



Ministry of Municipal Affairs and Housing Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON, M7A 2J3, Canada
Email: PlanningConsultation@ontario.ca

June 4, 2025

RE: ERO Number 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)

The Township of Puslinch Council at its meeting held on May 28, 2025 directed Township staff to submit comments with respect to 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) and respectfully submits the following comments and concerns with respect to the proposed legislative amendments.

The Township has significant concerns with respect limiting the requirements for supporting studies as a condition for deeming a *Planning Act* application complete, specifically that these limitations may impact the municipalities ability to adequately assess development applications. Supporting studies, such as environmental impact assessments, traffic studies, servicing reports, and others, are fundamental in evaluating the merits and appropriateness of a proposed development. These documents provide the technical basis upon which informed decisions are made and ensure that development proceeds in a manner that aligns with local planning goals, environmental protection, and public safety.

Further, there is a lack of clarity in Bill 17 regarding the process for requesting additional studies after an application has been deemed complete. It remains unclear how municipalities will be able to obtain critical information needed for thorough application review without inadvertently triggering issues related to *Planning Act* timelines. Without a clear mechanism for requesting or requiring additional studies post-submission, municipalities may be left without the necessary tools to properly evaluate applications. This could result in delays, inefficiencies, and an increase in appeals to the Ontario Land Tribunal (OLT), with financial implications for both municipalities and applicants.

The Township respectfully request that the Ministry reconsider the proposed limitations on requiring supporting documentation at the time of application submission and provide clear



guidance on how municipalities can manage supplementary information needs without prejudicing the statutory review period.

Thank you for the opportunity to provide comments. The Township looks forward to ongoing engagement and consultation to ensure that any legislative changes support an efficient, fair, and evidence-based land use planning process.

Sincerely,

Justine Brotherston,
Interim Municipal Clerk
Township of Puslinch