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May 11, 2026

Via ERO: 026-0300

**RE: ERO 026-0300 – Proposed *Planning Act, City of Toronto Act, 2006, Building Code Act, 1992* and *Municipal Act, 2001 Changes (Bill 98)***

The Council of the Township of Puslinch appreciates the opportunity to comment on ERO 026-0300 regarding proposed *Planning Act, City of Toronto Act, 2006, Building Code Act, 1992* and *Municipal Act, 2001 Changes (Bill 98)*.

The Township of Puslinch is a rural municipality with no municipal water or wastewater servicing systems. Development is primarily dependent on private wells and septic systems, and land use planning decisions must carefully balance housing opportunities, agricultural preservation, environmental protection, infrastructure limitations, and rural character. While Council supports efforts to improve planning efficiency, several proposed changes appear designed primarily for urban growth contexts and may create unintended consequences for rural municipalities such as the Township.

Council is concerned with proposals to standardize municipal official plan structure and land use designations across Ontario. While consistency may assist larger urban municipalities, a one-size-fits-all planning framework risks overlooking the distinct needs of rural municipalities with agricultural lands, dispersed settlement patterns, private servicing constraints, and environmental features. Rural municipalities require flexibility to tailor policies to local realities. Planning in a municipality without full municipal servicing differs significantly from planning in urban centres serviced by water, wastewater, and transit infrastructure. Council requests that



any standardized framework remain optional or sufficiently flexible so rural municipalities may adapt formats and land use categories to local conditions.

Because the Township does not provide municipal water or sewer services, growth potential is inherently tied to hydrogeology, septic capacity, lot configuration, road access, and cumulative environmental impacts. These considerations require robust local planning tools and discretion. Council is concerned that broad streamlining measures may place pressure on rural municipalities to accommodate growth without corresponding servicing capacity. Any reforms should expressly recognize that municipalities relying on private servicing must retain full authority to manage development based on servicing feasibility and environmental protection.

Council is also concerned with potential authority for the Minister to establish minimum lot sizes for urban residential lands that are fully serviced by public sewage and water systems. While this appears urban-focused, Council requests explicit confirmation that such tools will not directly or indirectly apply to rural municipalities. Lot creation in rural municipalities cannot be addressed through urban intensification models. Rural parcel fabric, private servicing requirements, agricultural viability, and environmental constraints require local evaluation.

Council is further concerned with proposals that remove or restrict municipal authority respecting certain enhanced development standards and site plan matters. While some municipalities may have overreached, local councils are democratically accountable and best positioned to determine appropriate standards for their communities. Rural municipalities often rely on modest but practical standards to address drainage, landscaping, buffering, lighting, compatibility, and environmental performance. Reducing local authority may create more conflict rather than less.

The proposal suggests transition costs would largely relate to learning and updating municipal documents. For small rural municipalities with limited staffing resources, official plan restructuring, zoning updates, mapping changes, public consultation, legal review, and implementation training can be significant burdens. Council requests provincial funding, technical assistance, and extended implementation timelines for small and rural municipalities.

Council respectfully requests that the Province exempt rural municipalities from standardized official plan mandates, preserve municipal authority to regulate development based on private



servicing and environmental capacity, confirm that minimum lot size tools will not apply to un-serviced rural municipalities, maintain appropriate local discretion respecting site plan and development standards, and provide transition funding and implementation support for rural municipalities.

Thank you for the opportunity to comment.

Sincerely,

Justine Brotherston  
Municipal Clerk