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Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th floor  
Toronto, Ontario  
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**June 5, 2025**

**Re: ERO 025-0462- Proposed Regulations - Complete Application**

The Region of Waterloo has reviewed the legislative and regulatory changes proposed by Bill 17 (Protect Ontario By Building Faster and Smarter Act) and continues to support the Province of Ontario in its efforts to make it easier and faster to build new homes and infrastructure.

At the Region of Waterloo, we share the Province of Ontario's goals in creating an environment that allows new homes to be built quickly, while also bolstering housing-enabling infrastructure and, most importantly, maintaining affordability for both current and future residents.

The Region has reviewed the proposed Bill 17 and below is a summary of our comments.

We look forward to working together on solutions to help build new housing and to ensure affordability for residents through this review. We continue to partner to build the critical pipes, water and wastewater treatment plants, roads and bridges deeply needed in our rapidly growing community.

As we grow to a community of more than one-million people by 2050, we need to ensure we have the right tools on the path to becoming one-million ready.

Sincerely,

Handwritten signature of Rod Regier in blue ink.

Rod Regier  
Commissioner, Planning,  
Development and Legal  
Services

Handwritten signature of Jennifer Rose in blue ink.

Jennifer Rose  
Commissioner, Engineering  
and Environmental Services

Handwritten signature of Wayne Steffler in blue ink.

Wayne Steffler  
Commissioner, Corporate  
Services and Chief Financial  
Officer

## **Proposed Changes to the Planning Act**

### **Schedule 7 of Bill 17, Protecting Ontario by Building Faster and Smarter Act, 2025**

#### **Simplify and Standardize Study Requirements for Complete Planning Applications:**

**Proposed Change:** Currently, municipalities have the authority to require various studies and reports to support complete development applications. The specific scope, type and number of studies can differ significantly across municipalities to reflect unique local conditions.

If enacted, Bill 17 would amend the Planning Act to prohibit municipalities from requiring new studies or reports beyond those already specified in their official plan (as of May 12, 2025), unless the Ministry of Municipal Affairs and Housing (MMAH) approves the new requirements.

The proposed amendments would also establish new regulation-making authority enabling the Minister of Municipal Affairs and Housing to:

- prescribe a list of topics that municipalities cannot require as part of a complete application;
- identify the only studies that could be required as part of a complete application; and
- require municipalities to accept studies from certified professionals for the purposes of deeming an application complete

**Potential Implications:** The Province is currently proposing to eliminate the following studies as part of complete planning application:

- Sun/Shadow: potential impacts of development shadows;
- Wind: potential impacts on wind conditions;
- Urban Design: urban design aspects of proposed development; and
- Lighting: lighting and lighting levels on the site.

While the removal of these specific studies would not directly impact the Region's service areas, if this regulation is passed as written, municipalities could lose an important

implementation/compliance tool for High Performance Development Standards. Poor urban design can also decrease intensification potential for nearby parcels and therefore be prejudicial to future growth.

The Province is also consulting on which studies municipalities should and should not require as part of a complete application. Depending on the results of this review, the Province could potentially eliminate certain studies currently listed in Schedule C to the Regional Official Plan. Schedule C provides the authority to request certain studies through the submission of a development application.

Although the Region no longer has direct authority to require any studies through the development review process (the Region must now request the Area Municipality to require them), the possible future removal of certain studies could hinder Regional staff's technical review of various development applications. This, in turn, could lead to unintended impacts on the Region's service areas, such as source water protection, transportation planning, transit, water and wastewater services. Since these are critical enablers of intensification, lack of consideration at the planning stage will be detrimental to future growth and affordability.

To ensure that appropriate technical review of development applications continues, the following types of studies should be identified as those that can continue to be required as part of a complete application:

- Transportation Impact Study
- Transit Assessment
- Functional Servicing Report
- Stormwater Management Report
- Noise and Vibration Study related to Regional Roads and Regional Railways
- Land Use Compatibility related to Regional Waste Management and/or Wastewater Treatment facilities
- Hydrologic and Hydrogeological Studies (including Vulnerability Assessments, Chloride Impact Assessments, Salt Management Plans and Source Water Protection Potential Contamination Studies)
- Aeronautical Assessment

In summary, this ensures the future viability and safety of our transportation systems and the availability of safe drinking water, which in turn supports medium term growth and affordability for residents.

## **Proposed Changes to the Building Code Act**

### **Schedule 1 of Bill 17, Protecting Ontario by Building Faster and Smarter Act, 2025**

**Proposed Change:** Currently, while the Building Code Act mandates Provincial standards on building construction, builders are still encountering varying requirements based on project location and municipal preferences.

To foster a more standardized approach across Ontario, the proposed Bill, if passed, would explicitly clarify that municipalities do not have the authority to create or enforce unique construction standards beyond the Provincial Building Code. The intent is to achieve consistency, reduce costs, and streamline permitting processes

**Potential Implications:** Since the Region does not issue building permits, this proposal has no direct implications on the Region's processes. However, by restricting municipalities from setting their own standards beyond the Building Code, the proposed change would threaten existing municipal "Green Development Standards" or "High Performance Development Standards" (HPDS). These standards typically mandate more energy efficient building practices and aim to improve air quality, energy efficiency, waste diversion, water conservation, and other environmental sustainability metrics. Implementing such standards would become entirely voluntary, which could indirectly hinder broader efforts to reduce greenhouse gas emissions. Given rising household energy costs, this will also affect affordability.

More clarity is required from the Province to understand a municipality's ability to influence sustainability characteristics that impact the broader site (i.e. parking lots, tree canopy, EV charging infrastructure, etc.)

