

June 25th, 2025

Re. [ERO- 025-0462](#)

The Ontario Regional Committee of the Canadian Association of Physicians for the Environment (CAPE Ontario) respectfully submits its formal comments on the *Protect Ontario by Building Faster and Smarter Act, 2025*.

CAPE is a non-partisan, physician-led organization with over 36,000 supporters across the country and over 10,000 in Ontario. It plays a unique role at the intersection of health and the environment, bringing a credible, evidence-based perspective delivered by the trusted voices of doctors, other health professionals, and researchers to support community and planetary health and environmental justice.

CAPE notes that *Protect Ontario by Building Faster and Smarter Act* became law after receiving Royal Assent on June 5, 2025, 21 days prior to the deadline for comments through the Environmental Registry of Ontario. Our comments and recommendations are therefore being submitted to inform the implementation of the Act and in any future legislative changes.

As an organization of physicians working in various medical specialties, living and working in Ontario, we have serious concerns about the *Protect Ontario by Building Faster and Smarter Act*. While we support the goal of streamlining the building of housing, we are concerned that provisions in this Act will have a detrimental impact on municipalities' ability to ensure that new housing is healthy, affordable, sustainable, and climate resilient. Housing is an important determinant of health. Municipal by-laws and standards that require new housing to be healthy and energy-efficient are not only economical, but also protect public health. As the climate crisis worsens, our concern is that by undermining municipalities' ability to implement bylaws and standards relating to new buildings, the *Protect Ontario by Building Faster and Smarter Act* will lead to worse public health outcomes than would otherwise be the case.

Our comments focus on provisions in the Act that limit the information that municipalities can collect in the planning process and provisions that are aimed at preventing municipalities from implementing green building standards.

Municipal Planning Responsibilities

The *Protect Ontario by Building Faster and Smarter Act* includes provisions that restrict what information a municipality can require as part of a “complete application” under the *Planning Act*. Specifically, the Act stipulates that sun/shadow studies, wind studies, lighting level information and studies relating to how a proposed development aligns with municipal urban design policies will no longer be required as part of a “complete application.”

As physicians, we are deeply concerned by the elimination of the requirement that these studies be included in development applications. Such studies are important for ensuring the security of buildings, the well-being of residents, and the safety of construction workers - and as climate change worsens, they are more needed than ever. Wind studies are needed to ensure that buildings are more resistant to extreme storms that are increasing as a consequence of climate change. Studies that ensure compliance with urban design guidelines are needed to address such critical issues as flood protection, air quality, and protections from the impacts of urban heat. With climate change increasingly threatening the security of buildings - and their residents - eliminating the requirement for these studies in development applications puts the health and well-being of Ontarians at risk. It unfairly prioritizes short-term cost-savings for developers over long-term costs to the public - including costs to insurance, health care, and productivity.

The government should be supporting the development of buildings that are more, rather than less, vulnerable to the impacts of climate change. Economically speaking, the cheapest house is the one you only have to build once.

We are also deeply troubled by the provision that mandates automatic acceptance of development submissions from “prescribed professionals.” This provision authorizes consultants hired by developers, rather than independent professionals, to judge whether proposals are in compliance. Transferring this authority to such consultants further undermines municipalities’ ability to protect public health and safety. It also creates potential conflicts of interest. Oversight of development submissions by independent professionals who are accountable to the public is critical and must be restored.

Green Development Standards

Our second area of concern relates to the provisions in the Act aimed at preventing municipalities from implementing or maintaining green development standards. These standards are critical to improving buildings' resilience to climate impacts, protecting residents from pollution and other environmental health threats, and driving down the emissions causing climate change. By seeking to override municipalities' authority to require adherence to green building standards, the Act threatens to undermine municipal climate mitigation and adaptation efforts and, with them, measures that protect public health and safety.

Green building standards are fundamentally important to the health and well-being of Ontarians. For instance, requirements for stormwater retention features that reduce flood risk, minimum tree canopy coverage to combat extreme heat, and the use of green and cool paving to minimize the urban heat island effect, promote climate resilience by protecting residents from the impacts of climate extremes. Provisions relating to energy efficiency, insulation and air tightness, will reduce residents' personal utility bills and overall energy demand.

Green development standards are also critical to municipalities' efforts to reduce carbon pollution and reach their climate targets. Buildings are the single largest source of carbon emissions in many jurisdictions across Ontario including Toronto and Mississauga, arising particularly from use of methane gas (so-called "natural" gas) for heating and cooking. In Toronto, the built infrastructure alone contributes the majority, 56%, of all emissions. These emissions are fuelling the climate crisis recognized today as the single greatest human health crisis of our time. Reversing vetted, updated and approved green development standards through the *Protect Ontario by Building Faster and Smarter Act* is not in the public interest of Ontarians and is not acceptable.

Meanwhile, green standards relating to the prevention of mold, improving ventilation and using less toxic building materials will improve indoor air quality, reduce the incidence of allergies, asthma and other respiratory diseases, and limit exposure to toxins. This, in turn, will reduce the burden on our healthcare system while improving the lives of Ontarians.

Recommendations

In CAPE's assessment, by limiting the information that municipalities can require in development applications, mandating the automatic acceptance of development submissions from "prescribed professionals," and by seeking to override municipalities' authority to implement green building standards, the *Protect Ontario by Building Faster and Smarter Act* threatens, in fact, to undo measures aimed at protecting Ontarians.

CAPE therefore calls upon the Ontario Government to add amending legislation that will:

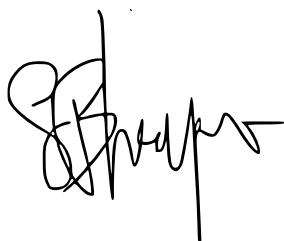
- Reverse the decision to restrict what information a municipality can require as part of a "complete application"
- Restore oversight of development submissions to independent and appropriately trained professionals who are accountable to the public
- Allow municipalities to retain their authority to advance mandatory green standards

CAPE further calls upon the Ontario government to ensure that any legislation relating to housing, building and development in Ontario be in compliance with:

- Ontario's Environmental Bill of Rights
- Planning Act Requirements for municipalities to protect ecosystems and public health and safety

At a time when the health of Ontarians is being threatened by escalating climate change, CAPE calls upon the government to do more, not less, to advance the building of housing that will protect the health and well-being of Ontarians.

Respectfully,



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on behalf of CAPE Ontario
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