



Ministry of Municipal Affairs and Housing Provincial Planning Branch  
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June 4, 2025

**RE: ERO Number 025-0462 – Proposed Regulations– Complete Application**

The Township of Puslinch Council at its meeting held on May 28, 2025 directed Township staff to submit comments with respect to ERO 025-0462 Proposed Regulations– Complete Application and respectfully submits the following comments and concerns with respect to the proposed legislative amendments.

The Township has significant concerns with respect limiting the requirements for supporting studies as a condition for deeming a *Planning Act* application complete, specifically that these limitations may impact the municipalities' ability to adequately assess development applications. Supporting studies and information regarding sun/shadow, wind, urban design and lighting, are important in evaluating the merits and appropriateness of a proposed development. These documents provide the technical basis upon which informed decisions are made and ensure that development proceeds in a manner that aligns with local planning goals, environmental protection, and public safety as outlined below:

- Not considering impacts of sun/shadow, wind and lighting are concerning because it ignores potential impacts on adjacent properties and the public right-of-way.
- It is appropriate to consider impacts such as sun/shadow, and wind when evaluating proposals for increased height.
- Lighting could cause visibility issues on the public right-of-way.
- Urban design ensures proposed development is compatible in built form with adjacent uses. Design Guidelines that provide directions for developers and staff when assessing new developments to ensure compatibility. Urban design guidelines undergo a public process, and such design guidelines should continue to have effect on land use planning.

Should the Province proceed with its limitation of supporting studies which are required in order to deem an application complete, the Township recommends the following studies be identified as being permitted to be required by a municipality as part of its planning application:



- Planning Justification Report
- Environmental Impact Assessment
- Traffic Impact Assessment
- Agricultural Impact Assessment
- Fiscal Impact Assessment
- Heritage Impact Assessment
- Archaeological Assessment
- Disclosure Report
- Dust Study
- Elevation Plan
- Environmental Site Assessment
- Exterior design
- Farm Data Sheets (Minimum Distance Separation)
- Farm Viability/Agrologist Study
- Farm Information Form
- Floodplain study
- Functional servicing report for water, wastewater, and storm water
- Geotechnical Assessment
- Grading and Drainage Plan
- Hydrogeological cumulative effects assessment where aggregate extraction is proposed below the water table. The appropriate boundaries, level of detail, and baseline data to be used will be determined by the County, local municipalities and Conservation Authority
- Hydrogeological impact
- Landscape Plan
- Lighting Plan
- Noise Study
- Odour Study
- Servicing Options Assessment
- Shadow Analysis
- Slope Stability study
- Socio-economic impact
- Tree preservation and replacement
- Vibration Study
- Visual impact study
- Studies required to fulfill the policies for lands within the Greenbelt.



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Further, the Township recommends that the following certified professionals be included in the list of professionals whose reports/studies would be required to be accepted as final submissions by a municipality as part of a complete planning applications:

- Architect
- Agrologist
- Land Use Planner
- Traffic Engineer
- Hydrologist
- Geotechnical Engineer
- Civil Engineer
- Environmental Engineer
- Ecologist
- Heritage Professional
- Archaeologist
- Ontario Land Surveyor

Thank you for the opportunity to provide comments. The Township looks forward to ongoing engagement and consultation to ensure that any legislative changes support an efficient, fair, and evidence-based land use planning process.

Sincerely,

Justine Brotherston,  
Interim Municipal Clerk  
Township of Puslinch