

June 10, 2025

Ministry of Municipal Affairs and Housing Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON M7A 2J3

Re: Proposed Planning Act and City of Toronto Act, 2006 Changes (Schedules 3 and 7 of Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025) (ERO 025-0461)

To Whom It May Concern:

Peel Region appreciates the opportunity to comment on proposed legislative changes to the *Planning Act* and *City of Toronto Act, 2006* through Bill 17, the *Protect Ontario by Building Faster and Smarter Act, 2025* and related regulatory changes. Peel staff generally support efforts to streamline processes, expedite projects, and build more homes to support the government's commitment to build 1.5 million homes over the next 10 years to address the housing supply crisis.

PEEL REGION STAFF COMMENTS ON THE PROPOSAL

Peel staff comments on this ERO consultation are related to matters of Regional interests within the context of Peel's current roles and responsibilities, as service manager for housing and early years and child care, regional roads, waste management, water and wastewater, and a Public Health Authority. The comments contained in this correspondence are provided by Peel staff and will be considered by Regional Council for endorsement. If additional or differing comments are provided through a Council resolution, they will be forwarded to the Ministry for consideration.

Minister's Zoning Orders (MZOs)

Peel staff support the proposal that the Minister of Municipal Affairs and Housing, or the Minister of Infrastructure as proposed for transit-oriented communities, be allowed to impose conditions on municipalities or proponents that must be met before a use permitted by a Minister's Zoning Order comes into effect. Within this process, there may be opportunities to impose conditions to require additional community benefits, such as securing a certain percentage of units being sold at prices that are affordable to low or moderate income households (consistent with the definition in the *Provincial Planning Statement, 2024*), a contribution of land or units for affordable and non-market housing, rough-ins for Additional Residential Units (ARUs), and/or a contribution to housing initiatives. Conditions could also include co-location with public service facilities such as licensed child care and early years centres and promoting a healthy built environment such as ensuring that land use compatibility concerns and built environment considerations are assessed and addressed.

Official Plan Population Updates

It is appreciated that the Province intends to consult with municipalities where additional population growth is projected to surpass previous estimates in current official plans. Requiring municipalities to plan for higher growth, however, should be implemented with tools and supports so that there is not only direction to meet targets, but also the ability to create conditions for a diverse range and mix of housing options, including affordable housing, and public transit and active transportation options.

Growth requires water and wastewater infrastructure that needs to be in place prior to development occurring. Peel understands the current challenges being faced by the development industry and needing relief from development charges however there is a corresponding need for predictable, dedicated provincial funding and additional revenue tools to support the delivery of infrastructure required to enable housing growth to bridge that gap.

To support a coordinated and effective approach to growth forecasting and implementation, appropriate transition provisions should be established as long range Master Plans at the local municipal and Regional municipal levels are underway using these forecasts. Existing provincially assigned targets should remain in place during any transition to avoid delays to master planning work.

Staff support the Province updating the Projection Methodology Guideline (PMG) and request that the process include consultation with municipalities, including upper-tier municipalities, to ensure that all end-users of the data have an opportunity to provide input on the methodology. To meet the objective of getting homes built faster and smarter, the PMG should include guidance for aligning municipal forecasts assumptions, time horizons, and methodologies. This alignment is critical to ensuring accurate servicing capacity and infrastructure needs, affordability analysis, financial sustainability, and reduced risk to regional infrastructure and assets.

Efforts to simplify official plans and standardize land use designations are appreciated. In addition, Peel staff are supportive of efforts to ensure that schools and associated child care centres are permitted in all urban residential areas, however, recommend that land use compatibility be evaluated with new proposals to ensure health promotion, such as through healthy school site design.

Changes to inclusionary zoning regulations that limit set-aside rates and affordability periods, while supporting project viability in markets where inclusionary zoning is less feasible, may result in fewer affordable homes in areas where they are most needed. The Province could support greater affordability by establishing a standard methodology, in consultation with municipalities, to identify opportunities for higher set-aside rates and affordability periods where supported by market conditions.

Streamlining and Standardizing Development Processes and Standards

Efforts to create more uniform provincial standards regarding the building code and provide for more flexible design for 4-storey townhouses and streamlined communal servicing could encourage innovative and economical housing formats and reduce costs to make housing more affordable. New innovations should have to demonstrate durability and efficiency of the materials, with consideration of utility costs and environmental performance. Local water and wastewater servicing improvements should be considered for residential density changes. For example, ARUs and other housing density increases may result in lack of infrastructure capacity availability.

Peel staff are generally in support of the proposed regulation to allow variations to be permitted “as-of-right” if a proposal is within 10% of setback requirements applicable to specified lands, subject to questions and comments outlined below. Applicants, however, should be required to demonstrate that there is no impact to existing below-ground infrastructure and public transit and active transportation infrastructure and accessibility (e.g., sidewalks, pathways, benches, lighting and landscaping). For further comments on proposed regulations regarding as-of-right variations from setback requirements, refer to Peel staff’s response to ERO O25-0463.

Peel staff support the Province's intent to explore the standardization of municipal data tracking in the land use planning, building code and permit applications spaces, and leverage technology to better automate planning and permitting processes and improve transparency. Streamlining and standardizing the various land use planning data metrics, measures and inputs across the Province is a much needed initiative, particularly if forecasts and methodologies may be updated, and if provincial housing targets continue to be monitored. For example, long term care beds and ARUs contribute to Province's annual housing targets but there is no standardized approach to data collection on these types of accommodation/living arrangements.

Complete Application Requirements

While it is appreciated that the Province is seeking to standardized complete application requirements to help reduce costs and delays in creating housing, municipalities should have flexibility to require studies that address local context and create conditions to support provincial and municipal objectives related to infrastructure, sustainability, social impacts, and affordability.

Peel requires supporting reports, studies and materials to ensure the efficient and sustainable delivery of Regional services to the community and requests the Province consider ensuring that the following commonly required reports, studies and materials continue to be required to support development applications: Planning Justification Report, documentation which identifies the overall development phasing/timelines of the development to assist with timely infrastructure delivery, Functional Servicing Report and supporting plans/table, Traffic Impact Study and supporting plans, Noise Impact Study, Stormwater Management Report, Waste Management Plan, Environmental Site

Assessments, Record of Site Condition and Certificate of Property Use. These reports are essential to enable Peel to support the Province and community building partners in delivering infrastructure such as water and wastewater systems, waste collection, transit and roads quickly and efficiently.

In addition, although the requirement for a health assessment is captured within local municipal Official Plans, it is important to maintain a health assessment as part of complete application requirements so that this tool can be used to promote healthy built environments. This will help Peel Public Health achieve the goals set out by Ontario's Public Health Standards and contribute to Peel Public Health strategic priorities. In alignment with current practice in Public Health Authorities, Peel staff recommend that Registered Professional Planners be considered a certified professional appropriate for the review of health-related studies.

For further comments on proposed regulations regarding complete applications, refer to Peel staff's response to ERO O25-0462.

Conclusion

All orders of government must work together to increase the supply and longevity of housing, including affordable housing and find innovative approaches for municipalities, industry, and community partners to respond to rapidly growing need. As the second-largest municipality in Ontario, Peel Region continues to play a vital role in addressing infrastructure requirements and other regional services and programs that are needed to support achieving increased housing targets. Peel looks forward to continuing to work with the Province, local municipalities, and other stakeholders to meet Ontario's housing needs.

Peel staff respectfully request that the Ministry consider the staff comments provided herein to inform legislative changes and regulatory changes. Should proposals advance, Peel looks forward to participating in the consultation on draft regulations.

I would be pleased to provide any clarifications or additional comments on these matters.

Yours Respectfully,



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