

June 5, 2025

**SENT VIA EMAIL**

Ministry of Municipal Affairs and Housing  
17<sup>th</sup> Floor  
777 Bay Street  
Toronto, ON M7A 2J3

**Attention: Hon. Rob Flack, Minister of Municipal Affairs and Housing**

**Subject: Bill 17 – Protect Ontario by Building Faster and Smarter Act, 2025  
Township of Essa Comments**

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As a lower-tier government partner in planning for housing, economic and community growth, the Township of Essa acknowledges the importance of Bill 17, *Protect Ontario by Building Faster and Smarter Act, 2025*.

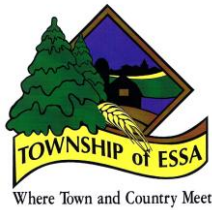
The following comments are specific to those school-specific Bill 17 amendments to the Planning Act as they relate to the Township of Essa and other smaller municipalities that face similar challenges in managing significant growth with limited financial resources, public transit and active transportation infrastructure.

**Listed below are the school-specific proposed Bill 17 amendments to the Planning Act, Township comments, and proposed alternative recommendations for your consideration.**

1. An amendment to Section 16 (Official Plans) and a new section to Section 35.1 (Restrictions for residential units) of the Planning Act would prevent any Official Plan or Zoning By-law from prohibiting *the use of a parcel of urban residential land for an elementary school or secondary school...including the use of a child care centre located in the school*.

Comments:

- If elementary and secondary schools (inclusive of child care centres) are permitted as-of-right in urban residential zones, this change will effectively eliminate the general public's ability to voice objections to having a school in their neighbourhood. And while NIMBYISM is a very real concern to consider, so are on-street parking, peak-hour traffic, road safety, and increased pedestrian traffic caused by the introduction of a school to a neighbourhood where it was not previously permitted through designation or zoning.
- Municipalities would potentially lose the ability to plan well-rounded and functional communities. School Boards may opt for school sites that are more affordable and construction ready, but not the most suitable for a school site. As such, a fully



completed school may have unintended consequences for municipalities and their tax-paying residents (e.g. increased traffic congestion, parking enforcement, and noise complaints).

- This proposed Planning Act amendment/new section seems to favour School Boards over municipalities and residents. And while a reduced timeframe for the development of schools is important, the potential downstream effects (namely traffic congestion, illegal parking, and enforcement issues) fall entirely with neighbouring residents and the approving municipality.

#### **Proposed Alternative:**

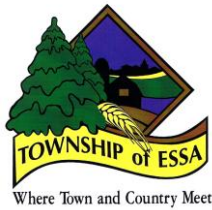
- **An alternative may lie in requiring School Boards to contain peak-hour traffic and parking entirely on-site, and to be responsible for relevant on-site and off-site pedestrian infrastructure upgrades as part of the Site Plan Control process. Additionally, requiring public consultation for school sites in as-of-right residential urban areas may prove prudent with adjacent residents. These issues are likely the major contentions between School Boards and municipalities/residents that currently lead to existing delays in Planning Act application approvals. Resolving these issues are likely to expedite the Planning and development processes considerably, whether within or outside urban residential areas.**
2. An amendment to Section 41 (Site Plan Control Area) of the Planning Act would remove portable classrooms from the definition of “development” under Site Plan Control. While the existing Planning Act provisions exempt portables from Site Plan Control on only those schools in existence since January 1, 2007, the proposed amendment would now apply the exemption to *all* schools.

#### **Comments:**

- The introduction of portables to a school site after a school has been built results in increased lot coverage, increased pedestrian and vehicular traffic, and potential negative drainage issues. To exempt Site Plan Control from a form of site alteration entirely could again have unintended negative consequences for municipalities and residents.

#### **Proposed Alternative:**

- **An alternative intervention may lie in providing a Provincially standardized and expedited Site Plan Control process specifically for portables on existing schools. This process may include mandatory updated applicant submissions for lot coverage and parking calculations, traffic modeling and drainage plans.**



The Township of Essa understands the need to expedite the development of schools. However, we remain concerned about the unintended consequences and long-term negative impacts that municipalities and adjacent residents will face. We believe that a more measured approach that balances the need for expedited school development while simultaneously addressing peak-hour traffic congestion, illegal on-street parking, negative drainage issues, and increased municipal enforcement matters is possible.

Should you have any questions regarding this correspondence, please contact the undersigned.

Yours truly,

A handwritten signature in black ink, appearing to read 'S. Haniff', is positioned above a horizontal line.

Samuel Haniff, MCIP, RPP  
Manager of Planning  
Township of Essa

Cc. MPP Brian Saunderson  
Mayor Sandie Macdonald  
Deputy Mayor Michael Smith  
Councillor Ward 1 – Pieter Kiezebrink  
Councillor Ward 2 – Henry Sander  
Councillor Ward 3 – Liana Maltby  
CAO Michael Mikael