



Regional Development Review
Development Services
Public Works
Halton Region
1151 Bronte Road
Oakville, ON L6M 3L1

June 11, 2025

Via ERO and Regulatory Registry Websites and Email

RE: Halton Region – Regional Development Review Submission in Response to Environmental Registry of Ontario (ERO) and Regulatory Registry (RR) Postings Related to Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025

Thank you for the opportunity to provide input with respect to the proposed changes presented in Bill 17, *Protect Ontario by Building Faster and Smarter Act, 2025*. Halton Region (the “Region”) welcomes the opportunity to participate in the Government of Ontario’s (the “Province”) request for comment on this initiative. The Region supports the objectives of the Province to advance growth, build housing and to build a stronger, more resilient economy. On June 5, 2025, Bill 17 received Royal Assent. The Region is proceeding with its comment submission as we are actively seeking to be engaged in any consultation related to Regional interests as described below. The Region is commenting in support of local growth objectives as a provider of essential services to the City of Burlington and the Towns of Halton Hills, Milton and Oakville.

As you are aware, as of July 1, 2024, Halton Region’s role in land use planning and development matters has changed. The Region is no longer responsible for the Regional Official Plan as this has become the responsibility of Halton’s four local municipalities. As a result of this change, a Memorandum of Understanding (MOU) between the municipalities and Conservation Authorities was signed that identifies the local municipality as the primary authority on matters of land use planning and development. The MOU also defines the continued scope of interests for the Region and the Conservation Authorities in these matters.

Regional Municipality of Halton

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As outlined in the MOU, the Region has an interest in supporting our local municipal partners by providing review and comments on a scope of interests that include:

- Water and Wastewater Infrastructure;
- Regional Transportation Systems including stormwater management infrastructure and acoustic mitigation on Regional rights-of-way;
- Waste Collection;
- Affordable and Assisted Housing;
- Responsibilities associated with a specific mandate prescribed by legislation (e.g. source water protection, public health); and
- Other Regional services that have a land component.

The MOU ensures that as planning and regulatory systems continue to evolve, the relationship between the Region and the municipalities is well-understood, seamless, and integrated. It is intended to work in tandem with the Province's legislative and planning policy framework.

The Region has reviewed the Environmental Registry of Ontario and Regulatory Registry postings associated with Bill 17 as they relate to our mandate. We note that many of the proposed changes of Bill 17 will depend on information to come through regulations to assess the impact. The potential modifications could have an impact on the Region's ability to deliver infrastructure needed for growth. Regional staff will continue to review the information as more becomes available.

Many of the proposed changes require further information to understand their full impact and to ensure they do not result in unintended consequences. For instance:

- Provincial transit projects: Expanding the range of projects requiring permits to be obtained for any work within a certain distance of a project eligible under the Building Transit Faster Act (BTFA) may lead to the Region being subject to more regulatory requirements for its own projects;
- Complete application: studies required by the Region to properly plan for and implement Regional infrastructure and services to support Provincial and local growth pledges should remain on the list of reports or studies required as part of a complete application;
- As-of-right variations: setback requirements may be based on recommendations from technical studies and an as-of-right reduction may not be appropriate. They may affect the Region's ability to provide and assess the impacts to municipal water and wastewater servicing, Regional transportation networks, waste management, and source water protection;
- Transit-Oriented Communities: The Region currently has one Transit-Oriented Community (TOC) and further information on what agreements would be subject to removal of Order-in-Council (OIC) approval would assist in understanding the impacts of this change;

- Information sharing: The Region supports opportunities to strengthen collaboration and information exchange between agencies to support provincially funded infrastructure projects. It would be beneficial to understand the scope of information and data contemplated to be able to identify streamlining opportunities for the collection and exchange of information.

This letter and the attachment on the following Environmental Registry of Ontario and Regulatory Registry postings represent the Region's comments. The Region is also providing preliminary comments to the Technical Briefing dated May 12, 2025.

Environmental Registry of Ontario (ERO) Postings	
Number	Name
025-0450	Bill 17: Protect Ontario by Building Faster and Smarter Act, 2025 – Amendment to the Building Transit Faster Act, 2020
025-0461	Proposed Planning Act and City of Toronto Act, 2006 Changes (Schedules 3 and 7 of Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025)
025-0462	Proposed Regulations – Complete Application
025-0463	Proposed Regulation – As-of-right Variations from Setback Requirements
025-0504	Bill 17: Protect Ontario by Building Faster and Smarter Act, 2025 – Accelerating Delivery of Transit-Oriented Communities
Regulatory Registry (RR) Postings	
Number	Name
25-MTO005	Amending the Building Transit Faster Act, 2020 to expand the definition of Priority Transit Projects to all Provincial Transit Projects
25-MOI003	Protect Ontario by Building Faster and Smarter Act, 2025 amendments to the Ministry of Infrastructure Act, 2011
25-MTO006	Amending the Metrolinx Act, 2006
Technical Briefing	
Protect Ontario by Building Faster and Smarter Act, 2025	

The Region would be pleased to arrange a meeting to discuss any aspect of our submission at your convenience.

Sincerely,



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Cc: Jamie Tellier, Director of Community Planning, City of Burlington
Cc: Bronwyn Parker, Director of Planning Policy, Town of Halton Hills
Cc: David Twigg, Director, Planning Policy & Urban Design, Town of Milton
Cc: Gabe Charles, Director of Planning & Development, Town of Oakville
Cc: Lee Ann Jones, Commissioner of Public Works, Halton Region

**CONSOLIDATED COMMENT CHART – ENVIRONMENTAL REGISTRY OF ONTARIO (ERO) AND REGULATORY REGISTRY (RR)
POSTINGS RELATED TO BILL 17, PROTECT ONTARIO BY BUILDING FASTER AND SMARTER ACT, 2025**

Posting / Name	Description of Proposed Change from ERO / RR Posting	Halton Region Comments
ERO: 025-0450 Bill 17: Protect Ontario by Building Faster and Smarter Act, 2025 – Amendment to the Building Transit Faster Act, 2020	Proposal Summary The proposed amendment adds a new definition of “provincial transit project” to the Building Transit Faster Act, 2020 (BTFA), meaning a “transit project that Metrolinx has authority to carry out.” The definition will continue to encompass projects that were previously defined as priority transit projects. This amendment, if passed, will expand the application of the BTFA to all provincial transit projects without having to name them in the Act or prescribe them via regulatory amendments. Upon Royal Assent, Metrolinx would have immediate access to two of the BTFA measures: <i>Utility Company Coordination and Municipal Service and Right-of-Way Access</i> for all provincial transit projects. The remaining three measures, <i>Corridor Development Permits, Entering Lands, and Land Assembly</i> , will be available to Metrolinx upon designation of transit corridor lands via Order in Council (OIC).	<p>With the Royal Assent of Bill 17, these amendments are now in force.</p> <p>In so far as the BTFA requires permits to be obtained for any work within a certain distance of an applicable project under the legislation, expanding the range of projects eligible under the Act may mean that the Region may be subject to more regulatory requirements for its own projects.</p> <p>The BTFA also enables access to land for certain purposes (vegetation removal, due diligence work, addressing imminent dangers), access to municipal rights of way, entering land for the purpose of stop-work order or enforcing a permit.</p> <p>As the revised legislation expands the types of projects that can be advanced under the legislation, there may be a greater number of projects where this legislation applies in Halton Region. The Region looks forward to working in a co-operative manner to realize Provincial transit projects in Halton.</p>
ERO: 025-0461 Proposed Planning Act and City of Toronto Act, 2006 Changes (Schedules 3 and 7 of Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025)	Proposal Summary Schedule 3 and 7 of Bill 17 propose a number of amendments to the Planning Act and City of Toronto Act, 2006. This includes initiatives to: <ul style="list-style-type: none"> • increase certainty throughout the development approvals process; • streamline processes further to help reduce barriers, and; 	<p>With the Royal Assent of Bill 17, the regulation-making authority related to minor variance exemptions and study requirements is now in force. Further, the enhanced MZO provisions and zoning prohibitions and site plan exemptions for schools are now in place.</p> <p>In order to appropriately assess the Region's ability to plan for, provide and assess the impacts to municipal water and wastewater servicing, Regional transportation networks, waste management, and source water protection, studies</p>

Posting / Name	Description of Proposed Change from ERO / RR Posting	Halton Region Comments
	<ul style="list-style-type: none"> • reduce development costs <p>If passed, proposed changes would be made to the following:</p> <ul style="list-style-type: none"> • Minor Variances (As of Right Variation from Setback Requirements); • Minister's Zoning Order (Enhanced oversight); • Study Requirements (Complete Application) and Certified Professionals; • Streamline Planning Approval for Schools. <p>Building on previous legislative and regulatory changes, the initiatives are anticipated to further support streamlining land use planning processes.</p>	<p>and plans related to these topic areas currently require scoping, review and validation by Regional staff.</p> <p>The Region requests to be consulted on any proposed Regulations for any proposed categories of prescribed or restricted reports, studies or information. To enable the Region to make sound decisions related to the delivery, maintenance, constructability and operation of Regional infrastructure, we currently engage in scoping, review and revisions to reports, studies, plans and other necessary information, as report quality, even by certified professionals, often varies. We request that studies, plans and information required by the Region to carry out our responsibilities related to delivering infrastructure and services, not be included in any prescribed exemption list under any proposed Regulation. Further, we note that the use of Terms of References aids in streamlining processes by establishing a baseline requirement for content, methodology and assumptions to be used in a report/study.</p> <p>The Region supports the change to allow for the Minister of Municipal Affairs and Housing to impose conditions in relation to a Minister's Zoning Order.</p> <p>The Region does not have any comments in relation to the changes to streamline planning approvals for schools. The Region has a long-standing strong and collaborative working relationship with school boards.</p>
<p>ERO: 025-0462</p> <p>Proposed Regulations – Complete Application</p>	<p>Proposal Summary</p> <p>Schedules 3 and 7 of Bill 17 propose to amend the Planning Act and the City of Toronto Act, 2006 to limit complete application (studies/reports) requirements to what is currently identified in municipal official plans, except where the Ministry of Municipal Affairs and Housing approves the changes.</p>	<p>The Region's comments for ERO: 025-0461 apply.</p> <p>Further, the Region requests participation in any consultation on this matter as there are a number of studies which are necessary for the Region to properly plan for and implement Regional infrastructure and services to support Provincial and local growth pledges. These studies should remain on any list of studies required</p>

Posting / Name	Description of Proposed Change from ERO / RR Posting	Halton Region Comments
	<p>Bill 17, if passed, also includes regulation-making authority that would enable the Minister of Municipal Affairs and Housing to further regulate the reports or studies required as part of a complete application. The changes would enable the Minister, by regulation, to:</p> <ul style="list-style-type: none"> • prescribe a list of subject matters for which studies cannot be required as part of a complete application; • identify the only studies that could be required as part of a complete application; • specify certified professionals from whom municipalities would be required to accept studies. <p>Collectively, the proposed changes would have the effect of reducing the number of studies that make up a complete application when proponents submit development proposals to municipalities.</p> <p>This ERO is seeking input on a specific set of studies that could no longer be required as part of a complete submission (to be set out in the Regulation). Further, it also seeks input on:</p> <ul style="list-style-type: none"> - What topics or studies should be identified as being permitted to be required by municipalities as part of a complete application - Which certified professionals (e.g., professional engineers) should be included in the list of professionals whose reports/studies would be required to be accepted as final submissions by a municipality as part of a complete planning application 	<p>as part of a complete application. These would include (but not be limited to): Phasing Plan, Waste Management Plan, Traffic Impact Study, Noise Impact Study, Functional Servicing Report, Area Servicing Plan, Allocation Assignment Plan, Hydrogeological Study (with a focus on source water protection policies of areas within the Region's Wellhead Protection Areas).</p> <p>The Region's experience with reports/studies and other submission material is that they often need to deal with specific, unique situations that require non-standard solutions and need to address localized geographic situations, by-laws and technical requirements (which flow from local municipal context). These realities would pose a challenge to implementing a Province-wide generalized approach.</p> <p>Further, given that the quality of reports/studies and information can vary (even amongst certified professionals, where some many not have as comprehensive a knowledge of the localized context), and that even the best submission can necessitate some revision, the Region requests to maintain our ability to review and seek revisions to any study, plan or information submitted as part of an application.</p> <p>The Region requests to have input into any list proposed to be included in the Regulations.</p>
<p>ERO: 025-0463</p> <p>Proposed Regulation:</p>	<p>Proposal Summary</p> <p>The government is seeking feedback on potential legislative and regulatory changes to help make it easier and faster to build new homes and infrastructure like transit, roads, and water and wastewater systems as part of the proposed Bill 17, the</p>	<p>While generally not opposed to this principal, the Region cautions that in some instances setback requirements may be based on recommendations from technical studies (such as Regional Road noise impact studies). For such instances an as-of-right reduction may not be appropriate. The Region requests the Province include a provision that</p>

Posting / Name	Description of Proposed Change from ERO / RR Posting	Halton Region Comments
As-of-right Variations from Setback Requirements	<p>proposed Protect Ontario by Building Faster and Smarter Act, 2025 and associated regulations.</p> <p>Schedule 7 of Bill 17 proposes to amend the Planning Act to provide regulation-making authority to reduce planning applications for minor variances. If passed, Bill 17 would enable the Minister, by regulation, to permit variation to a zoning by-law to be “as of right” if a proposal is within a prescribed percentage of the required setback (the minimum distance a building or structure must be from a property line) on specified lands.</p> <p>Specified lands would include parcels of urban residential lands outside of the Greenbelt Area, and exclude areas such as hazardous lands, and lands near shorelines and railways.</p> <p>The proposed changes would work with Ontario Regulation 299/19: Additional Residential Units to help create additional residential units, such as basement suites, by eliminating additional barriers related to setbacks.</p> <p>Proposed Contents of a Regulation under the Planning Act</p> <p>The government is consulting on a proposed regulation that would allow variations to be permitted “as-of-right” if a proposal is within 10% of setback requirements applicable to specified lands. For example, if your local zoning by-law requires a 5 metre front yard setback from the property line, this would effectively reduce the setback to 4.5 metres and you would be allowed to build .5 metre (half of a metre) into that 5 metre setback as-of-right, without a minor variance or zoning by-law amendment.</p> <p>This would mean that there would be fewer applications submitted and fewer hearings for minor variances before a municipal committee of adjustment for these proposals.</p>	<p>setbacks established to implement recommendations of a technical study are not subject to the exemption.</p> <p>The Province is also seeking comment on any other zoning regulations where an “as-of-right” variance may be appropriate. The Region would suggest consideration of as-of-right reductions which impact the Region’s ability to plan for, provide and assess the impacts to municipal water and wastewater servicing, Regional transportation networks, waste management, and source water protection be exempt from the provision and would request participation in any additional consultation occurring on this matter.</p>

Posting / Name	Description of Proposed Change from ERO / RR Posting	Halton Region Comments
ERO: 025-0504 Bill 17: Protect Ontario by Building Faster and Smarter Act, 2025 – Accelerating Delivery of Transit-Oriented Communities	Proposal Summary The proposed amendments are intended to streamline the planning and delivery of the Transit Oriented Communities (TOC) program. The definition of a “Transit Oriented Communities project” would be amended to include projects along the GO and LRT network more efficiently. Order-in-Council (OIC) approval requirements for any agreements between the Minister (or an entity with delegated powers) and a municipality would be removed. The Minister would be enabled to delegate certain responsibilities to Infrastructure Ontario for the purpose of developing TOCs.	With the Royal Assent of Bill 17, these amendments are now in force. Currently, Halton Region has only one TOC, and this could potentially lead to an expansion of TOC throughout the Region. Further information on what agreements would be subject to removal of OIC approval would assist in understanding the impacts of this change. To support the implementation of TOC’s, the Region encourages the Province to consider agreements and consultation with Halton Region to ensure the efficient delivery of Regional infrastructure and to ensure Regional interests are addressed.
RR: 25-MTO005 Amending the Building Transit Faster Act, 2020 to expand the definition of Priority Transit Projects to all Provincial Transit Projects	Proposal Summary The legislative amendment will enable Metrolinx to better coordinate with affected sectors and entities to streamline processes that enable building transit faster and more efficiently. The proposed amendment does not negatively impact small businesses or regulated entities. There are no forced measures on regulated entities. The aim of the initiative is to enhance coordination, planning and streamlining of transit delivery processes with stakeholders. The amendment will add a new definition, "provincial transit project," to the BTFA, defined as a "transit project that Metrolinx has authority to carry out." The definition will continue to include projects that were previously defined as "priority transit projects" under the Act. The amendment will expand the applicability of the BTFA to all provincial transit projects and help expedite provincial projects to increase connectivity to new neighbourhoods, reduce gridlock and emissions, and generate	The Region’s comments for ERO: 025-0450 apply: In so far as the BTFA requires permits to be obtained for any work within a certain distance of an applicable project under the legislation, expanding the range of projects eligible under the Act may mean that the Region may be subject to more regulatory requirements for its own projects.

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	significant economic benefits at local, regional and provincial levels.	
RR: 25-MTO006 Amending the Metrolinx Act, 2006	Proposal Summary The proposed amendment permits the Minister of Transportation to request certain information and data from municipalities or municipal agencies necessary to support the development of provincial transit projects or Transit-Oriented Communities projects. If approved, the proposed amendment would contribute to accelerating timelines associated information and data exchange for transit project delivery.	With the Royal Assent of Bill 17, these amendments are now in force. Currently, Halton Region has only one TOC, and this could potentially lead to an expansion of TOC throughout the Region. The Region supports opportunities to strengthen collaboration and information exchange between agencies to support provincially funded infrastructure projects. It would be beneficial to understand the scope of information and data contemplated to be able to identify streamlining opportunities for the collection and exchange of information.
RR: 25-MOI003 Protect Ontario by Building Faster and Smarter Act, 2025 amendments to the Ministry of Infrastructure Act, 2011	Proposal Summary The Ministry of Infrastructure Act, 2011 is proposed to be amended to provide the Minister of Infrastructure with the authority to direct a municipality and/or a municipal agency to provide information or data that may be required to support the development or implementation of a project funded by the provincial government.	With the Royal Assent of Bill 17, these amendments are now in force. The Region supports opportunities to strengthen collaboration and information exchange between agencies to support provincially funded infrastructure projects. It would be beneficial to understand the scope of information and data contemplated to be able to identify streamlining opportunities for the collection and exchange of information.

CONSOLIDATED COMMENT CHART – TECHNICAL BRIEFING: PROTECT ONTARIO BY BUILDING FASTER AND SMART ACT, 2025 (May 12, 2025)

Initiative	Future State	Halton Region Comments
<p>Technical Briefing</p> <p>Page 3</p> <p>Enabling authorities to speed up transportation permitting</p>	<p>Building roads faster</p> <p>Ontario will consult with municipalities and stakeholders to develop a framework that will standardize road building specifications and design across the province. That will speed up construction while reducing costs.</p> <p>Speed up corridor management permits</p> <p>By reviewing MTO's corridor management permitting process Ontario will modernize MTO's corridor management approvals process and accelerate the review and issuance of highway corridor management permits.</p>	<p>The Region will continue to monitor and provide comments on the potential impact to Regional roads, including those which intersect MTO corridors.</p> <p>The Region requests to be included in consultation by the Province.</p>
<p>Page 7</p> <p>Reviewing Corridor Management Permitting Process and Standards</p>	<p>MTO to undertake a review of the current Corridor Management process and standards. The purpose of the review is to confirm that the processes and standards are aligned with government priorities and supporting policies. The Ministry will provide options and recommendations, including on highway corridor setback standards, building and land use permits, encroachment permits and access management permits and a proposed implementation plan by the end of July 2025.</p>	<p>The Region will continue to monitor and provide comments on the potential impact to Regional roads. We look forward to reviewing the proposed implementation plan.</p> <p>The Region requests to be included in consultation by the Province.</p>
<p>Page 7</p> <p>Harmonization of Road Construction Standards</p>	<p>MTO will consult with municipalities and stakeholders by fall 2025 on a framework for greater harmonization and clarified governance of municipal standards, which will lead to cost savings through more efficient design and technical review, greater construction efficiencies, and streamlined procurement processes.</p>	<p>The Region supports opportunities to strengthen collaboration between agencies to support infrastructure projects. We look forward to consulting with MTO on the framework.</p> <p>The Region requests to be included in consultation by the Province.</p>

Initiative	Future State	Halton Region Comments
<p>Page 12</p> <p>Official Plan Population Updates</p>	<p>Undertake targeted outreach to municipalities where additional population growth is projected to surpass previous estimates in their current official plans (OPs). Require those municipalities to update their plans to align with the Ministry of Finance’s October 2024 population forecast, or approved upper tier forecasts, whichever is higher. The updates would be informed by updated provincial growth planning guidance (i.e., Projection Methodology Guideline [PMG]).</p> <p>The PMG is currently undergoing its first update since 1995. The PMG plays a vital role in helping municipalities plan for growth in a manner consistent with provincial priorities.</p> <p>Through this action, municipalities will have updated OPs that reflect current population projections, ensuring better planning for future growth.</p>	<p>The Region and our four local municipalities collaborate on population forecasts (Joint Best Planning Estimates) annually in accordance with our MOU to ensure Regional infrastructure can be planned and to enable the efficient and timely delivery of infrastructure to support growth priorities of our local municipalities. We request the Province includes the Region in any related targeted outreach.</p>
<p>Page 13</p> <p>Streamlining the Development of Communal Water/Sewage Systems and Permissions for Distributed, Modular “Off-Grid” Water Treatment Facilities</p>	<p>Consultations will consider potential approaches to streamline municipal consents for communal water/sewage systems and modular “off-grid” water treatment facilities to support greater adoption, where appropriate and unlock housing supply in underserved rural communities.</p>	<p>Due to recent legislation, Halton’s local municipalities are now responsible for the review, operation and maintenance of private servicing components. The Region will continue to have interests related to private servicing, including the application of source water protection policies within Wellhead Protection Areas. We request the Province includes the Region in any consultation.</p>
<p>Page 13</p> <p>Exploring a Public Utility Model for Water and Wastewater Infrastructure</p>	<p>The province is exploring the use of a public utility model (e.g., establishing a new type of municipal service corporations) for water and wastewater to provide opportunities to enable infrastructure expansion. Targeted changes to the existing municipal services corporation model could include:</p>	<p>The Region is responsible for water and wastewater infrastructure across the local municipalities and will request additional information and review any materials related to the Province exploring the use of a public utility model. The Region requests to be consulted directly on this matter.</p>

Initiative	Future State	Halton Region Comments
	<p>Governance: Appointing a skills-based municipal services corporation board with municipal representation to enable timely and effective decision-making.</p> <p>Financial: Access to favourable financing opportunities for municipal services corporations to pay for water and wastewater investments.</p> <p>Water and wastewater systems would remain publicly-owned.</p>	
<p>Page 15</p> <p>Create regulation-making authority to define a local service</p>	<p>A proposed legislative change would provide the province with regulation-making authority to define local services to assist in standardizing what infrastructure services are captured under municipal local service infrastructure policies compared to infrastructure services captured by DCs.</p> <p>This would help to reduce disputes between developers and municipalities causing delays in housing and other developments proceeding.</p> <p>This proposal was identified by the Association of Municipalities of Ontario and the Ontario Home Builders' Association.</p>	<p>As the authority on infrastructure in the Region, we request to be circulated on any proposed legislative changes to assist in standardizing what infrastructure services are captured under municipal local service infrastructure policies.</p> <p>It is unclear if this amendment would impact the Region's ongoing Integrated Master Plan.</p> <p>The Region will actively seek participation in any working groups formed to establish and clarify the definition of local services.</p>