

VIA ERO On-Line Portal/Posting

May 14, 2026

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

Dear Sirs / Madams:

**Re: Environmental Registry of Ontario (ERO) – File No. 026-0312
Times Group Corp.
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 Times Group (Times), a fully integrated real estate development firm dedicated to shaping thriving communities. Times has a 40-year track record in the development industry and more than fifty (50) successfully completed residential, commercial, industrial and mixed-use projects in major Urban Centres across the Greater Toronto Area (GTA).

Times Group is currently developing a number of sites throughout the Greater Toronto Area, including lands in Toronto, Markham and Stouffville and has contributed to the development of a multitude of residential and non-residential development that has resulted in the conveyance of dozens 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 changes with respect to the standardization of Parkland requirements, MSH is pleased to submit the following comments on behalf of Times Group.

Support for Land Use Suitability Criteria

Times Group is generally supportive of the proposed land suitability criteria included in the above noted ERO including the identification of specific criterion for both Eligible Lands Ineligible Lands for parkland dedication purposes. In addition, Times Group supports the notion that the Ontario Land Tribunal (OLT) can order the conveyance of lands for park purposes.

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's to support housing, economic and infrastructure under Bill 23, the *More Homes Built Faster Act, 2022* as well as advance key transportation and transit priorities under the proposed *Building Homes and Improving Transportation and Infrastructure Act, 2026*

Support for Eligibility of Greenbelt and Oak Ridges Moraine Lands and Request to Consider Natural Heritage Lands by Municipal Consent

More specifically, Times Group wishes to submit to the Province its comments with respect to the proposal to include certain lands contained within the Oak Ridges Moraine or Greenbelt (but NOT in the Natural Heritage System under *The Greenbelt Plan* and the Natural Core or Natural Linkage Areas of the *Oak Ridges Moraine Plan*) so long as these lands meet technical requirements to support the ongoing health and maintenance of environmentally sensitive features.

The proposed inclusion of eligible lands contained within the Oak Ridges Moraine or Greenbelt 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 of the most suitable lands (in the Countryside or Protected Countryside designations) for both active and passive recreation that are complementary to, and not impactful upon, significant natural features.

Process for Removal of Non- Natural Heritage Lands from the Greenbelt

Times Group owns lands in North Leslie in Richmond Hill, some of which is impacted by Greenbelt 'fingers' which are related to valley corridors. Extensive environmental work has been completed related to these fingers and the North Leslie Secondary Plan has extensive policies related to these valley corridors.

Some of the lands (the majority of which are currently farmed and therefore disturbed) are not part of the natural heritage system, yet they are designated as Natural Heritage System within the Greenbelt. In these areas, it is our view that the local municipality should have the opportunity to remove the lands and use them for much needed housing. In this specific area of Richmond Hill, the City has previously passed a motion for these excess areas to be removed from the Greenbelt.

We are appending the information from Beacon Environmental, in support of this request.

However, if a process for removal is not available, Times Group would request that lands that are within the Natural Heritage System in the Greenbelt or Oak Ridges Moraine may also be considered for parkland based on the following criteria;

- An environmental report determines that the lands do not contain any natural heritage features or function;

- Note, this is the case for Times Group lands in Richmond Hill, which are in the Natural Heritage Area, yet are not natural heritage lands and contain no features or function;
- The local municipality, having reviewed the study, determines that the lands can be used for parkland that meets a local standard.

This will allow a local municipality to ‘control their own destiny’, in being able to determine specific plots of land that may be able to serve an important purpose (a park), while the lands can remain in the Provincially protected area.

We thank the Province’s Municipal Finance Policy Branch for the opportunity to provide this input on behalf of Times 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:

Times Group