



May 12, 2026

Environmental Registry of Ontario  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 2nd Floor  
Toronto, ON M7A 2J3

**Subject: Town of Caledon Submission Regarding the Proposed Changes to Support Standardizing of Parkland Requirements Under the Planning Act**

Dear Sir/Madam,

The Town of Caledon staff appreciates the opportunity to provide comments on ERO 026-0312, which outlines proposed regulatory changes intended to standardize parkland requirements under the *Planning Act*.

While Town staff supports the Province's intent to modernize and improve the parkland dedication framework, the proposed changes are more suited to secure parkland in built-up and intensifying communities where traditional conveyance opportunities are limited as opposed to greenfield development communities like the Town of Caledon. Town of Caledon staff have identified several key concerns with the proposed changes, which may compromise the Town's ability to deliver functional, high-quality parkland for current and future residents:

1. **Environmental Considerations:** The proposed regulation would permit parkland to be located within or adjacent to natural heritage features, provided ecological functions are not compromised. However, this approach may increase human activity in ecologically sensitive areas, creating pressures that conflict with the Town's environmental protection objectives. There is also no reliable means of assessing or predicting the full extent of potential environmental impacts under this approach.

*Town staff recommend prohibiting parkland within natural heritage features and excluding natural heritage features, Greenbelt lands, and other protected environmental areas from being counted toward parkland dedication. This ensures that ecologically sensitive areas remain protected while parkland requirements are met without compromising environmental integrity.*

2. **Reduction in Municipal Discretion:** The proposed regulation would substantially limit municipal discretion in determining the suitability, location, and functionality of parkland. Under the new framework, municipalities would be required to accept developer-proposed lands if they meet provincial criteria, even when those lands

conflict with local planning objectives or established standards. For instance, the municipality may be forced to accept parkland in industrial zones that do not service local resident recreational needs.

*To ensure parkland continues to serve community needs and alignment with local planning priorities, Town staff recommend that municipalities retain the authority to determine the suitability and location of parkland based on local planning objectives, community needs, and established standards.*

- 3. Decline in Parkland Quality:** The proposed framework encourages the conveyance of constrained, encumbered, or privately owned publicly accessible lands. While this approach may increase the total amount of land conveyed, it risks diminishing the overall quality, usability, and recreational value of parkland in Caledon. This concern is heightened in new neighbourhoods, which are already receiving approximately 50% less parkland as a result of Bill 23. The Town's current standards prioritize parks that are centrally located, highly accessible, and supported by significant street frontage to enable active recreation and community use. Accepting lower-quality or constrained lands will compromise the Town's ability to deliver parks that meet resident needs and support recreational service level targets.

*To maintain high-quality, functional parkland, Town staff recommend that provincial criteria be aligned with Caledon's Parkland Dedication By-law by excluding utility corridors, stormwater ponds, trail corridors, lands with restrictive easements, and parcels with insufficient frontage, access, or significant slopes.*

- 4. Narrower Definition of Ineligible Lands:** The Town is also concerned about the 70% parkland credit towards privately owned publicly accessible spaces (POPS) and encumbered lands which include strata parks and lands with easements. While the Province identifies certain ineligible lands, the criteria do not address essential considerations such as grading, frontage, and overall suitability for park programming. This increases the risk of receiving fragmented, constrained, or irregular parcels that cannot support standard recreational amenities.

*Town staff recommend reducing the maximum credit for encumbered lands from 70% to a level that ensures meaningful unencumbered parkland contributions, consistent with Caledon's current 50% cap.*

- 5. Financial Implications:** The proposed changes also carry out financial implications. By encouraging land conveyance over cash-in-lieu (CIL), the regulation may reduce CIL revenues that the Town relies on to acquire strategic parkland, particularly larger district-level parks needed to serve the entire Town. Accepting encumbered or constrained lands may also increase long-term maintenance, liability, and operational costs, including uncertainty regarding responsibility for repairs or remediation. Additionally, expanded appeal rights and the need for more complex agreements related to POPS and strata parks may increase administrative and legal expenditures.

*To safeguard municipal financial sustainability, Caledon staff recommends ensuring that regulatory changes do not reduce essential CIL revenues needed to acquire strategic parkland, particularly in industrial and commercial developments where land conveyance is often impractical to meet community parkland needs.*

In conclusion, Town of Caledon staff supports the Province's intent to modernize the parkland dedication framework but remains concerned that the proposed changes may compromise the quality, functionality, and long-term viability of parkland in Caledon. To ensure that new tools do not replace essential public parkland, Town staff recommends clarifying that POPS, strata parks, and other encumbered spaces remain optional supplementary tools and should not be considered substitutes for traditional publicly owned parkland. Town staff also encourages the Province to consider the recommendations outlined in this memo to ensure that communities continue to receive high-quality, accessible parks that meet long-term recreational and environmental needs.

Sincerely,



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