

Written Submission on Bill 17 – *Protect Ontario by Building Faster and Smarter Act, 2025*

Dear Committee Members,

On behalf of the Ontario Society of Professional Engineers (OSPE), we appreciate the opportunity to provide feedback on Bill 17, the Protect Ontario by Building Faster and Smarter Act, 2025. As the voice of Ontario's engineering community, OSPE supports initiatives that aim to streamline infrastructure development while upholding safety, sustainability, environmental protection and professional standards.

Areas of Support

1. **Standardization of Building Codes and Materials Approval:**
OSPE supports the move to standardize building codes across municipalities, reducing redundancy and promoting efficiency. Allowing innovative materials and systems, as long as they meet rigorous safety and performance standards, can foster innovation in construction practices.
2. **Streamlining Transit-Oriented Development:**
The emphasis on accelerating transit-oriented communities aligns with sustainable development goals. Facilitating development near transit hubs can reduce reliance on personal vehicles and promote efficient land use, both of which will reduce carbon emissions.
3. **Deferral of Development Charges:**
Allowing deferral of development charges until occupancy can alleviate upfront financial burdens, potentially accelerating project initiation and completion. This will mean that municipalities will need to pay for the upfront infrastructure required for development ahead of being reimbursed through DCs. Essentially, it transfers the cash flow issue from developers to the municipality. Given that municipalities are constrained in their

borrowing by the province, will their debt allowances be relaxed by the province to accommodate these costs? Additionally, deferrals will likely require coordination with lenders and insurers to manage default risks, particularly in large-scale developments. This underscores the need for provincial guidance on financial risk management.

Recommendations

1. **Maintain Municipal Flexibility for Higher Environmental Standards**
While harmonization can create consistency, Bill 17 currently limits municipalities from implementing requirements beyond the Ontario Building Code. This could inadvertently restrict local climate action.

We recommend:

- Amending the legislation to explicitly allow municipalities to adopt higher green building and energy efficiency standards (e.g., Tier 2 or 3 of Toronto's Green Standard, passive house, net-zero ready).
 - Creating a provincial framework for municipally-led innovation zones where higher performance metrics may be piloted.
 - Ensuring local watershed and stormwater requirements remain enforceable to protect ecological health in rapidly urbanizing areas.
2. **Enhance Transparency and Oversight of Minister's Zoning Orders (MZOs)**
Expanding MZOs without clear oversight risks undermining public trust and environmental safeguards.

We recommend:

- Requiring an adequate public consultation period and planning rationale to accompany all MZOs prior to issuance.
 - Mandating a technical review by an independent engineering or planning panel when an MZO affects sensitive lands or alters development density near critical infrastructure.
 - Publishing an annual MZO summary report with details on rationale, location, and community input status.
3. **Support for Mid-Rise and Infill Housing Types**
Bill 17 largely focuses on large-scale, greenfield and transit-oriented development. However, mid-rise, gentle density, and missing middle housing options are critical to meeting affordability and densification goals in established neighborhoods.

We recommend:

- Introducing provincial design templates and pre-approved typologies for mid-rise and laneway housing to help speed up approvals, while allowing municipalities the flexibility to opt in or adapt these tools to local planning objectives.
- Funding municipalities to update zoning by-laws that allow as-of-right permissions for mid-rise and infill housing, especially near existing schools, parks, and utilities. Clarification is needed on what 'as-of-right' means specifically whether it refers to eliminating the need for public hearings or additional rezoning processes.
- Offering development charge (DC) discounts or tax incentives for projects that include affordable housing units within mid-rise and infill developments, where infrastructure capacity exists. In cases where additional development places strain on existing infrastructure, DCs should be applied appropriately. Flexibility should be maintained so that municipalities can assess and apply discounts where feasible without compromising infrastructure funding.

General Comments:

1. OSPE recommends the adoption of public utility models for water and wastewater (w&ww) services, which can improve service delivery, cost-efficiency, and long-term asset management through centralized planning and professional oversight.
2. How this act is implemented and the impacts will depend significantly on the composition and approach of the various review boards and committees noted. OSPE recommends that these bodies be made as independent as possible and not comprised solely of political appointees.
3. Bill 17 overlooks core barriers to housing—such as outdated zoning restrictions that prevent mid-rise development in serviced low-rise neighborhoods—while simultaneously undercutting municipal tools that support efficient construction and green building standards. We support targeted incentives for infill and multiplex housing rather than blanket changes that may benefit inefficient development patterns.

Conclusion

Ontario engineers play a central role in ensuring that development is efficient, resilient, and aligned with long-term public interest. OSPE supports the intent behind Bill 17 but urges the Committee to consider these refinements to ensure

sustainability, transparency, environmental protection and technical soundness remain central to Ontario's development framework.

Thank you for considering my submission. I would welcome the opportunity to appear before the Committee to provide further input on this matter.