

June 24, 2025

To Whom It May Concern,

The City of Brampton appreciates the opportunity to provide comments on the legislative changes introduced through **Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025**, and associated regulatory postings on the Environmental Registry of Ontario.

While the City strongly supports the Province's goal to increase housing supply, we remain concerned that several provisions within Bill 17—particularly those related to as-of-right planning permissions, mandatory acceptance of certified professional reports, and further limitations on development charge collection—may significantly hinder the City's ability to deliver complete, sustainable communities and housing infrastructure in a fiscally responsible manner.

Brampton has made notable progress towards its provincial housing pledge, with over 65% of its housing target already achieved between January 2023 and March 2025. This success has been rooted in context-sensitive planning, community engagement, and responsible infrastructure investment. However, Bill 17's "one-size-fits-all" approach risks undermining these principles by reducing municipal autonomy in planning and zoning decisions and shifting infrastructure costs away from developers to existing taxpayers.

Key Concerns:

- The **elimination of municipal review for certified professional reports** reduces the City's ability to evaluate application quality and safeguard local conditions, risking poor outcomes and increased post-approval costs.
- The proposed **prohibition of critical planning studies**—such as sun/shadow, wind, urban design, and lighting assessments—will diminish the City's ability to uphold public health, safety, and urban design standards.
- **As-of-right setback variations**, while potentially streamlining approvals, raise serious concerns around privacy, drainage, safety, and enforcement. These changes diminish the role of local oversight and erode neighbourhood character.
- Amendments to the **Development Charges Act**, particularly the deferral of collections and new exemptions, are expected to reduce Brampton's cash flow by \$84M–\$112M in Year 1 alone. These changes jeopardize infrastructure delivery and introduce up to \$2.9M in annual financial pressures.

The City is also concerned that application-based infrastructure funding streams introduced to date—while appreciated—lack the scale, predictability, and scope required to fully offset these financial impacts or to support vital community infrastructure like fire stations and community centres.

We urge the Province to:

- Consult further with municipalities prior to the finalization of all regulatory changes;
- Restore municipal discretion to determine when technical studies and local review processes are needed;
- Exempt sensitive areas, as defined by municipalities, from as-of-right permissions;

- Provide **direct, sustainable, and predictable funding tools** to municipalities to offset DC revenue losses and support infrastructure delivery.

The City of Brampton thanks the Province for the opportunity to submit comments. We respectfully request that municipal expertise, autonomy, and partnership be meaningfully incorporated into the implementation of Bill 17 to ensure that growth is not only faster, but also smarter and more equitable for all Ontarians.

Sincerely,



Steve Ganesh, MCIP, RPP
Commissioner, Planning, Building and Growth Management
City of Brampton