



**Via Online Submission**  
**<https://ero.ontario.ca/>**

**June 25, 2025**

Ministry of Municipal Affairs and Housing  
777 Bay St, 17th Fl  
Toronto, ON M7A 2J3

**RE: Comments on Bill 17, Protect Ontario by Building Smarter Act, 2025, and Associated Notices**

**ERO 025-0461 - Proposed Planning Act and City of Toronto Act, 2006 Changes (Schedules 3 and 7 of Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025)**  
**ERO 025-0462 - Proposed Regulation- As-of-right Variations from Setback Requirements**  
**025-0463 - Proposed Regulation- As-of-right Variations from Setback Requirements**

Thank you for the opportunity to comment on the proposed legislative and policy changes proposed by *Bill 17, Protect Ontario by Building Smarter Act, 2025*. The Town of Renfrew is supportive of proposals that have the effect of expediting the construction of housing, simplifying policy and process requirements while ensuring adequate consultation, and reducing the administrative and financial burden on municipalities.

The Town offers the following comments for consideration in finalizing the proposals under Bill 17:

1. Building Code Act:
  - a. The amendments to the Building Code Act clarify that municipalities do not have the ability to enact or enforce their own construction standards. While Renfrew does not currently have these, this would negate any opportunity to enact them in the



future, should Council desire, to address matters such as enhanced accessibility or green building standards.

## 2. Development Charges Act:

- a. Exemption for long-term care homes
  - i. This proposal would reduce/eliminate Development Charge (DC) revenues associated with any future expansion to the Town's long term care homes, or the construction of any new facilities. This would result in significant foregone revenue and adversely impact the Town's financial position.
- b. Provincial definition of capital costs, subject to regulation
  - i. The Town is concerned that this may lead to continued reduction in the scope of eligible capital costs in calculating DCs, leading to reduced DC revenues and adverse impacts to municipalities that do not carry a large DC reserve balance.
- c. Deferral of DC payments to occupancy for residential development
  - i. The Town is concerned that changes to the payment date of residential DCs to shift it to the earlier of the date of occupancy permit or the date the building is first occupied, without interest, will result in additional financing costs for capital projects, increased administrative costs associated with administering securities and occupancies, and potential delays in capital project timing.
- d. Ability for residential and institutional development to pay a DC earlier than a by-law requires.
  - i. The Town is concerned that potentially allowing residential developers to pay DCs before they would otherwise be payable, in order to avoid annual indexing or phase-in increases in the charge, would have the effect of reducing municipal DC revenues and adversely impacting the Town's financial position.
- e. Defining local services in the regulations.
  - i. The Town is generally supportive of consistency in the application of local service definitions, provided that local services are appropriately defined so as to not place undue



burden on DC reserves, or lead to significant increases in the calculation of DC rates.

### 3. Planning Act

- a. Proposed regulation to limit what can be required for a “complete application” for Planning Act applications.
  - i. This may reduce the initial cost and time to prepare the applications, however additional processing time and peer-review costs may result should necessary technical information be missing from more limited applications.
  - ii. The Town is generally not supportive of the requirement for Ministerial approval in order to amend the complete application requirements in an Official Plan, as this reduces local autonomy.
- b. Reports prepared by qualified professionals are considered to meet the requirements of a “complete application”, and are not subject to further review
  - i. While this will expedite approvals, it is likely to result in increased liability associated with designs and recommendations that have not been reviewed for accuracy or robustness. It is very common for information to be missing or incorrect upon initial submission, even when prepared by qualified professionals.
- c. Schools will be permitted as-of-right on all lands zoned for residential purposes – “Community Facility” or other site-specific zoning is not required.
  - i. The Town has no concerns with this proposal.
- d. As-of-right variations to zoning setbacks
  - i. The Town generally has no concerns with this proposal, provided that as-of-right variations do not result in inappropriate encroachments into functionally-necessary setbacks, such as encroachment into a daylight triangle.



**Renfrew**

If you have any questions in respect of the above comments, please contact the undersigned at your convenience.

Yours sincerely,



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