June 26, 2025

Hon. Kinga Surma, MPP
Minister of Infrastructure
5th Flr, 777 Bay St.
Toronto, Ontario M7A 2J3

Re: Modernizing Infrastructure Development and Approvals in Ontario

Dear Minister Surma,

I write on behalf of the Ontario Chamber of Commerce's (OCC's) Health Policy Council and Infrastructure Policy Council, which include business leaders from those two critical sectors, to share opportunities to improve the delivery of projects critical to Ontario's economic growth and population health.

The OCC and its members appreciate your extensive work to strengthen Ontario's infrastructure. From power generation and new transmission lines to hospitals and long-term care homes, these projects are foundational to healthy, resilient, and thriving communities.

To meet Ontario's ambitious infrastructure targets, the province requires a timely, stable, responsive, and well-resourced planning and approvals system. This will depend on targeted reforms to accelerate approvals, flexible and forward-looking policy tools, robust data infrastructure, and sufficient professional capacity, especially at the municipal level. Implementation will depend on clearly defined and logical consultation, streamlined decision-making, effective oversight, and strong partnerships, including with Indigenous communities.

We are encouraged by the government's commitment to improve project delivery and approvals. To help advance this goal, the OCC has identified three focus areas:

1. Streamlining the development and approvals process
2. Data planning and system readiness
3. Procurement modernization

Focus Area 1: Streamlining the Development and Approvals Process

As of June 2025, Infrastructure Ontario had 28 projects in the pre- and active procurement stages, with a design and construction value of over $30 billion. A further 19 projects were announced and are in the initial planning stages.[1]

With rising demand for healthcare and mobility services, a modernized and integrated approvals process is essential to ensure infrastructure delivery keeps pace with public need. These processes must also recognize the rights and roles of Indigenous communities and ensure their engagement is timely, respectful, and integrated into project planning from the outset.

Recommendations:

1. Mandate the delegation of technical planning approvals to qualified municipal planners and engineers, while supporting capacity-building in smaller and/or under-resourced municipalities, to reduce bottlenecks and improve decision timelines.
2. Incorporate long-term value and innovation into early-stage planning and cost assessments.
3. Explore a province-wide, centralized infrastructure approvals platform that integrates permitting, environmental assessments, and stakeholder engagement into a single system, and builds on and expands the scope of the *One Project, One Process* initiative. This platform should:
    a. Connect with the proposed federal "one window" tool.
    b. Adopt best practices and learn from past "one window" infrastructure programs, including the province's own Broadband One Window.
    c. Integrate permitting, environmental assessments, and stakeholder engagement into a single interface. This would offer a more transparent, accountable, and predictable process for proponents and communities alike.
    d. Be developed through meaningful consultation and engagement with municipalities, Indigenous communities, infrastructure proponents, and regulatory agencies. This should be a foundational requirement for its design and implementation.
    e. Include project tracking dashboards, shared data repositories, and milestone-based timelines to improve transparency and accountability across agencies.
    f. Ensure interoperability between disparate government systems and databases at the backend, enabling seamless and automated data exchange among ministries, agencies, and municipal systems.
4. Continue building towards implementing timely and focused development approvals, greater stability and predictability in Ontario's planning framework, and concurrent application

[1] https://www.infrastructureontario.ca/49bec5/contentassets/3662361c63ad4f7ea35fd861a8a375e3/mu-june-2025---final.pdf

processing that prioritizes early and collaborative engagement, capacity-building, and integrated, outcomes-focused processes. This includes:

   a. Maintaining regulatory integrity and streamlining permitting and other review processes through an end-to-end, closed-loop digital system that supports clear accountability and is tied to performance targets.
   b. Increasing transparency and communication from relevant ministries on project status and approval timelines for all infrastructure and health capital projects.
   c. Adopting standardization in hospital capital design to reduce delays and administrative burden.
   d. Encouraging municipalities to adopt the Community Planning Permit System (CPPS) in areas targeted for growth to consolidate zoning, minor variance, and site plan approvals into a single process.

5. Introduce a provincial Chief Planner role, strongly supported by a team of specialists, to provide oversight, drive consistency across jurisdictions, and support implementation of complex policy files.
6. Invest in capacity-building initiatives, including provincial support for professional planner training and upskilling related to new provincial policy statements and land use planning frameworks.

Focus Area 2: Data Planning and System Readiness

Ontario's population surpassed 16 million in October 2024, with more than 47,000 new residents added in Q3 alone. To meet current and future infrastructure needs, planning must be rooted in forward-looking, evidence-based forecasting tools, equitable access to capital, and addressing system and capacity challenges.

Recommendations:

1. Modernize forecasting and transparency by developing a central provincial infrastructure and housing data repository, reducing the data collection burden on municipalities, and leveraging technologies such as AI, digital twinning, and predictive analytics to guide planning and investment decisions. Ensure the data is actionable and accessible to decision-makers at all levels.
2. Align operating and capital funding models to support long-term, sustainable healthcare and infrastructure planning (e.g., hospitals, long-term care homes, community health facilities, public transit, housing-enabling infrastructure, etc.).

3. Explore new funding models that reflect today's infrastructure needs, such as the Post Construction Operating Plan (PCOP) model, to further encourage innovation and funding pathways within hospital capital projects and upgrades.
4. Address inequities in access to capital renewal funding by:
    a. Expanding and tailoring funding programs to improve access for rural, remote, northern, and Indigenous infrastructure projects by simplifying application processes, supporting pre-development work, and adjusting eligibility criteria to reflect local realities.
    b. Separately financing minor and major health capital projects to streamline allocation and approvals.
5. Leverage technology and advanced forecasting tools, including AI and real-time data integration, to improve accuracy in infrastructure planning. These tools should:
    a. Combine population growth trends with inputs such as housing, mobility, and immigration patterns to better anticipate future demand and target investments.
    b. Monitor the use of designated development lands to support better alignment with municipal infrastructure, growth plans, and long-term sustainability goals, and to ensure fiscally, environmentally, and agriculturally responsible land development.

Focus Area 3: Procurement Modernization

Ontario's public infrastructure needs are growing rapidly – from hospitals and long-term care homes to transit systems and energy grids. The province spends nearly $30 billion annually on public procurement, yet its processes are often fragmented, inconsistent, and driven by short-term cost considerations.[2] These issues have contributed to project delays, compromised service outcomes, and weakened domestic supply chains, particularly in the health infrastructure sector.

To deliver complex infrastructure projects successfully, Ontario should leverage its agencies' (e.g., Infrastructure Ontario, Supply Ontario) capacity and expertise to modernize its procurement systems by prioritizing value, collaboration, outcomes, and innovation while maintaining fiscal responsibility.

Recommendations:

1. Where appropriate, develop and adopt standardized, value-based procurement frameworks that prioritize outcomes, such as patient health (in healthcare builds), innovation, lifecycle costs, carbon emissions, sustainability, community benefits, timely economic development, and system interoperability, over lowest-cost bids.

[2] https://occ.ca/wp-content/uploads/OCC-Power-of-the-Purchase-Order.pdf

    a. For engineering and design services, this should include the use of Qualifications-Based Selection (QBS) to emphasize technical qualifications and project understanding, and support technical excellence, risk mitigation, and long-term value.
    b. These frameworks should be applied consistently across sectors to drive quality, innovation, and sustainable outcomes.
2. Support ongoing efforts to remove interprovincial barriers that impede procurement by working alongside other provinces and territories to harmonize regulatory approvals and procurement policies, and improve health data integration, clinical trial access, technology adoption, pilot procurement programs, and credentialing.
3. Standardize procurement planning and documentation across the public sector to improve efficiency, consistency, and project alignment. This could include ensuring an adequate supply of medicines, vaccines, medical technologies, and equipment through a streamlined procurement model, contingency planning, centralized forecasting, vendor diversification, and robust supply chains.
4. Facilitate early, cross-sectoral collaboration and engagement in capital planning by involving industry stakeholders, government agencies, Indigenous communities, and professional engineers and planners from the outset. This would align infrastructure design and delivery with emerging technologies, delivery models, and long-term land use objectives.
    a. Encourage early engagement between government and industry stakeholders before issuing Requests for Proposals (RFPs) to define project scope better, identify risks, and enhance delivery readiness.
5. Create dedicated and accessible pathways for Ontario-based SMEs to participate in public procurement contracts and innovation pilots. This could include reducing the administrative burdens of the RFP process and providing resources to improve the competitiveness of equity-deserving and Indigenous businesses.
6. Collaborate with industry stakeholders to develop and promote best practices and procurement guidelines to help ministries and agencies select the most suitable project delivery models for infrastructure projects, ensuring alignment with complexity, risk, and long-term value. This could build on ongoing work by industry, including the Construction and Design Alliance of Ontario.

The OCC and its members appreciate your consideration of these recommendations. We stand ready to work with your government and stakeholders to advance these priorities and ensure Ontario's infrastructure systems are built for speed, value, and resilience.

Sincerely,

Daniel Tisch
President & CEO
Ontario Chamber of Commerce

Cc:
Hon. Sylvia Jones, Deputy Premier and Minister of Health, Government of Ontario
Hon. Stephen Crawford, Minister of Public and Business Service Delivery, Government of Ontario
Doug DeRabbie, Chair, OCC Infrastructure Policy Council, & Provincial Government Relationship Manager, GHD Group
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