

**Public Works**

10 Peel Centre Dr.  
Suite B  
Brampton, ON  
L6T 4B9  
tel: 905-791-7800

[peelregion.ca](http://peelregion.ca)

May 16, 2025

Ministry of Citizenship and Multiculturalism  
Heritage Policy and Programs  
400 University Ave, 5th Floor  
Toronto, ON  
M7A 2R9

**Re: Proposed Amendments to the Ontario Heritage Act, Schedule 7 of  
the Protect Ontario by Unleashing our Economy Act, 2025  
(ERO number 025-0418)**

We thank the Ministry of Citizenship and Multiculturalism for the opportunity to comment on the proposed amendments to the *Ontario Heritage Act* as per Schedule 7 of the *Protect Ontario by Unleashing our Economy Act, 2025* (the Act).

**GENERAL COMMENTS**

Peel Region (the Region) staff appreciate and understand the Ontario government's goal of building important priority infrastructure projects that will help accommodate growth. However, it would be helpful to have a framework or details regarding which projects would be deemed eligible as a "provincial priority".

**SPECIFIC COMMENTS**

Peel Region Transportation staff would appreciate more information about what types of capital road projects would qualify for exemptions, and request the Ministry develop or communicate a framework or further details in this regard. Specifically, it would also be helpful to understand the process for determining eligibility, as it is unclear if a municipal road widening project, for example, might be exempted from archaeological assessment requirements if the province were to decide it fits a "provincial priority" (such as if a road widening project was to support new housing developments or transit).

Accordingly, the Region requests that the Province better define what is meant by "provincial priorities" within the Act to provide clarity to municipalities regarding which projects, particularly those which are growth-related, may be automatically exempted. Further clarity regarding what documentation or approvals municipalities would need to obtain would also be beneficial.

**Public Works**

10 Peel Centre Dr.  
Suite B  
Brampton, ON  
L6T 4B9  
tel: 905-791-7800

[peelregion.ca](http://peelregion.ca)

Finally, Region staff would like clarity around the grandfathering/transition period for a project. For example, if a project has already gone through an environmental assessment and design has initiated but archeological investigations have not been completed, would this project be considered grandfathered, or would it be subject to exemptions if it was deemed to support a "provincial priority"?

**CONCLUSION**

As Peel Region continues to ensure its road network meets the needs of future growth, staff remain committed to working closely with the Ontario government and other municipal partners to build necessary infrastructure. Should you have any questions or require more information, please feel free to contact Osama Alfalahi, *Manager, Transportation Design and Construction*, at [osama.alfalahi@peelregion.ca](mailto:osama.alfalahi@peelregion.ca).

Sincerely,

Lauren Crawford  
Director, Transportation  
Transportation Division, Peel Region

Cc:  
Kealy Dedman, *Commissioner, Public Works*  
Keith Medenblik, *Director, Government Relations and Strategic Initiatives*  
Osama Alfalahi, *Manager, Transportation Design & Construction*