

April 29, 2026

Environmental Registry of Ontario (ERO)
Ministry of Municipal Affairs and Housing

Dear Sir/Madam,

Re: Comments on Proposed Parkland Dedication Changes under the Planning Act

On behalf of Lormel Homes (“Lormel”), we appreciate the opportunity to comment on the proposed parkland dedication changes under the Planning Act. As a major developer in the Regional Municipality of York and the City of Vaughan, Lormel manages large-scale, phased communities where the efficient coordination of housing and parkland is essential.

General Support

Lormel supports the move toward a flexible, criteria-based approach. We specifically endorse:

- **Encumbered Lands & POPS:** Allowing these to count toward dedication requirements.
- **OLT Appeal Mechanism:** Providing a clear path for dispute resolution and municipal non-decisions.
- **Standardized Criteria:** Improving predictability and reducing negotiation timelines.

Strategic Opportunity: Greenbelt Lands

Lormel holds lands within the Greenbelt that sit outside the Natural Heritage System (NHS). These areas are ideal for passive recreation (trails, lookouts) but are often rejected by municipalities for parkland credit. To unlock housing potential on higher-value tablelands, we recommend:

- **Explicit Eligibility:** Formally recognize non-NHS Greenbelt lands as suitable for parkland credit.
- **Passive Use Validation:** Clarify that passive recreational uses meet the “park use” definition.
- **Credit Framework:** Ensure these lands contribute to the 70% credit framework when functional and accessible.

Key Recommendations for Refinement

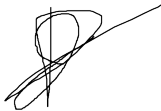
- **Define “Park Use” Broadly:** The current exclusion of lands that cannot support heavy fill or structural footings is too restrictive. The regulation should explicitly include passive and naturalized park typologies.

- **Clarify Natural Heritage Interfaces:** Provide a clear definition of “interference” to prevent conservative municipal interpretations from blocking parks adjacent to natural features.
- **Flexibility in Accessibility:** Visibility and access requirements should be context-sensitive, accounting for topography and phased trail connections.
- **Financial Encumbrances:** Allow conditional acceptance of lands, provided encumbrances are cleared at the time of final conveyance, rather than at the initial proposal stage.

Conclusion

Lormel supports the modernization of the parkland framework. By refining the criteria for non-NHS Greenbelt lands and passive uses, the Province can reduce land-use conflict and accelerate housing delivery.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julian De Meneghi', with a long horizontal stroke extending to the right.

Lormel Homes
Julian De Meneghi