

## **ERO 025-0462 Submission: Concerns Regarding Bill 17 and the Impact on Public Consultation and Appeals**

We are writing to express significant concerns regarding Bill 17 and its proposed changes to the Planning Act and City of Toronto Act, 2006. Specifically, we are concerned about the limitation of public consultation and the restriction of opportunities for appeals in the planning and development processes. These changes have the potential to undermine local democratic participation and reduce transparency in how development projects are assessed and approved.

### **1. Bill 17 and the Reduction of Public Consultation**

Bill 17 proposes changes that would limit the studies and reports required for planning applications. By restricting municipalities' ability to request key studies such as those addressing wind, lighting, shadowing, and urban design - this bill would significantly reduce the information available to the public. This, in turn, limits their ability to fully understand and respond to development proposals that could impact their communities, environment, and quality of life.

Furthermore, the proposed narrowing of application requirements could lead to fewer opportunities for meaningful public engagement. With less information available, municipalities and the public would have fewer tools to assess the potential consequences of new developments. The removal of key studies that assess environmental impact, urban aesthetics, or infrastructure needs could leave local communities with little recourse to raise concerns or adjust plans accordingly.

### **2. The Danger of Bill 5's Potential Use to Silence Public and Municipal Concerns**

In addition to Bill 17's implications, we are concerned about how Bill 5 (2025), if passed, could be used to further silence municipal and public concerns. Bill 5 introduces measures that would streamline approval processes and reduce the scope for public consultation, especially in terms of fast-tracking developments. Combined with Bill 17, Bill 5 could result in less local control and fewer avenues for communities to voice objections or influence decisions that affect them.

Should Bill 5 be approved, municipalities could lose their ability to require important studies or reports, and fast-tracked decisions could be made at the provincial level with limited public input. This centralization of decision-making could effectively limit the public's ability to challenge projects through the appeal process or by requesting additional assessments. These measures could bypass essential community oversight and democratic participation, undermining the public's role in shaping their own neighborhoods and communities.

### **3. The Need for a Balanced Approach to Development**

While streamlining approval processes and accelerating development may be seen as a quick fix to housing and infrastructure needs, it is crucial that public participation and environmental oversight are not sacrificed in the process. Communities must have the ability to raise concerns, ask questions, and challenge development proposals that could negatively affect their environment, infrastructure, or way of life.

The right to appeal and the ability to request important studies are fundamental to ensuring that development happens in a responsible and sustainable manner, taking into account the needs and voices of local communities. The current proposals risk undermining these rights and could result in poorly planned developments that do not fully account for the long-term impacts on residents or the environment.

The changes proposed in Bill 17 and the potential use of Bill 5 could also have significant long-term implications for future generations. By limiting public consultation, reducing the number of studies required, and centralizing decision-making, the legislation could undermine sustainable development that properly considers long-term environmental, economic, and social impacts.

Future generations, including our present day youth, will be directly impacted by poorly planned developments that don't adequately account for the needs of the community, the environment, and future growth. For instance:

- Environmental considerations: Reducing the scope of required studies could result in projects that harm local ecosystems or overlook the importance of preserving green spaces, which are critical for combating climate change and maintaining quality of life.
  - Bill 17 gives the Minister new powers to regulate what studies and materials can or cannot be required as part of a “complete application” for development proposals.
  - If a municipality's Green Standards (such as requirements for energy efficiency, tree planting, green roofs, or stormwater management) depend on studies or design elements being submitted during the planning process, the Minister could exclude those from the list of allowed requirements.
  - That means municipalities might no longer be able to enforce their own environmental or sustainability standards unless they are explicitly permitted under the Minister's regulations or official plan.
- Community well-being: Future generations will inherit communities shaped by today's decisions. If local voices are not heard, the urban environment may not reflect the needs and aspirations of residents, leading to less livable, sustainable spaces.
- Climate resilience: The reduced ability to assess and address environmental impacts could undermine efforts to adapt to climate change and limit opportunities to build resilient, sustainable infrastructure that benefits all Ontarians for decades.

In short, Bill 17 gives the province the power to override local green building standards, weakening municipal control over climate-conscious development - especially if the provincial priorities do not align with local environmental goals.

If these legislative changes proceed without adequate safeguards for community input and environmental protection, future generations may inherit poorly planned developments that lack sustainability. Climate Action Newmarket Aurora urges the government to reconsider **Bill 17's** limitations on public consultation and the ability to request key studies. Additionally, **Bill 5** should not be used to silence public and municipal voices.

The decisions made today will shape Ontario's future, especially for our youth who will live with the outcomes. Ontario's development policies should balance efficiency with transparency, community involvement, and environmental sustainability. Only by including all voices in decision-making can we ensure development benefits all Ontarians, now and in the future.

## **Recommendations**

**Streamline the Application Process with Safeguards:** Retain efforts to speed up the planning application process while ensuring public consultation and environmental assessments remain integral to decision-making.

**Clear, Predictable Guidelines:** Maintain consistent, transparent guidelines for developers across municipalities, ensuring that developments align with local needs and community values. Where appropriate, processes and forms should be standardized across municipalities by sharing best practices.

**Support for Affordable Housing:** Continue to make it easier to build additional residential units and expand housing options, focusing on affordability for younger generations, while ensuring developments are environmentally responsible.

**Clear, Predictable Guidelines:** Maintain consistent, transparent guidelines for developers across municipalities, ensuring that developments align with local needs and community values. Where appropriate, processes and forms should be standardized across municipalities by sharing best practices.