600 Southgate Drive
Guelph ON Canada
N1G 4P6

Tel: +1.519.823.1311

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Ministry of Municipal Affairs and Housing
Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

Re: RWDI Statement on Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025
Proposed Regulation for Complete Application Requirements (ERO #025-0462)

Thank you for the opportunity to provide comments on the proposed changes to the Planning Act regulations as outlined in Environmental Registry on Ontario (ERO) Notice #025-0462.

RWDI are recognized as global experts in climate and performance engineering design, modelling, and consulting with over 50 years' experience in supporting the Ontario public. We regularly support owners, developers, and architects in Ontario to design and build safe, comfortable, healthy, and low-carbon buildings and developments. As such, we support the intent of Bill 17 to modernize and remove barriers in the development approval process in order to increase housing supply, but caution that the sweeping measures proposed could inadvertently lead to the opposite outcome and more critically, potential safety concerns.

Bill 17 enables the exclusion of certain performance and safety studies (i.e. wind, sun/shadow, urban design) and prevents municipalities from passing construction bylaws, which would include green building standards. RWDI understands that a uniform approach to all Ontario municipalities is not practical or warranted but does see risk in removing these studies and guidelines as proposed. This letter expresses our concern related to the proposed removal of two aspects in particular – wind studies and green building standards.

The change suggesting the removal of assessment "related to the potential impacts of a proposed development on wind conditions in surrounding areas" is ill-advised and potentially dangerous. While the proposal states that the changes are expected to have a "neutral impact on the environment", this assertation is misleading and incorrect if it applies to the removal of pedestrian wind studies from planning application requirements. Wind conditions induced by tall buildings can have serious consequences for pedestrian safety and urban livability. There are numerous documented cases—both in Ontario and globally—where high winds around new developments have led to injuries and even, in rare cases, fatalities. Less extreme, but still impactful, are the everyday disruptions wind can cause to patios, sidewalks, parks, and public gathering spaces, reducing the usability and vibrancy of our cities.

Pedestrian-level wind studies, using wind tunnel testing and advanced computational simulations and modeling, have been in practice since the 1960s. They are mature, science-based tools that allow for the identification and mitigation of hazardous wind conditions before buildings are constructed. This proactive approach contributes to safer, more welcoming public environments.

The early involvement of wind engineers in the planning process supports better urban design outcomes and can lead to buildings that are more responsive to their environmental context. This is a standard practice in leading jurisdictions around the world. In fact, many municipalities in Ontario already require wind studies as part of their development approval process and have developed terms of reference that reflect their specific planning goals. These guidelines are based on consistent engineering principles and are well-integrated into municipal planning frameworks.

Green building standards, such as the Toronto Green Standard (TGS), offer an effective method for reducing our GHG emissions from the building sector. By applying a consistent framework that can be incrementally adopted across municipalities, the TGS has been shown to offer a streamlined approach to high-performance design. Abandoning these types of requirements (particularly for urban municipalities) puts at risk our ability to reduce building GHG emissions, and lower energy efficiency targets will lead to higher operational costs (lower affordability) for buildings in the years to come.

It's important to recognize that Ontario's expertise in these planning aspects has gained international recognition. The practices developed by Ontario firms, and adopted by many municipalities, have led to significant global exports, supporting local jobs. Eliminating these practices could hinder their development and weaken Ontario's leadership position, reducing our ability to tackle climate change risks globally.

We strongly urge the Province not to eliminate specific studies or key planning steps such as secondary peer reviews. Instead, we recommend developing a standardized set of Provincial Terms of Reference that address critical areas like pedestrian-level wind and green building standards. The framework could also be tailored by municipality type (e.g., urban vs. rural) and scaled to focus studies and peer reviews on developments with the highest potential impact and risk. This would enhance consistency, streamline application reviews, and ensure these important issues are addressed predictably and efficiently across Ontario. This standard approach would align with existing Provincial practices for other important built environment considerations, such as noise and air quality/odour.

We respectfully urge the Ontario government to reconsider the proposed approach to building faster and smarter. We believe that a uniform Provincial approach, as we have described herein, can successfully achieve the objective of consistency and efficiency for planning and development across the Province, while maintaining the critical aspects of the planning process. Without this, the proposed changes to the complete planning process will have longer term impacts that residents, building owners, and the Province will have to address after construction that will result in higher operational costs and impact on the occupants of the buildings and adjoining properties.

Sincerely,

Aimée Smith, M.Eng., P.Eng.
Principal, Director of Technical Excellence
RWDI – Climate & Performance Engineering
Aimee.Smith@rwdi.com