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June 6, 2025

Ministry of Infrastructure  
777 Bay Street, 4th floor  
Toronto, Ontario  
M5G 2C8

**Re: Bill 17- Protect Ontario by Building Faster and Smarter Act, 2025 - Accelerating Delivery of Transit-Oriented Communities (ERO 025-0504)**

To whom it may concern:

Peel Region appreciates the opportunity to comment on the proposed Protect Ontario by Building Faster and Smarter Act, 2025 and associated regulations. Peel Region staff support streamlining and delivery of the transit-oriented communities (TOC) program. We offer the following comments and questions for consideration.

**PEEL REGION STAFF COMMENTS**

The comments contained in this correspondence are provided by Peel Region 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.

Transit oriented communities serve high-density populations and have distinct infrastructure servicing needs that must be in place prior to occupancy. Water and wastewater infrastructure requirements must therefore be considered as part of any transit-based projects. Local water and wastewater servicing improvements should also be considered for residential density changes. For example, Additional Residential Units and other housing density increases may result in insufficient infrastructure capacity.

Similarly, water and wastewater projects for which planning is underway or complete should be taken into consideration when giving priority to transit projects. Active coordination between the province and municipalities is paramount for existing planned projects and where utility relocations may be required.

It is important that Peel Region is brought into the process during the initial planning stage of transit projects, so there is adequate time to understand the extent of Peel staff involvement, impact on Peel's current and planned infrastructure, and to allow the necessary work plans and agreements to be put in place prior to work beginning. This affords for resourcing and establishment of mutually beneficial timelines to facilitate the smooth delivery of projects.

Agreements for major transit projects within municipal rights of way are essential to ensure the security of existing infrastructure and must consider both implementation and operating impacts to the existing utilities within the rights of way. Exempting approvals may place unacceptable risk on existing utilities.



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Council endorsement of Agreements must be established to ensure proper coordination and funding by the initiating agency. Post implementation operating agreements must also be completed to ensure that municipal infrastructure can be properly operated and maintained by the municipality. Accessibility to municipal infrastructure and provision of development connectivity to municipal infrastructure must also be included in all transit projects. Provincial transit projects should not be prioritized over municipal infrastructure projects or preclude future connections or extensions to below-ground infrastructure that are necessary to support development.

#### CONCLUSION

Peel Region asks that the Ministry consider the comments provided herein to inform its decisions on the proposed amendments. 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](mailto:anthony.parente@peelregion.ca).

Kind Regards,

Signed by:  
  
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