

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



June 18, 2025

Re: Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025
Proposed Regulations under the Planning Act
ERO Number 025-0462

Dear Minister Flack:

Thank you for the opportunity to comment on the proposed regulation under the Planning Act to regulate complete application requirements (study/report requirements) and submissions from certified professionals.

Please find below for the Province's consideration the Township of Oro-Medonte's concerns regarding the proposed regulation. 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).

In conclusion, the Township appreciates the opportunity to provide comments for the Ministry's consideration on the proposed regulations under the Planning Act.

Sincerely,

The Corporation of the Township of Oro-Medonte



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RMS: L11