

## Public Works

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Ministry of Municipal Affairs and Housing  
College Park, 777 Bay St, 14<sup>th</sup> Floor  
Toronto, ON  
M7A 2J3

### **Re: Proposed Consultation – Simplifying and Standardizing Official Plans, 2025 (ERO 025-1099)**

To Whom It May Concern:

Thank you for the opportunity to comment on the proposed consultation on simplifying and standardizing official plans as part of *Bill 60, Fighting Delays, Building Faster Act, 2025*.

#### **PEEL REGION COMMENTS ON THE PROPOSAL**

Peel Region is providing the following comments on matters of regional interest within the context of Peel's current roles and responsibilities, which include managing, funding and/or delivering housing, early years and child care, regional roads, waste management, health services and water and wastewater. The Region generally supports efforts to simplify and streamline planning documentation as a service and infrastructure provider.

Although Peel is no longer responsible for its official plan, it remains affected by policies in official plans of lower-tier municipalities as a "Public Body" under the *Planning Act*. Lower-tier official plans provide a critical implementation framework to ensure the provision of regional infrastructure and services are aligned with local municipal land use planning decisions. It is critical that any simplification of official plans does not inadvertently eliminate or adjust key policy details that ensure the effective and timely delivery of Peel's programs, services, and infrastructure and the protection of regional interests affecting the health and wellbeing of the public. Any simplifying of official plans would need to continue reflecting the coordination of regional service and infrastructure needed for growth to occur at the local municipal level.

Should the Province require official plans to be singular documents, including potentially prohibiting the use of secondary or site specific plans, the detailed framework that exists in secondary plans would fall to the zoning stage which undermines the Region's ability to provide services. This would also lead to longer lead times in delivering regional infrastructure and services, cost overruns, service gaps, and a misalignment between land use decisions and infrastructure capacity.

The secondary planning stage allows for the detailed phasing of regional services, where specific studies are often required at a larger scale than site specific zoning to ensure feasibility of the development. This includes more detailed infrastructure capacity

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assessments, servicing reports, stormwater management plans, transportation assessments and other servicing implications required prior to development approval. Secondary plans provide for the more detailed growth target alignment with long-term servicing strategies that aim to support density and growth, without creating risks for public health, safety or the environment. Further, the proposed approach would compress the planning process, at the cost of meeting secondary plan/ site specific needs, lead to identification of infrastructure constraints far too late in the process, and make more difficult the ability to achieve healthy, complete communities.

It is critical that secondary plans continue to be the next level plan and that the studies typically required at that stage continue to be permitted as they ensure infrastructure and services can be delivered on time, efficiently and safely. While the intent is to streamline official plans in order to reduce planning timelines and increase consistency across municipalities, this should not be done at the cost of infrastructure, service misalignment, reactive growth management, and inadequate studies/ inputs that are in place to ensure safe, healthy and environmentally sustainable communities.

Lastly, a two-year time frame for official plans to comply with a potentially new official plan framework coming into force would be insufficient, considering various local official plans still require provincial approval, and updates to conform to the PPS. Local municipalities would need to restart official plan review processes to conform to a standardized plan framework that will require significant time and resources taken away from implementing plans, further compromising the goal to advance development and build new homes faster. A longer timeframe or assessing alternatives to support consistency across municipalities, while reducing the burden of reviewing and developing official plans is essential to ensure that regional infrastructure and services are aligned with planned growth objectives and support development.

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

Yours Respectfully,



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