

Hon. Rob Flack  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, Ontario, M7A 2J3



June 11, 2025

Re: Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025  
Proposed Amendments to the Planning Act  
ERO Number 025-0461

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Dear Minister Flack:

Thank you for the opportunity to comment on the proposed Protect Ontario by Building Faster and Smarter Act, 2025 (Bill 17).

Please find below for the Province's consideration the Township of Oro-Medonte's concerns regarding the proposed amendments to the Planning Act and its regulations. A detailed version of the Township's comments and concerns related to Bill 17 is contained in Staff Report DS2025-052 (copy attached), as adopted by the Council of the Township of Oro-Medonte on June 4, 2025.

**Concerns:**

1. **Required information and materials for a complete application, by a professional** – Clarification on the proposed changes related to the acceptance of professional information is needed, and more specifically if said changes are intended to impact the ability for the Township to peer review the information submitted by an authorized person. Without this confirmation, the proposed change comes with municipal concerns surrounding accountability and quality of submissions. The Township has standards that are to be upheld in order to ensure seamless integration with existing infrastructure, ensure safety, protect the environment and surrounding lands/properties, and reduce the opportunity for significant future burden (financial, liability, etc.) to the municipality. If it is the province's intent to accept qualifying professional studies, without or with limited peer review, will the authorized person be required to hold more robust insurance and/or are there opportunities for indemnification?
2. **Required information and materials for a complete application, proposed regulation** – In addition to the comments noted above related to required information and materials for a complete application, the following is noted:
  - Municipalities across Ontario are vastly diverse (i.e. urban vs. rural, etc.) and identifying a single standard and prescribed list for the studies that can or cannot be required may not accurately represent geographic diversity.

- Environmental and natural resource protection should remain a priority, and any prescribed list in the regulation should not limit items of this nature.
  - In likeness to environmental studies, agricultural related studies should continue to be an eligible requirement to ensure the protection of the land use.
  - Archaeological and cultural heritage reports should continue to be included on the list of studies that a municipality may require to ensure preservation of cultural heritage resources and mitigate the impacts of development on these resources.
  - Engineering studies and plans are crucial to ensuring compatibility with Townships standards and existing infrastructure and need to be included on the list of items that can be required (especially for applications under s. 41).
3. **Minor variances, as of right variations to setbacks** – Although in many situations a 10% decrease to a setback is not going to cause adverse impacts to surrounding land uses, there are instances where it may. The existing Minor Variance process adequately allows municipalities, stakeholders and the public to review a proposal and confirm that a requested variance is appropriate for the site.
- Secondly, understanding that Bill 17 as presented does include transition information, if passed, the regulation should also include clarification surrounding interpretation and implementation to allow for a consistent approach across municipalities. For instance, the province should confirm:
- Could the as-of-right variance be applied to a site-specific zone provision which already allows for reduced setbacks than the parent zone?
  - Could the as-of-right variance be applied to a legal non-conforming setback?
  - Would encroachment provisions be affected or altered by a decreased setback resulting from an as-of-right variance?
4. **Ministers Zoning Order (MZO) conditions** – It is agreed that conditions on MZOs by the Minister could provide beneficial and enhanced oversight and accountability to the process. With that said, outside of the conditions being reasonable in the Minister's opinion, will there be any guidance on what conditions could be imposed? Providing examples of potential conditions may assist municipalities with a further understanding about the goal of this amendment. Additionally, the ERO Posting (No. 25-0461) notes that conditions could also be imposed on municipalities. Clarification on what these conditions could entail would allow municipalities to understand the potential implications (i.e. financial) that this amendment could present.

In conclusion, the Township appreciates the opportunity to provide comments for the Ministry's consideration on the proposed amendments to the Planning Act and Bill 17.

Additional comments will be submitted regarding the Development Charges Act, through the appropriate avenues.

Sincerely,

The Corporation of the Township of Oro-Medonte

A handwritten signature in black ink, reading "Brent Spagnol". The signature is written in a cursive, flowing style.

Brent Spagnol, Director, Development Services  
Township of Oro-Medonte  
[Brent.Spagnol@oro-medonte.ca](mailto:Brent.Spagnol@oro-medonte.ca)

RMS: L11