

April 28, 2026

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

Re: Proposed *Planning Act*, *City of Toronto Act*, 2006, *Building Code Act*, 1992 and *Municipal Act*, 2001 Changes (Schedules 1, 2 and 7 of *Bill 98*, the *Building Homes and Improving Transportation Infrastructure Act*, 2026) (ERO 026-0300)

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To Whom It May Concern:

Thank you for the opportunity to comment on the proposed consultation on *Bill 98*, the *Building Homes and Improving Transportation Infrastructure Act*, 2026

PEEL REGION STAFF COMMENTS ON THE PROPOSAL

Peel Region staff 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.

Streamlining and Standardizing Official Plans

- Although Peel Region is no longer responsible for its official plan, it remains a "Public Body" under the *Planning Act* and relies on the policies in lower-tier municipal official plans to align with the efficient provision of regional programs, services, and infrastructure with municipal land use planning decisions. It is essential that during the official plan standardization process, Peel Region continues to be consulted and included to ensure that regional interests are safeguarded through robust lower-tier official plan policies.
- It is also important that the standardization process does not inadvertently remove or weaken key policy details necessary to support the effective and timely delivery of Peel Region's programs, services, and infrastructure, or compromise regional interests related to public health, safety, and overall community well-being.
- Peel Region has no concerns with removing provincial approval for Major Transit Station Areas (MTSAs). Early collaboration between the local municipalities and Peel Region is essential to ensure land use planning changes consider Peel's ability to effectively and efficiently provide infrastructure and services.
- The inclusion of long-term transportation networks and climate change policies and mapping within official plans provide Peel Public Health with an important opportunity to review for evidence-informed built environment elements that can support public health priorities, such as promoting physical activity, healthy eating, mental wellbeing, advancing health equity and reducing health-related impacts of climate change. Prohibiting municipalities from including climate

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change and sustainability-related policies in official plans may have implications on the future health and safety of residents by limiting opportunities to incorporate health considerations into land use planning and community design.

- Prohibiting municipalities from including climate change and sustainability-related policies in their official plans may have implications for health equity, particularly for populations that are more vulnerable to the health-related impacts of climate change and environmental stressors.
- Removing climate change policies in municipal official plans will reverse progress in addressing the climate change challenge and increase risks to municipal infrastructure and long-term public investments. The Province should consider allowing municipalities to advance climate work beyond the Provincial Planning Statement, provided that such measures are aligned with provincial policy direction and do not create unnecessary duplication.

Site Plan: Prohibit Mandatory Municipal Enhanced Development Standards and Green Building Standards

- Peel Region recommends municipalities retain the ability to have Green Building Standards, including active transportation infrastructure, landscaping, permeable paving materials, during the site plan approval process. Alternatively, consideration should be given to include design elements within a “green pick list” for development proposals, which speak to the promotion of health and safety, such as active transportation and green infrastructure including but not limited to, cycling networks, bicycle parking, sidewalks and pedestrian connections, landscaping, as well as permeable paving materials.
- In alignment with the Ontario Public Health Standards, Peel Public Health aims to reduce chronic disease, prevent injuries and reduce exposure to health hazards by reviewing development proposals and providing evidence-informed recommendations to integrate elements of healthy built environments into design. Many elements of walkable and health-promoting design can be supported and measured through sustainable green standards and enhanced development standards. Specifically, green infrastructure and active transportation support the development of compact, complete communities, improving air quality and protect health and safety (Section 2.9, PPS 2024).
- Enhanced Green Building Standards enable local governments to protect their specific communities and manage growth responsibly. Climate change does not affect all municipalities equally, for example, more populous and urban municipalities typically: experience higher exposure to heat islands, flooding, and extreme weather; manage denser and more vulnerable infrastructure systems; face higher financial and social risks from climate-related disruptions; and hold responsibility for long-term infrastructure investments with lifespans extending decades into the future. For these communities, integrating more stringent climate-resilient and low-carbon standards into planning and development is necessary for responsible risk management and fiscal prudence.
- Enhanced Green Building Standards also support and enable municipalities, particularly those with demonstrated capacity, to lead and innovate in climate-responsive land-use and building practices. Some municipalities have developed the technical capacity, policy expertise, and implementation experience needed to advance more robust climate change and green building standards. Where

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this capacity exists, municipal leadership can: pilot innovative approaches; create local market transformation; and generate best practices that can be scaled or adopted more broadly across the province. Restricting these municipalities from acting effectively limits opportunities for innovation and slows progress at a time when accelerated climate work action is needed.

Minimum Lot Sizes

- Peel Region generally supports efforts to set minimum lot size requirements, as this may increase housing options and improve affordability although these changes should not compromise or complicate municipal servicing responsibilities.
- Minimum lot size regulations may enable more units on existing serviced land, in turn, increasing local peak flows and demand on water distribution systems, wastewater collection systems and pumping stations without proportional agreements. This demand may occur without proportional agreements, increasing reliance on Peel's capital planning to keep up with the pace of development.
- Minimum lot sizes should only be allowed on land that is fully serviced by municipal water and wastewater systems. Part 8 of the Ontario Building Code does not regulate nitrate, or other pollutants from septic system effluent. A tertiary septic system (also referred to as a Level IV Treatment Unit under the OBC) is an alternative septic system that can improve certain characteristics of the effluent and is regulated through Table 8.5.2.2.A. Given these systems provide an additional level of treatment, the required size of the leaching bed may be reduced. However, these nitrate-reducing systems can experience a rapid decline in performance, even with regular, comprehensive maintenance.

A technical Memorandum from the Ministry of Environment, Conservation and Parks Source Protection Branch indicates up to 35% of these systems do not perform as required. Under the *Municipal Act*, municipalities can enter into long-term monitoring agreements with property owners for private sewage systems but the authority to monitor, construct, operate, and maintain private sewage systems is tied to a site plan or subdivision agreement. These agreements cannot regulate system performance; rather, they are limited to requiring monitoring and remedial action if the system does not perform as anticipated. A municipality would be required to seek a court order to enforce the agreement.

Minister's Zoning Orders

- Without adequate notice or consultation, Minister's Zoning Orders (MZOs) can disrupt planned growth, strain existing water and wastewater servicing capacity, and undermine long-term infrastructure phasing and strategies. The removal of the legislative requirement to provide notice on proposed amendments or revocations to MZOs may create pressure to accelerate or reprioritize major infrastructure capital projects that were not planned or funded, increasing risks related to system capacity, regulatory compliance, and long-term financial sustainability. Peel Region requests that notification and consultation be

maintained for all MZOs to ensure the effective, timely and fiscally responsible provision of regional infrastructure and services.

I would be pleased to provide any clarifications or additional comments on these matters. You can reach me at Tara.Buonpensiero@peelregion.ca.

Kind Regards,



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