

June 25, 2025

**RE: *Bill 17 – Protect Ontario by Building Faster and Smarter Act, 2025***

On behalf of WR Community Energy, I am writing to express concern with *Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025*, and its potential to erode local authority over land use planning, infrastructure, local energy, economic development, and climate resilience, particularly through efforts to limit High-Performance Development Standards (HPDS).

WR Community Energy is a non-profit partnership between municipalities in the Region of Waterloo and local utilities. We exist to ensure energy planning keeps pace with sustainable growth, aligning new development with economic priorities and long-term cost control. HPDS are among the most important tools we have to do this. They are not barriers to new construction; they are enablers of smarter growth.

**High-Performance Development Standards**

In Waterloo Region, our HPDS will be a streamlined planning tool shared between the three cities (Cambridge, Kitchener, and Waterloo) and the four rural townships (North Dumfries, Wellesley, Wilmot, and Woolwich). These standards will allow us to collectively take advantage of our local economic opportunities as we grow to one million people.

The Region of Waterloo received funding in 2023 through the [Codes Acceleration Fund](#) to advance our local and federal goal to reduce greenhouse gas emissions and energy consumption, and to fight climate change while strengthening the economy. Since then, we held dozens of community sessions, engaged with hundreds of local shareholders, and received thousands of comments. The first draft of the HPDS was released in December 2024.

**Approvals**

HPDS will not act as additional red tape but instead, help accelerate housing development by streamlining the approvals process. In 2023, Pickering introduced their Integrated Sustainable Design Standards (ISDS) to replace their voluntary 2007 Sustainable Development Guidelines. In 2024, they exceeded their housing target by 56.6% and reduced development approval timelines by 16%, as compared to 2022 (according to the [Provincial tracking housing supply progress](#) and [Canadian Home Builders' Association](#) (page 18, Figure 14)). Toronto and Brampton, with similar standards of their own, similarly saw approval timeline reductions during this period (22% and 26%, respectively).

Conversely, municipalities on the list without HPDS equivalents had slower or the same development approval timelines during 2024, as compared with 2022. Ottawa's increased by 30% while Hamilton's increased by 35% (according to the [Canadian Home Builders' Association](#) (page 18, Figure 14)). Streamlined standards are not a barrier to development but are correlated to expedited processes.

## **The Need for Predictable, Efficient Growth**

In Waterloo Region, we own our energy and water utilities. We also have finite land and limited access to fresh water. These realities demand that we grow carefully and predictably.

Predictable energy and water demand helps keep property taxes low and ensures we can finance and maintain critical infrastructure responsibly. As of 2024, Waterloo Region had a population of 706,875 and is projected to reach 1 million by 2050.

As a landlocked region, we rely on conservation, efficiency, and integrated planning to avoid expensive long-term options like importing water from the Great Lakes. HPDS will increase efficiency and conservation in new developments, allowing Waterloo Region to sustainably use its own water resources for longer.

A harmonized regional approach to HPDS reduces planning complexity for industry by aligning expectations across the seven municipalities. We have heard from many developers who welcome this consistent and predictable approach to development standards, making it easier to build across the region.

If Bill 17 restricts municipalities from adopting or enforcing HPDS, it puts this integrated approach at risk and makes new housing development more challenging.

## **Four Concerns with Bill 17**

### **1. Undermines Municipal Climate Leadership**

All three cities and the Region of Waterloo have declared climate emergencies (or equivalent) and established emissions reduction targets. HPDS are one of the few levers local governments have that align new development with these commitments, especially given provincial limitations on energy and building code jurisdiction. HPDS allows municipalities to implement climate mitigation and adaptation solutions that are tailored to our region's needs.

### **2. Contradicts Broader Housing and Infrastructure Objectives**

Buildings that meet HPDS are designed to reduce peak energy and water demand, lower utility costs, and integrate with future energy systems like heat pumps, electric vehicle charging, and district energy. These benefits lower long-term costs for residents and avoid expensive energy and water infrastructure upgrades.

In Waterloo Region, almost [a third of the population](#) are renters and we're seeing a rise in evictions linked to building retrofits and increasing energy costs—pressures made worse by hotter weather and the premiums some landlords charge for air conditioner use. Not only is it more cost-effective to build

it right the first time, doing so reduces energy poverty and helps avoid expensive retrofits and “renovictions”.

### 3. Introduces Uncertainty for Builders

WR Community Energy works closely with developers, engineers, utilities, and other industry partners to provide clarity around energy and emissions standards. A harmonized HPDS framework makes it easier for developers to plan across multiple municipalities. Repealing or weakening local standards will introduce uncertainty and disrupt current projects already aligned with HPDS targets.

### 4. Erodes Regional Coordination

Waterloo Region’s approach to HPDS is integrated across land use planning, energy infrastructure, and community climate action. Reducing municipal autonomy undermines this coordination and makes it harder to deliver affordable, efficient, and resilient growth.

## **A More Constructive Approach**

We acknowledge the need to increase housing supply; however, we encourage the Province to take an approach that delivers results, one that strengthens HPDS and supports local leadership:

- Provide municipalities with the tools and capacity to implement HPDS through training, compliance resources, and cost-effective energy modeling.
- Allow HPDS to serve as infrastructure tools, opening access to development charges, infrastructure financing, and accelerated approval pathways.
- Collaborate on a province-wide HPDS framework that supports consistency without diminishing municipal flexibility.

## **In Closing**

HPDS do not delay housing. They help us build smarter, more affordable, more efficient homes by speeding up approvals, and providing cohesive standards for developers. They ensure growth does not come at the expense of residents, future taxpayers, energy affordability, or environmental integrity.

The fastest and most efficient way to build is to plan well and we cannot plan well if we are forced to ignore the long-term infrastructure implications of growth.

We urge the Ontario Government to revise *Bill 17 – Protect Ontario by Building Faster and Smarter Act, 2025*, so it strengthens, rather than weakens, the ability of municipalities and utilities to deliver affordable, climate-ready communities for future generations.

Sincerely,



Matthew Day  
Executive Director, WR Community Energy