found that projects issued building permits in the post-pandemic years (2022 onward) took a median of 95 days to work through the building permit process, which was nearly the same as the median of 98 days for projects issued building permits during the pre-pandemic years (2017-19).

Figure 4 also shows that projects involving new construction typically took longer (a median of 208 days) to advance than those involving additions (123 days) or alterations (96 days) to existing buildings. This makes sense given that the scope and impacts of new construction projects are typically greater and because new buildings are more likely to require additional zoning approvals or changes than alterations or additions. Those additional steps also mean more public input and oversight, which can also add time and complexity.

We attempted to classify each project by land use type. Based on this analysis, we estimate that just over one-third of the building permits (34 of 94) we examined were for residential construction projects – more than any other category – and seven more were mixed-use developments, including many involving both residential and commercial uses.

Residential and mixed-use projects tended to take longer than commercial ones to go from zoning change application or initial plan submission to building permit approval, industrial, and institutional projects. One possible factor is that residential and mixed-use projects were somewhat more likely to require zoning changes than other project types, which require public meetings and approvals from the City Plan Commission and Common Council.¹ Apartment developments more often face community opposition than other project types as well, with neighbors often raising concerns about potential impacts on property values, traffic, or street parking. Residential developments require more extensive plumbing, heating, ventilation, and cooling than many other project types, which can extend timelines. It may also be more challenging and time consuming to assemble financing for residential projects.

In summer 2025, the city of Milwaukee approved an updated [Housing Element](#) for its comprehensive plan, which is intended to adjust the city's zoning code to allow more types of housing to be developed in city neighborhoods and to remove barriers to new housing development

¹ While 23% of the selected projects in Milwaukee required zoning changes, the same was true for 32% of residential projects and 43% of mixed-use projects.



on business corridors and in multi-family zoning districts. The new plan could reduce the need for zoning changes to accommodate residential development projects, potentially expediting the approval process.

About one-quarter (24) of the selected permits were for commercial projects such as BMO's new office building in downtown Milwaukee and Potawatomi's major hotel expansion. An additional 13 were institutional projects such as new school and university buildings.

More costly projects, which often are larger and more complex, took far longer than smaller projects. Those with estimated costs above \$20 million took a median of 443 days, compared with only 121 days for those valued between \$10 million and \$20 million and 119 days for those between \$5 and \$10 million. It may take longer for developers to put together the financing needed to advance larger projects, such as high-rise apartment buildings. Those projects are more likely to involve new construction and typically require more extensive and time-consuming review of water and sewer infrastructure, parking regulations, traffic impacts, and more.

Some of these findings are consistent across other cities we examined. For example, projects that require additional zoning approvals beyond each city's standard plan review process tend to advance more slowly than those that do not. Likewise, projects involving new construction, costlier projects, and those involving residential or mixed uses typically take longer than other types of projects in many cities.

City of Wauwatosa

Plan Approval Process. All new buildings and alterations to the exterior of commercial property in Wauwatosa must be approved by the city's Design Review Board, which considers the project's architectural design, site plan, and landscaping. Developers proposing these types of projects are encouraged to meet with the board early – even before submitting final construction documents. This allows the board to provide input and recommend changes, which can be incorporated into the design prior to final submittals, potentially saving time and reducing the likelihood of delays.

Once Design Review Board approval is obtained, the next step depends on the scope of the project. Larger or institutional projects, such as hospitals, may require review by the state of Wisconsin. Other commercial projects may be eligible for local plan review by city of Wauwatosa staff.

Projects that require a [zoning permit or change](#) (conditional use permit, amendment to the city's zoning map or text, planned unit development, or certified survey map) must also be approved by the city's Plan Commission and Common Council and include a public meeting. Depending on the zoning permit required, the approval process involves between two (certified survey map) and five (planned unit development) meetings with city bodies.

For a project involving a zoning change via creation of a planned unit development, Wauwatosa first requires a preliminary approval that lays out conditions for the proposal to advance. The applicant then determines when to seek final approval after they have met those conditions. Sometimes the two approvals happen in relatively quick succession, while in other cases, a significant amount of time elapses between the two. For a preliminary planned unit development (and many conditional use permits), a pre-application with city staff is required at least one month before applying for the zoning permit. The applicant is also required to hold a neighborhood meeting prior to submitting the



zoning application. If multiple zoning permits are needed for the proposed development, the approvals usually run concurrently.

Projects seeking a zoning variance, exception, or appeal are reviewed by the city's [Board of Zoning Appeals](#).

In November 2025, the city of Wauwatosa adopted changes to its zoning code such that many development projects – especially those involving multi-family housing – can be permitted “by right,” provided they align with current zoning and development standards such as maximum building height, required setbacks of structures from property lines, etc.

Building Permitting. Wauwatosa’s commercial building permit process begins with a pre-application meeting, where city staff meets with the applicant to review the proposed scope of work and outline all applicable submittal requirements. This early coordination aims to ensure a smooth and efficient review process and to allow staff to provide direction based on the specific project needs.

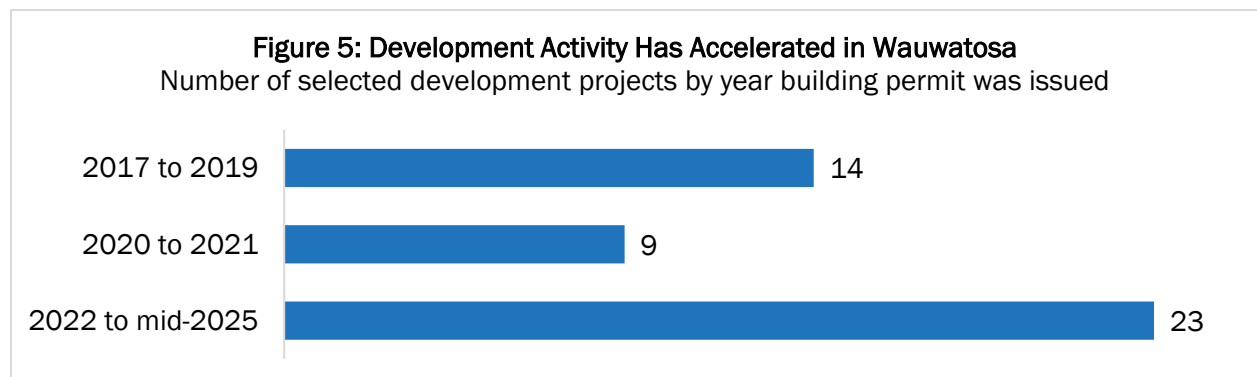
To apply for a building permit, a developer must submit an application and all construction documents through the city’s online portal, [Tyler](#). Once received, the permit application and documents undergo a concurrent review by multiple city departments, including Building Inspection, Fire, Planning/Zoning, and other relevant divisions, depending on the project. A separate site plan submittal is also required. The Engineering Department reviews the site plan independently, and no building permit will be issued until Engineering has approved the site plan and signed off on the building permit.

Project Analysis

Among the six cities included in our analysis, Wauwatosa was second only to Milwaukee in the number of large commercial development projects that met our criteria. A total of 46 projects each valued at \$5 million or more were issued building permits in Wauwatosa between January 2017 and July 2025. Nine of those projects involved housing, which together produced 1,127 residential units.

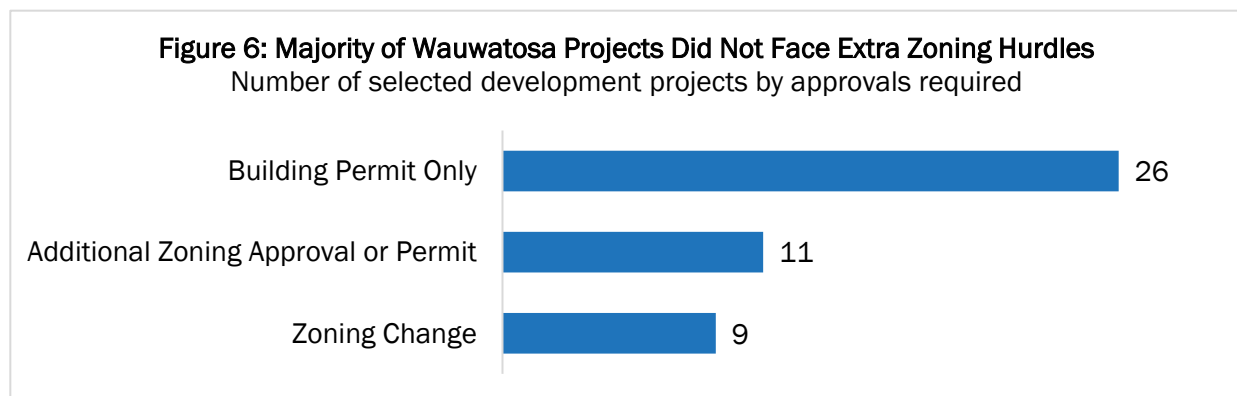
Wauwatosa Project Summary	
Total Projects	46
Combined estimated value	\$915.9 million
Median project value	\$11.8 million
Combined housing units added	1,127

Unlike in Milwaukee, development activity in Wauwatosa has increased rather than slowed post-pandemic. As Figure 5 shows, half of the 46 projects we examined were issued permits in 2022 or

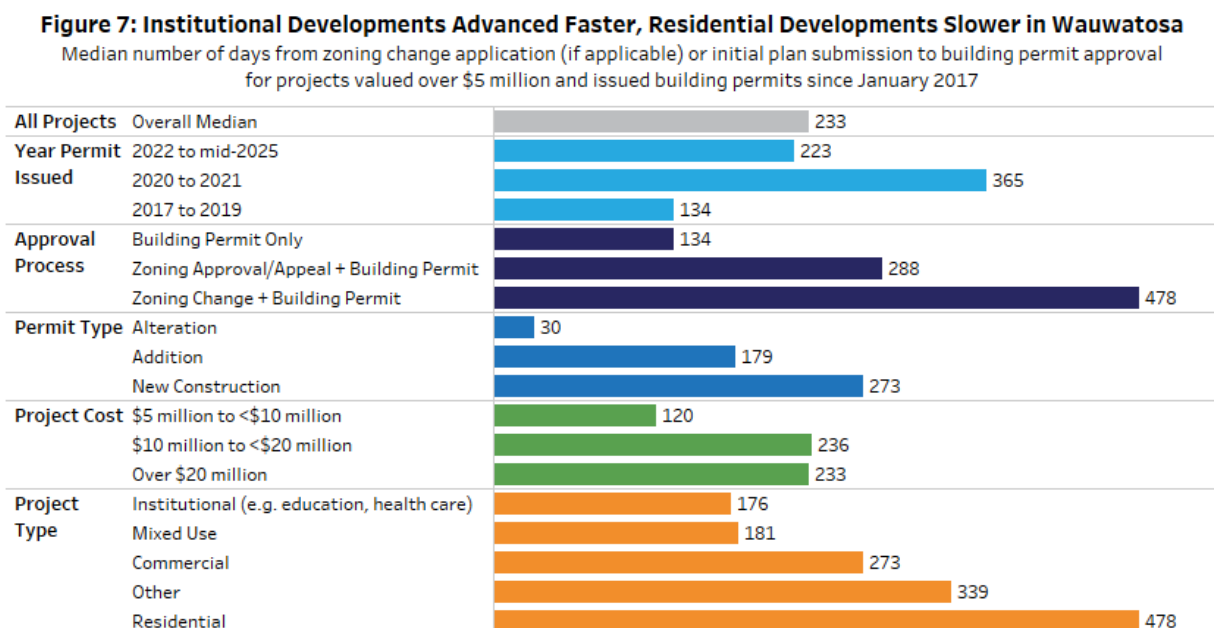


later, and only 14 (30%) were permitted before the pandemic began (2017-19). Conversely, only about one-quarter of the 99 projects in Milwaukee that met our criteria were permitted in 2022 or later, while more than half of the projects in Milwaukee were permitted before the pandemic.

As in Milwaukee, many projects in Wauwatosa were allowed to be developed “by right,” meaning they did not require Plan Commission or Common Council approval. However, most of those projects still had to be approved by the city’s Design Review Board, which is a step that is not required in Milwaukee unless a project is located within a specific area like the Historic Third Ward or East North Avenue that have designated architectural review boards. Among the 46 Wauwatosa projects we examined, only 11 required an additional zoning approval (typically a conditional use permit) and nine more involved zoning changes (typically the creation of a planned unit development), as shown in Figure 6. Those projects required lengthier approval processes involving public meetings.



Another unusual characteristic of recent development activity in Wauwatosa is that a large number of projects have been for institutional uses. Those include a new state crime lab and Milwaukee County Office of Emergency Management, additions to the Froedtert Hospital and Children’s



Source: WPF analysis of city of Wauwatosa data



Wisconsin campuses, the nearly complete Vel Phillips Justice Center, and new elementary school buildings. We estimate that half of the permits in Wauwatosa (23 of 46) were for institutional rather than residential, commercial, industrial, or other uses.

In Wauwatosa, institutional projects advanced from plan submission to building permit approval faster than other types of projects, while residential projects advanced the slowest (see Figure 7 on the previous page). Whereas the median timeline was 233 days for all Wauwatosa projects we examined, it was only 176 days for institutional projects but 478 days for residential projects. Most institutional projects only required a building permit and none involved a zoning change, though six required conditional use permits.

As in Milwaukee, more costly projects tended to take longer to advance, with projects valued at more than \$10 million taking roughly twice as long as those valued between \$5 and \$10 million.

City of Waukesha

Plan Approval Process. Unlike in Milwaukee and Wauwatosa, all new commercial, industrial, and multi-family buildings in Waukesha, as well as site or exterior changes to existing ones, require approval from the city's Plan Commission before a developer can apply for a building permit. Projects that only involve interior changes are the exception; they can proceed directly to permitting. Plan approval in Waukesha is a two-step process:

- **Preliminary Review.** The applicant submits preliminary plans. Staff from the city's Planning, Building Inspection, Engineering, Water Utility, and Fire Department review plans, typically within two or three weeks. A meeting is held with staff and the applicant to discuss issues or needed changes. Staff then provide written comments to the applicant for plan revisions.
- **Final Approval.** The applicant determines when to submit for final approval by the Plan Commission, often based on readiness. The Plan Commission meets monthly, and submissions are due 30 days prior. Plan Commission approvals are conditional on addressing all staff comments. The city's Planning Division sends final review comments to the applicant after the Plan Commission meeting. Further engineering work may be needed after approval.

For minor changes, the city's Planning Division may waive preliminary review and go directly to final approval. If significant residential impacts are expected, a consultation meeting with the Plan Commission may be recommended. This optional review allows applicants to gauge Commission feedback early, before investing in full designs. Consultation submissions are due two weeks before the meeting and only receive a cursory planning review.

- **Conditional Uses and Zoning Changes:** Projects that require a conditional use permit but no zoning change only require Plan Commission approval and a public hearing. Timing is applicant-driven and often aligned with final plan approval. Projects that involve zoning changes require a public hearing and must be approved by the city's Common Council. Per city staff, those hearings and votes typically occur about four weeks after Plan Commission

approval. Staff advises applicants on likely outcomes but cannot guarantee decisions, so there is inherent risk in proceeding without approvals.

Building Permitting. Applicants decide when to apply for a building permit, which may depend on project timing, financing, or completing engineering and construction drawings. Before applying for a commercial building permit, plans must receive state approval or be reviewed by the city’s third-party reviewer, Eplan Exam, the latter of which is frequently used due to its shorter turnaround times of approximately 10 days.

Once state or Eplan approval is received, the applicant can submit their building permit application to the city. Plans that required Plan Commission approval are re-reviewed by the interdisciplinary team to ensure all revisions were made. To avoid delays, as of May 2025, a “Letter of Concurrence” from the Engineering Department is also required prior to a building permit application, confirming that the plan has been approved by all relevant departments and all engineering issues have been resolved.

Once the city receives all documents, there is a 10-day staff review window. Upon approval, applicants are contacted with the permit cost and any applicable fees. Permits are issued after payment.

Project Analysis

The city of Waukesha has seen slower but steady development activity since 2017. Unlike in Milwaukee or Wauwatosa, the 31 development projects in Waukesha that met our criteria were almost equally divided between the pre-pandemic, peak pandemic, and post-pandemic years, as Figure 8 shows.

Compared with Milwaukee and Wauwatosa, an even smaller share of recently approved development projects in Waukesha have required zoning

permits or changes. Only two of the 31 projects we examined required an additional zoning approval such as a conditional use permit, and three others required zoning changes (see Figure 9 on the next page). According to city staff, this is likely because Waukesha’s current zoning code includes very few conditional uses and allows for flexibility in each land use category, which limits rezoning requests.

Waukesha Project Summary			
Total Projects			31
Combined estimated value		\$446.8 million	
Median project value		\$9 million	
Combined housing units added			500

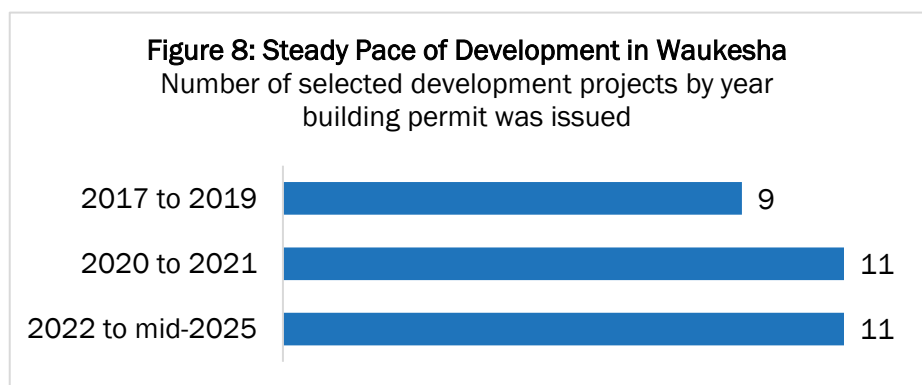
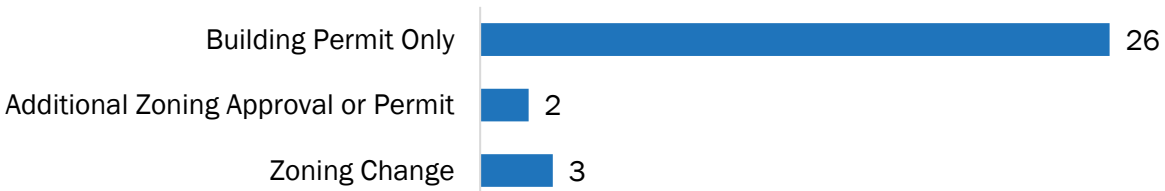
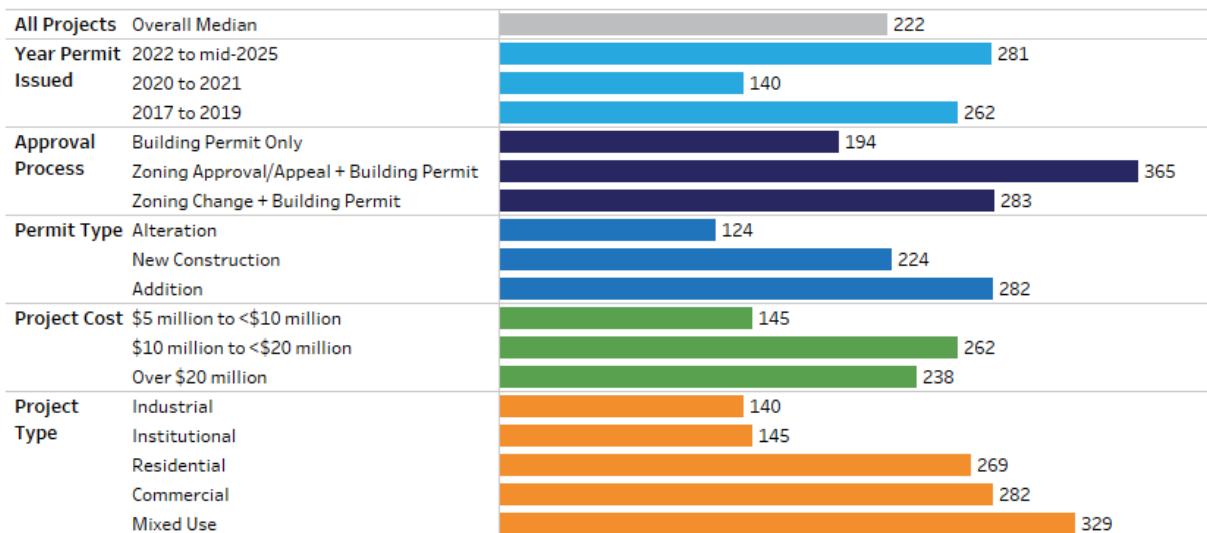


Figure 9: Few Waukesha Projects Required Extra Zoning Approvals or Changes
Number of selected development projects by approvals required



Among the 31 selected projects in Waukesha, a majority involved either institutional (12) or commercial (10) uses. Notably, commercial projects took roughly twice as long as institutional projects to advance from plan submission to permit approval (282 days versus 145 days), as Figure 10 shows. Though there were fewer of them, residential and mixed-use projects also proceeded more slowly in Waukesha, while industrial projects advanced the fastest. Again, these timelines include time between Plan Commission or Common Council approvals and building permit applications, which is dictated by developers.

Figure 10: Industrial, Institutional Projects Move Faster than Commercial, Mixed-Use Projects in Waukesha
Median number of days from zoning change application (if applicable) or initial plan submission to building permit approval for projects valued over \$5 million and issued building permits since January 2017



Source: WPF analysis of city of Waukesha data

City of West Allis

Plan Approval Process. As in Waukesha, all new commercial, industrial, and multi-family development projects in West Allis – as well as alterations to existing properties – must be approved by the city’s Plan Commission before a developer can apply for a building permit. [Plan approval](#) typically proceeds as follows:



- **Pre-Application Support.** Applicants are encouraged to meet with city staff (in person, virtually, or by phone or email) to understand the appropriate development path for their project. Most applicants are referred to the city's Planning and Zoning Department or contact the department directly. Staff assesses project goals and outlines the necessary steps. Applicants can choose the level of support they prefer, from minimal guidance to frequent staff contact. The city uses the [OpenGov](#) online platform to manage applications, track progress, and facilitate communication.
- **Design Review.** Site, landscaping, and architectural alterations require design review and approval by the city's Plan Commission in advance of starting work or obtaining a building permit. This applies both to projects involving changes to existing properties and new development of commercial, industrial, and multi-family buildings.
- **Conditional Uses.** Projects classified as "conditional uses" under the [municipal code](#) require approval by the Plan Commission and subsequent approval by the city's Common Council. This ensures oversight from both appointed and elected officials.
- **Zoning Changes.** Those seeking changes to the zoning of a property to facilitate a proposed development must seek sponsorship from an alderperson to bring the matter before the Common Council. A Council committee then reviews the proposal and may subsequently direct city staff to proceed with an ordinance amendment. If successful, the proposed change then proceeds to the Plan Commission and Common Council for consideration.

Applications for the following month's Plan Commission meeting are due at the end of the current month. After the Planning and Zoning Department processes the applications, key departments review them and meet to discuss them on the second Wednesday of each month. The Planning and Zoning team then prepares reports that incorporate departmental comments and distributes them to the Plan Commission members prior to their meeting. If Common Council approval is required, the project is reviewed during a Council meeting (typically the first and third Tuesdays of each month) after the Plan Commission approval.

In some cases, there is a gap between the developer obtaining zoning entitlements (e.g. a conditional use permit, rezoning, design review approval) and applying for a building permit. This period of time often includes the negotiation of a purchase and sale development agreement between the city and the developer, approval of tax increment financing (TIF) agreements (if relevant), and preparation of more finalized plan documents that are used for construction bidding to determine construction costs and to raise private equity to secure project financing.

Building Permitting. The applicant determines when to apply for a building permit. Sometimes it is soon after Plan Commission approval, though delays between approval and application are common.

Plans for commercial buildings must be approved by the city's Code Enforcement Department. The department's plan reviewer then circulates plans to other departments (e.g., Fire, Health, Engineering) for additional approvals, as needed.



Once all documents are received, the city has 10 business days to complete the review. Applicants can submit a building permit application at any point during the process. When all approvals are finalized, staff verify the application and send a payment notification via the online portal. Upon payment, the permit is issued.

Project Analysis

West Allis issued building permits for the fewest development projects (14) that met our criteria during our period of study. Still, those projects together produced nearly 1,000 housing units and were valued at a combined \$382 million.

As in Waukesha, development activity was slow and steady in West Allis during our study period. Among the 14 selected projects, four were issued building permits between 2017 and 2019, four were permitted in 2020 or 2021, and six have been permitted since 2022.

Development proposals in West Allis were more likely to require an additional zoning approval – typically a conditional use permit – or a zoning change than projects in other cities. As Figure 11 shows, eight of the 14 projects we examined (57%) required some sort of zoning action beyond standard review for compliance.

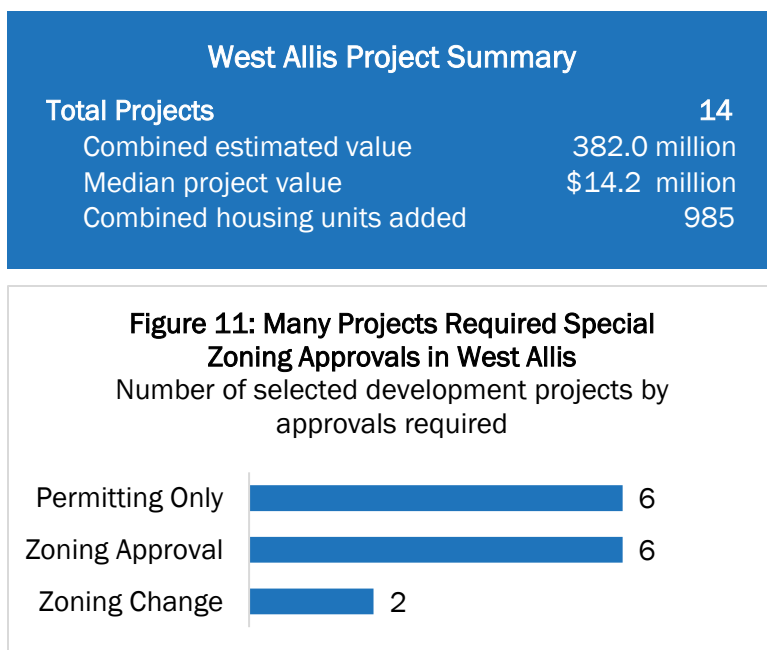
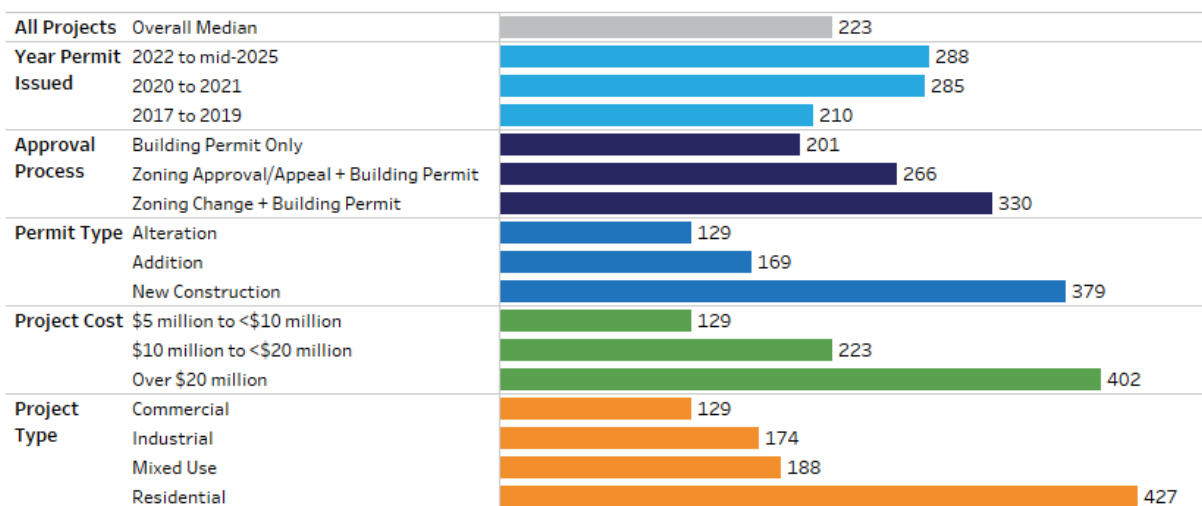


Figure 12: Timelines Vary Greatly by Project Characteristics in West Allis
Median number of days from zoning change application (if applicable) or initial plan submission to building permit approval for projects valued over \$5 million and issued building permits since January 2017



Source: WPF analysis of city of West Allis data



As in other cities, certain types of projects were more likely to take longer than others to advance in West Allis from plan submission to building permit approval. Those involving new construction or residential uses and those estimated to cost at least \$20 million all had median timelines of more than one year (Figure 12 on the previous page). In some cases, the same project met two or more of those criteria.

City of Oak Creek

Plan Approval Process. As in Waukesha and West Allis, no new commercial buildings or exterior alterations to existing commercial buildings in Oak Creek may proceed without Plan Commission review and approval of detailed site and architectural plans. This is required before a building permit can be issued. This process typically involves two steps:

1. The developer submits a complete application to the city's Department of Community Development about one month before a scheduled Plan Commission meeting (typically held on the second and fourth Tuesdays of each month).
2. The Plan Commission reviews and may approve or deny the application.

Certain projects may require additional approvals. Requirements for each application type are listed on the city's [website](#). These may include:

- *Comprehensive Plan Amendment* – to align with future rezoning
- *Certified Survey Map* – to reconfigure land for development
- *Official Map Amendment* – to modify reserved rights-of-way or street layouts
- *Rezoning* – to allow a different land use than what is currently allowed by the zoning code
- *Conditional Use Permit* – for uses listed as conditional in the zoning code
- *Planned Unit Development Overlay* – for flexible zoning in unique or mixed-use projects
- *Final Plat* – last step for a subdivision approval
- *Variance* – in rare cases involving deviations from dimensional (rather than land use) standards, a variance must be approved by the Board of Housing and Zoning Appeals before Plan Commission review.

Multiple entitlements. Often, applications for multiple entitlements associated with the same project, such as a certified survey map and a conditional use permit, can be reviewed together at the same Plan Commission meeting and subsequent Common Council meeting to streamline the process. Those projects typically start with the same two steps listed above. Then approximately one month later, the Common Council holds a public hearing and votes. If approved, the applicant may then submit for site and architectural plan review, if necessary/applicable, which must occur about one month prior to the relevant Plan Commission meeting.

Complex projects: Some developments require entitlements to be reviewed sequentially, especially when a comprehensive plan amendment is needed. These cases involve longer timelines due to public notice requirements and statutory deadlines.

Building Permitting. Following Plan Commission and/or Common Council approval, applicants can apply for building permits. Additional approvals (e.g., development or maintenance agreements) may still be required and must be approved by the Common Council, but permit applications may be submitted during this phase. The city of Oak Creek can conduct internal building plan reviews for certain building types, allowing applicants to submit both plan reviews and building permit applications simultaneously. Alternatively, applicants may opt for state-level review first. In addition to projects involving health care facilities, certain projects such as buildings over two stories require state plan approval. For all projects, plumbing plans must be reviewed by the state.

Plans are reviewed for code compliance and conditions of Plan Commission approval. Reviews may involve the city's Community Development, Engineering, Fire, and Inspection departments. The city's Finance department also reviews all permit applications to verify no outstanding assessments or invoices. Departments coordinate directly with applicants to ensure requirements are met.

Permits are issued only after all required agreements or permits are received, all departmental reviews are completed, and all fees are calculated and paid. Permit issuance timing varies based on how quickly applicants respond and complete payments.

Project Analysis

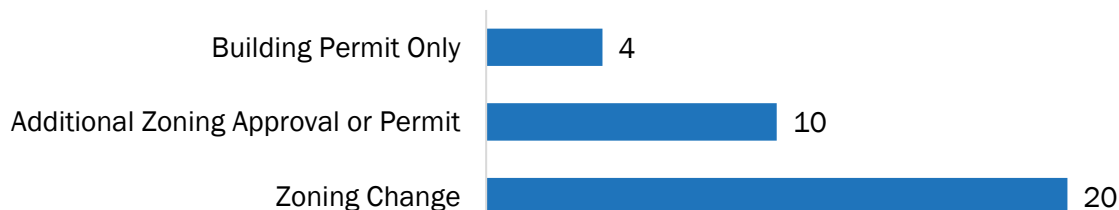
Despite having the smallest population among the cities included in our study, Oak Creek has experienced strong development activity in recent years, ranking third among the six cities (after Milwaukee and Wauwatosa)

in both the number of projects that met our criteria and the total value of those developments and second in the number of housing units the selected projects produced.

Recent projects in Oak Creek have been much more likely to require zoning changes than in the other selected cities. In fact, a majority (20) of the 34 projects we examined required a zoning change (Figure 13). Often, these projects were part of planned unit developments.

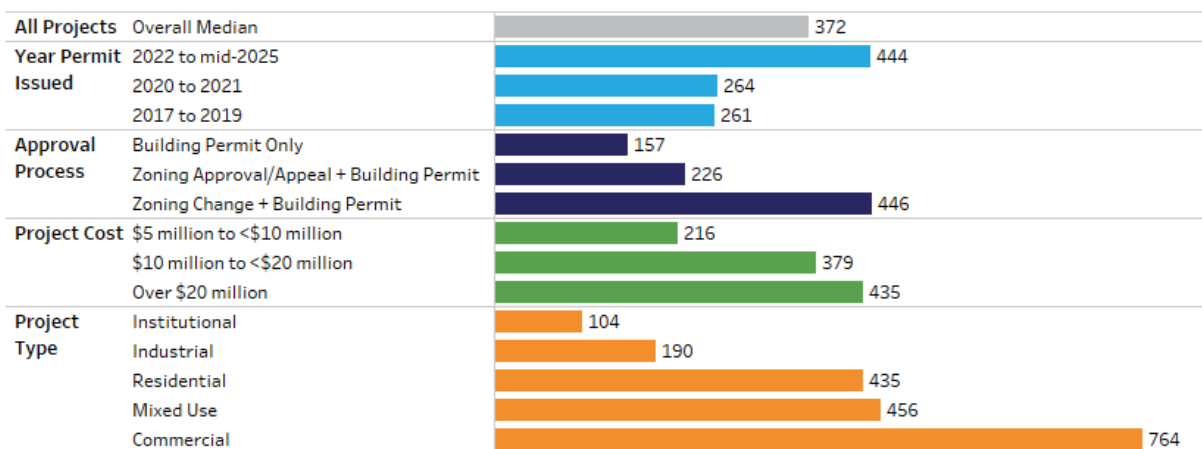
Oak Creek Project Summary	
Total Projects	34
Combined estimated value	\$747.1 million
Median project value	\$12.4 million
Combined housing units added	1,577

Figure 13: Majority of Projects in Oak Creek Have Involved Zoning Changes
Number of selected development projects by approvals required



This is likely one key factor behind Oak Creek’s relatively long project timelines, which took a median of 372 days. Indeed, projects that required a zoning change took a median of 446 days to be approved and permitted, compared with 226 for those requiring an additional zoning approval or permit but no zoning change, and 157 days for those only requiring a building permit (Figure 14).

Figure 14: Industrial, Institutional Projects Faster than Commercial, Residential Projects in Oak Creek
Median number of days from zoning change application (if applicable) or initial plan submission to building permit approval for projects valued over \$5 million and issued building permits since January 2017



Source: WPF analysis of city of Oak Creek data

In Oak Creek, as in other cities in this study, residential and mixed-use projects typically took longer to advance than projects involving other uses. Commercial projects took the longest at roughly two years, but there were fewer of them (five, compared with 14 industrial projects and 13 residential projects). Residential, mixed-use, and commercial projects were also far more likely to have required zoning changes than industrial or institutional projects.²

Projects that have been issued permits since 2022 have typically taken much longer to advance than those that were permitted previously. However, in 2025, city staff made procedural changes and Oak Creek’s Common Council adopted an ordinance change that was intended to expedite the entitlement approval process. Going forward, the city’s building permitting process should be substantially faster, according to city staff.

City of Brookfield

Plan Approval Process. In Brookfield, proposals to develop, expand, or externally remodel commercial, industrial, institutional, or multi-family developments, or to make major site changes, require Plan Commission approval before building permits may be issued. All Plan Commission decisions must also be ratified by the Common Council. The Plan Commission meets monthly, and applicants must submit materials at least 35 days prior to a meeting, following a required pre-application conference with city staff. City staff review applications and acknowledge whether any items are incomplete. Applicants then are able to resubmit or complete missing items up to 15 days prior to the Plan Commission meeting.

² More than three-quarters of the residential projects we examined required zoning changes, as did all of the commercial and mixed-use projects. By contrast, only 29% of industrial projects and no institutional project required zoning changes.



Site or exterior changes to existing commercial, industrial, or multi-family buildings may bypass Plan Commission review if deemed minor. These projects proceed directly to the building permit stage after a three-day notice to the district alderperson, provided no issues are identified by the Planning Department.

Applicants are guided by the city's Site Development Handbook and engineering standards, which outline requirements for site design, architecture, landscaping, infrastructure, and utilities. Fire protection review follows national standards while coordinating with city engineering on site access and circulation. Stormwater management is regulated separately and often requires an on-site management plan and a development agreement to ensure long-term maintenance.

Certain project elements such as proposed signage for commercial, industrial, and institutional uses are reviewed separately by the city's Inspection Services Department. Projects involving rezoning, planned development districts, or comprehensive plan amendments require additional time for neighborhood meetings, public hearings, and statutory notices. Public infrastructure improvements, ranging from hydrants to new streets, require a development agreement prepared by the city attorney, approved by the Plan Commission and Common Council, and signed by the mayor and city clerk. If timing allows, these agreements can be prepared alongside the above processes.

According to city staff, projects not involving rezoning or comprehensive plan amendments typically take about six months from initiation to permitting. They note that rezoning or plan amendments generally add three to four months, while controversial projects or those involving tax increment financing have less predictable timelines. Conditional use permits are limited primarily to institutional uses.

Building Permitting. Applicants determine when to apply for a commercial building permit, but if it is for a new development, then legal, engineering, and community development approvals are required first. The city of Brookfield reviews plans for proposed new construction projects of up to 50,000 cubic feet and alterations of up to 100,000 cubic feet. Larger projects and hospital projects are reviewed by the state.

Once complete applications are submitted, staff review typically takes 10 to 15 days. Permits are issued after all approvals and fees are paid. Delays most often occur due to issues with civil engineering plans, which require thorough review by city engineering staff.

Project Analysis

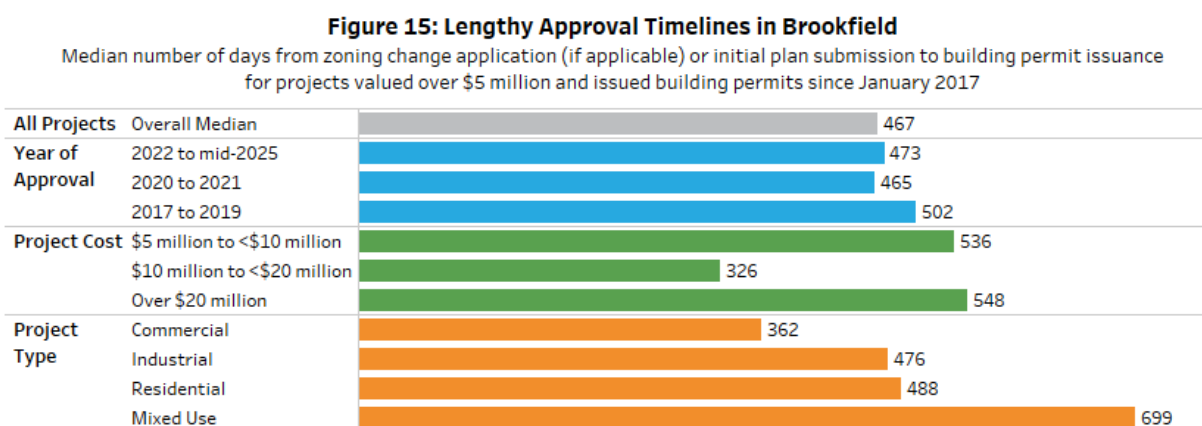
In Brookfield, 21 projects valued at \$5 million or more were issued building permits during our period of study. They included four residential projects that produced a combined 1,101

housing units. As in Milwaukee, development activity was higher in Brookfield prior to the pandemic, with a majority (14) of these projects issued building permits between 2017 and 2019 and only two permitted in 2022 or after.

Brookfield Project Summary	
Total Projects	21
Combined estimated value	\$315.8 million
Median project value	\$9.25 million
Combined housing units added	1,101



Among our selected cities, Brookfield had the longest median project timeline of 467 days, as shown in Figure 15. This may be influenced in part by the city's policy requiring Plan Commission and Common Council review of all development proposals, which is unique among those cities. According to city staff, Brookfield's lengthier approval timelines may also be influenced by the types of projects that met our minimum value threshold of \$5 million. They noted that most of the selected projects in Brookfield involved new construction, which typically take longer to be approved than projects involving alterations because they are more likely to require zoning changes and state agency review.



Source: WPF analysis of city of Brookfield data

Project timelines in Brookfield were relatively consistent across years. Commercial development projects typically advanced in about one year, while industrial and residential projects took longer and mixed-use projects (of which there were only two) took the longest.

Regional Comparison

Our review of local development approval and permitting processes and project timelines in metro Milwaukee reveals both similarities and differences across the six selected cities.

With regard to **policies and practices**, all of the selected cities:

- require that development proposals comply with municipal zoning and state building codes
- involve multiple city departments in their plan review process (planning, engineering, fire, etc.)
- require discretionary approval of projects that seek variances from local zoning codes, conditional or special use permits, or zoning changes (including planned unit developments) by an appointed plan commission, and also require city council approval for all zoning changes
- accept building permit applications only after project plans are approved and issue building permits only after all required conditions have been satisfied and fees have been paid

Projects involving health care facilities trigger state-level review regardless of where they are located, and for many Milwaukee suburbs cities, all larger or more complex projects are also reviewed by the state or by an approved third-party reviewer.



The cities differ most in how much discretion is built into the approval and permitting process. Milwaukee is the clear outlier: many development projects in the city proceed “by right,” with permits issued administratively if zoning standards are met. City Plan Commission and Milwaukee Common Council involvement is limited to projects located in designated overlay zones or involving special uses, variances, or zoning changes.

Wauwatosa has the next most streamlined model. While many development projects are allowed by right, all commercial exterior work requires discretionary Design Review Board approval, and zoning changes involve layered review and early neighborhood engagement.

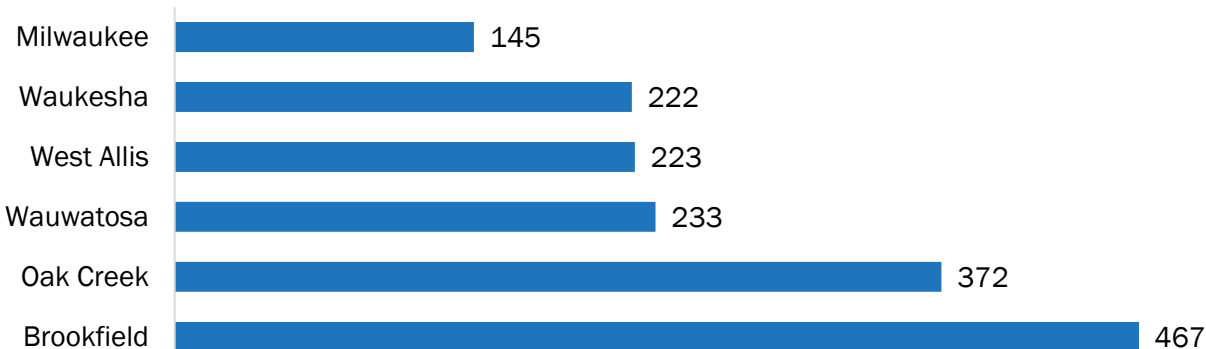
Waukesha, West Allis, Oak Creek, and Brookfield require more discretionary review of proposed development projects. In these cities, nearly all new commercial, industrial, and multi-family projects require plan commission approval before permitting, even when proposals are compliant with zoning. Brookfield further requires Common Council ratification of all plan commission decisions, extending project timelines. Oak Creek offers structured sequencing of multiple entitlements, while Brookfield and West Allis require or encourage pre-application coordination with city staff.

Project timelines vary widely by city, by whether projects require discretionary approvals, and by project type and cost. Streamlined, staff-level permitting consistently shortened timelines across all cities, while projects requiring conditional use permits or zoning changes took significantly longer.

It is also notable that the volume of post-pandemic development activity has diverged among the selected cities. Milwaukee’s development activity has remained slower for the last several years, while Wauwatosa and Oak Creek have seen increased development driven by health care and educational institutions in Wauwatosa and industrial and residential developments in Oak Creek.

Milwaukee – which had the highest number of projects that met our criteria involving the largest total investment and creating the highest number of housing units – also had the fastest median project timelines (Figure 16). That was influenced by the fact that more than half of the selected projects in Milwaukee advanced without requiring discretionary approvals beyond city staff. Brookfield, which requires both plan commission and common council approval of virtually all development projects, had the longest project timelines. Project timelines were also longer in Oak Creek, where zoning changes (often planned developments) were more common.

Figure 16: Project Timelines Shortest in Milwaukee, Longest in Brookfield
Median time from zoning change application (if applicable) or initial plan submission to building permit approval for selected projects, in days



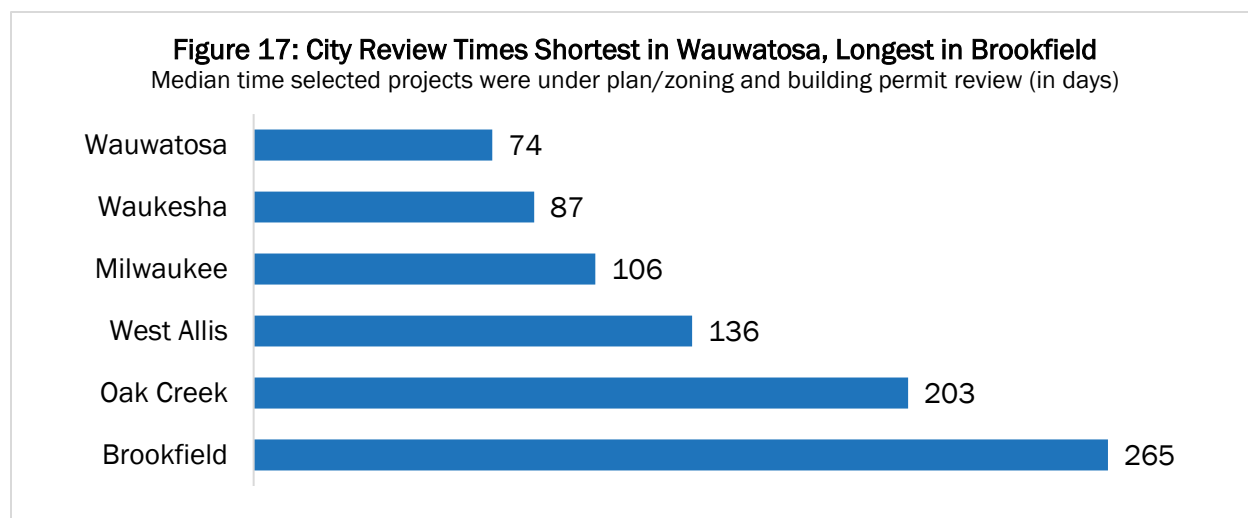
Residential projects often took longer than projects with other land use types, with a median timeline of more than 400 days in four of the six cities (Wauwatosa, West Allis, Oak Creek, and Brookfield) from zoning change application or initial plan submission to building permit approval. By contrast, industrial and institutional projects such as hospitals and government facilities took a median of less than 200 days in all cities. This may be because residential projects were more likely to have required zoning changes, based on our analysis of project data in Milwaukee and Oak Creek. Industrial and institutional projects may more often be located in areas already zoned for those uses, such as industrial districts or health care or higher education campuses.

Other characteristics also strongly influenced project timelines across all cities. Projects involving new construction took longer than those involving alterations or additions. Costlier projects consistently required more time to advance than smaller-scale developments.

Project timelines versus time under city review. For many selected development projects across the six metro Milwaukee cities, there was a period of time *after* the city government approved the developer's project plan and *before* the developer applied for a building permit when the project was not under city review. During this time, the developer is often working on project financing and other aspects of planning and management. These gaps in time can vary widely in length by project, and our analysis shows that they are typically longer in some cities than others, which could be influenced by the mix of project types and size of projects being built in each city, project timing (season), availability of construction crews, and tax considerations, among other factors.

Given this, we also examined the amount of time our selected projects were under review by city government, while excluding any time between each city's final plan approval decisions for these projects and the developers' building permit applications, when the local governments were not involved. This revealed a somewhat different picture, as projects in Wauwatosa and Waukesha were under city review for the shortest amounts of time, while review periods remained the longest in Brookfield and Oak Creek (Figure 17).

The three cities that typically spent the most time reviewing projects were those where a majority of the selected projects required conditional use permits or zoning changes (Brookfield, Oak Creek, and West Allis). In the other three cities, those approvals were less often needed.



INTERVIEW INSIGHTS

For additional perspective, we conducted 10 interviews with area professionals who have worked on large development projects in one or more of the metro Milwaukee cities included in our study. They included developers, brokers, architects, and representatives of industry organizations, with experience spanning infill, adaptive reuse, redevelopment, and greenfield development projects.

The interviews focused on challenges related to municipal plan approvals, zoning, and building permitting; the role of local policies, staff, elected officials, and the public in the development process; and suggestions for improving municipal approval and permitting processes. Below, we identify themes that emerged across multiple interviews and then share city-specific summaries. Where relevant, we also note areas of agreement and disagreement among interviewees.

Themes Across Municipalities

Predictability, clarity, and transparency are central concerns.

Across nearly all interviews, the most consistent theme was the importance of clear, predictable, and transparent processes for plan approval and permitting. Interviewees emphasized that uncertainty has more potential to delay or derail a project than local regulations.

Common issues cited included unclear or outdated municipal websites; lack of consolidated checklists for entitlements and permits; uncertainty about local government timelines, sequencing, and decision points; and inconsistent interpretation of requirements across city departments.

Several individuals noted that larger and more experienced firms are better positioned to navigate opaque municipal processes and absorb pre-development losses, while smaller and mission-driven developers face steeper learning curves and greater financial risk if they invest heavily in a project that ultimately is rejected. Communities that provide clear submission requirements, realistic timelines, and early feedback were consistently viewed as easier to work with by interviewees.

For developers, having a single point of contact within a local government is highly valued.

Many interviewees highlighted the importance of having a clearly identified municipal staff member who shepherds a project through the approval process and coordinates across departments. They also perceived projects as moving more smoothly when city staff were empowered to provide guidance to developers and flag issues early — even when municipal processes were complex.

Suburban communities were often praised for assigning a project manager or development director to serve as the key point person for a given project. By contrast, several interviewees described the city of Milwaukee as lacking a consistent point person for individual development proposals, which they said resulted in fragmented communication and developers having to independently track progress across multiple departments.



Political dynamics and public opposition introduce significant uncertainty.

Virtually all interviewees identified local politics and public opposition (often characterized as NIMBYism) as major sources of project delay and risk. This was especially pronounced for multi-family housing developments, higher-density projects, projects requiring variances, rezoning, or conditional use permits, and projects perceived as changing a neighborhood's character.

Several interviewees noted a disconnect between adopted comprehensive plans — which often support additional density, housing, and redevelopment — and elected officials' willingness to approve projects that are consistent with those plans in the face of neighborhood opposition.

"Aldermanic privilege" (deference to the city council representative whose district a proposed development is in) was cited repeatedly as a factor that can effectively determine a project's outcome, particularly in Milwaukee but also in some suburbs.

"By right" development is viewed as a key improvement opportunity.

There was broad agreement that expanding development "by right," through clearer and more modern zoning codes, would reduce politicization and risk during the approval process. Interviewees suggested that when projects align with zoning and comprehensive plans, approval decisions should be largely administrative rather than discretionary.

Several interviewees contrasted communities where projects consistent with zoning proceed directly to permitting with those where even projects that aligned with zoning are routinely routed through boards, commissions, or councils, which they said increases time and cost.

Permitting delays are viewed as a significant cost driver.

While zoning and entitlement timelines were often described as manageable or at least predictable, building permitting was frequently cited as a bottleneck, particularly in Milwaukee. Common permitting challenges cited included:

- Sequential rather than parallel departmental reviews
- Lack of clear timelines or review deadlines
- Permits being held up by a single unresolved issue
- Difficulty communicating directly with plan reviewers
- High staff turnover in the recent past and loss of institutional knowledge

Interviewees consistently noted that "time equals money" in development, and said that extended permitting timelines can raise costs and also jeopardize financing, investor confidence, and project feasibility.

Many say the costs of design changes and lengthy review processes are often underestimated.

Multiple interviewees emphasized that requested project design changes — particularly late in the process — can impose substantial costs on developers, even when changes appear minor to reviewers, commissions, or boards. Redesigns may require re-engaging architects and engineers, revising studies, and resubmitting plans, which they said can carry substantial costs.

Views diverged somewhat on the value of design review. Some interviewees felt design review boards and plan commissions meaningfully improved projects and community outcomes when expectations were clear and feedback occurred early. Others viewed their influence as overly subjective and inconsistent, particularly when the requirements they imposed focused on aesthetic preferences rather than code compliance.

TIF is often necessary but complicating.

There was broad agreement that tax increment financing (TIF) is increasingly necessary for projects to pencil out, especially for multi-family housing, due to rising construction and financing costs. However, interviewees also noted that seeking TIF typically extends project timelines, introduces additional negotiation and scrutiny, and expands municipal demands related to design, hiring, or community benefits.

Some interviewees emphasized that municipalities vary widely in their willingness and ability to use TIF, with some suggestions that certain suburbs have been more flexible or proactive than Milwaukee in recent years.

Relationships, experience, and institutional knowledge matter.

Many interviewees stressed that development outcomes depend heavily on relationships with municipal staff and elected officials, and that staff turnover can cause significant disruptions. Long-tenured, experienced staff who understand development economics were generally viewed as ideal.

At the same time, interviewees acknowledged that developers themselves vary in experience, approach, and willingness to engage early and collaboratively with city staff, which can also affect project outcomes.

Milwaukee

Interviewees described Milwaukee as offering both opportunities and challenges. The city's planning staff and zoning framework were often praised for their professionalism and urban design standards. However, the overall process was frequently characterized as complex, fragmented, and highly political. Key issues cited included:

- Aldermanic privilege and reluctance to take political risks on proposed projects that face community opposition
- Permitting delays and interdepartmental coordination challenges



- Challenges advancing projects in overlay zones and projects involving the Historic Preservation Commission
- The need to secure TIF to make projects financially feasible

Some interviewees noted recent improvements in staffing at the city’s Development Center, while others reported continued delays and uncertainty. Experiences varied significantly by project type and location, and based on whether projects had aldermanic support.

Wauwatosa

Wauwatosa was often described as supportive but increasingly challenging, particularly as the city has become more built out and politically engaged. Interviewees cited:

- Strong planning staff and updated zoning
- An active design review board
- Higher levels of neighborhood activism and scrutiny of development proposals
- Greater likelihood of design-level negotiations

Several interviewees reported both positive experiences where projects improved through review and frustration with perceived overreach with regard to design.

West Allis

West Allis was the most consistently praised municipality across interviews. It was described as “pro-development” and partnership-oriented, clear in its expectations and processes (including via its [website](#) that allows developers to request meetings online), willing to use TIF strategically, and responsive and efficient in permitting. Interviewees frequently cited West Allis as a model for how legacy industrial communities can proactively encourage reinvestment.

Oak Creek

Oak Creek was generally viewed as welcoming and collaborative, particularly for large or strategic projects. Interviewees cited regular meetings with city staff, coordinated reviews, willingness among city leaders to update plans and zoning, and clear guidance from city staff. However, some interviewees noted that outcomes can still depend heavily on whether a project aligns with the city’s vision, and that certain uses (e.g., projects that include drive-throughs) may face resistance.

Brookfield

Brookfield was widely described as challenging to develop in and highly discretionary in its approval process. Common themes included resistance among elected officials and community members to density and multi-family housing, lengthy and political approval processes, less clarity around process expectations, and greater risk of late-stage opposition. Some interviewees noted that Brookfield has gradually become more open to moderately-priced “workforce” housing in recent

years, while others reported continued difficulty securing approvals even for market-rate multi-family housing developments.

Waukesha

Waukesha was mentioned less frequently and with less detail. Interviewees generally characterized it as more conservative and cautious about approvals than some other communities, particularly for multi-family or higher-density projects. There was limited commentary on permitting efficiency, suggesting fewer recent projects or fewer acute issues.

CONCLUSION

Our analysis shows both similarities and meaningful distinctions in how local governments in metro Milwaukee approve and permit proposed development projects. It also reveals considerable variation in the amount of time it takes for projects to advance across communities and by project type and scale. Project timelines are influenced by many factors beyond local government control, including developer actions and market conditions. Yet, these findings highlight important considerations for leaders in the cities we examined and throughout the metro area as they seek to balance public oversight and community input in local development decisions with the need for timely housing and commercial development.

In all six cities we examined, development proposals must comply with municipal zoning and state building codes and undergo review by multiple city departments prior to being approved and permitted. However, the ways in which these common requirements are met and administered – and the degree to which projects are subject to discretionary review and decision-making – varies by city, which influences both the pace and predictability of local development.

One of the most prominent distinctions among the cities we examined is the extent to which development projects are allowed to proceed “by right” versus requiring discretionary approvals from appointed or elected bodies. Milwaukee and Wauwatosa stand out for this approach and the relatively high share of their projects that receive staff-level approvals, which likely contributes to shorter median project timelines. Wauwatosa recently modified its zoning code to make more projects developable by right – particularly those involving multi-family housing – and Waukesha is currently working on an update to its zoning code that will, if adopted, make similar changes. These steps could have an impact on development activity and project timelines moving forward. Other municipalities in the region could consider similar strategies for specific types of development or targeted areas.

At the same time, while many area development professionals we interviewed said “time is money,” they often identified clear expectations, predictability, transparency, and early and consistent communication as their highest priorities in working through municipal approvals and permitting. They cited suburbs like West Allis and Oak Creek as models for establishing a clear point person to coordinate inter-departmental reviews and communicate with applicants, and Wauwatosa and Brookfield for holding pre-application meetings that connect applicants with staff across departments and provide early feedback. Many suggested that Milwaukee – which as a much larger city has a more complex staffing structure and processes more development proposals – has more fragmentation across city departments involved in reviews and may benefit from replicating at least some aspects of these approaches in the suburbs.

Another key finding is that while concern over rising housing prices and limited housing supply has grown over the last several years, multi-family residential projects have taken longer than other types of development (including industrial and institutional projects) to work through approvals and permitting in most cities we examined. One contributing factor is that residential projects have been more likely to require conditional use permits or zoning changes, which take time to secure and involve discretionary review that present more opportunities for public opposition to emerge and slow or derail projects. One possible strategy that local governments could consider to accelerate



approvals of these projects is to adjust their zoning codes to allow multi-family housing to be built by right in more areas.

It is also worth considering whether regional collaboration among local officials, development professionals, and relevant community organizations could help to improve development outcomes. For example, those we interviewed said it is difficult for smaller and less experienced developers to work across communities with different processes and requirements, which may limit their ability to develop projects throughout the region. Sharing best practices and establishing more consistency across cities in how information about development requirements is provided, how applications are accepted and tracked, how municipal staff communicate with developers, and other aspects of development approvals and permitting may be beneficial.

We hope that this report and our findings help to strengthen understanding of how proposed development projects move through local government approval processes in metro Milwaukee and provide a foundation for deliberations among local leaders on potential improvements.

APPENDIX

Methodology

This study involved analysis of both quantitative and qualitative data from the six selected cities and from interviews with local development professionals. Below, we summarize our research methodology.

Data Collection and Synthesis

As previously noted, we requested and received project-level data from each of the six cities on development projects with estimated construction costs exceeding \$5 million that were issued building permits from January 1, 2017 to mid-2025. Staff from each of the selected cities also provided narrative descriptions that outlined their typical commercial development plan approval and building permitting processes.

We organized the project-level data into a spreadsheet that included the following information about each permitted development: project name, project address, record ID or tax key/parcel number, type of permit applied for and received (New Construction, Alteration, or Addition), estimated construction cost, land use type, and number of residential units created or impacted. We also included key dates for each project, including the date of the initial development plan application, the final plan approval, the building permit application, and the building permit approval. When any of this information was not provided by the municipality, we collected it from online city sources or directly from city staff.

We also collected and synthesized qualitative information and insights obtained through semi-structured interviews with area professionals who have worked on large development projects in one or more of the selected cities.

Project Data Analysis

Our standard process for analyzing the timelines of development projects that met our study criteria was to calculate the number of days from the date when the city first recorded each proposed development plan (file introduction or application date) to the date when the city approved a building permit for the same project. For projects involving multiple building permits, we used the first recorded building permit approval date and only included them once in our final project count and timeline calculations. We excluded footings and foundations permits from our analysis, as they are a preliminary authorization that allows limited early construction activity before a municipality has completed its full technical review of a development project.

The research team periodically contacted city staff to ensure an understanding of their respective processes and for project-specific data inquiries, particularly for projects with unclear, overlapping, or missing application or approval dates.



City-Specific Details and Caveats

Milwaukee

- A majority of the selected projects began with building permit applications to the Department of Neighborhood Services. For those projects, we used the “Accepted” dates provided by city staff as the starting point of the city approval process.
- For projects that required a special use permit or zoning change, Department of City Development staff provided a “File Introduction or Application” date for when applications were first introduced to the Common Council or City Plan Commission. We used these as the start of the plan approval process for those projects. For projects that required a BOZA referral but no special use permit or zoning change, we used the “BOZA Referral Date” provided by the Department of Neighborhood Services as the starting date. For rare cases when neither date was available, we did not include the project in our analysis of median approval timelines.
- For projects that required special use permits, overlay zone approvals, or zoning changes, we found the dates of those approvals through the city’s online Land Management System portal. City staff reviewed our work and provided dates for additional projects we had missed.
- An application’s “Coordinated Report” is the report produced by the city’s plan reviewer that represents the final internal building permit approval from all city departments. We used the approval date from the Coordinated Report as the final date in the permitting approval process. For building permits with multiple internal approval dates, we used the first date listed in our timeline calculations, which was typically labeled, “Approved with Comments.”

Waukesha

- We used the “Preliminary Approval Submittal” date provided by city staff as the start date of the plan approval process for a majority of the selected projects. It represents the date when a developer first submitted a project plan for preliminary approval by city staff. When no Preliminary Approval date was provided, we used the “Final Submittal” date provided by city staff as the start of the plan approval process. That is the date when a developer first submitted a project plan to Waukesha’s Plan Commission for final approval.
- For projects that required a zoning change, the city provided a “Rezoning Date” that we used as the start of the plan approval process. That date typically preceded the preliminary or final submittal date.
- For building permitting, we used the city-provided application and “Final Sign Off” date for each project, the latter of which was when the building permit application was internally approved by all relevant city departments.

Wauwatosa

- For projects allowed to be developed “by right,” city staff provided a “Zoning Application” date when a developer first submitted a zoning request to the city, which we used as the start date for the plan approval process.
- For projects requiring zoning permits or changes, we used the “Council Approval” date provided by the city as the date when the plan approval process ended. We used the city-provided “Design Review Board” date as the end of the plan approval process if that date was after the Council Approval date. Design Review Board approval is mandatory for most projects and must occur before an applicant can apply for a commercial building permit.



- For building permitting, we used the “Application Date” and “Engineering Date” provided by city staff as the start and end of the process.

West Allis

- City staff provided “Date Submitted (Planning and Zoning)” and “Conditions of Approval Satisfied” dates, which we used as the start and end of the plan approval process. They also provided “Date Submitted (Code Enforcement)” and “Approved Date (Permitting)” that we used as the start and end of the building permitting process.

Oak Creek

- We removed a number of items from the original data provided by the city of Oak Creek to maintain consistency with our analysis of data from the other cities. This process shortened project timelines in Oak Creek by eliminating steps that preceded a project plan submission, including all comprehensive plan amendments, certified survey maps, and Footings and Foundations permits. We also removed any steps taken after a building permit was issued. We began each project timeline with the first meaningful land-use action directly related to the development, such as an application for a site plan review, zoning amendment, or conditional use permit.
- City staff provided each project’s building permitting application and approval dates, which we used in our analysis.

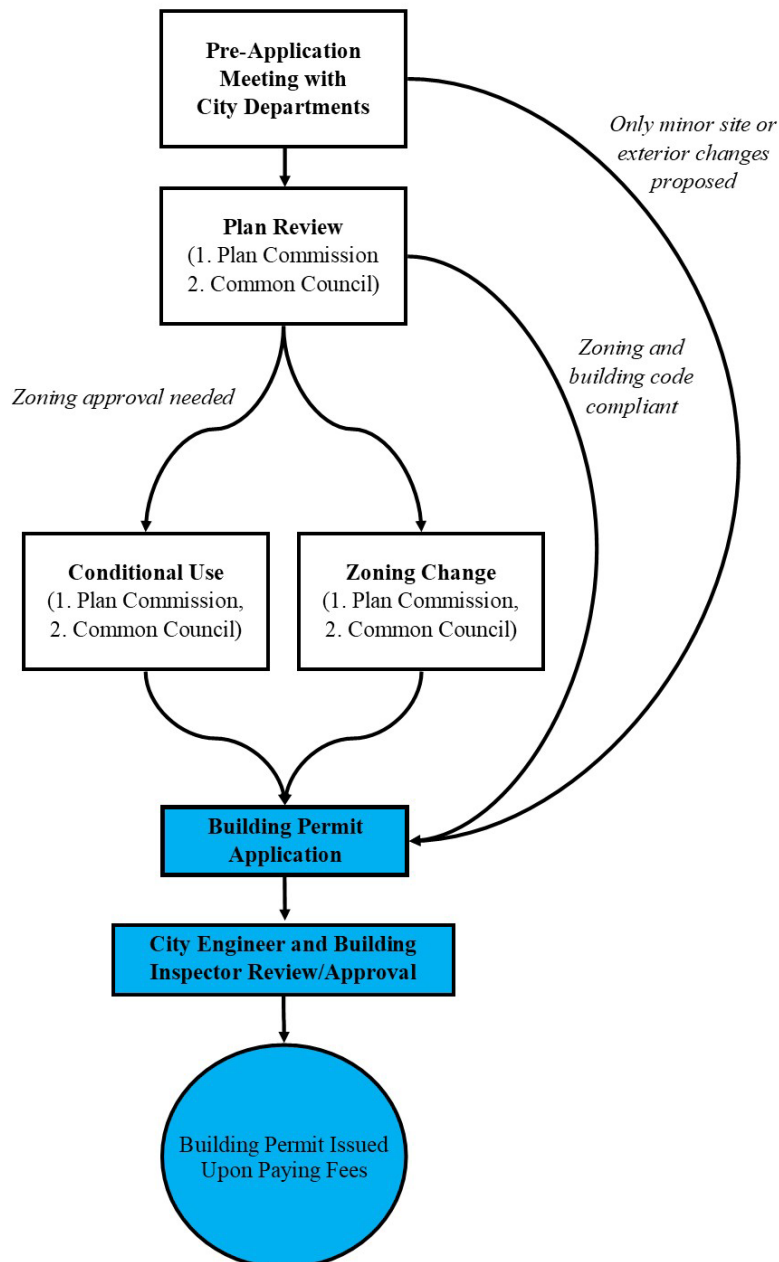
Brookfield

- For the plan/zoning approval process, city staff provided us with application dates, final Common Council approval dates, and dates when each application was transmitted to the city’s Inspections department, the latter of which reflects when all administrative city approvals have been made. For building permitting, they provided us with application and issued dates.

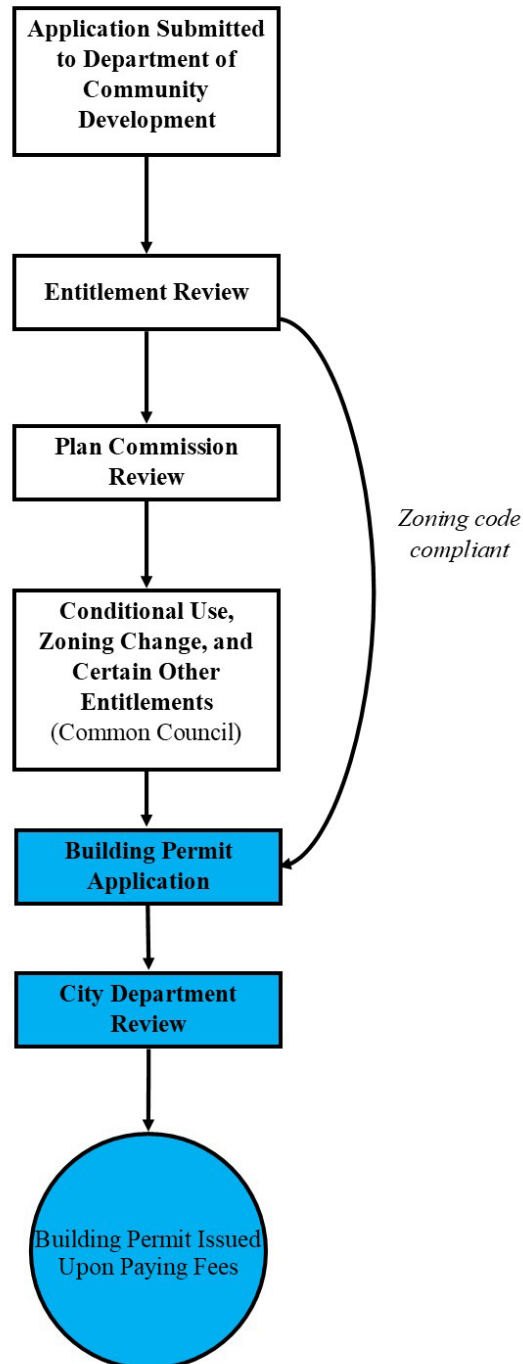
Approval Processes in Selected Cities

A flowchart illustrating the city of Milwaukee's typical plan approval and building permitting process can be found on p. 10 of this report. Below are similar charts for each of the other selected cities. They show the steps most projects go through but do not capture every possible exception. Dashed lines indicate steps that are optional. White boxes represent steps that are part of the plan approval process, while blue boxes indicate steps that are part of building permitting.

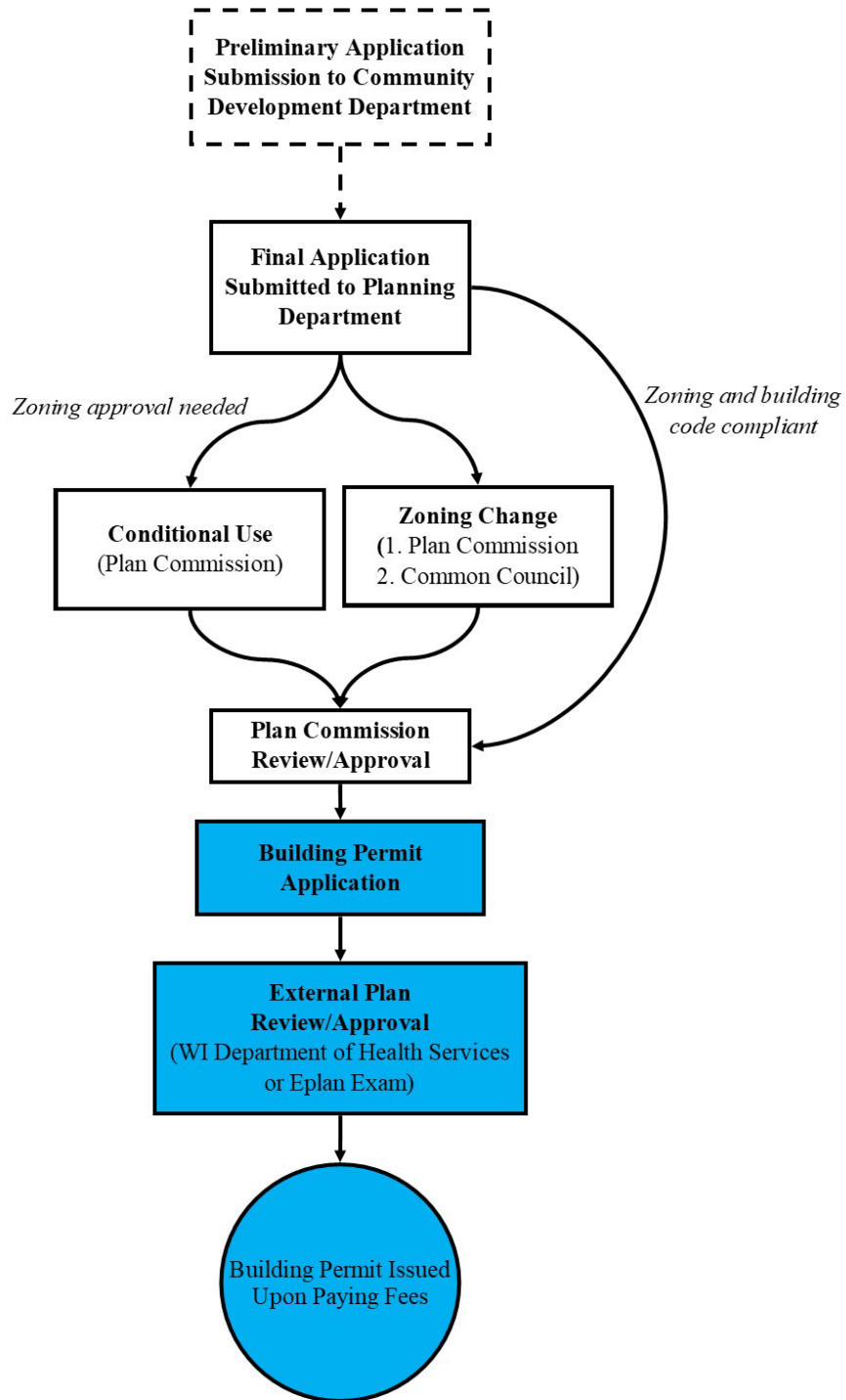
City of Brookfield



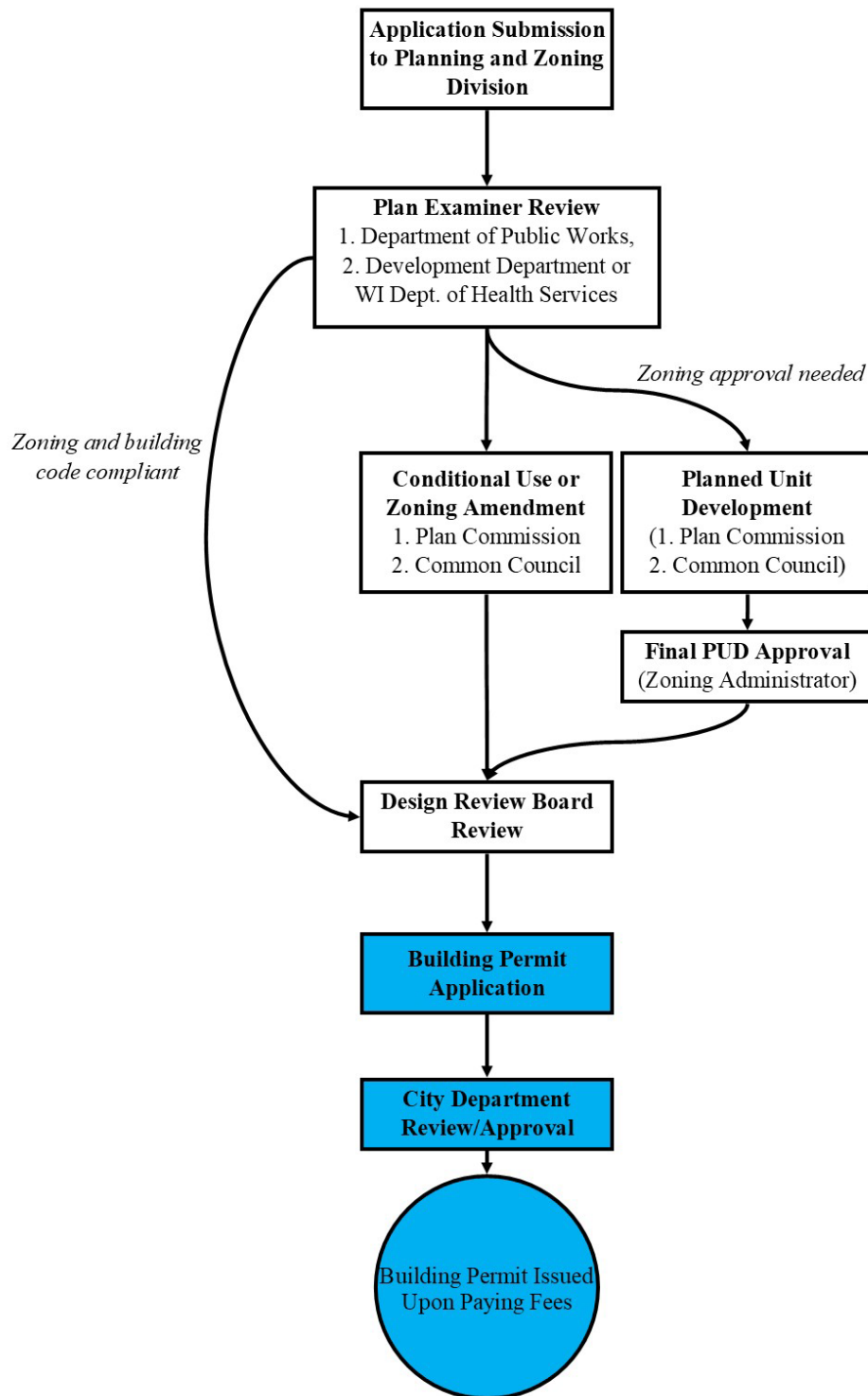
City of Oak Creek



City of Waukesha



City of Wauwatosa



City of West Allis

