

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

June 26, 2025

To Whom It May Concern,

Re: Proposed Regulations, Complete Application - *Protect Ontario by Building Faster and Smarter Act, 2025*
ERO Number: 025-0462

Please accept this submission as Starlight Investments' feedback on the recently passed *Protecting Ontario by Building Faster and Smarter Act, 2025 (Bill 17)*—specifically regarding the Ontario government's commitment to streamline and simplify the planning application process to address the inconsistency in the scope, type and number of studies required to make up a complete application when proponents submit development proposals to municipalities.

About Starlight

Starlight Investments is an Ontario-based leading global real estate investment and asset management firm with 350+ employees on our team. A privately held owner, developer and asset manager of over 70,000 multi-residential suites – including 39,730 in Ontario – and over 7 million square feet of commercial property space, **we are proud to be Canada's largest rental-housing provider**. At Starlight, we invest with impact – building stronger communities by developing new purpose-built rental housing and investing in the protection of aging infrastructure. We are committed to supporting all levels of government achieve their respective housing commitments and believe together we can increase the supply of safe and attainable housing across Canada.

Submission

Starlight supports the Ontario government's proposed changes to simplify and streamline the planning application process. The Ontario government is seeking feedback on the following:

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?

Recommendation #1: Starlight recommends that all reports stamped and submitted by professional engineers, professional planners, and registered landscape architects should be deemed a complete application. Municipalities would retain the right to review and dispute these submissions but should not be permitted to deem an application incomplete on the basis of additional peer review requirements for professionally certified reports. Engineers, professional planners, and registered landscape architects are bound by strict codes of conduct and liability, ensuring high standards already.

Recommendation #2: For certain disciplines, notably archaeological, wind, and noise studies, we further suggest that these reports, when stamped by a qualified professional engineer, should be accepted without additional peer review. Municipalities often lack in-house expertise for these specialized fields, leading to a reliance on external peer reviewers who may introduce subjectivity and unnecessary revisions to justify their engagement. Our recommendation recognizes the technical proficiency, professional accountability, and stringent professional liability insurance requirements of qualified professional engineers, and this would significantly reduce approval timelines, costs, and risks.



Designating Detail-Oriented Studies for Site Plan Approval Only

Many technical studies, such as noise, wind, and vibration assessments, are required at the Official Plan Amendment (OPA) or Zoning By-law Amendment (ZBA) stage. This early requirement can introduce uncertainty, delay initial project direction, and increase costs. These studies are often more relevant to the detailed design phase and fit better within the site plan approval process.

Recommendation #3: Starlight recommends that detail-oriented technical studies, including noise, wind, and vibration assessments, be designated for **site plan approval only** and not required as part of OPA/ZBA applications. This would allow developers to establish the broad direction and feasibility of a project before incurring costs for detailed technical studies.

Closing

We strongly support the Ontario government's leadership in creating a more consistent and predictable process for planning applications across municipalities. In our view, this will accelerate the building of new homes and infrastructure across the province.

Thank you for the opportunity to provide input. Starlight looks forward to continued collaboration with the province and municipalities to advance housing delivery in a fair, efficient, and partnership-based manner.

Sincerely,



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