



October 22, 2024

Planning Policy Branch
Ministry of Municipal Affairs and Housing
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Toronto, ON
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Public Works

10 Peel Centre Dr.
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Re: Proposed amendment to Ontario Regulation 299/19 ADDITIONAL RESIDENTIAL UNITS, made under the Planning Act (ERO 019-9210)

To whom it may concern:

Peel Region appreciates the opportunity to comment on the proposed regulation to facilitate creation of additional residential units. Peel Region staff generally support efforts to permit “as of right” residential housing up to three units per lot but only in strategic growth areas (such as major transit station areas and urban growth centres).

Overall, this change could create more housing options and support intensification. Some “as of right” provisions could be supported in other areas pending further studies demonstrating the availability of infrastructure and services to support housing that includes units that are affordable to low- and moderate income households.

The following Peel Region staff comments are provided for the Ministry’s consideration related to Peel’s responsibilities as the provider of water and wastewater infrastructure and services.

PEEL REGION STAFF COMMENTS ON THE PROPOSAL

Reduction or elimination of the need for landowners to obtain a rezoning or minor variance prior to construction.

Peel Region is not a participant in the building permit process; however, does have a role to provide water and wastewater services or upgrades to existing connections to accommodate additional residential units, should they be required. This review is currently undertaken through circulation of minor variances where proposals for additional residential units are included and Peel Region advises applicants, through the Committee of Adjustment process, of the metering requirements and servicing permitting requirements. No connection to an existing water service or sewer lateral can be made without Peel Region’s approval. Without the Committee of Adjustment process, there is an increased risk non-compliant connections to Peel Region's water and wastewater systems and may cause delays in the building permit process. There will need to be an increased responsibility for local municipal building departments to advise the applicants of the requirements for connecting to Peel Region’s services.



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Province-wide as-of-right permission to add units to any residential-use land parcel of land with full municipal water and sewage services, and discretionary permission for parcels that are rural or not fully serviced.

Coordination between Peel Region and the local municipalities will be required at the building permit stage so Peel Region can confirm the availability of adequate municipal water and wastewater services. The system was not designed for the additional water and wastewater flows that will be generated by the creation of a substantial number of additional residential units within existing properties. Without consultation with Peel Region in advance, there is significant risk of system inadequacies, including the likelihood for low water pressure during high demand periods and potential sewer surcharging during normal periods due to excessive flows.

It is important to note that water and sewer pipes are sized according to subdivision/parcel designs and predicted flows before development begins; thus they may not be rated for the new higher volumes resulting from population intensification. With the additional flows, there is a higher risk (both in likelihood and severity) of sewer surcharging resulting in environmental spills and basement flooding during heavy rainfall events when inflow and infiltration allows stormwater into the sanitary sewers, including flows from private sump pumps, downspouts and foundation drains connected to the sanitary sewer system.

CONCLUSION

Peel Region asks that the Ministry consider the comments provided herein to inform its decisions on the approach to as-of-right permissions for additional residential units. Should the proposal advance, Peel Region looks forward to participating in the consultation on the draft regulation.

If you have any questions or require more information, please contact me at anthony.parente@peelregion.ca.

Kind Regards,

Signed by:

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Region of Peel, Public Works