

June 10, 2025

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

Re: Proposed Regulations – Complete Application (ERO 025-0462)

To Whom It May Concern:

Peel Region appreciates the opportunity to comment on the proposed regulatory changes to the *Planning Act*. Peel staff generally supports efforts to streamline processes, expedite infrastructure projects and increase the housing supply.

PEEL REGION STAFF COMMENTS ON THE PROPOSAL

Peel 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.

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

Current regulations are limited in terms of the reports, studies and materials required to support applications, but rather it is the municipal Official Plans that outline the majority of the requirements. Peel requires supporting reports, studies and materials to ensure the efficient and sustainable delivery of Regional services to the community. Peel staff request that the Province consider ensuring that the following commonly required reports, studies and materials continue to be required to support development applications:

- A Planning Justification Report, prepared by a Registered Professional Planner, be required for Official Plan Amendments, Zoning By-law Amendments, Subdivisions, Consents and Site Plans providing the site context, a summary of the proposed development and policy analysis.
- Documentation which identifies the overall development phasing/timelines of the development to assist with timely infrastructure delivery for Official Plan Amendments, Subdivisions and multi-unit or multi-phase Site Plans. This documentation may be stand alone or included in a Planning Justification Report and/or the Functional Servicing Report and Traffic Impact Study documents.

- Where the subject land will be serviced by municipal (publicly owned or operated) services, a Functional Servicing Report and supporting plans/tables, prepared by a professional engineer, be required for Official Plan Amendment, Zoning By-law Amendment, Subdivision and Site Plan applications.
- Where the subject land will be accessed by municipal roads, a Traffic Impact Study and supporting plans, prepared by a professional engineer, be required for Official Plan Amendment, Zoning By-law Amendment, Subdivision and Site Plan applications.
- Where the subject land is adjacent to municipal roads:
 - A Noise Impact Study, prepared by a professional engineer, be required for Zoning By-law Amendment, Subdivision and Site Plan applications.
- Where the proposed development is adjacent to public roads and lands:
 - A Stormwater Management Report, prepared by a professional engineer, be required for Zoning By-law Amendment, Subdivision and Site Plan applications.
- A Waste Management Plan be required for Subdivision and Site Plan applications which demonstrates how waste will be collected from the site and that it meets the local requirements for waste collection vehicles.
- Where the subject land/proposed development will result in land being conveyed to a public agency:
 - Environmental Site Assessments (Phase I and/or Phase II), Record of Site Condition and Certificate of Property Use (as applicable)

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 for Subdivision and Site Plan applications so 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.

The scope of all required reports, studies and materials should be in accordance with Terms of Reference satisfactory to the local municipality and the service provider. Local municipalities and service providers should be required to develop standard Terms of Reference to identify clear requirements and streamline the process. It is important that the regulation include a provision to allow the local municipality, service provider and developer to work together to either scope the content of the report or not require the report recognizing the site-specific circumstances.

The above-noted reports are essential to enable Peel Region to support the Province and community building partners in delivering essential infrastructure like water and wastewater systems, waste collection, transit and roads quickly and efficiently. While Peel staff prefer that these documents be listed in the Regulations, Peel staff request that they remain as studies which may be identified in an Official Plan to support development applications.

Overall, municipalities should have the flexibility to require studies that address local context and create conditions to support provincial and municipal objectives related to sustainability, social impacts, and affordability. Streamlining and efficiencies can be gained by requiring the various studies/reports at the appropriate stage of development and by developing standard terms of reference (which can then be amended considering local context). Peel staff have identified these important supporting documents, which are used to inform the delivery of Regional services, and request that they be included in studies that municipalities be permitted to require.

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 Region 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 Region 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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