



ONTARIO REAL ESTATE ASSOCIATION

15 Kern Road, Toronto, ON, M3B 1S9

June 26, 2025

Hon. Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th
Toronto, ON M7A 2J3

RE: ERO #025-0462 *Bill 17: Protect Ontario by Building Faster and Smarter Act, 2025*
– *Proposed Regulations - Complete Application*

Dear Minister Flack,

On behalf of the Ontario Real Estate Association (OREA), we would like to thank you and your Ministry for your commitment to support housing development through regulatory changes to Bill 17, the *Protect Ontario by Building Faster and Smarter Act*. These additions will strengthen Ontario's ability to build new homes and critical infrastructure.

OREA commends the province's work to hasten housing construction and views Bill 17 as a positive step towards managing red tape on zoning and infrastructure requirements in the housing sector. The proposed regulatory changes will accelerate housing starts by limiting the prerequisites needed for submitting development proposals.

Far too often, municipal bylaws contradict the *Ontario Building Code*, making it difficult for developers to obtain approval for housing construction. As OREA discussed in our 2025 report *Building More, Building Faster*, inconsistent and unpredictable standards across different municipalities can quickly prevent new kinds of housing supply from scaling up. Inconsistent planning requirements such as the vastly different requirements for setbacks on detached homes between cities slows housing development.

One of the main roadblocks to scaling factory-built home manufacturing in Ontario is a lack of consistent standards across Ontario's 444 municipalities – though this challenge is not unique to factory-built construction methods. Variances from municipality to municipality have long challenged Ontario's ability to build “missing middle” housing, as noted in the aforementioned report.

By clarifying the requirements for a complete planning application, Bill 17 will promote new housing growth, especially through the amendment to remove urban design as a required topic for a complete planning application. The misconception that factory-built homes are lower quality than traditionally built homes can stifle factory-built development projects, prompting a need for the kind of pro-housing legislation found in this amendment.

Ontario's nearly 100,000 REALTORS® strongly support reducing the regulatory burdens that slow down housing construction. As a next step, OREA recommends that the Ontario government take further action to harmonize streamlined planning tools and processes across the province. Each municipality interprets the *Ontario*

Building Code differently and has their own zoning bylaws in place. As a result, developers and architects are starting from scratch each time they manufacture a home in a new jurisdiction.

To help directly address this issue – and its increased impact on Ontario's budding factory-built home industry – the Government of Ontario could create a Vendor of Record list of approved factory-built home manufacturers, exempting any factory-built home under 1,500 square feet built by one of these vendors from governmental approvals. This would help encourage municipalities to look at any bylaws that may be similarly restricting traditional developments, while also providing room for factory-based manufacturing to grow and scale their operations.

Thank you for the opportunity to participate in the consultation process. Ontario will open the door for future housing projects by amending Bill 17 to facilitate a streamlined planning process. We applaud the government's efforts to accelerate housing development and look forward to continuing to work with you and your team.

Submitted on behalf of the Ontario Real Estate Association

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