

May 14, 2026

Ministry of Municipal Affairs and Housing (MMAH)
Municipal Finance Policy Branch
College Park 13th floor, 777 Bay St
Toronto, ON, M7A 2J3
MFPB@ontario.ca

Attention: Honourable Rob Flack, Minister of Municipal Affairs and Housing (MMAH)

Re: ERO No. 026-0312 Consultation on proposed regulation to standardize parkland dedication requirements for landowner identified parkland, including encumbered land (strata) and POPS (Related ERO No.: 026-0300)

On behalf of Cortel Group, we are writing to address ERO Submission No. 026-0312, which is seeking to prescribe criteria for developer-identified parkland and related implementation matters for the conveyance of developer-identified lands for municipal parkland dedication, to implement provisions in Bill 23, the *More Homes Built Faster Act, 2022*, that are not yet in force.

We have the following comments:

- The focus is on park conveyance but POPS are not conveyed –assuming that the same criteria would apply?
- In terms of ineligible lands, is the Province suggesting that a brownfield site could not support parkland even on condition that the site is appropriately remediated/risk assessed similar to traditional parkland dedication process?
- Understood that parkland and POPS need to be accessible – strongly encourage that if the future park/POPS area fronts onto a public street it meets the criteria – cannot be overly prescriptive on % of street frontage, etc.
- With respect to land accessibility/comfort for use, the suitability criteria provides that parkland must be accessible, visible and comfortable to facilitate public use of it and, in particular, must be...of a size and shape that is capable of serving park or public recreation purposes--We request clarification on the term “park or public recreation purposes”.
- Why is the criteria outlining that land for a public park or POPS must be a certain size, shape and provide a specific recreational program?—there should not be a one size fits all approach to parkland/POPS—there are many examples of successful parks that provide more passive programming, are more compact in size and are not a traditional square or rectangular in shape
- We understand that that objective is not to qualify a remnant or unusable land parcel as parkland but that can be qualified without overly prescribing specific site characteristics and program

We appreciate your consideration and we are available to provide any additional information or respond to any questions at your convenience.

Sincerely,



Elsa Fancello
Cortel Group