



Ministry of Municipal
Affairs and Housing
Provincial Planning Branch
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Canada
VIA ERO: 025-1101

Township of Puslinch
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November 21, 2025

RE: 9.4.2 Report COR-2025-057 Reporting Out from Council Direction Update

On behalf of the Council of the Township of Puslinch, thank you for the opportunity to comment on ERO 025-1101.

As a rural lower-tier municipality with no municipal services, extensive agricultural uses, aggregate activity, and hamlet settlement areas, Puslinch relies on a limited but essential set of lot-level standards. These standards are critical to managing compatibility, servicing, drainage, groundwater protection and rural character. While the Township appreciates the province's intent to improve clarity and reduce inconsistency, Council is concerned that a broad standardization, or any prohibition beyond clear health and safety matters, could inadvertently remove tools that are vital to protecting local conditions and infrastructure capacity.

The Provincial Policy Statement 2024 (PPS) directs planning authorities to plan for reduced greenhouse-gas emissions and for climate resilience, including through green infrastructure, low-impact development and active transportation. In Puslinch, several lot-level standards outside the building envelope directly implement these directions: requiring infiltration features or bio-retention where soils and groundwater protection warrant it; specifying driveway materials and widths to limit runoff; ensuring for adequate soil volumes and native plantings to sustain canopy and manage heat. The ERO posting recognizes that these types of requirements are among the items under consideration in this consultation. If they were standardized at a minimal provincial level, or prohibited outright, the result could be increased runoff to rural ditches, greater erosion and sedimentation, and added stress on private wells and septic systems, all of which would be counter to the intent of the PPS and local environmental stewardship. Further, these restrictions may lead to a reduction in recharge of



the water table which could affect residents of municipalities who source their water from aquifers.

Further, variability among municipalities is not solely a matter of policy preference but reflects real differences in geology, drainage, road standards, haul routes, natural heritage features and servicing models. In Puslinch, developments occur on private services or along rural cross-sections with open drainage. A one-size-fits-all provincial approach would struggle to account for these conditions. The Township respectfully submits that local tailoring, documented and justified through official plan and site plan instruments, remains necessary to avoid downstream costs and risks to public and environmental health. The ERO posting's premise that practices vary and can add cost is understood; however, removing or heavily constraining municipal discretion could shift long-term costs to taxpayers through increased maintenance, road damage and flooding.

Additionally, the ERO notice indicates that this consultation follows Bill 17's clarification that municipalities cannot enact by-laws respecting the construction or demolition of buildings beyond the *Ontario Building Code*. Council appreciates the province's desire for Building Code consistency inside the building envelope. At the same time, we ask that the province distinguish clearly between "building" requirements and "site/lot" requirements (a traditional municipal planning function). Many of the standards listed in the posting, bioswales, permeable paving, soil volumes, landscaping palettes, are quintessentially site planning matters that address how development fits on a lot and interfaces with neighbours, roads and natural features. Preserving municipal authority to set these standards, within reasonable provincial guidance, is important for rural serviceability and compatibility.

Council supports the province's goals of efficient, timely and affordable development. The Township respectfully asks that any future framework arising from this consultation preserve a reasonable scope for municipal lot-level standards tied to local geology, drainage, servicing, agricultural interfaces and rural road conditions, so that small communities like Puslinch can continue to deliver growth that is safe, sustainable and compatible.

Sincerely,

Justine Brotherston
Municipal Clerk