

Submission to the Environmental Registry of Ontario**Re: Bill 17 – Protecting Ontario by Building Faster and Smarter Act, 2025****From: Clean Air Partnership****June 11th, 2025**

Clean Air Partnership appreciates the opportunity to provide comments on Bill 17- Protecting Ontario by Building Faster and Smarter Act, 2025. Clean Air Partnership is a charitable environmental organization whose mandate is to work with Ontario municipalities, as well as other levels of government and stakeholders to advance the energy transition and climate action implementation.

While we support the goal of streamlining housing approvals, we are concerned that some of the proposed changes may unintentionally slow progress on building healthy, affordable, and energy-efficient communities. Our concerns focus on how Bill 17 could affect municipal Green Development Standards (GDS) and local planning responsibilities.

1. Green Development Standards (GDS) Support Faster, Better Housing

Over the past 15 years, over 14 Ontario municipalities have been advancing green development standards (GDS) to set clear, practical targets for new buildings to reduce stormwater risk, and reduce energy use and carbon emissions. Most of these municipalities have aligned their requirements with either V3 or V4 of the Toronto Green Standard and there is significant consistency across the metrics within the municipal green standards being implemented. This has created a relatively consistent regional approach that works for builders and helps reduce long term energy needs and costs while also helping to prepare and advancing Ontario’s beneficial electrification and low carbon energy transition.

In all the cases of municipalities with green standards in place, they all began with voluntary green standards and switched to mandatory standards upon not securing the desired and needed uptake from the development community via the voluntary route. Hence the ability of municipalities to mandate their GDS is critical to enabling the GDS to drive the necessary uptake.

Importantly, GDS are not prescriptive construction rules. They don’t conflict with the Ontario Building Code and have been used to make the planning process more efficient—not less. Cities like Toronto, Pickering, and Brampton have all reported faster development approvals after introducing or updating their GDS. On the other hand, cities without GDS—like Ottawa—have seen approval timelines slow down. The evidence shows that GDS help municipalities move housing forward more quickly and more responsibly.

Municipalities undertake extensive stakeholder engagement and outreach with their development community and many other stakeholders during their development of their GDS and report on the stakeholder input they receive via the public and transparent council decision making process.

Municipalities should retain their authority to advance mandatory green standards and any permissions that they may be required to adhere to Bill 17 (such as requiring ministerial approval for Official Plan amendments) should be approved by the Minister.

2. Concerns About Limits on Planning Studies

We are concerned that the proposed regulatory powers in Bill 17 would limit municipalities to a standardized, provincially approved list of planning studies. If not carefully designed, this approach could weaken a municipality's ability to address key matters of provincial interest outlined in the Planning Act—such as protecting ecological systems, conserving energy and water, and reducing greenhouse gas emissions. Municipalities need flexibility to require studies that reflect the specific type, scale, and local context of development. Without this flexibility, they cannot fulfill their planning responsibilities effectively.

Any regulations developed under Bill 17 must align with the Planning Act direction that requires municipalities to plan for policies related to climate and energy conservation.

3. Positive Step on Minor Variances

Clean Air Partnership supports the proposed change that would let the Province allow small zoning adjustments (called “minor variances”) without requiring a full application process. This is a helpful step to reduce red tape for developments making small changes like slight setbacks and supports to increase and drive infill and intensification of new developments.

4. Municipal Planning Roles Must Be Protected

Ontario's Planning Act and the new Provincial Planning Statement make it clear that municipalities must plan for sustainability, affordability, public safety, climate change, and environmental protection. To do that,

municipalities need the right tools—like Green Development Standards and the ability to request relevant studies—to make informed decisions that serve their communities and future generations.

Recommendations

- **Municipalities should retain their authority to advance mandatory green standards and any permissions that they may be required to adhere to Bill 17 (such as requiring ministerial approval for Official Plan amendments) should be approved by the Minister.**
- **Allow flexibility in requiring studies that drive progress on Planning Act responsibilities allocated to municipalities and based on their local needs and priorities.**
- **Continue to support minor variance reform to reduce red tape.**

We urge the Province to design regulations that empower municipalities to help build more housing—while also reducing stranded asset risks and energy needs, advancing beneficial electrification and preparing Ontario for the low carbon energy transition, and protecting health, safety, and the environment. This approach will ensure new development is not just being built faster, but also smarter, more affordable, and climate ready to reduce longer term risks Ontario’s housing stock faces.

Sincerely,

Gabriella Kalapos
Executive Director
Clean Air Partnership