



**Ministry of Municipal Affairs and Housing**

17th Floor  
777 Bay St.  
Toronto, ON M7A 2J3

**Re: ERO Posting 025-0461 – Protect Ontario by Building Faster and Smarter Act, 2025 (Bill 17)**

Dear Minister Flack,

I'm writing on behalf of the Save the Oak Ridges Moraine (STORM) Coalition to express our deep concern regarding the proposed *Protect Ontario by Building Faster and Smarter Act, 2025* (Bill 17), posted under ERO notice 025-0461.

Of particular concern are proposed new subsections 17(21.1) and 17(21.2) of the *Planning Act*, which would require municipalities to obtain ministerial approval before making certain amendments to their official plans, and amendments to Section 47, whereby the Minister is permitted to impose conditions on use, erection, and location of buildings.

While the stated intention of these changes may be to ensure greater provincial oversight, we are concerned that they will be leveraged by municipalities and the province alike to circumvent Ontario's environmental protection frameworks, namely the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan (ORMCP).

This is not a hypothetical risk. In Whitchurch-Stouffville, Council has already approved Staff Report DS-021-25, which explicitly seeks sweeping changes to how development is permitted within some of the most sensitive and highly protected areas of the Oak Ridges Moraine and Greenbelt. The report asks the province to consider immediate revisions to the Town's official plan that would allow development forms currently prohibited under the ORMCP and Greenbelt Plan, and potentially fast-track approvals through mechanisms introduced in Bill 17 and prior to the formal review of these policies during the 10-year consolidated review.

**Celebrating 34 years of protecting the Oak Ridges Moraine. One kame at a time!**  
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We fear that Whitchurch-Stouffville is a test case, and that municipalities across the province will soon follow suit. Without clear legal guardrails, Bill 17 could enable a piecemeal dismantling of conservation protections, with each of the 32 municipalities across the ORM attempting to solicit the province for changes and exceptions to these environmental protections as they exist in their own official plans.

We urge the Ministry to amend Bill 17 to ensure that:

1. All planning decisions remain consistent with and do not override the Greenbelt Plan, ORMCP, or other provincial environmental plans.
2. Ministerial exemptions from provincial policy tests are disallowed or tightly restricted, and are subject to public consultation and review.
3. Municipal official plan amendments triggered under Bill 17 cannot be used to bypass required environmental assessments or the 10-year consolidated review cycle.

Ontarians expect and deserve a planning system that builds housing responsibly, with respect for natural heritage, water protection, agricultural lands, and the public trust. We strongly urge you to withdraw or substantially revise these provisions to protect the ORM and stand by the provincial government's promise to uphold the Greenbelt protections.

Sincerely,

**Robert Brown**

Co-Chair, STORM Coalition

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