

**VIA ERO Portal**

May 13, 2026

**Province of Ontario  
Municipal Finance Policy Branch  
777 Bay Street  
College Park, 13<sup>th</sup> Floor  
Toronto, Ontario  
M7A 2J3**

Dear Sirs / Madams:

**Re: Environmental Registry of Ontario (ERO) – File No. 026-0312  
The Remington Group  
Proposed Legislative Changes to Support Standardizing of Parkland  
Requirements under the proposed Building Homes and Improving  
Transportation Infrastructure Act, 2026**

Macaulay Shiomi Howson Ltd. (MSH) are the planning consultants for The Remington Group, (Remington) one of the largest privately owned landholders and developer of existing and future mixed use, residential commercial and retail development and property management projects across the Greater Toronto Area (GTA).

Remington is committed to building with purpose – prioritizing quality, innovation and community. It's collaboration with all levels of government ensure that every development is designed to last and enhance the lives of those who live, work and visit.

Over the last few decades, Remington has contributed to the development of a multitude of residential and non-residential building space that has resulted in the conveyance of hundreds of acres of otherwise developable land (and/or Cash-In-Lieu depending on the circumstance) as per the existing Planning Act R.S.O. 1990 requirements.

Further to the Province's request for comment on the above proposed legislative/regulatory changes with respect to the standardization of Parkland requirements, MSH is pleased to submit the following comments on behalf of The Remington Group.

## Support for Land Use Suitability Criteria

Remington is generally supportive of the proposed land suitability criteria included in the above noted ERO posting including the identification of specific criterion for both Eligible Lands and Ineligible Lands for parkland dedication purposes. Further, Remington supports the ability for the Ontario Land Tribunal (OLT) to order municipalities to accept land for parks purposes that meet the criteria outlined.

Remington recommends that the Province consider lands that are within (below) the 350 year floodline, but above the 100 year floodline (an extremely rare storm event), also be considered for non-active or passive parkland dedication, with some justification outlined below.

The following provides a summary of Remington's comments with respect to Eligible Lands, specifically Encumbered Lands, as well as lands outside of (ie, NOT contained within the Natural Heritage System under *The Greenbelt Plan* and the Natural Core or Natural Linkage Areas of the *Oak Ridges Moraine Plan*).

## Support for Eligibility of Encumbered Lands and Public Owned Private Spaces – POPS and Lands within the 350 Year Floodline

Remington is encouraged to see the proposed legislative changes to Parkland dedication requirements that would allow for the inclusion of encumbered lands for conveyance to the local Municipality and the ability for the OLT to order such lands to be accepted.

Identification of Encumbered Lands such as those listed as candidates for conveyance will provide both Owners and Local Municipalities with opportunities for greater flexibility in terms of parkland design, functionality, interface and programming that will result in not only the highest and best use of space from a functional perspective but also the very best that Community Building has to offer.

Remington requests that the Province consider the inclusion of the following more specific examples of Encumbered Lands within the proposed legislative changes, including, but not limited to lands that are subject to stratified conditions and/or public private interfaces, for example:

- Underground structures (e.g. parking garages);
- Underground servicing infrastructure and corridors;
- Underground pedestrian connections (e.g. to neighbouring buildings and transit); and,
- Urban Squares and Plazas (e.g. including Private Owned Public Space – POPS) located at grade and accessible to the public.

Further, Remington requests that the Province consider the inclusion of lands above the 100 year floodline, but below the 350 year floodline, which can be used for passive or non-active recreation. The 350 year storm is a very rare storm event. There are recreational opportunities that may be missed if these lands are simply discarded as a potential option. This may include passive parkland (for walking, dog-walking, etc.) or even nature enjoyment/trails and may also include activities like bird-watching and other passive activities. These lands can be added to a municipal roster of parks and open space, in a useable fashion, but not necessarily for active play or children's play areas.

## **Support for Eligibility of Certain Greenbelt and Moraine Lands**

The proposed inclusion of eligible lands contained within the Greenbelt or Oak Ridges Moraine (Countryside or Protected Countryside designations) is a positive and progressive step forward towards building more homes faster in Ontario.

Providing the opportunity for eligible lands to be considered for Parkland conveyance will assist developers making highest and best use of their developable lands while reserving some suitable (but otherwise undevelopable) lands for both active and passive recreation that is complementary to, yet not impactful upon significant natural features.

## **Support of More Homes Built Faster and Improving Transportation and Infrastructure**

Implementation of the new Land Use Suitability Criteria will require coordination and cooperation between private landowners, local planning authorities, services and utilities but it will go a long way towards supporting the efforts of the Province to support housing, economic development and infrastructure under Bill 23, the *More Homes Built Faster Act, 2022* as well as advancing key transportation and transit priorities under the proposed *Building Homes and Improving Transportation and Infrastructure Act, 2026*

We thank the Province's Municipal Finance Policy Branch for the opportunity to provide this input, and some suggested additions, on behalf of The Remington Group and look forward to remaining connected to the process as it moves forward.

Sincerely,

**MACAULAY SHIOMI HOWSON LTD.**

*Nick Pileggi*

Nick Pileggi, MPP, RPP  
Principal

Cc:

Remington Group – Mr. Randy Peddigrew