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May 11, 2026

Via ERO: 026-0312

RE: ERO 026-0312 – Proposed Changes to Support Standardizing of Parkland Requirements Under the *Planning Act*

The Council of the Township of Puslinch appreciates the opportunity to comment on ERO 026-0312 regarding proposed changes to support standardizing of Parkland Requirements Under the *Planning Act*.

The Township of Puslinch is a rural which does not operate municipal water or wastewater systems, and development is primarily supported through private wells and septic systems. The Township is characterized by agricultural lands, rural residential communities, natural heritage features, and dispersed settlement areas.

Council understands that the Province is considering changes intended to standardize parkland dedication requirements under the *Planning Act*, including proposals related to the type of lands municipalities may be required to accept as parkland. While Council supports clarity and consistency where appropriate, the Township has significant concerns that a standardized provincial framework may be designed primarily around urban growth contexts and may not adequately recognize the circumstances of rural municipalities.

In rural municipalities such as Puslinch, development often occurs on a smaller scale through lot creation, infill development, and modest site-specific applications rather than large greenfield subdivisions or high-density redevelopment. Parkland dedication tools therefore need flexibility



to reflect differing development forms, lower densities, limited growth volumes, and the geographic distribution of residents. A rigid one-size-fits-all model may reduce the ability of rural municipalities to secure appropriate recreational lands or funding to meet local needs.

Council is particularly concerned with any proposal that would require municipalities to accept encumbered lands, constrained lands, or lands with limited recreational utility as part of parkland dedication requirements. Municipalities must retain the discretion to determine whether lands offered as parkland are appropriate, functional, safe, accessible, and capable of supporting present or future recreational use.

For rural municipalities, lands subject to environmental constraints, irregular configurations, drainage features, easements, buffers, steep slopes, stormwater facilities, access limitations, or other encumbrances may create long-term liabilities rather than community benefits. Accepting such lands can impose maintenance, insurance, operational, and risk management costs on municipalities while delivering little practical recreational value to residents.

Council is also concerned that mandatory acceptance of encumbered lands may reduce opportunities for municipalities to secure more suitable lands or cash-in-lieu contributions that could be directed toward meaningful recreational priorities such as trail connections, playgrounds, soccer fields, ball diamonds, community centre improvements, and enhancements to existing parks and open spaces.

The Township further notes that rural municipalities frequently operate with smaller tax bases and fewer recreational assets than surrounding urban centres. As a result, parkland dedication and cash-in-lieu revenues can represent an important funding source for community recreation infrastructure. Any reduction in municipal flexibility or contribution levels may transfer costs directly onto existing rural taxpayers.

In addition, the Township requests that any new framework avoid creating unnecessary administrative burdens for small municipalities. New appraisal requirements, formulas, mapping obligations, or reporting requirements can be disproportionately burdensome for rural municipalities with limited staffing resources.



Council respectfully requests that the Province ensure any changes to parkland dedication requirements preserve local flexibility for rural municipalities. If a standardized framework proceeds, the Province should confirm that municipalities are not required to accept encumbered or unsuitable lands, maintain robust cash-in-lieu options, permit municipalities to prioritize improvements to existing recreational assets, and provide exemptions or alternative rules for rural and un-serviced municipalities.

Council supports efficient development approvals and increased housing opportunities; however, these objectives must be balanced with complete and healthy communities. Rural municipalities must retain practical tools to secure functional parkland and fund recreation amenities that meet the needs of their residents.

Thank you for the opportunity to provide comments.

Sincerely,

Justine Brotherston
Municipal Clerk