THE CORPORATION OF THE TOWNSHIP OF PUSLINCH
SEPTEMBER 17, 2025 COUNCIL MEETING
VIRTUAL MEETING BY ELECTRONIC PARTICIPATION &
IN-PERSON AT THE MUNICIPAL OFFICE –
7404 WELLINGTON RD 34, PUSLINCH

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A G E N D A ADDENDUM

DATE: Wednesday September 17, 2025
REGULAR MEETING: 10:00 A.M.
CLOSED MEETING: Directly following Section 13 Announcements

Addendum

7.1.3 10:05 A.M. Delegation by John McNie regarding Report COR-2025-037 Major Site Alteration

7.1.4 10:15 A.M. Delegation by George Anastasakos regarding Report COR-2025-037 Major Site Alteration

7.1.5 10:25 A.M. Delegation by Mike McColl regarding Report COR-2025-037 Major Site Alteration

7.1.6 1:20 P.M. Delegation by Zachary Rypalowski Regarding Report COR-2025-039 Request for Municipal Support Confirmation – IESO LT2(e-1) RFP – 3972 Sideroad 10 S – Solar Farm

9.3.3 Amended Report CAO-2025-003 AMO Update

9.4.2 Amended 11:40 A.M. Report COR-2025-036 Zoning By-law Amendment Application (D14/AUD) Audrey Meadows Phase II Update

9.6.1 Amended 1:10 P.M. Report PW-2025-002 Township Speed Limit Study and Solar Powered Mobile Speed Identification Sign Recommendations

≠ Denotes resolution prepared

1. **Call the Meeting to Order**

2. **Roll Call**

3. **Moment of Reflection**

4. **Confirmation of the Agenda ≠**

5. **Disclosure of Pecuniary Interest & the General Nature Thereof**

6. **Consent Agenda ≠**

Consent Agenda items are considered routine in nature and are voted on collectively. Any member of Council may request one or more items be removed from the Consent Agenda for separate action.

6.1 Adoption and Receipt of the Minutes of the Previous Council and Committee Meetings
- 6.1.1 August 27, 2025 Council Meeting Minutes
  (Circulated under separate cover)

6.2 Ombudsman Ontario 2024-25 Annual Report

6.3 Municipality of Tweed Council Resolution regarding Collaborative Action on Sustainable Waste Management in Ontario

6.4 Town of Goderich Council Resolution regarding Senate Committee on Agriculture and Forestry Report

6.5 Township of Armour Council Resolution regarding Governance of Family Health Teams

6.6 Township of West Lincoln Council Resolution regarding Code of Conduct for the prevention of Human Trafficking in the Niagara Region

6.7 Pit #5738 July 2025 Monthly Monitoring Report

6.8 Puslinch Profile September 2025

6.9 Notice of Pre-consultation - Draft Updates to the Grand River Source Water Protection Plan and Assessment Report

Recommendation:
That the Consent Agenda items listed for the September 17, 2025, Council meeting be received for information.

7. **Delegations ≠**

7.1 Specific Interest (Items Listed on the Meeting Agenda)

7.1.1 **11:00 A.M.** Delegation by Ann Caine and Peter Cummins regarding Report CAO-2025-002 County Housing Development Fund Application

Recommendation:
That the delegation by Ann Caine be received for information.

7.1.2 **11:30 A.M.** Delegation by Rob Stovel regarding Report COR-2025-036 Zoning By-law Amendment Application (D14/AUD) Audrey Meadows Phase II Update

Recommendation:
That the delegation by Rob Stovel be received for information.

7.1.3 **10:05 A.M.** Delegation by John McNie regarding Report COR-2025-035 Major Site Alteration

Recommendation:
That the delegation by John McNie be received for information.

7.1.4 **10:15 A.M.** Delegation by George Anastasakos regarding Report COR-2025-037 Major Site Alteration

Recommendation:
That the delegation by George Anastasakos be received for information.

7.1.5 **10:25 A.M.** Delegation by Mike McColl regarding Report COR-2025-037 Major Site Alteration

Recommendation:
That the delegation by Mike McColl be received for information.

7.1.6 **1:20 P.M.** Delegation by Zachary Rypalowski Regarding Report COR-2025-039 Request for Municipal Support Confirmation – IESO LT2(e-1) RFP – 3972 Sideroad 10 S – Solar Farm

Recommendation:
That the delegation by Zachary Rypalowski be received for information.

7.2 General Interest (Items Not Listed on the Meeting Agenda)

7.2.1 **1:00 P.M.** Delegation by Rick and Shannon Standish regarding safety concerns at the Leslie Rd and Watson Rd S Intersection

Recommendation:
That the delegation Rick and Shannon Standish be received for information.

8. **Public Meeting**

8.1 September 17, at 7:00 P.M. Public Information Meeting held in-person at the Municipal Office (7404 Wellington Road 34) and by electronic participation through Zoom regarding Proposed User Fees and Charges By-law

9. **Reports ≠**

9.1 **Puslinch Fire and Rescue Services**

9.1.1 **None**

9.2 **Finance Department**

9.2.1 **Report FIN-2025-024 2026 Proposed User Fees and Charges**

Recommendation:
That Report FIN-2025-024 entitled 2026 Proposed User Fees and Charges be received; and

That Council directs staff to proceed with holding a Public Meeting on September 17, 2025 at 7:00 p.m. to obtain public input on the proposed User Fees and Charges By-law as outlined in Schedule A to Report FIN-2025-024; and

That staff report back to Council with the results of the Public Meeting.

9.3 **Office of the CAO**

9.3.1 **Report CAO-2025-001 Strategic Plan Scope of Work ≠**

Recommendation:
That Report CAO-2025-001 entitled Strategic Plan Scope of Work be received for information; and,

That Council endorse the Phase 1 Planning and Launch report as [presented/amended].

9.3.2 **11:10 A.M. Report CAO-2025-002 County Housing Development Fund Application ≠**
(Circulated under separate cover)

Recommendation:
That Report CAO-2025-002 entitled County Housing Development Fund Application be received for information; and

That Puslinch Council endorse the recommendations outlined in the report as [presented/amended]; and

That Township staff be directed to make an application to the County Housing Development Fund for the projects as outlined in this report.

9.3.3 **Amended Report CAO-2025-003 AMO Update ≠**
(Circulated under separate cover)

Recommendation:
That Report CAO-2025-003 entitled AMO 2025 Conference Debrief be received for information.

9.4 **Corporate Services Department**

9.4.1 **Report COR-2025-035 Zoning By-law Amendment Application D14/ONT(Ertl) Request for Council to deem the application to be complete ≠**

Recommendation:
That Report COR-2025-035 entitled Zoning By-law Amendment Application D14/ONT(Ertl) Request for Council to deem the application to be complete received; and

That Council deem the zoning amendment application to be complete; and,

That staff be directed to proceed with notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the Planning Act, 1990.

9.4.2 **Amended 11:40 A.M. Report COR-2025-036 Zoning By-law Amendment Application (D14/AUD) Audrey Meadows Phase II Update ≠ - Corrected**

Recommendation:
That Report COR-2025-036 entitled Zoning By-law Amendment Application (D14/AUD) Audrey Meadows Phase II Update; and

That Council direct staff to hold a Public Information Session prior to bringing forward a recommendation report for Council's consideration.

9.4.3 **10:35 A.M. Report COR-2025-037 Major Site Alteration Recommendation Report P11/MAR – Gino Martinello, 4670 Sideroad 10 North ≠**

Recommendation:
That Report COR-037 entitled Major Site Alteration Application Recommendation P11-MAR – Gino Martinello, 4670 Sideroad 10 North be received for information; and,

Whereas the Township and its expert consultants are satisfied with the application for a Major Site Alteration through their comprehensive review of the submission materials;

Therefore be it resolved,

That Council approves the Major Site Alteration Permit for 4670 Sideroad 10 North; and,

That Council approve the Conditions of the Site Alteration Permit as [presented/amended] in Schedule "B" of this report; and,

That Council give three readings to By-law No. 2025-071 being a by-law to authorize the Mayor and Clerk to sign the required contract documents.

9.4.4 **Report COR-2025-038 Zoning By-law Amendment Application (D14/DAN) Request for Council to deem the application to be complete ≠**

Recommendation:
That Report COR-2025-038 entitled Zoning By-law Amendment Application (D14/DAN) Request for Council to deem the application to be complete be received; and

That Council deem the zoning amendment application to be complete; and,

That staff be directed to proceed with notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the Planning Act, 1990.

9.4.5 **1:30 P.M. Report COR-2025-039 Request for Municipal Support Confirmation – IESO LT2(e-1) RFP – 3972 Sideroad 10 S – Solar Farm ≠**

Recommendation:
That report COR-2025-039 entitled Request for Municipal Support Confirmation – IESO LT2(e-1) RFP – 3972 Sideroad 10 S – Solar Farm be received for information; and,

Whereas issuance of a Municipal Support Resolution prior to a decision being made on applicable Planning Act approvals may prejudice the Township in its decision on such Planning Act matters;

And Whereas the Township does not wish to contribute to any loses the proponent or landowner may experience, whether real or perceived, in advancing a project where Planning Act and other subsequent approvals are not guaranteed;

Now therefore be it resolved that Council declines issuance of a Municipal Support Resolution for LT2 (e-1) RFP, where a 'solar farm' is not permitted on the subject lands in accordance with the County of Wellington's Official Plan and the Township's Zoning By-law 023-18, as amended.

9.4.6 **Report COR-2025-041 Zoning By-law Amendment Application (D14/DAA) Request for Council to deem the application to be complete≠**

Recommendation:
That Report COR-2025-041 entitled Zoning By-law Amendment Application (D14/DAA) Request for Council to deem the application to be complete be received; and

That Council deem the zoning amendment application to be complete; and,

That staff be directed to proceed with notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the Planning Act, 1990.

9.5 **Building Department**

9.5.1 **Report BLD-2025-003 Building Department Second Quarter Update – April to June 2025 ≠**

Recommendation:
That Report BLD-2025-003 entitled Building Department Second Quarter Update – April to June 2025 be received for information.

9.6 **Public Works Department**

9.6.1 **1:10 P.M. Report PW-2025-002 Township Speed Limit Study and Solar Powered Mobile Speed Identification Sign Recommendations ≠**

Recommendation:
That Report PW-2025-002 entitled Township Speed Limit Study and Solar Powered Mobile Speed Identification Sign Recommendations be received; and

That Council endorse the recommendations of the Paradigm Speed Study; and

That Council direct staff to prepare a comprehensive signage plan in accordance with the Paradigm Speed Study, including recommended locations for additional solar-powered mobile speed identification signs, implementation strategies, and detailed costing, for Council's consideration during the 2026 budget process.

9.7 **Recreation Department**

9.7.1 **None**

10. **Correspondence ≠**

10.1 NPG Planning Solutions and Watson & Associates Economists LTD. review of Province of Ontario - 2025 Population Methodology Guidelines ≠

Recommendation:
That Correspondence Item 10.1 NPG Planning Solutions and Watson & Associates Economists LTD review of Province of Ontario - 2025 Population Methodology Guidelines be received for information.

10.2 ERO-025-0950 Con-Cast Pipe Limited – ECA and Peer Review Comments ≠
(Circulated under separate cover)

Recommendation:
That Correspondence Item 10.2 ERO-025-0950 Con-Cast Pipe Limited – ECA and Peer Review Comments be received for information; and,

That Council direct staff to submit comments to the ERO posting objecting to the approval of the ECA until such time that the comments from the Township's Engineering Consultant has been addressed; and,

That Council direct staff to submit the comments from Wellington County Source Water Protection to the ERO posting for the Ministry's consideration.

11. **Council reports**
    11.1 Mayor's Updates
    11.2 Council Member Reports (verbal or written updates from members who sit on boards/committees)

12. **By-laws ≠**
    12.1 First, Second and Third Reading
        12.1.1 BL2025-071 being a by-law to authorize entering into a Site Alteration Agreement with Gina and Gino Martinello

Recommendation:
That the by-law 2025-071 be taken as read three times and finally passed in open Council.

13. **Announcements**

14. **Closed Session – Pursuant to Section 239 Subsection (2) of the Municipal Act, 2001 for the purpose of:**
    14.1 Confidential report regarding personal matters about an identifiable individual, including municipal or local board employees – Youth Advisory Committee Appointment
    14.2 Confidential report regarding personal matters about an identifiable individual, including municipal or local board employees – Committee of Adjustment and Planning and Development Advisory Committee Appointment
    14.3 Confidential report regarding personal matters about an identifiable individual, including municipal or local board employees – Wellington County Joint Accessibility Advisory Committee Appointment

15. **Business Arising from Closed Session**

16. **Notice of Motion**

17. **New Business**

18. **Confirmatory By-law ≠**
18.1 BL2025-072 Confirm By-law – September 17, 2025

Recommendation:
That the following by-law be taken as read three times and finally passed in open Council:
By-law 2025-072 being a by-law to confirm the proceeding of Council for the Corporation of the Township of Puslinch at its meeting held on the 17th day of September 2025.

19. **Adjournment ≠**

M I N U T E S

DATE: August 27, 2025
CLOSED MEETING: Directly following Section 13 Announcements
COUNCIL MEETING: 10:00 A.M.

The August 27, 2025 Council Meeting was held on the above date and called to order at 10:00 a.m. via electronic participation and in-person at 7404 Wellington Rd, Puslinch.

1. **CALL THE MEETING TO ORDER**

2. **ROLL CALL**

ATTENDANCE:

Councillor Sara Bailey – absent
Councillor Russel Hurst
Councillor Jessica Goyda
Councillor John Sepulis
Mayor James Seeley

STAFF IN ATTENDANCE:

1. Courtenay Hoytfox, CAO
2. Justine Brotherston, Director of Corporate Services / Municipal Clerk
3. Sarah Huether, Manager of Corporate Services / Deputy Clerk
4. Mike Fowler, Director of Public Works, Parks and Facilities
5. Mary Hasan, Director of Finance/Treasurer

3. **MOMENT OF REFLECTION**

4. **CONFIRMATION OF THE AGENDA**

Resolution No. 2025-259: Moved by Councillor Hurst and Seconded by Councillor Sepulis

That Council approves the August 27, 2025 Agenda as circulated; and

That Council approves the additions to the agenda as follows:

Consent Item 6.1.8 Questions received from Council seeking additional information and the corresponding responses provided by staff regarding the August 27, 2025 Council agenda.

CARRIED

5. **DISCLOSURE OF PECUNIARY INTEREST & THE GENERAL NATURE THEREOF:**

Councillor Sepulis declared a potential pecuniary interest related to item 6.20 County of Wellington Notice of Complete Application – OP-2025-01 as the notice of completion is in regard to Estill Development proposed on SR20N. I reside on Sideroad 20N which will be impacted by this development should it proceed. As such my property value may be affected which requires that I declare a pecuniary interest as defined in the Municipal Conflict of Interest Act.

6. **CONSENT AGENDA**

6.1 Adoption and Receipt of the Minutes of the Previous Council and Committee Meetings:

6.1.1 July 23, 2025 Special Council Meeting Minutes
6.1.2 July 9, 2025 Council Meeting Minutes
6.1.3 July 8, 2025 Committee of Adjustment Meeting Minutes
6.1.4 July 8, 2025 Planning and Development Advisory Committee Meeting Minutes
6.1.5 June 10, 2025 Committee of Adjustment Meeting Minutes

6.1.6 June 10, 2025 Planning and Development Advisory Committee Meeting Minutes
6.1.7 May 28, 2025 Public Information Meeting Minute
6.1.8 August 27, 2025 Council questions and Staff Responses
6.2 AMO Policy Update - Comments on Bill 9, OPP Billing Review, Waste Management and OMA Consultations at the AMO Conference
6.3 AMO Policy Update - IESO Releases Final LT2 Documents, Trade and Tariff Webinar
6.4 City of Orangeville Council Resolution regarding Elect Respect Campaign
6.5 City of St. Catherines Council Resolution regarding Elect Respect Pledge
6.6 The Town of The Blue Mountains Council Resolution regarding TC Energy's Proposed Battery Storage Project
6.7 Village of Burks Falls Council Resolution regarding the Opposition of Battery Energy Storage System facilities
6.8 Town of Erin Council Resolution regarding the Opposition of Bill 17
6.9 Town of Goderich Council Resolution regarding Opposition of Bill 17
6.10 Ministry of Natural Resources Proposed Regulations to Support the Implementation of the Proposed Geologic Carbon Storage Act 2025, if passed
6.11 Township of North Glengarry Council Resolution regarding Request to amend Ontario regulation 39121 blue box
6.12 Municipality of Strathroy-Caradoc Council Resolution regarding Ontario Regulation 391-21 Blue Box
6.13 Township of Otonabee-South Monaghan Council Resolution regarding Opposition of Bill C-2, section 77.5
6.14 Township of Wellington North Council Resolution regarding Critical Ground - Why Soil is Essential Report
6.15 Township of Amaranth Council Resolution regarding County Road 109 Corridor Study
6.16 Municipality of West Nipissing Council Resolution regarding Moratorium on Aerial Spraying
6.17 June Monthly Monitoring Report, Mill Creek Pit License #5738
6.18 County of Wellington OPP - May 2025 Detachment Commander's Report
6.19 Grand River Conservation Authority Summary of General Membership Meeting June 2025
6.20 County of Wellington Notice of Complete Application – OP-2025-01

Resolution No. 2025-260: Moved by Councillor Sepulis and Seconded by Councillor Hurst

That the Consent Agenda items listed for AUGUST 27, 2025 Council meeting with the exception of items 6.14 and 6.20 be received for information.

CARRIED

Resolution No. 2025-261: Moved by Councillor Sepulis and Seconded by Councillor Hurst

That the Consent Agenda item 6.14 be received for information; and

Whereas the Township of Puslinch is receipt of North Wellington's letter of July 21, 2025 to The Standing Senate Committee of Agriculture and Forestry wherein North Wellington's Council communicated their full support for a 2024 report titled "Critical Ground: Why Soil is Essential to Canada's Economic, Environmental, Human and Social Health";

Be it resolved that the Township of Puslinch also fully supports all of the recommendations included in the Report; and

That a copy of this resolution by forwarded to, the Standing Senate Committee of Agriculture and Forestry, Senator Robert Black, MP Michael Chong, All municipalities within the County of Wellington, Wellington Federation of Agriculture, and Ontario Federation of Agriculture.

CARRIED

Councillor Sepulis declared a potential pecuniary interest related to item 6.20 County of Wellington Notice of Complete Application – OP-2025-01 as the notice of completion is in regard to Estill Development proposed on SR20N. I reside on Sideroad 20N which will be impacted by this development should it proceed.

As such my property value may be affected which requires that I declare a pecuniary interest as defined in the Municipal Conflict of Interest Act and refrained from discussions and voting on that item.

Resolution No. 2025-262: Moved by Councillor Goyda and
Seconded by Councillor Hurst

That the Consent Agenda item 6.20 County of Wellington Notice of Complete Application – OP-2025-01 be received for information.

CARRIED

7. **DELEGATIONS:**
   (a) Specific Interest (Items Listed on the Meeting Agenda)
      7.1.1 **10:05 A.M.** Delegation by Christine Veit of Safe Communities regarding the Community Safety and Well-Being Plan.

Resolution No. 2025-263: Moved by Councillor Sepulis and
Seconded by Councillor Hurst

That the delegation by Christine Veit regarding the Safe Communities Community Safety and Well-Being Plan be received for information; and

Whereas Christine Veit of Safe Communities regarding the Community Safety and Well-Being Plan endorses the recommendations from Puslinch Council;

Therefore that the following be forwarded to the County Clerk for inclusion at the appropriate County Council committee/council meeting:

Whereas Council has safety concerns at the intersections of Concession 1 and Wellington Rd 35 and Concession 2 and Wellington Rd 35 as there has been a rise in recent collisions at these intersections;

That Council directs staff to request the collision data from the OPP at these intersections for review, and that the County/OPP be requested to place black cats in these areas; and

That Council direct staff to request that the County consider line painting roads more than once per year at high traffic and sensitive areas, such as roundabouts, crosswalks, and community safety zones; and

That Council direct staff to request the County clarify the policy framework for placing 50km speed limit delineators (centre line signage).

CARRIED

7.2 General Interest (Items Not Previously Listed on the Meeting Agenda)
7.2.1 None

Council recessed from 10:35am to 10:37am

Roll Call
Councillor Goyda
Councillor Sepulis
Councillor Bailey - absent
Councillor Hurst
Mayor Seeley

8. **PUBLIC MEETINGS:**
September 17, at 7:00 P.M. Public Information Meeting held in-person at the Municipal Office (7404 Wellington Road 34) and by electronic participation through Zoom regarding Proposed User Fees and Charges By-law.

9. **REPORTS:**

9.1 Puslinch Fire and Rescue Services

9.1.1 None

9.2 Finance Department

9.2.1 None

9.3 Office of the CAO

9.3.1 None

9.4 Corporate Services Department

9.4.1 Report COR-2025-033 Reporting out from Council Direction Update

Resolution No. 2025-264: Moved by Councillor Sepulis and
Seconded by Councillor Goyda

That Council direct staff to provide the peer review of the 2024 Ground Water Monitoring Report and Ecology Report for Mill Creek Pit to the Pit Operator for response and the MNR for their information; and

That Council endorses the Mayor reaching out to the Pit Operator regarding the beaver dam noted in the report and connecting the Pit Operator with a licensed trapper to inquire about remedies; and

That Council direct staff to request a comprehensive review of the redd population by the pit operator as noted in the report; and

That Council endorses Councillor Goyda sharing the tasks of cleaning the banks with the Friends of Mill Creek Rangers to inquire if this clean up can be incorporated into their work plan; and

That Council direct staff to request the traffic count data and the criteria to warrant a traffic light from the MTO for review, and that staff report back to Council after theupcoming meeting between MTO and Township staff.

CARRIED

9.4.2 Report COR-2025-034 Shooting Range Complaint Resolution Protocol

Resolution No. 2025-265: Moved by Councillor Sepulis and
Seconded by Councillor Goyda

That Report COR-2025-034 entitled Shooting Range Complaint Resolution Protocol (Protocol) be received; and

That Council endorse the Protocol as presented with the third and final reading of the Shooting Range By-law at a future meeting.

CARRIED

9.5 Building Department

9.5.1 None

9.6 Public Works Department

9.6.1 None

9.7 Recreation Department

9.7.1 None

10. **CORRESPONDENCE:**

10.1 Ministry of Natural Resources Proposed Updates to Certain Operational Policies under the Aggregates Resource Act

Resolution No. 2025-266: Moved by Councillor Sepulis and Seconded by Councillor Goyda

That Correspondence Item 10.1 Ministry of Natural Resources Proposed Updates to Certain Operational Policies under the Aggregates Resource Act be received for information; and,

That Council direct staff to request a copy of TAPMO's review of the policy updates for consideration.

CARRIED

10.2 Hamilton Conservation Authority – 2024 Audited Financial Statements

Resolution No. 2025-267: Moved by Councillor Sepulis and Seconded by Councillor Hurst

That Correspondence Item 10.2 Hamilton Conservation Authority – 2024 Audited Financial Statements be received for information.

CARRIED

11. **COUNCIL REPORTS:**

11.1 Mayor' Updates

11.1.1 Mayor Seeley remarked that a staff report on the AMO conference will be coming to the September meeting.

11.1.2 Mayor Seeley remarked that the Puslinch Fall Fair is coming up the weekend of September 6th.

11.1.3 Mayor Seeley provided an update on an upcoming meeting with the MNR in early September to discuss the ARA policy changes.

11.2 Council Member Reports

11.2.1 Councillor Sepulis noted that a member of PDCA has vacated her seat on the Committee.

Resolution No. 2025-268: Moved by Councillor Sepulis and Seconded by Councillor Hurst

That Council receive the Mayors and Council member updates for information.

CARRIED

12. **BY-LAWS:**

12.1.1 BL2025-069 – BL2025-069 being a by-law to appoint a Municipal Law Enforcement and Property Standards Officer

Resolution No. 2025-269: Moved by Councillor Sepulis and Seconded by Councillor Hurst

That the following By-laws be taken as read three times and finally passed in open Council:

12.1.1 BL2025-069 – Being a by-law to appoint a Municipal Law Enforcement and Property Standards Officer.

CARRIED

13. **ANNOUNCEMENTS:**
17.1 Councillor …

14. **CLOSED SESSION:**
Council was in closed session from 11:30 a.m. to 12:28 p.m.

The Clerk stopped the recording and removed all public attendees from the webinar. The webinar was then 'locked' so no new participants are able to join.

Resolution No. 2025-270: Moved by Councillor Hurst and
Seconded by Councillor Sepulis

That Council shall go into closed session under Section 239 of the Municipal Act for the purpose of:

14.1 Confidential report regarding a proposed or pending acquisition or disposition of land by the municipality or local board – Land Acquisition/Disposition

14.2 Confidential report regarding personal matters about an identifiable individual, including municipal or local board employees – Human Resource Matter

CARRIED

Resolution No. 2025-271: Moved by Councillor Hurst and
Seconded by Councillor Sepulis

THAT Council moves into open session at 12:28 pm

CARRIED

Council resumed into open session at 12:28 p.m.

Resolution No. 2025-272: Moved by Councillor Sepulis and
Seconded by Councillor Goyda

That Council receives the:

14.1 Confidential report regarding a proposed or pending acquisition or disposition of land by the municipality or local board – Land Acquisition/Disposition

14.2 Confidential report regarding personal matters about an identifiable individual, including municipal or local board employees – Human Resource Matter; and

That staff proceed as directed.

CARRIED

15. **BUSINESS ARISING FROM CLOSED SESSION:**
None

16. **NOTICE OF MOTION:**
None

17. **NEW BUSINESS:**
Councillor Sepulis remarked at the GJR railroad siding at the Corwhin crossing. Councillor Sepulis requested an update on this matter from staff. Mayor Seeley requested that staff inquire with the GJR how many historic sidings exist in the Township and if there will be driveway access during

construction and if it will be removed after construction is complete, and when switching of cars will be occurring.

Resolution No. 2025-273: Moved by Councillor Sepulis and Seconded by Councillor Goyda

That Council receives the new business item discussion and proceed as directed.

CARRIED

18. **CONFIRMATORY BY-LAW:**

(a) By-Law to confirm the proceedings of Council for the Corporation of the Township of Puslinch

Resolution No. 2025-274: Moved by Councillor Hurst and Seconded by Councillor Sepulis

That the following By-law be taken as read three times and finally passed in open Council:

By-Law 2025-070 being a by-law to confirm the proceedings of Council for the Corporation of the Township of Puslinch at its meeting held on the 27 day of August 2025.

CARRIED

19. **ADJOURNMENT:**

Resolution No. 2025-275: Moved by Councillor Goyda and Seconded by Councillor Sepulis

That Council hereby adjourns at 12:29 p.m.

CARRIED

_____
James Seeley, Mayor

_____
Justine Brotherston, Clerk

Ombudsman
ONTARIO

J. Paul Dubé, Ombudsman

Greetings,

It is my great pleasure to send you two hard copies (one English, one French) of my 2024-2025 Annual Report as we mark Ombudsman Ontario's 50th anniversary.

In this milestone year, we helped more people with more issues than ever before. This report reviews key trends in the 30,675 complaints and inquiries we received, including a 55% increase in cases about provincial correctional facilities, and a record 3,908 cases about municipalities. We also saw record or near-record numbers of cases about school boards, post-secondary education and children's services.

In keeping with our 50 years of protecting the rights of Ontarians, this report pays special attention to the rights of vulnerable children and youth, people with disabilities and Ontarians seeking provincial services in French. It also describes progress on our efforts to co-develop an Indigenous Services Plan (pages 8-10), as well as on our strategic plan (p. 11).

We encourage you to read the chapters of the report that relate to the topic areas relevant to your interests. In each chapter, we discuss the most common issues and the types of cases we have resolved. Please feel free to share this information with your colleagues and any other interested parties.

You can find the entire report, media materials and statistics on our website. We would be happy to provide more copies upon request.

Should you have any questions about the report or cases related to your organization, please do not hesitate to contact us. We are also happy to assist you with any general questions about our work. Our staff can be reached via email at info@ombudsman.on.ca.

Sincerely,



Paul Dubé,
Ombudsman of Ontario

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1975 - 2025

50 YEARS | ANS

Ombudsman
ONTARIO

ANNUAL REPORT

2024 - 2025

Office of the Ombudsman of Ontario

We are dedicated to being an effective agent of positive change for the people of Ontario and ensuring that their rights are respected and that public services are delivered with professionalism and fairness.

Acknowledgement of Territory

The Ombudsman of Ontario acknowledges that the province of Ontario is situated on the lands and territory of more than 130 unique First Nations, each with its own distinct cultures, languages, and histories that predate the existence and boundaries of the province.

We acknowledge the existence of political confederacies on these lands that predate both Canada and Ontario, such as the Three Fires Confederacy and the Haudenosaunee Confederacy, who among themselves have treaties and relationships that make up the dynamic landscape of this province.

We humbly recognize that we have collective responsibilities and obligations within the more than 40 treaties in Ontario, such as Treaty 3, Treaty 9, the Robinson Superior and Huron Treaties and the Williams Treaties.

We recognize that Indigenous peoples who have cared for these lands for millennia have been dispossessed by colonization, and we seek to find ways to remedy both historic and ongoing wrongs.

We are grateful to have travelled and worked in First Nation territories and with Métis and Inuit peoples in Ontario since the inception of the Ombudsman 50 years ago.

Ombudsman Ontario is committed to building respectful relationships with First Nation, Inuit, and Métis people and communities in Ontario through trust and transparency in order to be able to provide more services for a shared better future.

Aussi disponible en français.

ISSN 1708-0851

June 2025

Hon. Donna Skelly, Speaker
Legislative Assembly
Province of Ontario
Queen's Park

Dear Madam Speaker,

I am pleased to submit my Annual Report for the period of April 1, 2024 to March 31, 2025, pursuant to section 11 of the *Ombudsman Act*, so that you may table it before the Legislative Assembly.

Sincerely,



Paul Dubé
Ombudsman

Office of the Ombudsman of Ontario
483 Bay Street
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50 YEARS | ANS

"The Ombudsman as an institution to further protect the rights of [Ontarians] is an idea whose time has come… There is no doubt in my mind that the Office of the Ombudsman will continue to serve an essential role in Ontario."

– Arthur Maloney, first Ombudsman of Ontario, 1975-1976 Annual Report

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OMBUDSMAN'S MESSAGE

A strong voice for fairness – now more than ever

It is my great pleasure to present my 10th Annual Report as we mark Ombudsman Ontario's 50th anniversary. It has been an historic year in many respects.

As we mark a half-century of protecting Ontarians' rights and promoting fair, accountable public services, our role as an independent oversight body has never been more crucial.

Ontarians are turning to us in record numbers and benefiting from our unique ability to navigate bureaucracy, resolve problems in accessing public services, protect their fundamental rights, recommend systemic reforms and drive improvements in public administration.

In fiscal 2024-2025, we received **30,675** complaints and inquiries from people seeking our assistance. This represents a 30-year high, based on statistics we have reported every year since 1975-1976. Over that time, our intake processes evolved, our use of technology improved, and our jurisdiction expanded significantly. Given all of that, I can confidently report that in this milestone year, we have helped more Ontarians with more issues than at any other time in our history.

Correctional services – the urgent need for reform

The complaints brought to our Office often reflect deep public frustration with delays and failures in government services – even in cases where responsibilities and timelines are clearly defined. Our role is to ensure that public administration remains responsive, fair and accountable – principles we uphold across all areas of our mandate.



June 26, 2024: Ombudsman Paul Dubé releases his 2023-2024 Annual Report at a press conference at Queen's Park, Toronto.

But many of the issues we confront go far deeper than poor service. They raise serious questions about basic human rights. Nowhere is this more apparent than in Ontario's correctional system, which is, frankly, in growing crisis. We received **6,870** cases about correctional facilities this past year – a staggering 55% increase over 2023-2024. While this sector has long been our top source of complaints, the nature and severity of what we are hearing – and witnessing firsthand during our visits – demand urgent attention.



March 27, 2025: Ombudsman Paul Dubé, centre, with members of our Investigations team, Maplehurst Correctional Complex, Milton.

Most people held in Ontario's jails are not serving sentences; they are awaiting trial, legally presumed innocent. Many institutions are dangerously overcrowded – some operating at over 150% of their intended capacity – and/or facing chronic staff shortages. The result is a deteriorating environment marked by escalating tensions and compromised safety for inmates and staff alike.

Respecting the rights of individuals in custody is a legal and moral imperative, and my team and I are intensifying our efforts to this end. Correctional institutions reflect the values of the society that maintains them. When we fail to uphold the basic dignity of people in custody, we do more than inflict harm – we erode public trust, degrade working conditions for staff, and weaken the very foundations of our justice system.

That is why we recently launched an investigation into the province's response to the two-day incident at Maplehurst Correctional Complex in which inmates were forced to strip to their underwear and sit facing a wall with their wrists zip-tied. When an incident occurs in an Ontario correctional facility that impacts the administration of justice and the rights of inmates, it is imperative that we understand why it happened and what measures are being taken to ensure it does not happen again.

Recent media coverage has exposed just how far-reaching these failures can be. Violations of inmate rights' are not just internal matters – they are undermining the administration of justice itself. Courts have reduced sentences and granted early parole due to unlawful treatment behind bars. Some inmates have applied to have their charges – even murder charges – stayed.

This is not just a legal and policy failure, it is a moral one. If left unaddressed, the consequences will continue to reverberate through our courts, our communities and our collective conscience.

Ontario's correctional system is in urgent need of meaningful, systemic reform – not only to relieve pressure on overcrowded facilities and burned-out staff, but to realign the system with its rehabilitative purpose. This is a matter of public safety, human rights, and basic decency. We cannot afford to ignore it any longer.

Promoting good governance

Governments everywhere are grappling with financial pressures as they serve growing and diverse populations. Ontario is no exception. Ombudsman Ontario plays a key role in guiding public institutions toward solutions that are efficient, fair, and grounded in a respect for rights.



August 18, 2024: Ombudsman Paul Dubé, left, and Deputy Ombudsman Barbara Finlay, at the annual Association of Municipalities of Ontario conference, Ottawa.



November 8, 2024: Ombudsman Paul Dubé, right, with Kimberly Murray, the Independent Special Interlocutor for Missing Children and Unmarked Graves and Burials Sites associated with Indian Residential Schools, after Ms. Murray spoke to Ombudsman staff about her report, Toronto.



June 3, 2025: OPP Commissioner Thomas Carrique, left, accepts the Ombudsman's Award for Good Governance from Ombudsman Paul Dubé. Both were attending the Canadian Association of Civilian Oversight of Law Enforcement's annual conference, Fredericton.

At its core, good governance is about giving people a voice and respecting their rights. Individuals must be able to access public services without unnecessary barriers, and their concerns should be heard and addressed meaningfully. We work continuously with public officials to reinforce the link between sound administration, democratic values, and the protection of rights.

Fortunately, Ontario benefits from thousands of dedicated public servants – across the provincial government, within its 444 municipalities, and throughout the many agencies in the broader public sector – who understand and value the importance of independent oversight.

In recognition of this, and building on principles established by this Office from the outset, I launched the

Ombudsman's Award for Good Governance this year, to reflect tangible actions by public sector bodies that have resulted in exemplary administration. I was pleased to present the first Good Governance Award to the Ontario Provincial Police for its efforts to enhance its provision of French language services. We plan to honour other bodies in the provincial government and municipal sector in the coming months.

Building together for the future

This year also marks the first milestone in the three-year **Strategic Plan** we unveiled last year. I am proud to report significant progress on our key objectives, including a major website redesign, enhanced outreach efforts and increased collaboration across our team (see more on page 11).

In particular, I am proud to highlight the co-development of our first **Indigenous Services Plan**, which reflects our dedication to meaningful engagement with Indigenous peoples and communities, and to listening, learning, and acting in the spirit of reconciliation. The plan (detailed further in the next section of this report) will be developed collaboratively with Indigenous partners and will be a foundational step in ensuring that our services are more culturally responsive, respectful, and accessible. It marks not just a policy achievement, but a long-term commitment to building trust and advancing reconciliation through our daily work.

In times of economic and social strain, the need for reliable and transparent public services becomes even more critical. This was undeniably evident during the COVID-19 pandemic. Today, as Ontario faces economic uncertainty due to newly imposed tariffs by the United States, it is more vital than ever that government actions designed to protect people, industries and jobs are executed with fairness, transparency and unwavering respect for individual rights.

When the Ombudsman's Office was first proposed in 1975, Ontario's government pledged it would "ensure the protection of our citizens against arbitrary judgment or practices." Over the past five decades, we have remained a steadfast advocate for transparency, fairness, and accountability, working alongside democratic institutions across Canada and around the globe. Our mission aligns with the United Nations' 2024 Resolution recognizing the vital role that ombudsman institutions play in promoting and protecting human rights, good governance, and the rule of law.

We are stronger when we stand united, ensuring that fairness, accountability, and the protection of rights continue to be the cornerstones of our public institutions.

As your Ombudsman, I want every Ontarian to know that we are here for you, as we have been for 50 years. We are here to listen, to provide oversight, and promote good governance that upholds the values of justice and fairness that define us all.



December 3, 2024: Ombudsman Paul Dubé, left, signs a Memorandum of Understanding with Hong Kong Ombudsman Jick-Chi Jack Chan, Hong Kong (see more on p. 17).

INDIGENOUS SERVICES PLAN

Our commitment to reconciliation

Ombudsman Ontario is creating an Indigenous Services Plan that will guide our service delivery, collaboration, and engagement with Indigenous peoples, communities, and organizations.

Over the coming year, we will engage with Indigenous communities and service providers to co-develop this plan. Through this process, we aim to define key guiding principles, identify shared priorities, strengthen relationships, and improve how we serve Indigenous peoples.

This plan signals our commitment to reconciliation and building respectful relationships with First Nation, Inuit and Métis people in Ontario through trust and transparency, in order to provide services for a better shared future.

> We are not just inviting participation – we are building partnership.

We have set out to **co-develop** a meaningful, culturally grounded strategy for engagement with Indigenous communities – one that informs both our outreach and our transformation as an organization. This approach aims to build relationships and identify opportunities for the Ombudsman to contribute to reconciliation by identifying issues and building the capacity necessary to address them effectively.

Ontario is home to the largest Indigenous population in Canada, and that population is growing at a rate faster than the non-Indigenous population. We are committed to creating meaningful and respectful relationships with Indigenous peoples and ensuring their access to the services we offer in all areas within our jurisdiction – from education and corrections to health care, child welfare, housing, natural resources and more.

Our commitment to respectful relationships

Through the resolution of complaints and investigation of systemic issues, Ombudsman Ontario plays a unique role in promoting fairness and a respect for rights. We can identify emerging challenges, propose improvements to public services, and serve as a bridge between people and the provincial institutions in Ontario that serve them.

Our mission is to acknowledge, respect, and affirm the cultures, traditions, and histories of Indigenous peoples – not only in individual cases but in the broader systemic change we seek to influence.

We also recognize the special constitutional relationship that Indigenous peoples hold with the Crown. Our work aims to support this relationship, inform constructive government-to-government dialogue, and contribute meaningfully to Ontario's reconciliation journey.

Opportunities in dialogue

For Indigenous peoples and communities:

- A stronger voice in identifying issues and shaping outcomes
- Recommendations that promote fairness, the protection of rights, and culturally responsive services
- A trusted, long-term partnership with an oversight body that is independent of government

For the people and institutions of Ontario:

- A deeper understanding of Indigenous perspectives and priorities
- More informed and inclusive policy decisions
- Guidance that supports meaningful reconciliation efforts

For the Ontario Ombudsman's office:

- A transformative opportunity to increase cultural humility, competence and responsiveness
- A foundation to serve all Ontarians with greater equity and awareness
- A leadership role in promoting good governance and learning through an Indigenous lens

> This is more than access to services – it's about reconciliation in action.

Our first steps

Education and capacity building

In response to the Truth and Reconciliation Commission's Call to Action 57, we have begun by educating ourselves – acknowledging that internal change is a prerequisite for meaningful engagement. We have undertaken:

- Staff training over the past four years through the National Centre for Truth and Reconciliation
- Mandatory cultural safety training for all staff
- Establishment of a smudging room and Indigenous Circle within our office
- Participation in Orange Shirt Day and other commemorative events
- Adoption of trauma-informed practices

> Education is the foundation of cultural safety and trust.

Outreach and relationship building

We have engaged directly with Indigenous leadership and organizations, and participated in community and cultural events:

- Meetings with First Nations Chiefs, Friendship Centres, and Indigenous women's organizations like the Ontario Native Women's Association
- Participation in conferences, community powwows, and a three-day visit to Asubpeeschoseewagong Netum Anishinabek (Grassy Narrows First Nation)
- One-on-one engagement with Chiefs
- Outreach to Indigenous organizations and political representatives

Transparency, listening, and cultural understanding are key to fostering trust and building respectful relationships.

Culturally responsive services

We are working to improve accessibility and service delivery by:

- Translating outreach materials into Ojibwe (Anishinaabemowin), Moose Cree (Iliilîmowin), Oji-Cree (Anishininiimowin), and Mohawk (Kanien'kéha)

- Enhancing visibility of Indigenous services on our website
- Adapting complaint processes to reflect Indigenous cultural and contextual realities

Milestones to date

Our culturally responsive and proactive approach has already led to tangible improvements in cases involving Indigenous individuals and communities, including:

- Investigations and recommendations to improve child and family services
- Promoting access to spiritual and cultural programming in correctional institutions
- Supporting families of children with complex special needs in accessing services
- Resolving matters involving natural resource permits and land use

Supporting long-term transformation

To sustain and deepen this work, we are creating two dedicated positions:

1. **Indigenous Liaison Advisor (now operational):** An Indigenous advisor working directly with the Ombudsman to build respectful, strategic partnerships with Indigenous Nations and organizations.
2. **Indigenous Services Coordinator (in progress):** A leader within Ombudsman Ontario who will help ensure that all services and investigations are conducted with cultural awareness and sensitivity.

The individuals in these roles will be part of our collective effort to facilitate engagement and building relationships with Indigenous peoples, nations and communities, and our commitment to embed principles of Truth and Reconciliation across our operations.

Looking forward

Our next phase of work includes:

- Expanding services to First Nations, Inuit, and Métis peoples across Ontario
- Continuing staff training on the history and impacts of colonialism
- Strengthening government-to-government and nation-to-nation relationships
- Integrating calls to action from the Truth and Reconciliation Commission and calls for justice from the National Inquiry into Missing and Murdered Indigenous Women and Girls into our work

Measures of success

1. Accessibility and awareness
   - Co-development of an impactful Indigenous Services Plan
   - Indigenous-specific communications and outreach
   - Staff with enhanced cultural competence
   - Complaint resolution that reflects Indigenous experiences
2. Engagement and knowledge sharing
   - Ongoing relationships with Indigenous leaders and organizations
3. Systemic change and influence
   - Identification and resolution of systemic issues
   - Implementation of culturally grounded recommendations
   - Promotion of best practices in public sector equity and accountability

> “This is not a checklist. It’s a long-term, living commitment to reconciliation and is rooted in truth, respect, and positive action.”
>
> — Ontario Ombudsman Paul Dubé

STRATEGIC PLAN UPDATE 2024-2025

Our strategic plan, created a year ago and available on our website, sets our strategic priorities to support our vision and mission through fiscal 2026-2027. Here is a summary of the progress we have achieved in our first year.

PILLAR 1

PRIORITIZE SERVICE EXCELLENCE AND VALUE FOR ALL ONTARIANS

Prioritize innovative solutions and commitment to meeting the diverse needs of Ontarians.

PROGRESS

- Increased public outreach activities and measured reach to thousands of people across Ontario, including Indigenous and Francophone communities.
- Launched 50th anniversary engagement campaign.
- Recorded 15% increase in complaints and inquiries from public.
- Launched redesigned website with improved accessibility and interactivity.
- Upgraded tech devices and strengthened cybersecurity.
- Progressed the co-development of Indigenous Services Plan (see page 8).

PILLAR 2

STRENGTHEN AND IMPROVE PUBLIC SERVICES THROUGH EXEMPLARY OMBUDSMANSHIP

Promote accountability, transparency, fairness and a respect for rights.

PROGRESS

- Launched Ombudsman's Good Governance Awards.
- Shared best practices with more organizations across mandate.
- Conducted visits to correctional facilities, youth justice centres, provincial schools, group homes.
- Created new resources for local integrity commissioners and local services boards.
- Engaged with municipalities and a wide range of other bodies at conferences.
- Shared expertise with peers in national and international ombudsman and oversight bodies.

PILLAR 3

FOSTER A WORKPLACE THAT EMPOWERS AND UNIFIES OUR TEAM

Foster an environment where our valued, empowered team has a shared sense of purpose.

PROGRESS

- Recruitment efforts resulted in 92% of staff complement filled.
- Engaged all units in Operational Plan projects.
- Conducted cross-team training in investigation skills, unconscious bias and trauma-informed interactions.
- Set framework for Employee Resource Groups.
- Advanced new performance optimization program.
- Launched organization-wide management training program.

OUR 50TH ANNIVERSARY

50 years of protecting your rights

On March 11, 1975, Ontario became the seventh province in Canada to propose an independent parliamentary Ombudsman. Reading the Speech from the Throne that day, Lieutenant Governor Pauline McGibbon said the Ombudsman would help the people by serving as "a safeguard against the growing complexity of government."

Two months later, the government introduced the *Ombudsman Act*, and Premier Bill Davis nominated well-known criminal lawyer Arthur Maloney as the first Ombudsman. This announcement touched off what Mr. Maloney later called "an avalanche of written and verbal requests for the Ombudsman's help," even before the legislation was passed.

> "The office of Ombudsman will be a necessary additional tool to the already extensive program for the protection of civil rights which exists under the law of this province."
>
> — Premier Bill Davis, after nominating the first Ombudsman, May 1975

Ombudsman Maloney was officially sworn in by Lieutenant Governor McGibbon on October 30, 1975 – by which time he had already received more than 1,000 complaints. A great deal of these were about provincial bodies like correctional facilities – where the Ombudsman flagged serious concerns about overcrowding. He also addressed issues with social benefits, health agencies and youth justice in his first year.



October 30, 1975: Arthur Maloney is sworn in as Ontario's first Ombudsman by Lieutenant Governor Pauline McGibbon, right, at Queen's Park, Toronto.

As the office's symbol, Mr. Maloney chose a gryphon – a mythical half-eagle, half-lion that protects human rights. The original Ombudsman logo showed the gryphon seated amongst four trilliums (the province's floral emblem), representing the Indigenous peoples, Francophones, Anglophones, and all other diverse populations that make up the province.



1975 - 2025

50 YEARS | ANS

Ombudsman ONTARIO

The Ombudsman's original gryphon symbol from 1975, left, is reimagined in our 50th anniversary logo. The gryphon represents the Ombudsman's role as a protector of rights.

> "And thus, the Ombudsman represents protection for the social rights and cultural integrity of all."
>
> — Arthur Maloney, first Ombudsman of Ontario, 1975-1976 Annual Report

He promised that everyone who contacted the Ombudsman would receive help, particularly vulnerable people. However, many of the problems people brought to him fell outside of his powers under the *Ombudsman Act*.

After three years, he published a 598-page report called *Blueprint for the Office of the Ombudsman*, in which he argued that the Ombudsman should be able to help people with more than just provincial government agencies. He pointed out that thousands of complaints had to be turned away about municipalities, school boards and other organizations, such as children's aid societies.

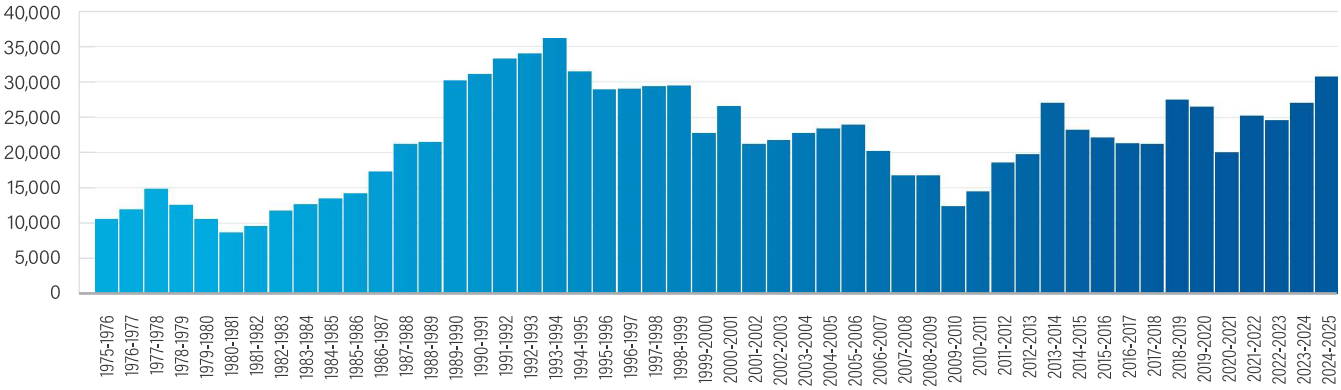
Today, thanks to legislative changes in 2015 and 2019, the Ombudsman's jurisdiction includes more than 1,000 public bodies – most of those mentioned in the *Blueprint*, and more. In addition to provincial government services, anyone can complain to us about municipalities, universities and school boards, child protection services and French language services.



April 29, 2025: Ombudsman Paul Dubé with our public display case at Queen's Park, which details our role and impact as a democratic institution since 1975, Toronto.

In 50 years, we have handled more than **1 million** cases and conducted hundreds of investigations, resulting in more than **1,300** recommendations. The vast majority of Ombudsman recommendations to improve public services have been implemented, benefiting millions of Ontarians. These include: Expanded life-saving screening of newborn babies for metabolic diseases, a more fair and secure lottery system, protections for the rights of inmates in segregation, better pandemic preparedness in long-term care homes, enhanced de-escalation training for police, more supports and services for adults with developmental disabilities, improved provision of services in French, and improved recognition of the rights of children and youth.

CASES RECEIVED 1975-2025 ▸ TOTAL: 1,080,824



2024-2025 AT A GLANCE



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1. August 17, 2024: Ombudsman staff at our booth at the Anishinaabe Keeshigun gathering and pow-wow, Thunder Bay. **2. May 11, 2024:** Ombudsman Paul Dubé, centre, speaks on a panel at the 13th World Conference of the International Ombudsman Institute, The Hague. **3. June 11, 2024:** Ombudsman staff at our booth at the Chiefs of Ontario Annual Chiefs Assembly, Ohsweken. **4. October 17, 2024:** French Language Services Unit Manager Jean-François L'Heureux gives a presentation at the annual conference for the Assemblée de la francophonie de l'Ontario, Ottawa. **5. November 8, 2024:** Ombudsman Paul Dubé and French Language Services Commissioner Carl Bouchard, centre, with Deputy Ombudsman Barbara Finlay, right, greet interns from the Ontario Legislature Internship Programme, Toronto. **6. June 25, 2024:** Members of our Children and Youth Unit at the Wonderland Pride Prom, Toronto. **7. May 23, 2024:** Ombudsman staff at our booth at Toronto Newcomer Day, Toronto. **8. March 25, 2025:** Our staff at the East York Seniors Active Living Health and Wellness Fair, Toronto.



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9. August 18, 2024: Ombudsman staff speak to a delegate at the annual Association of Municipalities of Ontario conference, Ottawa. **10. June 28, 2024:** Our Office's presence in the Toronto Pride Parade, Toronto. **11. February 28, 2025:** French Language Services Commissioner Carl Bouchard, centre, and staff at our booth at the Centre francophone du Grand Toronto's Black History Month Gala, Toronto. **12. May 2, 2025:** Ombudsman staff and a sign language interpreter greet attendees at our booth at the Ontario Association of the Deaf's annual Mayfest event, Toronto. **13. November 14, 2024:** Ombudsman staff at the Ontario Society of Senior Citizens Organizations' annual fair, Toronto. **14. March 10, 2025:** Ombudsman Paul Dubé, centre, with staff at our booth at the Little Native Hockey League Tournament, Markham. **15. August 2, 2024:** A member of the Children and Youth Unit's Indigenous Circle team greets attendees at our booth at the Gathering of Our People, Moose Cree First Nation.

ABOUT OUR OFFICE

Ombudsman
ONTARIO

Who we are

The Ombudsman is an independent, non-partisan Officer of the Ontario Legislature, appointed by all parties. Our role is to ensure that the provincial government and public sector serve people in a way that is fair, accountable, transparent and respectful of their rights.

The Ombudsman is a democratic institution, not a government department.

What we do

We receive complaints and inquiries from the public about the administrative decisions and actions of more than 1,000 public sector and government bodies in Ontario, as well as French language services and services provided in the child protection sector.

We intervene to resolve or investigate issues involving government and public sector administration and make evidence-based recommendations for corrective action when necessary.

We provide free assistance to people who need help accessing public services or having their rights respected.

What we don't do

There are some things we can't do. For example, we cannot take complaints about private businesses, federal government bodies, decisions of judges, the conduct of elected officials, or hospitals and long-term care homes. But if we can't help, we'll let you know who can.

Our vision

A public sector that serves Ontarians in a way that is fair, accountable, transparent and respectful of their rights.

Our mission

To be an effective agent of positive change for the people of Ontario by enhancing government and public sector fairness, accountability and transparency, as well as promoting a respect for rights.

Our principles

Impartiality
Independence
Confidentiality
Fairness

Our values

Trust
Respect
Accessibility
Excellence



May 12, 2025: (L-R) Ombudsman Paul Dubé signs Memoranda of Understanding with Netherlands Ombudsman Reinier van Zutphen, Curaçao Ombudsman Keursly Concincion, and Chief Ombudsman of Thailand, Somsak Suwansujarit, at the IOI General Assembly, Rabat.

Our affiliations

Our Office works collaboratively and shares insights, strategies and best practices with many other oversight bodies. Participation in organizations related to our oversight responsibilities provides valuable learning opportunities, optimizes our knowledge and skills, and enables us to better serve Ontarians. They include:

Canadian Council of Parliamentary Ombudsman

- Represents provincial and territorial parliamentary ombudsman offices across Canada.

International Ombudsman Institute (IOI)

- Represents 205 independent ombudsman institutions from more than 100 countries
- Ombudsman Paul Dubé has been President of the IOI's North American Region since 2016

L'Association des Ombudsmans et des Médiateurs de la Francophonie

- Represents independent ombudsman and human rights institutions throughout the French-speaking world

Plus:

Forum of Canadian Ombudsman

International Association of Language Commissioners

Canadian Council of Child and Youth Advocates

United States Ombudsman Association

Canadian Association for Civilian Oversight of Law Enforcement

National Association for Civilian Oversight of Law Enforcement

International Corrections and Prisons Association

Stronger together: International collaboration

Ombudsman Paul Dubé participated in a number of Memoranda of Understanding (MOUs) with his international peers this past year, to foster the exchange of professional knowledge and collaboration. In December 2024, he signed an MOU with the Hong Kong Ombudsman during an international summit financed by that office to mark its 35th anniversary (see photo, page 7).

In May 2025, in honour of Ombudsman Ontario's 50 years of commitment to promoting fairness, accountability and transparency, he signed MOUs with the Netherlands Ombudsman, the Ombudsman of Curaçao, and the Chief Ombudsman of Thailand during the Annual General Assembly of the International Ombudsman Institute in Morocco.

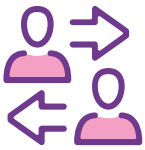
HOW WE WORK



COMPLAINT INTAKE

We take complaints via the complaint forms on our website, by email, phone or letter, or in person by appointment. Our staff will contact you for more details to review your complaint. We will not divulge your name or information to anyone without your consent, and there is no charge for our services.

Not a complaint? No problem – we also handle inquiries. Our staff can answer general questions or point you in the right direction.



REFERRALS

If your complaint is not within the Ombudsman's jurisdiction, we will refer you accordingly. If you haven't tried existing complaint mechanisms, we'll suggest you do that first – and return to us if the issue isn't resolved.



REVIEW AND RESOLUTION

We always seek to resolve complaints at the lowest level possible. To do so, we often make inquiries and requests for information with the relevant bodies. Our review might determine the organization acted fairly. If we find problems, we might also share best practice suggestions to improve services to the public.



INVESTIGATION

If we are unable to resolve the matter, the Ombudsman may decide to conduct an investigation. Some investigations involve multiple interviews and extensive evidence gathering. The Ombudsman may also launch a systemic investigation if there is a potential systemic issue of significant public interest underlying a complaint or group of complaints.



FINDINGS AND REPORTS

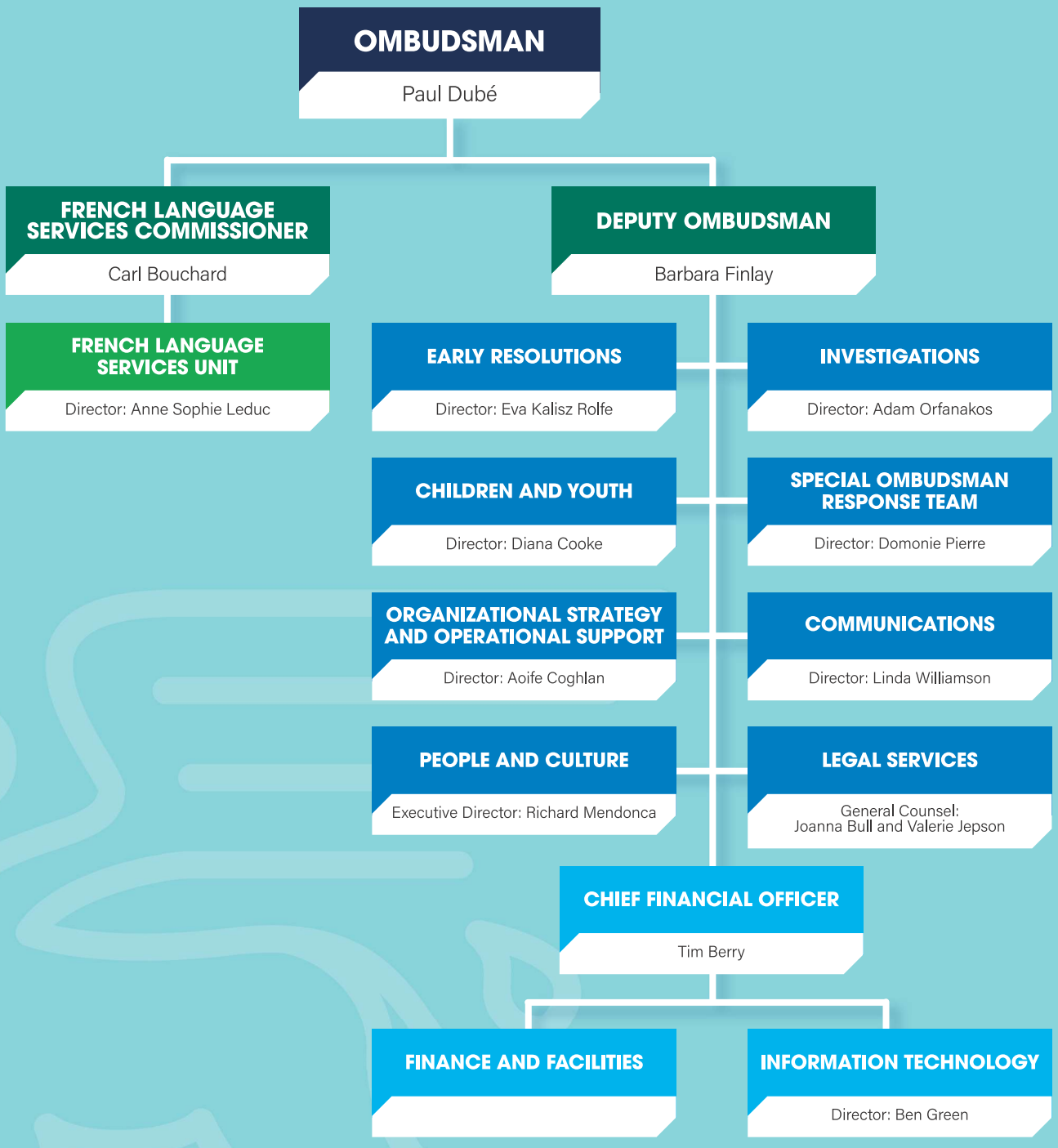
When an investigation is completed, the Ombudsman provides the findings to the organization in question for a response before they are finalized. His findings and recommendations are published in investigation reports and/or in our Annual Reports, and shared publicly on our website, via social media, news media and our e-newsletter. Copies are also available from our Office.



RESULTS

We communicate the outcome of individual investigations and most reviews and resolutions to complainants and the relevant public sector bodies, as warranted. Summaries of many such cases are published in our Annual Reports and other communications. When the Ombudsman's recommendations are accepted, our staff follow up until they are implemented, and we monitor in case problems recur.

WHO WE ARE


OMBUDSMAN
Paul Dubé
FRENCH LANGUAGE SERVICES COMMISSIONER
Carl Bouchard
FRENCH LANGUAGE SERVICES UNIT
Director: Anne Sophie Leduc
DEPUTY OMBUDSMAN
Barbara Finlay
EARLY RESOLUTIONS
Director: Eva Kalisz Rolfe
INVESTIGATIONS
Director: Adam Orfanakos
CHILDREN AND YOUTH
Director: Diana Cooke
SPECIAL OMBUDSMAN RESPONSE TEAM
Director: Domonie Pierre
ORGANIZATIONAL STRATEGY AND OPERATIONAL SUPPORT
Director: Aoife Coghlan
COMMUNICATIONS
Director: Linda Williamson
PEOPLE AND CULTURE
Executive Director: Richard Mendonca
LEGAL SERVICES
General Counsel:
Joanna Bull and Valerie Jepson
CHIEF FINANCIAL OFFICER
Tim Berry
FINANCE AND FACILITIES
INFORMATION TECHNOLOGY
Director: Ben Green



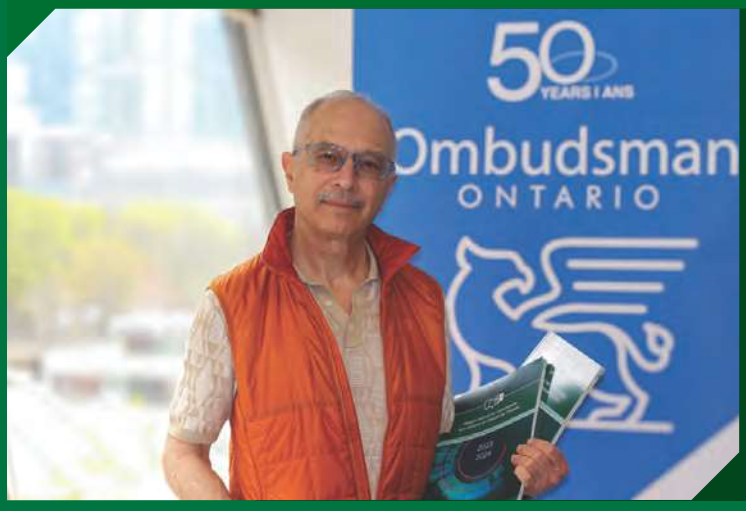
"What I love most about this job is the sense of purpose it gives me. Knowing that we've made a difference for someone who really needed support is incredibly fulfilling. People trust us with really personal stories and difficult situations. It's a privilege to be that support, to guide them when they feel overwhelmed."

— Mobolaji, Early Resolution Officer, General Unit

"There's a strong emphasis here on collaboration, and everyone is approachable and professional. I'm constantly learning and feel challenged every day in a positive way. The most meaningful moments for me are always the cases where I've been able to highlight the voices of children and youth, especially because they are some of the most vulnerable people in our society."

— Jessica, Investigator, Children and Youth Unit





"Being able to work in French and English is one of the main reasons I came to work here. There's also a strong sense of collaboration and a deep respect for human rights and dignity. It's rewarding to see the positive impact we can have at the individual level, and on how services are delivered overall."

— Toufic, Investigator, French Language Services Unit

ABOUT THIS REPORT

Cases discussed in this report were received between **April 1, 2024 and March 31, 2025**. Significant events occurring between March 31, 2025 and the time of publication may also be included.

We use "**cases**" to mean complaints and inquiries. Cases sometimes involve multiple issues or complainants and several different public sector bodies.

This report is organized by topic area, rather than by government body. The chapters are arranged in order of case volume, as shown in the accompanying pie chart. Each topic chapter discusses the main complaint trends and significant cases of the past year.

We recognize people of all **gender expressions**, and we do our best to use accurate pronouns. In anonymized case descriptions, gendered and non-binary pronouns are sometimes randomly assigned, or changed to protect the person's identity.

We're grateful for the feedback we receive from the people we help, and have included some of their comments throughout this report, while preserving their confidentiality.

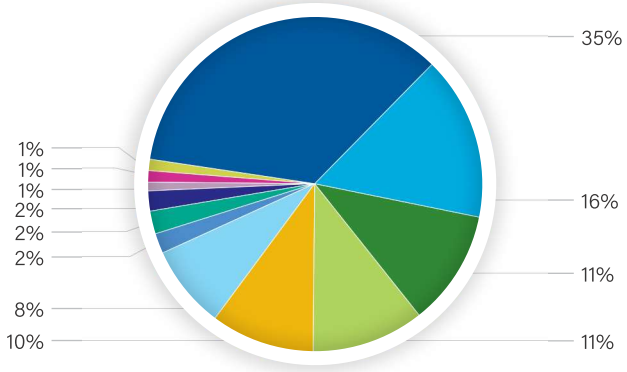
A breakdown of complaints by ministry, program, municipality, etc. can be found in the **Appendix**.

GOOD TO KNOW

Watch for "Good to know" boxes throughout this report for explanatory notes.

Cases by topic

- LAW AND ORDER
- MUNICIPALITIES
- SOCIAL SERVICES
- EDUCATION
- CHILDREN AND YOUTH
- MONEY AND PROPERTY
- TRANSPORTATION
- EMPLOYMENT
- HEALTH
- CERTIFICATES AND PERMITS
- FRENCH LANGUAGE SERVICES
- ENERGY AND ENVIRONMENT



Cases by type

Within each topic area, the most common complaint – by far – is service delivery. Here are the 10 most common types of complaints we receive.

1. **Service delivery**
2. Administrative decisions
3. Communication
4. Delays
5. Legislation and/or regulations
6. Enforcement of rules or policies
7. Broader public policy matters
8. Procedures
9. Internal complaint processes
10. Fees or funding

2024-2025 HIGHLIGHTS



TOTAL CASES RECEIVED

30,675*

42% resolved within one week

53% resolved within two weeks

41% received online

46% received by phone

13% by mail or fax

*See more statistical breakdowns in the **Appendix***

TOP 10 CASE TOPICS

6,870	Correctional facilities
3,908	Municipalities and municipal meetings
2,129*	Children and youth
1,261	School boards
1,237	Tribunals Ontario
1,038	Ontario Disability Support Program
708	Universities and colleges
423	Family Responsibility Office
281**	French language services
218	ServiceOntario

*Cases received by the Children and Youth Unit, and about youth justice centres

**Cases received by the French Language Services Unit – details of these will be published in a separate annual report in late 2025.

2024-2025 HIGHLIGHTS

COMMUNICATIONS

199,710 website visitors from **187** countries



1,484,263 pageviews

10,547 people Facebook reach

7,300 YouTube views

309,630 X impressions

117,073 LinkedIn impressions

560 print and digital media articles

281 broadcast media stories

OUTREACH

131 events (in-person and virtual presentations, speeches, conferences, meetings, etc.)

186 consultations and responses to requests from bodies we oversee

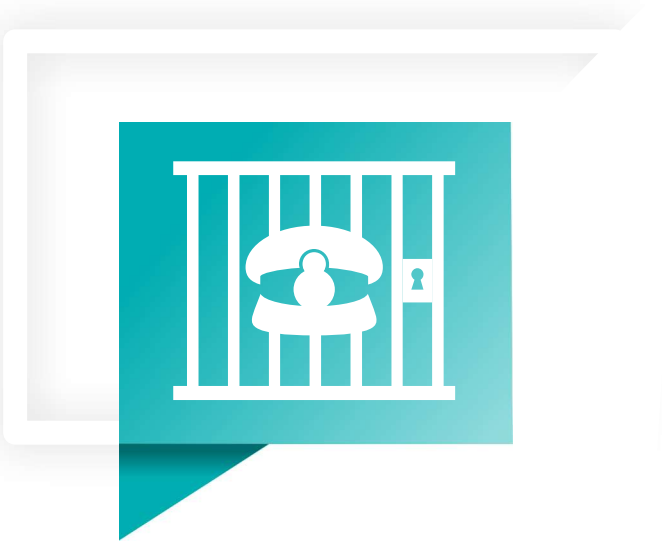
REPORTS ON INVESTIGATIONS

- *Missed Messages* – July 2024 – Investigation by the French Language Services Commissioner into unilingual government advertising regarding health services
- Municipal open meetings – **35** reports and letters issued in fiscal 2024-2025
- School board open meetings – **3** reports and letters issued in fiscal 2024-2025

5 SUBMISSIONS TO GOVERNMENT

- April 2024: Proposed changes for integrity commissioners and meeting procedures for school board trustees
- June 2024: Proposed policy directives for children's aid societies
- May 2024: Bill 188, *Supporting Children's Futures Act, 2024*
- January 2025: Amendments to designated areas under *French Language Services Act*
- February 2025: Proposed changes to municipal code of conduct and integrity commissioner framework

YEAR IN REVIEW



LAW AND ORDER

Overview

In 2024-2025, cases in this category reached a record high, due to a 55% surge in complaints about correctional facilities. The Ombudsman has signalled this alarming increase to the Ministry of the Solicitor General, along with our observations from visits to several correctional facilities.

It was also an historic year with respect to oversight of policing, as legislative changes extending the Ombudsman's jurisdiction to all of the province's police oversight bodies came into effect, closing a longstanding gap.

We continued to receive complaints about delays at administrative tribunals like the Human Rights Tribunal of Ontario and the Landlord and Tenant Board. Tribunals Ontario, which is part of the Ministry of the Attorney General and includes both of those tribunals and more, was again the single most complained-about organization, although cases declined to **1,237** from last year's 1,457.

Trends in cases – correctional services

Ensuring the fair and humane treatment of individuals in Ontario's correctional facilities is a core responsibility

of our Office. We take swift action on urgent issues – especially those involving health, safety, and basic rights – and work to ensure that no voice goes unheard.

We also maintain confidential channels for inmates to reach us, including toll-free phone access and self-sealing letters that cannot be opened by facility staff. This ensures that inmates can safely share concerns and access our services without fear of reprisal.

This past year saw a significant increase in complaints from correctional institutions, many of which were operating over capacity. We received **6,870** complaints and inquiries about them, representing a **55%** increase over 4,444 in 2023-2024.

The most frequent complaints we reviewed involved:

- Inadequate health care
- Overcrowding (three or more inmates in cells built for two)
- Frequent lockdowns
- Segregation (solitary confinement)
- Use of force by correctional officers

We received nearly **2,800** complaints about conditions related to overcrowding and lockdowns. At Central East Correctional Centre, **366** inmates submitted a group complaint highlighting deteriorating living conditions. At Central North Correctional Centre, **197** inmates reported unsanitary cells and some vermin infestations.

Site visits and proactive oversight

We visited **12** correctional facilities across Ontario in 2024-2025 to view conditions firsthand and meet with senior staff and inmates. These visits strengthen our oversight and ensure that our work is informed by our firsthand observations.

Between July 2024 and April 2025, we visited: Central East Correctional Centre, Central North Correctional Centre, Elgin Middlesex Detention Centre, Kenora Jail, Maplehurst Correctional Complex, Ontario Correctional Institute, Ottawa-Carleton Detention Centre, Quinte Detention Centre, South West Detention Centre, Thunder Bay Jail, Toronto South Detention Centre and Toronto East Detention Centre.

Examples of issues raised during these visits include:

- At Kenora Jail: Access to feminine hygiene products and the need for improved Indigenous supports.
- At Central North Correctional Centre: Overcrowding, frequent lockdowns, and the absence of a Native Inmate Liaison Officer.
- At Ottawa-Carleton Detention Centre: Complaints about mold, poor air quality, and extreme temperatures.

We engage regularly with senior officials at the Ministry of the Solicitor General and with leaders at correctional institutions. These proactive discussions allow us to flag systemic issues early and support timely solutions.

We also meet with organizations such as the John Howard Society, which offers support to individuals in conflict with the law. These interactions help us stay informed about community-based concerns and improve our responsiveness to issues raised by incarcerated individuals and their advocates.

Maplehurst Correctional Complex – overcrowding and strip search

We noted a substantial increase in the volume and seriousness of complaints coming out of Maplehurst Correctional Complex in 2024-2025 – **722** cases, up from 357 in 2023-2024. Many inmates complained about poor living conditions, including frequent lockdowns and overcrowding.

In March 2025, the Ombudsman was copied on numerous emails sent to the Premier and Solicitor General by members of the public concerned about the conditions at Maplehurst. The emails raised concerns about inmates' human rights, an outbreak of invasive Group A streptococcal disease that resulted in the death of two inmates, and a troubling 2023 strip search action by the Institutional Crisis Intervention Team (ICIT) involving nearly 200 inmates that came to light in court cases in April (with one judge calling it a "rather shocking situation").

We received complaints directly from inmates at Maplehurst, as well as their family members, about this incident. They told us inmates were strip searched and zip-tied and given no access to showers, phones, socks, shoes, or blankets. They believed that this was a retaliation for an inmate assaulting a correctional officer. Several of the inmates said they were assaulted by officers.

The Ombudsman visited Maplehurst with a team of staff in late March. He also raised the complaints we received with senior Ministry leadership in April and communicated that he was contemplating an investigation.

On June 9, 2025, the Ombudsman notified the Ministry of the Solicitor General that he had launched an investigation to examine the Ministry's response to the December 2023 ICIT activation and its impact on the rights of inmates.

> "The fair and humane treatment of people in Ontario's correctional facilities, including their health and safety, is a priority for our Office. The issues that you raised in your letter are vital to the health and well-being of inmates and the Ombudsman takes these issues very seriously."
>
> — Excerpt from our response to a group complaint regarding conditions at Maplehurst Correctional Complex, April 2025

Health care

We prioritize urgent cases where inmates' safety and well-being might be at risk. When dealing with access to health care, we help inmates access the specialists, medication, and mental health services they need. The Ministry has told us it is working to improve health care delivery for inmates through its Health Services Division.

We regularly speak with senior Ministry officials about their efforts to address frequent complaints, such as delays in seeing medical professionals and receiving medication, and scheduling urgent appointments with specialists.

Some examples:

- After an inmate was given the wrong medication because her file was switched with someone else's by mistake, we followed up with the facility to make sure the records were corrected.
- An inmate with sleep apnea needed a part for a machine that helped him breathe at night; we made sure it was delivered to him directly.
- When an inmate in a wheelchair was transferred into a unit that wasn't wheelchair accessible, we spoke with senior staff, who moved him back to a unit that could accommodate his mobility needs.
- A group of inmates were notified that they might have been exposed to a blood-borne virus during dental visits, due to dental equipment that was not properly cleaned. We are following up with the Ministry on its actions to prevent further such incidents.

We also helped inmates access crucial mental health supports:

- An inmate at his "breaking point" desperately needed mental health services; we ensured he was quickly seen by a physician and psychiatrist.
- We prompted a facility to confirm an inmate's prescriptions and fill them after he told us he had gone without his prescribed mental health medications for a month.

Access to Indigenous services

Complaints about access to traditional spiritual practices and services for Indigenous inmates skyrocketed in 2024-2025 – to **275**, from just 19 the previous year. The bulk of these were from inmates who had issues accessing Native Inmate Liaison Officer (NILO) services.

Correctional facilities are required to provide Indigenous inmates with access to their traditional spiritual practices in a manner that recognizes and encourages their traditions. NILOs play a crucial role in ensuring Indigenous inmates can engage in their cultural and spiritual traditions. In many of the cases we handled, there was no NILO at the facility, but we helped ensure that Indigenous inmates had access to spiritual and cultural supports, such as smudging kits, and that smudging occurred regularly within facilities.

In April 2024, we received **195** complaints about lack of access to a Native Inmate Liaison Officer at Central North Correctional Centre. A year later, there was still no NILO at the facility. We continue to work with this facility and others, as well as the Ministry, to resolve inmates' concerns.

Cultural and diet issues

Although we refer most inmates' complaints about food back to the facilities themselves, we reviewed recent changes to the Ministry's special diet policy to confirm it was being followed consistently. We helped several inmates access kosher or halal meals, as well as other cultural and religious supports and services.

For example:

- We helped an inmate get a prayer mat after he had submitted multiple requests over a month, and had resorted to using a towel for his daily prayers.
- Another inmate was waiting to receive a prayer mat and Quran, and had requested meals without pork as a religious accommodation. After our intervention, all three requests were filled.

Personal property and trust accounts

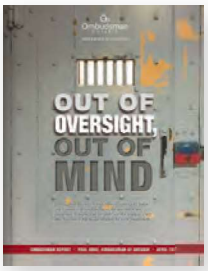
When we receive complaints from inmates about their personal property going missing or about difficulty accessing things like their important court documents, we liaise with facility staff to ensure the matter is looked into. We also routinely hear from inmates about issues with their trust accounts, where money can be deposited to allow them to make phone calls or purchase canteen items within the facility.

Some examples:

- Several inmates told us they had waited months to get access to documents related to ongoing criminal court proceedings. Once we stepped in, each of them was provided with their documents and able to review them in a private space.
- We discovered an inmate's trust account had been mixed up with the account of another inmate with the same name. After our intervention, the facility made sure the inmate's funds were restored.

Investigations – correctional services

Tracking of inmates in segregation



Report: *Out of Oversight, Out of Mind*, released April 2017

Investigation update: The Ministry of the Solicitor General has made significant progress in implementing most of the Ombudsman's **32** recommendations in this 2017

report. His investigation was prompted by a high volume of complaints about the Ministry's use and tracking of segregation – solitary confinement – as well as the troubling case of Adam Capay, an Indigenous man who was held in segregation for more than four years while awaiting trial.

As we noted in last year's Annual Report, we continue to monitor the Ministry's process for regular reviews of segregation placements by an internal team which includes the input of a human rights advisor.

We are also keeping a close eye on the frequent use of segregation for people with mental health issues, which is supposed to be prohibited. In both 2022-2023 and 2023-2024, Ministry figures showed there were more than **1,000** people who had been diagnosed with or had symptoms of a serious mental illness who were nonetheless placed in segregation. Ministry officials have shared with us several ways in which they are trying to mitigate this problem, but these will, at best, only reduce the number of placements rather than end this troubling practice.

Trends in cases – policing

Although the Ombudsman does not have the authority to investigate most aspects of police conduct directly, we play a key role in promoting transparency and accountability across Ontario's police oversight framework. It has been most gratifying to hear leaders in policing and police oversight thank the Ombudsman for our work, acknowledge its positive impact, and affirm that our observations and recommendations remain relevant.

This past year, the Ombudsman's mandate was expanded to include oversight of all provincial police oversight bodies.

Local and First Nations police services, police service boards, and Ontario Provincial Police (OPP) detachment boards remain outside our jurisdiction.

Police and oversight bodies

On April 1, 2024, legislation came into force to expand the Ombudsman's jurisdiction over police oversight bodies. It now includes:

- The new Law Enforcement Complaints Agency (LECA), which takes complaints about police conduct;
- The Inspectorate of Policing, which deals with compliance with policing legislation, police board member conduct, local police policies, and more; and
- The Ontario Police Arbitration and Adjudication Commission (which addresses police labour relations issues)

The Special Investigations Unit, which investigates incidents of police-involved serious injury or death, has been within our mandate since its inception in 1990; this remains unchanged.

In 2024-2025, we received **97** complaints about LECA, which deals with cases of police conduct. About a quarter of these were about incidents that occurred before April 1, 2024, which are outside our mandate. Most of the rest related to delays or a lack of response from LECA; we were able to resolve many of these by facilitating communication between complainants and LECA. We received **163** complaints about the OPP, up from 130 in 2023-2024. Our role in such cases is not to redo investigations or overturn decisions – it is to make sure these organizations follow fair processes.

We also received **352** cases about municipal and First Nations police, which are outside of our jurisdiction. We referred these cases to existing complaint mechanisms.

Special constables

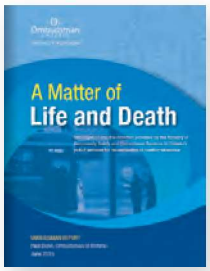
Special constables work for police services, transit agencies, universities, court transportation units, and community housing corporations. LECA does not take complaints about

their conduct; police services must have a separate process for these and must publish that process online.

We received **2** complaints from inmates about the special OPP constables working in the vehicles that transport them to and from court appearances. The inmates were unable to access the complaint process because it was only online. We flagged this to the OPP and the Ministry of the Solicitor General, emphasizing that the special constable complaint process should include a meaningful way for inmates to file complaints.

Investigations – policing

Police de-escalation training



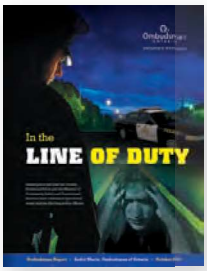
Report: *A Matter of Life and Death*, released June 2016

Investigation update:
The Ombudsman made **22** recommendations to improve the way police across Ontario are trained in using de-escalation techniques. Many of these echoed recommendations from inquests into police shooting deaths dating back two decades. He called for, among other things, a new model that would require police to try to de-escalate situations of crisis before using force.

Although all of his recommendations were accepted, very little changed until 2023, when the Ministry of the Solicitor General introduced a new training aid (replacing its old use-of-force model) encouraging the use of de-escalation techniques wherever possible. Our investigators visited the Ontario Police College in late 2024 to see this training in action, along with other improvements the Ombudsman suggested, like using more real-world training scenarios. Mental health crisis response training is also now mandatory for all police services.

However, the Ministry has decided not to act on the Ombudsman's recommendation that de-escalation be mandated by regulation. Ministry officials told us they believe existing legislation, regulations and training are sufficient. We continue to monitor the Ministry's progress on the remaining recommendations.

Operational stress injury and suicide affecting Ontario Provincial Police (OPP)



Report: *In the Line of Duty*, released October 2012

Investigation update: In our 2012 report, the Ombudsman made **34** recommendations aimed at addressing the issue of police suicide provincewide and within the OPP. Although most of the recommendations have been addressed, in 2018, the Ombudsman announced an assessment of new issues in light of new suicide cases and 90 new complaints.

The OPP has since made numerous organizational changes and implemented mental health services and supports for members with operational stress injuries. It also requires all members to take a suicide prevention course.

In 2021, the OPP unveiled a memorial at its Orillia headquarters that honours members who have died by suicide since 1989. In June 2024, it held the first of what is planned to be an annual service to remember these officers, at which 51 names of those who died because of the line of duty were honoured.

The Ombudsman welcomed this effort and continues to dialogue with the OPP Commissioner on this issue. We received **13** related complaints over the past five years, **2** of them in 2024-2025.

Other trends in cases

Administrative tribunals

Tribunals Ontario – a collection of 13 administrative tribunals that deal with approximately 100,000 cases each year – was the subject of **1,237** complaints and inquiries in 2024-2025. This is down from 1,457 the previous year, and well below the record high of 2,043 cases in 2022-2023.

Most of these cases were about delays at the Landlord and Tenant Board (LTB), which was the subject of an Ombudsman report in May 2023, and has seen a decline in complaints as it continues to implement the Ombudsman's recommendations (for more, see the **Money and Property** chapter of this report).

Still, we continue to receive complaints about delays at several Tribunals Ontario bodies. In particular, the **Human Rights Tribunal of Ontario (HRTO)** was the subject of **199** cases, up from 135 the previous year. The HRTO has faced challenges, including recruitment and retention of adjudicators, contributing to a significant backlog. We helped resolve several cases by facilitating communication with the appropriate officials.

The HRTO's delay issues mirror several of those we identified in our 2023 report on the LTB. The HRTO has reviewed our recommendations in that report and is using them to take a proactive approach to addressing delays in its own processes. Over the past year, HRTO staff have worked closely with us and communicated openly about their challenges and their efforts to address them.

We acknowledge this collaborative approach and continue to monitor the HRTO's efforts to reduce its backlog, including making improvements to its website and case management system, modifying its training and onboarding of adjudicators, and consulting with the community about its processes.

Animal welfare

We received **14** cases this year about the Animal Welfare Services (AWS) branch of the Ministry of the Solicitor General. This branch enforces provincial animal welfare legislation, including conducting investigations, inspecting facilities such as zoos and aquariums, and responding to public concerns.

> "[Your Early Resolution Officer] proved to be the consummate professional. She was patient, listened carefully, answered questions, made thoughtful, useful suggestions, and emailed important information. It was such a pleasure speaking with her that just for the moment, I forgot the deep problems with which I am dealing."

Most complaints were about communication issues and enforcement decisions. We resolved these individually, and also provided best practice suggestions to senior officials to improve their public communications and the transparency of their investigations and complaint processes.

Some case examples:

- A woman with a disability who can't use the telephone told us AWS offered no way for her to report an animal abuse case. We confirmed she could use email, and AWS also added a teletypewriter line to its contact options on its website.
- A woman came to us when she didn't get a response after filing a complaint about an inspector's conduct. We ensured the AWS provided her with a written response explaining the results of its complaint review.

Case summaries

Urgency overlooked

An injured inmate sought our help with complications related to his eye socket, which had become seriously swollen. He told us he had raised this multiple times with health care staff, who had dismissed his concerns, suggesting it was just swelling and not a cause for alarm.

RESULT: We immediately reached out to health care staff at the facility to make sure the man could see a doctor as soon as possible. The doctor ordered a scan of his head, which confirmed the man's orbital bone was fractured, and he was referred for surgery.

A history of violence

An inmate reached out to us after getting in a fight with another inmate. Both had previously been involved in physical altercations with each other, and should have been placed in separate units within the facility to prevent further ones.

RESULT: Our Office spoke with senior staff at the facility, who determined that the appropriate notice about the pair's previous fights had not been entered into their tracking system. As a result of our work, a notice was sent to all staff reminding them of their obligations to promptly and properly input security notifications.

A timely response

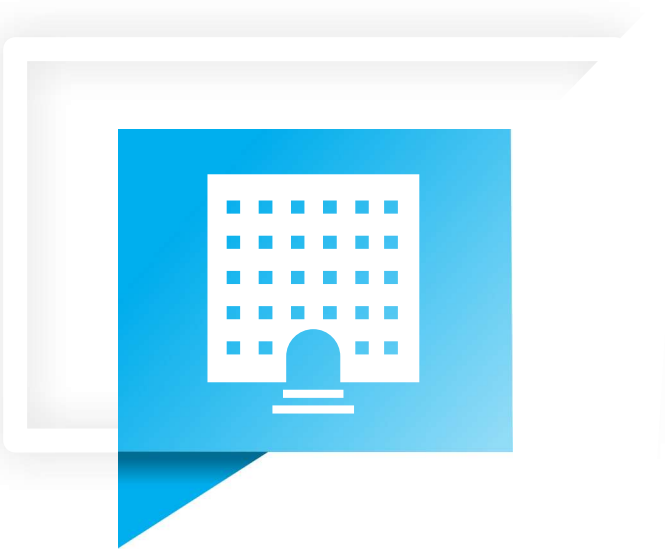
An individual who sent a complaint letter to the Special Investigations Unit (SIU) came to us for help, saying they had been told the SIU had no formal complaint process or timeline for receiving a response. As a fairness best practice, we generally recommend that public bodies establish a clear timeline for responding to complaints, including a reasonable deadline for acknowledging receipt of the complaint.

RESULT: We shared these suggestions with the SIU, which told us it was in the process of redeveloping its existing policies and would be publicly posting a revised complaint policy in the coming months. In the meantime, the SIU posted its existing policy online, and apologized to the complainant for the delay.

Get me to the court on time

An inmate reached out to us to complain about a rapidly approaching court date. He was scheduled to appear in court in person, but the courthouse was a 15-hour drive away, and facility staff had not made travel arrangements to get him to court.

RESULT: We made immediate inquiries with senior staff at the facility, who confirmed that they had made an error when adding the inmate's court date into the system. They took care of the arrangements and made sure the inmate was transported to court for his scheduled appearance.



MUNICIPALITIES

Overview

Municipalities have always been a significant source of complaints to the Ombudsman, even though they were outside of our jurisdiction for the first few decades of our history. Shortly after taking office in 1975, the first Ombudsman, Arthur Maloney, noted that a large volume of the complaints he received were about municipalities, and argued that the Ombudsman should not be restricted from helping people with local problems.

That restriction began to change in 2008, when we were able to take complaints about closed municipal meetings only. Finally, in January 2016, the Ombudsman's jurisdiction was fully extended to include complaints and inquiries about all municipal services and administration. This is our 10th year of reporting on general municipal cases.

As of the end of the fiscal year covered by this report, we have received **27,468** complaints and inquiries about general municipal issues. We resolved the vast majority of these without need for formal investigation. We have published **6** investigation reports, and the Ombudsman's recommendations in those have been largely implemented. They have also served as guidance for many other municipalities, who can adopt the recommendations and best practices. In fact, recommendations from our very first investigation of a municipal complaint, from 2017, continued to bear fruit this year (see **Investigations**).

Overall, our work has helped municipalities improve their processes and services, and connected residents with the information they need.

Improving local fairness, transparency and accountability

Our overall approach to municipal cases is that local issues are best solved at the local level. We refer people to local complaint and appeal mechanisms where they exist. If they don't, or if they aren't fair and transparent, we will often



August 18, 2024: Ombudsman Paul Dubé and Deputy Ombudsman Barbara Finlay, both at left, with staff at our booth at the annual Association of Municipalities of Ontario conference, Ottawa.

suggest best practices to the municipalities in question to fix issues and avert future complaints.

We share resources with local officials and the public on things like how to create fair complaint processes and codes of conduct. We also publish guides for integrity commissioners and for following the open meeting rules.

The Ombudsman and staff regularly interact with municipal leaders and officials at conferences – like those of the Association of Municipalities of Ontario and the Association of Municipal Managers, Clerks and Treasurers of Ontario – to share these resources and the many ways we can help them and their residents.

Also of note this year:

- New legislation created open meeting rules to cover local services boards, which can provide services such as water, waste collection and fire protection in areas of Northern Ontario where there is no municipal government. Starting on **August 1, 2025**, complaints about closed meetings of these boards can be filed with us. We created a new "tip card" about these rules, available on our website.
- We shared best practices with local public health units, whose meetings are also subject to open meeting rules. We also reached out to the four new units created last year in the Northeastern, South East, Grand Erie, and Haliburton-Kawartha-Northumberland-Peterborough regions, and sent them our open meeting guide (also on our website).

Trends in cases – general municipal issues

We received **3,809** cases about general municipal issues in 2024-2025, a record high, up from last year's 3,595. We also received **68** cases about shared local boards and **91** about shared corporations.

As in most years, the most common case topics were by-law enforcement, councils and committees, and infrastructure matters. We also saw more issues regarding local accountability officers, and suggested best practices based on our experience in this area.

Accountability officers

The Ombudsman takes a special interest in municipal accountability officers – integrity commissioners, local ombudsmen, lobbyist registrars, etc. He made a submission to the government on its pending legislation for provincewide standards for local integrity commissioners, and called attention to potential conflicts and barriers that could compromise them.

GOOD TO KNOW

Cases about Ontario Works can be found in the **Social Services** chapter of this report. Cases about municipal hydro can be found in the **Energy and Environment** chapter.

We received **94** cases about municipal accountability officers in 2024-2025, up from 80 the previous year.

Our role in such cases is to bolster fairness, transparency and accountability at the local level. We do not redo the work of local accountability officers, but can review their processes and suggest improvements to them and/or the municipality as warranted.

Some individual examples:

- After several residents complained that the **Township of Rideau Lakes** would not release its integrity commissioner's report about a local councillor's conduct, the Ombudsman strongly encouraged the council to reconsider, noting the *Municipal Act* did not permit withholding the report. The municipality made it public shortly thereafter.
- We advised a municipality to post clear information about its integrity commissioner's process on its website.

We regularly share best practices and tailored resources with municipalities to improve their local accountability processes, such as our handbook, ***Codes of Conduct and Integrity Commissioners: Guide for Municipalities*** (available on our website or in hard copy from our office).

Submission to government

In February 2025, the Ombudsman made a submission to the Ministry of Municipal Affairs and Housing as part of its consultation on proposed changes to the municipal code of conduct and integrity commissioner framework. The Ombudsman supported the Ministry's efforts to standardize codes of conduct and integrity commissioner processes across the province, and made **22** proposals based on our experience with complaints about integrity commissioners.

New legislation incorporating some of these changes was pending at the time of writing this report.

Potential conflicts of interest

The Ombudsman raised concerns about the independence and potential conflict of interest of accountability officers who hold multiple roles, such as when an individual serves as a municipality's legal counsel and integrity commissioner at the same time. We received several complaints about this issue in multiple municipalities, including **Tay Valley Township, Hastings Highlands, North Grenville,** and **Mississippi Mills**.

The Ombudsman warned the municipalities that this practice undermines public confidence in the important role of integrity commissioner, and should be avoided. He strongly encouraged the municipalities to make the roles separate.

> "Having the same official toggling between the function of providing legal advice to municipal council and the role of municipal integrity commissioner detracts from the importance of the role played by the Integrity Commissioner in promoting ethical conduct and accountability among council members and decreases the public's confidence that a truly independent official is performing this important function."
>
> — Ombudsman Paul Dubé, letters to the councils for Tay Valley Township, Hastings Highlands and North Grenville, January 27, 2025

Fees and other barriers

In the interest of fairness, the Ombudsman has always argued that there should be no barriers to making a complaint to an accountability officer, such as fees or other onerous requirements like having to swear an affidavit.

For example, in the spring of 2025, he wrote to the council for the **Town of Iroquois Falls**, which already required complaints to the integrity commissioner to be witnessed by a commissioner of oaths, and was considering imposing a $200 fee as well. He urged against both, however, the municipality chose to go ahead with the fee.

> "When the burden of filing a complaint becomes too difficult, individuals may be discouraged from raising legitimate concerns, undermining the purpose of the code of conduct."
>
> — Ombudsman Paul Dubé, letter to Town of Iroquois Falls council, March 2025

By-law enforcement

The top topic of complaints and inquiries about municipalities in 2024-2025 was by-law enforcement, with **533** cases – up from 449 last year. When people raised concerns about why or how by-laws were (or were not) enforced, we often helped by liaising with the municipality.

For example:

- A woman was worried that tall weeds on the vacant property next to hers could attract pests, and she couldn't get answers from her municipality. We contacted by-law enforcement staff who met with her, inspected the property, and ensured the neighbour fixed the issue.
- We helped a couple with disabilities who were ordered by local by-law enforcement to remove snow markers on the municipal road adjacent to their property. They told us the markers were frozen in place and they were unable to move them. We relayed this to municipal staff, who arranged to remove the snow markers at no cost to the couple.
- We worked with a city's by-law department to have a man's parking ticket declared void, after he told us he hadn't visited that city in 45 years. The city confirmed the ticket was issued in error.

We also flagged issues of fairness and suggested best practices to help municipalities forestall complaints. For example:

- A dogsitter sought our help after a dog in his care escaped and rushed at a passing dog walker, and he was fined under a municipal by-law. He pointed out that the by-law only applied to dog bite cases, which this was not – and it offered no opportunity for appeal. We raised this with municipal officials and shared best practices for setting up an appeal process, which they agreed to consider.
- A resident complained about a lack of fairness in the **Township of Ramara**'s by-law appeal process. An appeal tribunal upheld a fine against him for breaking the municipality's short term rental by-law. But it did not give him any reasons for its decision, even though the by-law requires it to do so. The Ombudsman wrote to the municipality, suggesting best practices for improvement.

> "Providing written reasons will increase transparency and strengthen accountability by allowing individuals to know how and why a decision was made and to demonstrate that the appeal tribunal considered the issues and arguments in a fair and lawful manner."
>
> — Ombudsman Paul Dubé, letter to Township of Ramara council, October 2024



May 6, 2024: Ombudsman staff at our booth at the annual conference of the Federation of Northern Ontario Municipalities, Sudbury.

Councils and committees

We received **517** complaints and inquiries about councils and committees in 2024-2025 – down from 653 in 2023-2024.

As in previous years, many of the concerns we heard were about council decisions and the conduct of elected officials. In such cases, we clarify that we cannot reverse decisions of elected officials, and that complaints about their conduct should be directed to the local integrity commissioner.

However, we can review a council's decision-making process for fairness and transparency, and to determine whether local procedures and by-laws were followed.

Some examples:

- A resident complained to us that her municipality had passed a new by-law but hadn't made it public. We spoke with the municipal clerk, who explained the reasons for the delay and ensured the by-law was posted online shortly thereafter.
- We received **23** complaints from residents concerned about a lack of transparency in a municipality's decision to build a new administrative centre and its potential costs to ratepayers. Our review determined that the municipality had provided information and feedback opportunities to the public throughout the decision-making process, including through public consultations, a dedicated website page about the project, and an ad hoc residents' committee.
- Residents reached out to us about their concerns that their city was permitting an encampment in a local park. We made inquiries with the city and shared the information with the residents, including that the city was working closely with public health and police officials and had a policy with clear guidelines on encampments.

We also suggest best practices to municipalities when we find fairness concerns. For example:

- A low-income resident complained to us that the **Town of Tillsonburg** charged a $100 fee to appeal an order that banned him from public transit for a year. He could not afford it, so he abandoned his case. The Ombudsman wrote to the municipal council, urging it to remove the fee or at least empower staff to waive it in some circumstances.

> "There should be no fee or other barrier to file an appeal of a service suspension, as it penalizes individuals and may prevent legitimate appeals from being brought forward due to concerns about financial cost."
>
> — Ombudsman Paul Dubé, letter to council for the Town of Tillsonburg, May 2024

Housing

Municipalities are responsible for providing affordable and supportive housing programs and services. We received **465** cases about these services, up from 401 in 2023-2024 – and helped many people with common complaints about things like accessing supportive housing. We also helped find shelter for some people who were experiencing or at risk of homelessness.

For example:

- A woman in crisis called us for help. She was living outside in a tent with her dog and needed help accessing a shelter for the upcoming winter. She couldn't stay at the previous shelter she was in because she could not afford to pay for vaccinations for her dog. We made inquiries with a local emergency housing provider who agreed to provide housing for the woman and her dog.
- We worked with a municipal housing provider to help a woman who couldn't accept the unit she was offered because relatives of her abusive ex-husband lived in the same building.
- A woman was locked out and stuck on her balcony for four hours before a neighbour called a locksmith. The woman told us she had repeatedly called the housing provider's emergency phone line, but no one answered – and the provider would not pay her back for the cost of the locksmith. After we intervened, the provider reimbursed her.

Infrastructure and water/sewer issues

We received **173** cases about municipal infrastructure, such as roads and sidewalks, up from 152 in 2023-2024. Most of these were about issues related to roads, bridges and snow removal.

We also received **92** complaints and inquiries about municipal water and sewer services, consistent with last year's 100. These were primarily related to fees and billing, as well as decisions made by service providers.

Some examples:

- A man told us his property was being damaged by flooding from a poorly maintained municipal ditch. We raised the case with municipal staff, who confirmed that previous repairs had not fixed the problem and made sure it was addressed.
- We prompted municipal officials to explain to a resident why it had taken so long to apply calcium (a dust-control measure) to the unpaved road near his property.

We also shared best practices in cases where we identified fairness issues. For example:

- A landlord whose tenants had failed to pay their rent or water bills complained to us that the **Town of Essex** had simply added the unpaid water bills to his property tax bill, without notifying him of the arrears. We raised this with the municipality, which was in the midst of taking over responsibility for water bills from another provider. It accepted the best practices we suggested, including publicizing a clear policy on billing, payment options and arrears collection, and it addressed the concerns of landlords by eliminating separate water accounts for tenants.

Planning, zoning and land use

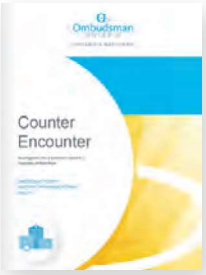
We received **150** complaints related to planning, zoning and land use, up from 135 in 2023-2024. Many of these were from people concerned about local planning decisions and the lack of communication about them. We helped by sharing information about how these decisions are made, and facilitating communication

with municipal officials. For example:

- After our inquiries, municipal planning staff offered to speak directly with a group of concerned residents to answer their questions about a proposed zoning by-law and official plan amendment.

Investigations – general municipal issues

Trespass orders and service restrictions (Township of Red Rock)



Report: *Counter Encounter*, released May 2017

Investigation update:
The Ombudsman's recommendations from this 2017 report took on new life in 2024, when a woman sought our help about a trespass notice issued to her by the Township of Red Rock.

She complained that the township had escalated an earlier order that barred her from two properties, extending it to a blanket ban without explanation. She also said she was not told whether she could appeal or request a review of the decision, or how long the restriction would last.

The case had clear similarities with the *Counter Encounter* case – the Ombudsman's first formal investigation of a complaint about a municipality. In that case, the complainant was a member of the township council who had been banned from municipal property for two years.

The Ombudsman found that this ban was "excessive and unjust," and made 11 recommendations to improve the municipality's policies and practices, particularly with regard to trespass notices and service restrictions.

We have since shared these recommendations as best practices with numerous municipalities, and they have been widely adopted. (Others, like the Ombudsman's call for the municipality to implement a code of conduct and appoint an integrity commissioner, are now mandatory across the province.) However, several of the recommendations remained unaddressed in Red Rock.

We took the opportunity to revisit the Ombudsman's recommendations with municipal officials in light of this new case, with positive results.

They agreed to implement an "R-zone" ("respect zone") policy (a combined policy covering trespass notices and respectful conduct, explained in the Ombudsman's report), that includes examples of conduct that will result in a restriction, procedures for issuing trespass notices, time limits for restrictions, and a process for the affected individual to appeal or request a review.

> "We appreciate the thorough review conducted by your Office and your ongoing commitment to promoting fairness in public sector administration…We appreciate your guidance on these matters and are committed to improving our processes to uphold the principles of fairness and transparency."
>
> — Letter from the Township of Red Rock's Chief Administrative Officer, responding to the Ombudsman's best practice suggestions

Trends in cases – open meetings

All municipal meetings, whether held by council, committees, or local boards, must be open to the public unless they meet very specific exceptions outlined in the *Municipal Act, 2001*. Anyone who thinks a meeting was improperly closed to the public can make a complaint.

Most of Ontario's 444 municipalities use the Ombudsman as their closed meeting investigator, although they can choose to appoint their own. The Ombudsman is now responsible for investigating closed meetings in **286** municipalities, up from 268 last year – the highest number since the open meeting rules were established in 2008.

In 2024-2025, we received **99** complaints about closed meetings, consistent with the previous year. Of those, **74** were about municipalities where the Ombudsman is the investigator; the rest were referred to the investigators appointed by those municipalities.

We looked into **66** meetings by **32** municipalities and local boards. We issued **12** letters and **23** reports on the Ombudsman's findings in these cases. The Ombudsman found that **21** meetings (**32%**) were illegal (they violated the open meeting requirements). He also identified **28** procedural issues and made **14** best practice recommendations to help those municipalities be more transparent in their meeting practices.

The municipalities in question make these reports and letters public when they are released. We also make them all available on our website, in our searchable database, ***Open Meetings: Case Digest***.

Our handbook about the open meeting rules and how they should be interpreted – ***Open Meetings: Guide for Municipalities*** – is also available to the public and municipal officials, on our website, or in hard copy upon request.



June 10, 2024: Ombudsman staff at our booth at an Association of Municipal Managers, Clerks, and Treasurers of Ontario conference, Collingwood.

As in previous years, the top topics of complaints about closed meetings were about procedural issues or glitches with electronic meetings, and how municipalities applied the exceptions cited in the *Municipal Act*.

Livestreaming

We regularly hear concerns about livestreaming meetings, which are considered "open meetings" as long as the public has advance notice and can access the proceedings in real time. When people complain about virtual meetings, it is often due to technical issues or inaccurate information that left them unable to attend virtually. For example:

- The Ombudsman found the **Municipality of Whitestone** showed a "critical misunderstanding of the public's democratic right to access meetings and observe government in action" when councillors decided to proceed with a meeting, even though the livestream link was not made available to the public due to website maintenance.
- The Ombudsman found the **Municipality of West Elgin** contravened the open meeting rules when it published notices for council meetings that included mention of a livestream, even though council had stopped offering it.

> "The Act requires that the public be able to observe council meetings in process, including electronic meetings. […] Compliance with the law is not optional."
>
> — Ombudsman Paul Dubé, report on closed meetings in the Municipality of Whitestone, September 2024

Meetings by email or text message

A "meeting" of council is defined as when a quorum of council gathers to advance council business. If this happens via email or text, it violates the open meeting rules because it's closed to the public. The Ombudsman has cautioned council members to take care to avoid discussing council business or decision-making this way.

For example:

- In reviewing complaints about a text message conversation by members of council for the **Township of The North Shore**, the Ombudsman found that a quorum of council participated, but the discussion did not materially advance council business. Nonetheless, he cautioned that exchanging text messages or emails constitutes "being present in an electronic place" and could be considered a "meeting" subject to the open meeting rules.

Common issues – closed meeting exceptions and procedural matters

Meetings may be closed to the public if they fall within certain limited exceptions, such as a training session or to protect information that is personal in nature. Most of the cases we review centre on whether or not the exceptions fit the subject matter of the meetings.

For example, here are some cases where the Ombudsman found meetings should not have been closed under the "education or training" exception:

- The **City of Elliott Lake**'s closed meeting on changes to the local procurement by-law did not count as "education or training" because councillors talked about proposed changes to existing procurement practices which were going to be the basis of future decision-making.
- A **City of Cornwall** meeting on strategic planning was not about "education or training" because councillors were working on the substance of the strategic plan, rather than learning about the process.
- When councils for the **Town of Grimsby**, the **Town of Lincoln**, and the **Township of West Lincoln** met behind closed doors to discuss a potential amalgamation, it was not "education or training" because they shared opinions and ideas intended to form the basis of imminent decisions.

Case summaries

Saved, not sold

A man called us in distress, saying he would become homeless if he could not immediately pay nearly $25,000 in property tax arrears and fees. He said he had just learned that his municipality had seized his properties for unpaid taxes and put them up for auction. The properties would go to the successful bidders unless he came up with the money to cancel the sale.

RESULT: After we spoke with staff at the municipality, they provided the man with additional time to make the required payments and keep his properties. We also shared best practices with the municipality, which it relayed to its finance staff for future policy development. These include providing reasonable notice for owners whose property is subject to a tax sale to vacate the property, and ensuring that they are informed about available financial and housing supports.

Sudden shutoff

A woman who was in hospital sought our help after water service was cut off to her home, where her son, who has autism and medical needs, was receiving at-home care in her absence. She told us she had a payment plan with the water service provider and had paid her bills. She was worried for her son, whose treatment would have to be put on hold without water service.

RESULT: We made inquiries with the municipality and the utility and discovered that the woman's water bill payments had been sent to the wrong account. The service provider clarified what information they required to turn the mother's water back on and relayed this back to her so it could be restored.

One for the price of two

A man sought our help in getting money back from his municipality for a nonexistent water line. He told us that when he bought the property, he was told there were two water lines, and he would be billed for both. He said municipal staff assured him the second line was there, even though it was not connected to a meter.

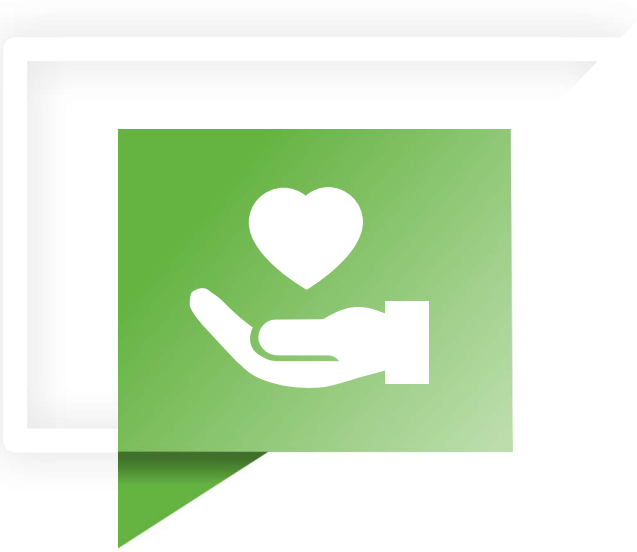
Two years later, during a construction project, a municipal engineer discovered there was only one water line to the property. However, the municipality only offered him a partial refund for the two years' worth of fees he had paid.

RESULT: We made inquiries with municipal staff. After we intervened, the municipality agreed to give the owner a full refund of more than **$6,000**.

Parting words

A Francophone man was let go from his position as a volunteer firefighter with a municipality. He complained to us that the municipality sent him a letter explaining his termination in English only. He asked if we could help him connect with someone who could send it in French, given that his relationship with the municipality was strained.

RESULT: While the municipality was not required under the *French Language Services Act* to do so, after we raised the issue with the clerk, they said they were happy to provide the letter to him in French. He received it and thanked us for our help.



SOCIAL SERVICES

Overview

Over the past year, thousands of people reached out to us with questions and concerns about their experiences with social service agencies. We helped them by clarifying eligibility requirements, facilitating communication, and following up on delays.

Many of those who depend on social services are navigating complex systems while in vulnerable situations. When possible, we step in to help resolve their concerns. We also share best practices for improving fairness and service delivery, and flag recurring issues to senior officials in relevant agencies and the Ministry of Children, Community and Social Services.

When issues are persistent and particularly complex, we are able to look into the root causes through our systemic investigations, while resolving individual cases wherever possible. In the spring of 2025, we completed the field work in our investigation into cases of adults with complex special needs who are inappropriately hospitalized, and the Ombudsman's report is in progress.

We also continue to help families of children with complex special needs who sometimes have no choice but to surrender custody of them to children's aid societies in order to get the residential care they need – an issue we first investigated 20 years ago (see more on both of these investigations under **Investigations**).

Trends in cases

The top subjects of complaints and inquiries in the social services sector are consistently the Ontario Disability Support Program (ODSP), Ontario Works (OW), and the Family Responsibility Office (FRO). Cases about the first two agencies were up slightly in 2024-2025 over the previous year, while we saw fewer cases about the FRO.

People who wish to contest decisions by ODSP and OW about their benefits can file an appeal with the Social Benefits Tribunal (SBT), part of Tribunals Ontario. We can review complaints about the SBT's services and processes. For example:

- A community legal clinic complained to us about the Social Benefits Tribunal's process for deciding applications for the Mobile Access Terminal service offered by Tribunals Ontario, which is supposed to provide a private space, computer and internet access to people who cannot otherwise participate in virtual hearings. The clinic told us the SBT denied all of its clients' applications for this service. Both the SBT and Tribunals Ontario have provided us with information about the decision-making process for this service. At the time of writing this report, our review of this issue was ongoing.

Ontario Disability Support Program

The ODSP provides income and employment support to Ontarians with disabilities. It also includes benefits like dental care, prescription drug coverage, and other disability-related supports.

In 2024-2025, we received **1,038** cases about ODSP, an increase from 978 the previous year. Many of these were from people who had difficulty reaching caseworkers or getting answers to questions. An MPP also shared concerns with us about constituents having trouble with some of ODSP's new digital tools for submitting documents – an issue we are actively reviewing.

We helped connect many ODSP recipients with people who could answer their concerns. Some examples:

- When the ODSP didn't respond to a man's eligibility documents and his benefits were put on hold, we contacted senior officials. His benefits were reinstated retroactively to October 2022. He told our staff: "I could not have gotten through this without you."
- We contacted the ODSP on behalf of a woman whose benefits were suspended and who couldn't reach her caseworker. She was relieved to have her benefits reinstated in time to pay her rent.
- We helped a woman reach her caseworker after she transitioned from Ontario Works benefits to ODSP. She got her questions answered after receiving no response for two months.

People often seek our help with decisions about their ODSP income support and benefits. In these cases, we assist by addressing administrative errors and delays. For instance:

- We helped a man whose ODSP file had been neglected after a tribunal decision confirmed his disability. After we stepped in, the ODSP reopened his case and provided more than **$11,000** in back payments plus an additional benefit of **$400**.
- We helped an ODSP recipient successfully challenge a 2021 overpayment assessment, resulting in a reimbursement of **$1,500** plus an additional **$200**.
- We looked into a surprise $600 utility bill for a woman whose utilities are normally paid directly by the ODSP as part of her benefits. We discovered the issue was a communication error between the woman's case worker and the utility company – and confirmed the bill was paid.

Ontario Works

Through Ontario Works, people in financial need can receive money for food, shelter, and other expenses. The program is administered by municipalities and district social services administration boards. We received **412** complaints about OW in 2024-2025, up from 390 in the previous year.

Most cases involved poor communication or customer service, as well as delays in payments or decisions about people's eligibility for benefits. We referred OW recipients to other community supports when possible, and flagged cases that had been overlooked.

For example:

- We connected OW with a mother who was staying in a shelter with her baby, who has special needs. She received **$500** in OW emergency funding the same day she contacted us, to buy formula and other necessities for her baby. We also provided her with other referrals for support.
- A father's benefits were increased after we escalated his case to an OW manager, who identified an error in their calculation of rent expenses for him and his daughter.
- A man who was experiencing homelessness sought our help in replacing his OW benefit card so he could rent a place to live. We flagged his case as urgent and he received a new card and funding the same day so he could make a deposit on a rental unit.

As of March 1, 2025, employment-related services provided locally through Ontario Works, such as job search support, were taken over by Employment Ontario. We are monitoring the effects of this change.

Family Responsibility Office

The Family Responsibility Office enforces court-ordered child and spousal support payments. In 2024-2025, FRO-related cases decreased slightly to **423** from 440 the year before. The most common complaints involved incorrect or inadequate enforcement of child or spousal support orders. We also heard from frustrated clients that their case workers gave them little or no explanations in response to their concerns.

We meet regularly with senior FRO staff to address recurring case themes and discuss improvements to the FRO's procedures. Over the past year, we held several discussions about improving its internal complaint processes. We also highlighted concerns about its failure to follow its own procedures and take timely action to enforce support orders, and continue to follow up on this issue.

Some examples:

- We helped expedite the processing of a court order for support for a woman who had been trying to have it registered and enforced by the FRO for more than four years.
- We helped a woman get more than **$2,000** in unpaid support after we pointed out that the FRO had not sought to garnish the payor's federal benefits.
- We helped a support payor get a clean credit rating after the FRO mistakenly reported her to the credit bureau for non-payment.
- We helped a father get his child support arrears reduced by **$55,000** – and garnishment of his pension stopped – after we determined the FRO had never received the paperwork ending his child support obligations in 1995.

Services for children with developmental disabilities

Special Services at Home

We received **171** complaints and inquiries about Special Services at Home (SSAH), which helps families caring for children with developmental disabilities. Similar to last year, the bulk of these cases were about delays in receiving reimbursements for expenses, despite SSAH's 30-day reimbursement standard. For example:

- A woman told us she was suffering financial strain as she waited to be reimbursed for four months' worth of

expenses, totaling **$6,700**. Through our inquiries, we confirmed that the receipts were approved and that the payment would be issued.

Senior Ministry officials told us internal system changes were made to address these delays, increasing the number of reimbursements processed. However, they noted other factors contributing to delays, such as high volumes at certain times of year or data entry backlogs in some regions.

We also received a group of **23** cases from families in the Central Region about delays in their annual SSAH funding package for the 2024-2025 fiscal year. We discovered that the Ministry had updated the SSAH policy just prior to the new fiscal year and the region had delayed the packages to include information about the update. After our inquiries, families were able to submit their receipts for reimbursement before the packages were sent out in June and July.

Ontario Autism Program (OAP)

The Ontario Autism Program supports families of children and youth with autism. AccessOAP is its intake organization, which helps them connect with services and manage benefits. AccessOAP's Independent Review Office (IRO) handles complaints about their services. We received **92** cases related to these programs in 2024-2025, a slight decrease from 110 last year.

A key issue families raised with us was a lack of information from AccessOAP and the Ministry about the wait times to receive an invitation for core clinical services. They said neither organization provides information to families about how long their wait time may be, or how many people are in front of them. Some said they struggle to estimate how long they can afford to pay for services out-of-pocket while they wait, and they are unable to financially plan for their children's services needs.

Families also told us they were frustrated with delayed or unclear responses from AccessOAP's IRO to their complaints. We made suggestions to the Ministry to address these concerns. We strongly encouraged the Ministry to provide families with more information about the estimated length of time they can expect to wait for an invitation to core clinical services. Although the Ministry has said individual estimates are not feasible because there are so many variables, we continue to follow up on this lack of information, given its serious effect on so many families.

We also suggested the Ministry work with AccessOAP to improve communication about the IRO's processes and decisions. The Ministry has agreed to pursue improvements and we are receiving regular updates about its efforts.

Meanwhile, we resolved many of these complaints individually. For example:

- We helped a mother raise concerns about her son's assessment, leading to a reassessment that determined the family should get **$30,000** more in supports.
- We helped a mother resolve a six-month delay in decisions about funding services for her son, identifying some procedural issues. The family received **$20,000** more in supports as a result.

Children with complex special needs

We received **29** complaints in 2024-2025 from families who had difficulties accessing programs and services through the Ministry's Children With Special Needs Division.

Families often contact us about their children not getting the mental health and developmental supports they need. Many tell us they feel overwhelmed by the complex system and the emotional and financial stress it causes. Urgent help is often hard to find, especially in remote areas where there are fewer support and treatment options.

Here are some examples of how we helped individual families:

- We helped secure a supported living arrangement for a teen with complex needs after repeated hospitalizations, failed group home placements, and a violent incident involving a weapon that put his toddler sibling at risk.
- A teen who had been living in a residential placement since age 3 needed to move when the facility stopped serving children. He uses a wheelchair and requires 24-hour care, making it difficult to find an appropriate placement. After we raised the case with the Ministry, a long-term placement that could meet his needs was found.
- We worked with the Ministry and others to find a home for a 17-year-old non-verbal refugee with complex needs in Northern Ontario who had been inappropriately housed in hospital for months, after his mother told us she could no longer manage his violent behaviour and no suitable options were available.

Children's aid society involvement

In some cases, the lack of appropriate services puts children at risk of self-harm or harming others, and they are placed in the care of a children's aid society (CAS). Although we always work to resolve these cases individually, the Ombudsman has also launched investigations into the troubling systemic issues that underlie them:

- We continue to see cases where families have to surrender custody of their children to CASs to obtain the supports and care they require, an issue we have followed up on consistently since our investigation in 2005. See our update on this issue under **Investigations**.
- Our latest investigation, launched in September 2024, is looking at the provincewide practice of child welfare agencies placing children – many of whom have complex special needs – in hotels, motels, trailers and their own offices because of a lack of appropriate homes and supports. See more on this in the **Children and Youth** chapter.

Adults with developmental disabilities

We continue to receive complaints about services and supports for adults with developmental disabilities – often from family members who are struggling with caring for them or finding adequate assistance.

We work with the families and decision-makers to resolve individual cases wherever possible. For example:

- We helped find additional support for the aging parents of a 26-year-old with a developmental disability, seizures, and other medical issues, as their own health challenges posed a risk to his care. After we intervened, the Ministry approved funding for overnight assistance at their home.
- A mother told us her own health problems left her in need of more support for her 32-year-old son, whose developmental disability and mental health issues were escalating. After we intervened, the family was referred for urgent support funding and a reassessment.

We received **43** complaints about the Ministry's decision and process for ending funding to Jake's House, a care residence for adults with developmental disabilities. The Ministry shared details with us about its decision and the current care arrangements for the residents. Our review of this issue is ongoing, including examining the Ministry's process for ensuring the safe relocation of the residents.

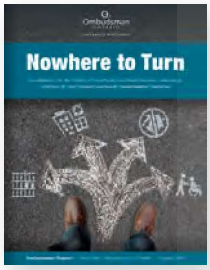
The Ombudsman has twice investigated the systemic issues that have resulted in people with developmental disabilities living in inappropriate settings such as hospitals. At the time of writing this report, his latest findings on this situation are in the process of being finalized (see more under **Investigations**).

Investigations

Cases of adults with developmental disabilities who are inappropriately housed in hospitals

and

Services for adults with developmental disabilities who are in crisis



New investigation launched: March 2023

Previous report: *Nowhere to Turn*, released August 2016

Investigation update: The Ombudsman's 2016 report, *Nowhere to Turn*, examined crisis cases where adults with developmental disabilities ended up in hospitals, shelters and jails because of limited community supports and services. We have closely followed the progress of the Ministry of Children, Community and Social Services in implementing the Ombudsman's **60** recommendations, all of which it accepted.

However, we continued to receive complaints about the inappropriate hospitalization of adults with developmental disabilities. In some cases, individuals remain in hospitals for years, diminishing their independence and quality of life.

In March 2023, the Ombudsman launched an investigation into whether the Ministry of Children, Community and Social Services and the Ministry of Health were taking adequate steps to facilitate transition of such individuals from hospital to appropriate community supports and supported living options.

We have completed the investigative field work in this case. Once the Ombudsman's findings and recommendations have been shared with the Ministries for input, as per our normal process, his report will be finalized and published.

This investigation included more than 120 interviews with affected individuals, family members, health care professionals, advocacy groups, service agencies and government staff. We also reviewed thousands of documents in addition to online research.

We continue to receive complaints relevant to this investigation – more than **30** since 2023 – from families who are facing similar issues and are desperate for help, as well as hospital staff and support agencies. We resolve individual cases wherever possible while the investigation is pending.

Individual cases:

- We continued to follow up with the Ministry and service agencies about a 27-year-old man with a developmental disability, chronic health conditions and violent behaviours, who finally transitioned into a permanent supported living residence in 2024 after more than four and a half years residing in a hospital.
- A woman complained that her 22-year-old daughter spent more than four years in hospital due to a lack of suitable community supports, but after we connected the family with a DSO Transition Coordinator to develop a support plan, she was able to return home.
- A 59-year-old woman with developmental disabilities and complex mental health and behavioural needs spent nearly three years in hospital due to a lack of local assisted living options. After we raised her case with agencies and the Ministry and reviewed their planning efforts, she was able to move into a suitable community placement.

Care and custody of children with complex special needs



Report: *Between a Rock and a Hard Place*, released May 2005

Investigation update: Twenty years ago in this investigation, we highlighted the issue of families who felt pressured to give up custody of their children with special needs in order to get them the care they needed. The children were placed in the care of children's aid societies (CASs) even though there were no child protection concerns.

At the heart of these cases – which we have consistently flagged ever since – is a complex, difficult-to-navigate system that lacks resources for families, particularly in urgent situations.

In 2024-2025, we received such **15** cases. The families told us they surrendered custody of their children to CASs because they:

- Were desperate to secure funding for supportive living options for their children on an urgent basis and could find none (particularly in Northern Ontario);
- Felt they had no choice, because they could not access services and funding any other way;
- Were denied funding through the Ministry of Children, Community and Social Services' Complex Special Needs division; or
- Were advised by agencies that the CASs could access more resources for their children than they could.

In some cases, families made this choice because their children had been discharged from an intensive treatment facility or a youth justice centre and could not be cared for at home.

We meet regularly with senior Ministry officials and have alerted them to these complaint trends. The Ombudsman's ongoing investigation into the practice of CASs placing children in hotels, motels, offices and trailers is also exploring some similar issues about available funding and supports (see more in the **Children and Youth** chapter). At the same time, we help families navigate the system to access the supports their children need wherever possible.

For example:

- The parents of a 15-year-old who had been denied Complex Special Needs funding sought our help in finding a supported living option for him, as he had been charged with assaulting one of them and it was not safe for him to remain in their home with another child. A CAS stepped in to help fund a placement while the family sought other sources of funding. After we raised this case with the Ministry, the youth was reassessed and approved for funding and supported living.
- A family in Northern Ontario was struggling to cope with the aggressive behaviour of a 10-year-old with high needs, alongside their six other children. A local CAS stepped in and moved the child to a separate apartment. After we raised the case with the Ministry, the child was admitted to an appropriate treatment facility and connected with ongoing support services.

> "Thank you for helping me out with this matter. I'm really grateful for all your help."

Case summaries

Bridging support

The mother of a 17-year-old Indigenous youth with complex special needs sought our help, concerned that her son was about to lose his residential placement. She said he was turning 18 in a month, and no plan had been created to transition him to adult services. With no other options, the mother relinquished custody to a children's aid society (CAS) even though there were no protection concerns. The CAS covered the cost of a residential placement, but additional funding for respite workers was needed.

RESULT: We raised this case with multiple agencies, leading to the CAS securing additional federal funding through a First Nations Child and Family Services program that supports youth transitioning to adult services. We also brought the case to the Ministry of Children, Community and Social Services, resulting in the youth being transitioned to a supported living arrangement. Following our inquiries, the Ministry initiated a review of its transition planning for Indigenous youth receiving federal funding for adult services. We continue to monitor the progress of this review.

Subsidy sorted

A mother had been trying to reach her Ontario Works (OW) caseworker for more than a month about her daycare subsidy application. She was paying the full rate for her child's daycare while she waited for a response.

RESULT: After we made inquiries with OW about her case, the mother was approved for the subsidy and was issued a full refund for the more than **$2,000** in child care costs she incurred because of the delay. The mother told us: "I sincerely don't think I would have had much luck if it wasn't for your intervention, and consistent pressure on them to rectify the situation. Thank you, from the bottom of my heart… you made the holidays far less stressful, and helped make it possible to actually give my children gifts this year."

Unwarranted hold

An Indigenous woman who had moved from a city to a First Nations reserve was referred to us by her local legal aid clinic for help with her Ontario Disability Support Program (ODSP) benefits. The ODSP had confirmed her medical eligibility, but she had been waiting for seven months and still hadn't received any support.

RESULT: We reached out to the woman's ODSP manager, who explained that the decision was put on hold because they couldn't contact her by phone. We helped them connect with her, and the woman received more than **$6,500** in retroactive benefits, as well as ongoing monthly support. ODSP staff said they would speak to her about her rights and responsibilities. She confirmed that she was receiving the payments and thanked us for our help.

Balance reset

A mother sought our help in stopping the Family Responsibility Office (FRO) from enforcing a child support order against her from 40 years ago. She said a court had previously terminated the support order and she did not owe any money – but the FRO was still going to court to get her to pay what it said was $35,000 in arrears. Her passport and driver's licence had been suspended as part of FRO's enforcement action.

RESULT: We discovered that the FRO was not aware of the earlier court order that terminated the woman's support obligations. After our intervention, it took steps to reverse the woman's arrears and waived the fees for reinstating her identification.



EDUCATION

Overview

We help people with problems across the education sector, from daycare and kindergarten through university. Ontarians can complain to us about school boards, school authorities, universities and colleges – and the Ontario Student Assistance Plan.

Throughout our history, the Ombudsman has always been able to take complaints about the Ministry of Education and post-secondary education programs under what is now called the Ministry of Colleges, Universities, Research Excellence and Security, including colleges of applied arts and technology. But school boards and universities were outside of our scope until a decade ago. We began handling cases about school boards in September 2015, and universities in January 2016.

This is our 10th report on those cases. We have helped thousands of students and their families with school boards and universities in just under 10 years. Between September 1, 2015 and the end of the fiscal year covered by this report (March 31, 2025), we received **8,499** cases about school boards. Between January 1, 2016 and the end of this fiscal year, we received **2,391** cases about universities.

In 2024-2025, we received **661** cases about the Ministry of Colleges, Universities, Research Excellence and Security, a steep increase from 472 the previous year. This increase, which includes a record **434** cases about colleges of applied arts and technology, is partly due to concerns arising from the federal government's cap on international student visas and its impact on college programs. Cases about universities remained steady at **274**.

Complaints and inquiries about school boards remained at near-record levels (**1,261**, second only to last year's record high of 1,334) this year, while those about the Ministry of Education dropped to **79** from 142.

Our work also had an impact on transparency and accountability at the school board level, as several of the Ombudsman's proposals for improving school board codes of conduct were incorporated into law, and we continued to promote open school board meetings.

Trespass notices

A common area of concern we see across all levels of the education sector is about trespass notices issued by educational institutions. Trespass notices can be used to limit a person's access to property or events. We routinely share best practices with school boards, universities and colleges about these notices to ensure they are fair.

For example:

- A mother complained to us after her child's school board issued her a trespass notice for posting a profane rant about a school sporting event on social media. We shared best practices with the school board, which agreed to add an expiry date to the notice and clarify which types of school events the woman was barred from attending.
- A school board said it would consider revising its approach after we raised a complaint from a mother who received a trespass notice that didn't include a time limit, options for appeal, or clear language about how she could still pick up her child from school.
- A college of applied arts and technology revised a trespass notice against a man after we flagged that its scope was unclear.
- A university agreed to review a longstanding trespass notice against a student who wanted to resume her studies online. Once we reached out, the university said it would consider updated information about her circumstances.

Trends in cases – early years through Grade 12

The most common concerns we hear about school boards, year after year, tend to be related to enrolment, student safety, and support services for students with special needs. We resolve most cases by connecting families of students with the right officials, and escalating concerns to school board leadership or the Ministry of Education as warranted.

We also recently completed the field work in the Ombudsman's investigation into the Ministry of Education's administration of its direct payment programs (read more under **Investigations**).

Special education, accommodations and student safety

Programs for students with special needs can be difficult for families to navigate. Parents and guardians often seek our help with things like student safety plans or Individual Education Plans. We liaise with school board officials to help families get the information they need.

Some examples:

- We helped a mother who had received no response to her request for additional learning supports for her son. We contacted a school board superintendent who agreed to reach out to her directly.
- We helped a grandmother meet in person with the local superintendent and school administrators to raise her concerns about her granddaughter being bullied and to develop a personal safety plan for the child.
- We helped three families who had difficulty registering their children in intensive special needs programs at a public school board when transferring from the

local Catholic school board. The families said the board raised safety concerns about the students' past behavioural incidents, and some were told they would have to wait several months to register in the program. After we intervened, the board published information online to clarify when parents can transfer their children from another board into its intensive special needs programs. We also confirmed with the Ministry of Education that school boards cannot deny registration of students based on safety concerns.

Enrolment

We frequently help parents who have difficulty enrolling their children in certain schools or programs, or transferring between school boards. For example:

- A mother who was experiencing homelessness sought our help in ensuring that her son was enrolled in high school. We facilitated communication between her and the local school board to make them aware of her exceptional circumstances.
- A mother who was trying to register her children in a new school reached out to us because she had received no response from the school board after she withdrew her children from their previous school. We ensured administrators provided her with instructions to correctly complete the students' transfer.

Last year's Annual Report noted that we received more than a dozen complaints after the **Durham District School Board** designated a "holding school" to temporarily accommodate students in areas with new housing developments. The cases raised concerns about the board's designation process and how it communicated with affected communities. In 2024-2025, we shared best practices with the board for future improvement. It has since committed to clarifying its community information and consultation processes and to developing and publishing a new school boundaries procedure.

> "We appreciate the time and effort your Office has dedicated to this matter and the constructive feedback provided. [...] We value our ongoing collaboration with your Office and remain committed to reflecting and evolving our practices to better respond to the needs of the students we serve."
>
> — Letter to Ombudsman from Durham District School Board Superintendent of Equitable Education and Head of Facilities Services, February 2025

Tuition fees for temporary residents

Although school boards are permitted to charge tuition fees for children whose parents or guardians are temporary residents of Ontario, the *Education Act* outlines exemptions to this rule, such as when a parent or guardian is claiming refugee protection, or awaiting a work permit or approval of permanent resident status. As we noted in last year's Annual Report, we helped resolve complaints about this issue with several different school boards.

We have since helped three families – who were charged tuition fees even though they should have been exempt – receive refunds ranging from **$7,000** to more than **$15,000**. We continue to follow up with the school boards about their tuition refund policies and practices.

We also raised this matter with the Ministry of Education, which provides guidance to school boards on the eligibility criteria for tuition-free enrolment. After we shared best practices with the Ministry, it updated its guidance to school boards in August 2024, correcting some areas that were inconsistent with the *Education Act*. We continue to monitor this issue.

TVO Independent Learning Centre and credit recognition

After we identified issues with the way it awards credits for prior learning, the TVO Independent Learning Centre (TVO ILC) – a virtual online high school operated on behalf of the Ministry of Education – committed to a full review of its processes and a website update.

We stepped in after a parent told us her son, who was homeschooled, had difficulty getting consistent answers about why TVO ILC had revoked his prior learning credits after initially granting them. We shared best practices with the centre about the importance of clearly communicating its eligibility criteria and process for awarding credits, and ensuring that it aligned with Ministry policies. We continue to monitor the centre's efforts to address these issues.

Transportation

We received **102** complaints about school transportation in 2024-2025, including about busing for children with special needs, transfers between schools, and bus stop locations. We resolve these wherever possible by connecting people with the relevant officials. For example:

- A mother complained that the local school bus consortium would not provide what is known as a "courtesy seat" on the bus for her eldest child so he could ride to school with his younger siblings. She had unsuccessfully appealed the decision but was not told there was a second appeal option. After we spoke with the consortium, it agreed to hear the woman's appeal and updated its correspondence in such cases to include information about additional appeals.
- The mother of a kindergarten student who only takes the school bus occasionally complained to us after her son was put on a school bus on a day when she did not request it. The mother was not aware her son would be on the bus, and as a result, she was not waiting at the bus stop for him. We confirmed with the superintendent that in response to the incident, the school had put new departure procedures in place.

School board governance and open meetings

School boards were recently required to update their trustee codes of conduct to reflect amendments to the *Education Act*, including the formal adoption of an integrity commissioner role for school boards. In July 2024, the government made new regulations under the *Education Act* to improve school board governance, incorporating several proposals made by the Ombudsman in a submission that spring. These included adding anti-reprisal provisions in trustee codes of conduct, and requiring references to matters like receiving gifts and disclosing confidential information.

The Ombudsman can take complaints about school board integrity commissioners, as well as the new appeal process for their code of conduct findings.

We also review complaints about closed school board meetings. Under the *Education Act*, all meetings of a board of trustees or a committee of the board must be open to the public, with some narrow exceptions. Like municipal council and committee meetings (discussed in the **Municipalities** chapter of this report), all school board meetings must follow the relevant open meeting rules to ensure transparency and accountability.

The Ombudsman has reviewed **16** meetings of **6** school boards since 2022, including **3** in 2024-2025. His findings were made public by the boards in question, and can be found in the **Education** section of our website.

The Ombudsman shares best practices or recommendations related to improving meeting procedures. For example, in December 2024, the Ombudsman suggested that the **Greater Essex County**

District School Board expand its safety protocol to address exceptional circumstances, after it relocated a June 2024 meeting due to public disruptions.

> "In the face of increasing security concerns faced by the school board, it may wish to revise its safety protocol to specifically address how to respond if [...] it is necessary to reconvene a meeting in a different room. This clarity will help ensure transparency in the event the school board faces similar disruptions in the future."
>
> — Letter from Ombudsman Paul Dubé to Greater Essex County District School Board, December 17, 2024

Investigations

Direct payment programs for parents and students

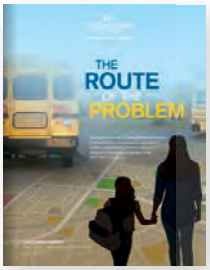
Launched: December 2023

Investigation update: The Ombudsman launched this investigation to examine the Ministry of Education's administration of five direct payment benefit programs between 2020 and 2023, which dispersed more than $2 billion to Ontarians.

These programs provided financial support to parents and guardians with school-aged children and youth who were affected first by labour action by education workers and then prolonged school closures during the COVID-19 pandemic.

We received more than **200** complaints about the Ministry's administration of these programs, including some from parents who were denied payments for children in their custody because someone else (such as a non-custodial parent) had claimed the money first. We have completed the field work for this investigation, and as of the writing of this report, the Ombudsman's findings are in the process of being drafted.

School busing issues in Toronto



Report: *The Route of the Problem*, released August 2017

Investigation update: This investigation stemmed from a bus driver shortage in the fall of 2016, resulting in more than 1,000 students in the Toronto District School Board and Toronto Catholic District School Board facing severe bus delays and route changes.

We are pleased to report that both the boards and their transportation consortium have substantially implemented the Ombudsman's **42** recommendations from this report. New bus contracts have been signed, a new incident reporting protocol has been established, and an updated parent guide has been created. Buses are now equipped with GPS technology, enabling real-time tracking and better identification of service delays.

Trends in cases – post-secondary

The record **434** cases we received about colleges of applied arts and technology in 2024-2025 reflect the impact of the federal government's January 2024 cap on international student visas. Colleges that relied on international student enrolment were particularly affected

by the repercussions of this, and several cut programs due to a lack of revenue.

There were **274** cases about universities, consistent with 289 in 2023-2024.

Across the post-secondary sector, the most common complaints were about course work and class accommodations, admissions, document requests, grade appeals, and requests for tuition refunds.

We helped students connect with relevant officials, or intervened to make sure their concerns were addressed.

Repercussions of changes in policy on international students

As a result of changes in federal immigration policy in 2024, the number of international students in Ontario was dramatically reduced, causing many institutions to lose revenue and cut programs. Many students whose permits had been denied or delayed sought our help in getting tuition refunds from Ontario colleges. Others had issues with obtaining the "attestation letters" Ontario required to allow them to study here. We also heard from students who were left in the lurch by program cuts.

For example:

- A prospective student from Ghana complained to us after an Ontario college took so long to confirm that he had paid a deposit on his tuition that he could not receive his attestation letter in time to study here. After we intervened, the college acknowledged its error and refunded him the **$9,000** he had paid.
- We received **20** complaints related to **Fleming College**'s decision to suspend a number of programs. We referred individuals to the appropriate channels to raise their concerns with the college, but continue to monitor the effects of the changes.

Ontario Student Assistance Program (OSAP)

We received **187** cases about OSAP loans and grants in 2024-2025, up from the previous year's total of 160. We helped students resolve problems related to documentation requirements, delays, communication issues, and conversions of grants to loans. For example:

- When a student's **$19,000** grant was converted to a loan, we determined that OSAP hadn't properly verified the student's documents; as a result, OSAP converted the loan back to a grant.
- In two cases involving international students, we discovered that OSAP had converted grants to loans because it mistakenly calculated the students' family incomes using outdated foreign exchange rates.
- After confusion between OSAP and the federal National Student Loans Service Centre about who would lift a restriction on a student's account, we intervened so the student could access funding just in time to make his tuition payment.

> "I appreciate that you read my email and responded to my concerns. It makes me feel really good about the Ombudsman's office."

Case summaries

Without consent

A First Nations grandparent complained to us after a school board used medicated lice shampoo on one grandchild and attempted to use it on another, both times without consent. The grandparent likened this action to past treatment of Indigenous students in residential schools.

RESULT: The family raised their concerns with the board, which investigated the incident and met with them. The board ultimately apologized, made staffing changes, and implemented new staff training to avoid similar incidents in future. Ombudsman staff stayed in touch with the family throughout and reviewed the board's response. We confirmed that it had taken steps to address the grandparent's concerns.

Credit carryover

A student came to us for help after trying for months to get her out-of-province post-secondary credits recognized by her Ontario college of applied arts and technology.

RESULT: After we intervened, the college agreed to review the coursework and confirmed with the student that her out-of-province courses would count towards her Ontario program requirements.

Transcript tribulations

A man hoping to return to university needed a college transcript for courses he had taken several decades ago. He had been trying for more than two months to get a copy of his transcript, even though the college's typical turnaround time for such requests was 7-10 days.

RESULT: We raised his case with staff at the college, who acknowledged the poor communication on their part and expedited the transcript request so the man could register in time for his new course.

Work permit woes

A student from abroad whose attendance at an Ontario university was dependent on his father's federal work permit needed our help when the extension of his father's permit was delayed. If his parent could not produce a current work permit, the university would charge him the tuition fee of an international student, rather than the Ontario rate. Although the student had a letter from Canadian immigration authorities confirming his father's status and the pending work permit decision, the university rejected it.

RESULT: After we intervened and explained that the source of delay was Immigration Canada, the university agreed to accept the status letter as proof of the student's status in Ontario. His fees were reverted from the international student rate (roughly $30,000) back to the domestic rate (roughly **$3,000**) for the upcoming semester. This change in practice also benefited five other students in the same situation, after the university proactively let them know that it would accept a status letter in lieu of an updated work permit.



CHILDREN AND YOUTH

Overview

We are the Ombudsman for all children in Ontario. We work to make sure the rights of children and youth are respected by the many government and public sector bodies that interact with them and their families.

In all cases related to children and youth, we take a child-centred approach. Our staff speak directly to young people every day about a wide range of issues affecting them. We listen to their experiences and help them find solutions.

In many cases, we connect them with the support they need, and make sure their voices are heard. We also hear from hundreds of concerned adults – such as family members, social workers, educators, police and medical professionals – about issues affecting children and youth.

We have teams who specialize in helping Indigenous, Black and 2SLGBTQIA+ children and youth, as well as blind, Deaf and deafblind children and youth who reside at provincial and demonstration schools, and youth in detention or custody at youth justice centres.

We also interact with young people and adults who work with them at events across the province, including events for Black, Indigenous and 2SLGBTQIA+ youth – and speak about our work to organizations across the child welfare, youth justice, social services and education sectors.

Stories about the results we've achieved for children and youth can be found not just in this chapter – which focuses on services provided to them under the *Child, Youth and Family Services Act* – but throughout this report, such as in the **Education, Social Services** and **Health** chapters.



May 17, 2024: Children and Youth Unit staff at our booth at Pride Toronto's Youth Conference, Toronto.

Children and Youth Unit

Our Children and Youth Unit was established on May 1, 2019, when the Ombudsman's jurisdiction was extended to include child protection services. From that day to the end of the fiscal year covered by this report (March 31, 2025), we have received **9,997** complaints and inquiries from children and concerned adults. We have also published reports on **4** investigations and have **2** new investigations pending (see more under **Investigations**).

In that time, we have visited hundreds of young people in foster homes, group homes, and youth justice facilities, and worked proactively with the Ministry of Children, Community and Social Services to flag and address serious concerns affecting children across Ontario.

Our staff have specialized expertise in child welfare, residential care, and the youth justice system and can provide guidance about the best way to resolve issues brought to our attention.

Five specialized outreach teams conduct outreach and consult on individual cases and investigations. They are:

- 2SLGBTQIA+ Outreach Team
- Black Children, Youth and Families Roundtable
- Indigenous Circle
- Provincial and Demonstration Schools Outreach Team
- Youth Justice Outreach Team

Child, Youth and Family Services Act, 2017 (CYFSA)

Under the *CYFSA*, all children and youth living in foster homes, group homes, treatment facilities, and youth justice centres have a legislated right to privately contact the Ombudsman. This includes receiving visits from our team. Students residing at any of the provincial schools for the Deaf, deafblind, blind, or students with severe learning disabilities (known as demonstration schools) have similar rights.

Over the past year, the government amended the *CYFSA* and its regulations to enhance rights and safeguards, several of which were called for by the Ombudsman. The *CYFSA* now requires service providers to inform children and youth in care or in custody about their right to contact the Ombudsman whenever they make a complaint to a service provider, and again after a children's aid society or residential licensee has reviewed their complaint.

Outreach, specialized teams and proactive work

We delivered more than **60** presentations in 2024-2025 – many directly to children and youth in care, at youth justice

centres, and in provincial and demonstration schools. Others were to staff at children's aid societies, group and foster homes and youth justice centres, as well as to conferences of workers in the child welfare and residential services field, and post-secondary students and faculty.

Whenever we speak to young people, we follow up with each of them privately to ensure they have a chance to share their concerns with us directly.

Our specialized outreach teams met with hundreds of young people at powwows across the province, at 2SLGBTQIA+ Pride events, and events like PowerUp! (an event for Black children and youth in care), and Mayfest (a Deaf community event). They also met with youth in custody at youth justice centres and with students and their parents at several provincial and demonstration schools.

Sharing expertise with our peers is another important facet of our work, and we do so regularly with fellow members of the Canadian Council of Children and Youth Advocates.



March 20, 2025: Children and Youth Unit staff at our booth at Sherbourne Health Centre's Trans and Non-Binary Career Fair, Toronto.

We also liaise with the Children and Families Chapter of the United States Ombudsman Association and the European Network of Ombudspersons for Children.

We meet regularly with the Ministry of Children, Community and Social Services to proactively discuss important case trends and issues, as well as with organizations in the child welfare sector such as the Ontario Association of Children's Aid Societies, the Association of Native Child and Family Service Agencies of Ontario, the Foster Parents Society of Ontario, and more.

Trends in cases

We received **2,129** complaints and inquiries in 2024-2025 regarding children and youth in care and in youth justice centres, up from 1,924 the previous year.

Most cases – **1,533** – were related to children's aid societies, an increase from last year's 1,451. Residential licensees (group homes and foster homes) were the subject of **103** cases, and there were **12** about secure treatment facilities; both down from the previous year's respective totals of 175 and 27. We also saw a significant spike in complaints and inquiries about youth justice centres in 2024-2025: There were **423** cases, more than double the previous year's 202.

Children's aid societies and residential licensees

The most common complaints we hear in this area are about young people's placements, the level of support they get from children's aid societies (CASs) and concerns about the difficulty of transitioning into adult services.

One concerning trend that we noted across the province was the practice by several agencies of placing children and youth in their care – including some with complex

special needs – in hotels, motels, offices and trailers. The Ombudsman launched an investigation on his own motion into this practice (see more under **Investigations**).

We also continued to encounter cases where 16- and 17-year-olds were not able to get the care they are entitled to when they request Voluntary Youth Service Agreements (VYSAs), the subject of our most recent investigation report (also under **Investigations**).

We resolve most of the cases we receive about child welfare agencies by listening to the young person's concerns, escalating them where necessary to the right workers or officials, and following up.

Some examples:

- A youth in care sought our help in reconnecting with her siblings, but neither she nor we could reach her case workers. We escalated the request to a supervisor at the CAS, who arranged for her to connect with her family.
- After our staff gave a presentation at a group home, one resident asked for help in reaching someone at their CAS to retrieve a bicycle they had left behind at a previous placement. We reached a CAS worker who picked up the bike and delivered it to the home.

Death and Serious Bodily Harm (DSBH) reports

Children's aid societies and residential licensees are required to notify us when they become aware of an incident of death or serious bodily harm involving a child or youth who has received services from a CAS within the past 12 months.

In 2024-2025, we received **1,767** DSBH reports about a total of **1,578** incidents, reflecting **131** deaths and **1,447** cases of serious bodily harm (this means any injury requiring treatment beyond first aid, any injury from a physical restraint, and sexual assault).

We follow up on every case where a young person in care was injured because of a physical restraint (**40** cases this past year compared to 66 in 2023-2024), and as warranted. Although death investigations are the responsibility of the Office of the Chief Coroner, once they are completed, we can look into any outstanding concerns about the services the child received. At the time of writing this report, we have one such investigation in progress.

Youth justice centres

Young people who are in detention while awaiting trial or in custody while serving sentences under the *Youth Criminal Justice Act* are held in youth justice centres. In 2024-2025, we met in person with 125 young people in these centres, part of our commitment to visit every secure youth detention and custody facility in the province over the next year.

We conducted a two-day visit at the Roy McMurtry Youth Centre in Brampton in November 2024, and toured the Arrell Youth Centre in Hamilton in February 2025. We spoke to youth there about their rights and how we can help them, and relayed their concerns to staff at the centres.

Overall, the most common youth justice complaints were about health care, living conditions, and staff conduct. We resolved these by flagging them to facility staff, and in some cases escalating concerns to the Ministry of Children, Community and Social Services.

Some examples:

- We made inquiries to confirm that a youth's school credits had been correctly added to his academic record when he was transferred from one youth centre to another.

- We prompted a youth centre to review its food handling practices after a youth who requested a religious diet told us the facility was not respecting the required food preparation protocols.
- We helped a youth get transferred to a centre that was closer to his family, after he submitted three transfer requests and got no response.
- A youth centre added another staff member to monitor a young person who told us he had been threatened by another youth in the same unit and feared for his safety.

Strip searches

We also conducted a review of the Ministry's response to concerns raised about strip searches at youth justice facilities – including some that drew the attention of the judge in the trial of several teen girls charged in the death of an unhoused Toronto man. Several media reports highlighted the routine use of strip searches of youth as young as 13, strip searches conducted contrary to Ministry policies, and the Ministry's lack of data on the subject.

We confirmed that the Ministry is taking steps to ensure consistency and oversight across all youth justice centres. It is developing a standardized training regime for strip searches, and working on a new process to collect data on this issue. We are closely monitoring these efforts.

Investigations

We have published **4** investigation reports regarding children and youth in care or custody since 2019. As with all our investigations, we follow up on the implementation of the Ombudsman's recommendations. All of the recommendations from our first investigation – *A Voice Unheard: Brandon's Story* (regarding the Children's Aid Society of Toronto) – have been implemented. Updates on the others are detailed in this section.

Two new investigations are pending at the time of this report:

- Child welfare agencies placing youth in unlicensed settings; and
- Services provided by a child welfare agency prior to the death of a child (for reasons of confidentiality, no further details can be published about this investigation until it is completed).

Child welfare agencies placing youth in unlicensed settings

Launched: September 2024

Investigation update: This ongoing investigation is focused on the practice of child welfare agencies placing young children and teens – many of whom have complex special needs – in hotels, motels, offices and trailers. Prior to launching the investigation, we visited several of these children and youth and observed their living conditions.

Some children's aid societies have indicated that they place children in these types of unlicensed settings – including spaces in their own offices – as a last resort, due to a lack of appropriate housing options, particularly for young people with high needs and/or challenging behaviours.

As the investigation progresses, we are:

- Speaking with children and youth who are directly affected, using a child-centred, trauma-informed and culturally sensitive approach;
- Conducting interviews with organizations across the children's services sector as well as officials in the Ministry of Children, Community and Social Services; and
- Reviewing documents from the relevant organizations.

> We are aware of numerous incidents across the province of children being placed in these unlicensed settings, many of which have raised some serious concerns about their safety, privacy and comfort. […] It is our intent to determine why this is happening and, if applicable, make recommendations to ensure the rights of these vulnerable young people are respected.
>
> — Ombudsman Paul Dubé, press release announcing investigation, September 5, 2024

Services provided to missing and at-risk Indigenous girl



Report: *Missing in Inaction: Misty's Story*, released April 2023

Investigation update: The Ombudsman made **58** recommendations as a result of this investigation, which detailed the experience of 13-year-old "Misty," an Indigenous girl from a northern First Nation who went missing several times while in the care of a foster agency in a southwestern Ontario city in 2020.

Misty was placed with Johnson Children's Services Inc. foster homes in a city far from home because her local Indigenous child and family well-being agency, Anishinaabe Abinoojii Family Services (AAFS), could not find an appropriate place for her. During the time she went missing, she was physically and sexually assaulted and suffered a drug overdose.

Both agencies, along with the children's aid society (CAS) in the city (unnamed to protect Misty's identity) accepted all of the Ombudsman's recommendations to improve their practices and ensure the rights of Indigenous youth like Misty are respected.

The city CAS has implemented the 5 recommendations directed at it. Johnson Children's Services, the subject of 31 recommendations, is no longer licensed. AAFS continues to make progress in implementing the 23 recommendations that apply to it. The agency is in the final stages of a full policy review process and has implemented several new procedures related to service delivery. We continue to work collaboratively with this agency and monitor its progress on the recommendations.

Services provided under a Voluntary Youth Services Agreement



Report: *Rights Unrecognized: Mia's Story*, released April 2024

Investigation update: This investigation examined the services provided to 16-year-old "Mia" by the York Region Children's Aid Society before she died suddenly in 2020. In late 2019, Mia had asked to be placed in foster care, but the CAS had refused and suggested she go to a shelter.

The Ombudsman found the CAS had failed to provide her with the protection services to which 16- and 17-year-olds are entitled under Voluntary Youth Services Agreements (VYSAs). He made **20** recommendations to the CAS, including that it improve staff training in the use of such agreements and ensure the rights of the teens who seek them are respected.

York Region CAS accepted all the recommendations and has made good progress to date. This includes the creation of a new policy statement specifically geared to this age group of young people, a revised VYSA procedure, and staff training initiatives.

Broader impact: Although focused on one CAS, this investigation has resulted in improvements across the province. We identified similar issues in cases from across the province involving teens seeking VYSAs, and flagged **90** of these cases to the Ministry of Children, Community and Social Services.

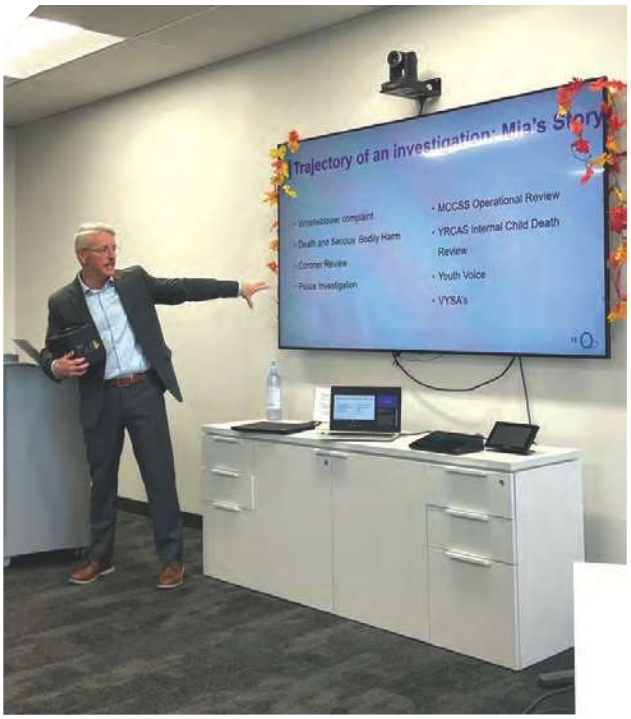
For example, some CASs were suggesting shelters as adequate housing, failing to consider whether the youth in question needed protection, not notifying the Office of the Children's Lawyer as required when a VYSA is requested, or simply not taking the youth's voice into account. The Ministry committed to improving education about the administration of VYSAs.

It has since reviewed the VYSA policies of all CASs and Indigenous child and family well-being agencies, and updated its website to clarify expectations and requirements around VYSAs. As well, it is working with the Ontario Association of Children's Aid Societies to develop resources specific to working with 16- and 17-year-olds. We are very pleased with the action the Ministry has taken in response to our concerns.

We continue to monitor this progress and liaise with the organizations that have brought VYSA concerns to our attention.

Individual cases: We helped some 16- and 17-year-olds who still had difficulties obtaining VYSAs in 2024-2025. For example:

- A teen sought a VYSA after fleeing to a shelter to escape physical abuse by a parent, but was told by shelter staff and a CAS that she didn't qualify because her father had said she could return home. After we stepped in, the CAS notified the Office of the Children's Lawyer as required, and police helped her retrieve her belongings from the family home. She was approved for a VYSA, received financial support, and moved into stable housing.
- A CAS denied a VYSA to a youth who had been living outside the family home for four years. Despite documented abuse in the home, a CAS specialist's opinion was that he could return home. We determined that the specialist had never spoken to the youth, which we flagged to CAS leadership. The CAS offered the youth a VYSA three days later, and he received financial support to live on his own.



November 21, 2024: Children and Youth Unit Investigator James McGuirk gives a presentation to the Peel Children's Aid Society, Mississauga.

Closure of youth justice centres



Report: *Lost Opportunities*, released April 2022

Investigation update: The Ministry of Children, Community and Social Services accepted all **16** of the Ombudsman's recommendations arising from our investigation of the sudden closure of two youth justice centres, in Kenora and Thunder Bay, in March 2021. The investigation revealed that the planning of the closures was shrouded in secrecy and failed to consider the best interests of the residents, including Indigenous and transgender youths.

The Ministry has taken some significant steps to transform how it approaches such closures, including consulting with staff, other jurisdictions, the Ministry of Indigenous Affairs and First Nations Economic Reconciliation and Indigenous partners to identify best practices. It also revised several related policies and procedures.

The Ministry is creating a best practices manual to guide staff in future program or facility closures, which it says will ensure a more transparent and youth-centred approach to closures, and sufficient time for communication with relevant youth justice and facility staff and interested parties.

As we noted in last year's Annual Report, we raised concerns with senior Ministry staff about another youth justice centre closure in the spring of 2024, which lacked transparency and communication with affected parties. They told us these issues will be addressed in their best practices manual, which is expected to be finalized this year.



August 2, 2024: A member of the Children and Youth Unit's Indigenous Circle team at our booth at the Gathering of Our People, Moose Cree First Nation.

Case summaries

Coming of age

A group home director contacted us about an Indigenous youth with special needs who had been in the home's care for seven years. The youth was nearing her 18th birthday, and the director was concerned that nothing had been done to ensure that she was transitioned to adult support services by referral to Developmental Services Ontario. He noted that normally, this is done through a children's aid society case worker, and the process starts at age 16.

We reached out to the Indigenous child, youth and family well-being agency that was involved with the youth, and learned that it had only recently assigned a case worker to her, and had not developed a plan to transition her to adult services.

RESULT: The service director at the well-being agency committed to reviewing the youth's transition plan and addressing her medical needs, which included hearing aids, glasses and braces. We followed up with the youth and confirmed that she had received hearing aids, started orthodontic treatment, and moved into an adult home while staying connected to her former group home.

Healthy review

A young person in a youth justice centre contacted us after an incident where mechanical restraints were used on him. He complained that he was never assessed by the health care team at the centre after this use of restraints, which is his right and normally required by policy.

RESULT: We reviewed the incident and found that the facility had not followed its policy. We raised this case with staff at the centre, who acknowledged their error. They also updated their process and shared a memo with staff to prevent similar errors in the future.

Hair help

A group of nine youths detained at a youth justice centre complained to us that they could not get hair oil. They complained that this left them with dry hair that was prone to breakage.

RESULT: We made inquiries with the centre and discovered it had provided these youths with an out-of-date form for requesting hygiene products like this – and hair oil was available on the updated form. Once it implemented the right form, we confirmed that the youths were able to obtain the product they needed.

Continued care

A young woman who had been in the care of a children's aid society (CAS) sought our help because she was not provided with continued care and support – including mental health supports – after she turned 18, even though she was entitled to it. She was also denied help with an application to the Ontario Student Assistance Program (OSAP).

At the time, the province had issued a moratorium preventing CASs from ending services for young people over 18 due to the COVID-19 pandemic. It has since continued services for those transitioning out of CASs up to the age of 23.

RESULT: After we raised the case with senior staff at the CAS in question, they agreed to help the young woman with her OSAP application and even cover the cost of the first semester of her college program. They also agreed to cover the cost of an assessment for mental health help and provide her with the support funding that she should have received between November 2022 and April 2023, had she not been inappropriately discharged from CAS care.

> "Thank you so much for reaching out and helping to get this issue resolved. I really appreciate what your office does to help when the situation requires it."



MONEY AND PROPERTY

Overview and trends in cases

This category includes complaints and inquiries about provincial ministries, agencies and corporations that deal with financial and property matters, such as the Ministry of Finance, the Municipal Property Assessment Corporation (MPAC), the Liquor Control Board of Ontario (LCBO), the Ontario Lottery and Gaming Corporation (OLG), and the Ontario Cannabis Store.

It also covers cases related to organizations under the Ministry of the Attorney General, such as the Landlord and Tenant Board, and the Office of the Public Guardian and Trustee, which handles money and property for people who are unable to do so themselves.

Cases about these organizations declined overall in the past year. There were **23** cases about the LCBO and also **23** about MPAC, whose provincewide property assessments were paused due to the COVID-19 pandemic in 2020.

Complaints about the Landlord and Tenant Board (LTB), part of Tribunals Ontario, decreased in 2024-2025, to **971** cases, from the previous year's 1,284. The dominant issue continued to be delays in getting LTB hearings or orders. Still, Tribunals Ontario and the LTB continued to make progress on implementing the recommendations from the Ombudsman's 2023 report on our investigation into delays at the LTB. In a similar vein, we proactively shared best practices with the Rental Housing Enforcement Unit of the Ministry of Municipal Affairs and Housing (see more under **Investigations**).

Office of the Public Guardian and Trustee

The Office of the Public Guardian and Trustee (OPGT) helps manage money and property matters for people

who are incapable of doing so for themselves. We liaise regularly with the OPGT to discuss complaint trends and the OPGT's efforts to improve services for the vulnerable people it serves.

In 2024-2025, we received **195** cases about the OPGT, consistent with 199 the previous year. Complaints were primarily about slow service, poor communication, and disagreements with OPGT decisions. We resolved such cases by facilitating communication with OPGT staff and raising concerns with senior officials.

For example:

- With our help, the OPGT reviewed and increased a woman's monthly allowance to **$390**, to better support her needs.
- A man complained to us that he was struggling to afford groceries on his OPGT allowance. We encouraged the OPGT to find a more affordable cellphone and Internet plan for the man, which reduced those costs by more than $100 a month.
- We helped a man connect with the OPGT about a missing cheque for **$149**, which it replaced once it determined it had been lost in the mail.

OLG Super Bowl winnings delays

Over the past year, we monitored the OLG's response to complaints received about delays in accessing winnings from the OLG's 2024 "Super Bowl LVIII" promotion – an issue highlighted in our Annual Report last year. New players complained to us about significant delays in getting their bank accounts verified as part of the withdrawal process after the OLG could not keep pace with these requests given the popularity of the promotion. Many also complained about the lack of information from the OLG about processing times. We raised these concerns with the OLG, which has since improved communication with affected players, increased capacity to process withdrawal requests during high-demand periods, and changed its internal processes to prevent delays from recurring.

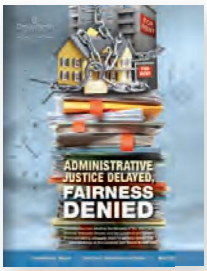
Ministry of Finance - Ontario First Nations HST rebate program

We continue to follow up with the Ministry of Finance about ongoing delays in reimbursements under the Ontario First Nations HST rebate program, which allows eligible First Nations individuals, bands, and band councils to claim a rebate of the provincial portion of the HST (8%) paid on qualifying purchases made off-reserve.

The Ministry has acknowledged delays in issuing rebates and committed to improvement by, for example, exploring resource strategies and examining opportunities to modernize and digitize the program to help it meet its 8-week service standard. We are actively monitoring these efforts.

Investigations

Delays at the Landlord and Tenant Board



Report: *Administrative Justice Delayed, Fairness Denied*, released May 2023

Investigation update: This investigation looked into whether the Ministry of the Attorney General and Tribunals Ontario were taking adequate action to address the delays and backlogs at the Landlord and Tenant Board (LTB).

We found that delays and backlogs pervaded almost every aspect of the Board's process, from the scheduling of

hearings to order production, affecting tens of thousands of landlords and tenants. These delays worsened over the course of the COVID-19 pandemic when the LTB suspended in-person hearings and all hearings related to eviction proceedings.

The Ombudsman made **61** recommendations to improve the LTB's processes and address delays. The LTB, Tribunals Ontario and the Ministry accepted all of the recommendations.

Since then, they have taken action on many of them to reduce backlogs and make LTB services more efficient. The LTB now has 81 full-time and 52 part-time adjudicators, and is continuously monitoring the status of recruitments and appointments to ensure a sufficient complement is maintained. They are now scheduling more than 1,000 tenant matters each month. They have also taken action to ensure that the Board is better able to provide services in French.

Updates to the Tribunals Ontario portal were made to help with the application process, such as screening applications for errors so they can be corrected before a hearing takes place.

The LTB has also provided guidance to members to help them produce orders in a timely manner. Vice Chairs also now directly monitor the volume of outstanding orders for members on a monthly basis.

The province's recent *Bill 227, Cutting Red Tape, Building Ontario Act, 2024*, will, among other things, allow the LTB to expedite certain files and allow matters to be reassigned if decisions aren't provided within a reasonable time.

As a result of the ongoing efforts made to address our recommendations, the LTB is now resolving more cases than it is receiving, which is helping to reduce the overall backlog. Application processing times have also improved to an average of 3-7 months, compared to 8-10 months in prior years.

In 2024-2025, we received **971** cases about the LTB. Of those, **542** involved complaints about delays. We continue to work closely with the Ministry, Tribunals Ontario and the LTB to ensure that their changes have the desired impact on backlogs and delays and result in a more timely process.

Individual cases: We continue to help people resolve their issues with the LTB. For example:

- A landlord had been waiting eight months for a hearing at the LTB. After we raised his case with administrators, a hearing was scheduled.
- A tenant's lawyer asked us to help because the LTB had not responded to his request for the recording of a hearing. After we intervened, he received it.
- After we flagged the case of a landlord who had been waiting close to two years to reschedule a hearing to LTB officials, they gave him the first available timeslot.

Rental Housing Enforcement Unit

In addition to our work with the LTB, we also proactively

> "I cannot thank you enough. This was stalled and not going anywhere until you got involved. Honestly, so impressed with how the process worked through your office."

shared best practices with the Ministry of Municipal Affairs and Housing's Rental Housing Enforcement Unit (RHEU), in light of media reports about its caseload and track record, as well as some complaints and inquiries. The RHEU's role is to enforce the rights and responsibilities of landlords and tenants under the *Residential Tenancies Act*. Our suggestions included ways for the RHEU to raise their public profile and review and investigate complaints more efficiently.

Case summaries

Pending licence

A financial advisor who had paid the fee to renew his licence with the Financial Services Regulatory Authority of Ontario (FSRA) complained to us after waiting more than two months for a confirmation from them. He told us he was frustrated because without his licence, he could not continue to serve clients looking to set up life insurance policies.

RESULT: The man's new licence was issued on the same day we made inquiries with the FSRA.

Misrouted rent

A landlord came to us for help after her tenant finally paid her overdue rent directly to the Landlord and Tenant Board (LTB) – and the money was sent to the previous owner of the building instead.

RESULT: After we stepped in, the LTB agreed to pay the landlord the overdue rent while it recouped the payment it had mistakenly sent to the previous owner. We also worked with the LTB to implement best practices to prevent similar administrative errors in the future.

Service connection

The family of a client of the Office of the Public Guardian and Trustee (OPGT) told us they were alarmed to hear from their relative's cellphone provider that their bills – which the OPGT is supposed to pay on the client's behalf – had not been paid in several months. The family paid the arrears to prevent a service disconnection, but told us OPGT staff never responded to them when they asked them to look into what happened.

RESULT: We made inquiries and discovered the cellphone provider had switched the account to online billing without notifying the OPGT. The OPGT arranged to pay the bills and advised the family they would be reimbursed.

Cost of ownership

A woman contacted us for help in correcting the ownership information for her deceased parents' house, which had been in the family for close to 50 years but had mistakenly been left in the previous owner's name at the time they bought it. The error in the land registry documents resulted in the wrong name on their property tax bills – but the woman's parents had simply continued to pay the taxes without attempting to change it.

The woman told us she tried for years to get clarification from her municipality about the incorrect property tax bills. She said for lack of answers, she stopped paying them. The municipality warned her it could put the home up for auction if she did not pay.

RESULT: We raised her case with provincial officials, who explained she could apply to correct the land registry documents to show the current owner. We also raised the issue with the municipality, which agreed to work with the woman on a plan to pay her overdue property taxes.



TRANSPORTATION

Overview and trends in cases

We help Ontarians with a wide range of concerns related to driving, roads and public transit. The Ministry of Transportation is responsible for many of the programs and agencies that people complain to us about in this area, such as driver and vehicle licensing, highways, and public transit services like Metrolinx and GO Transit.

In 2024-2025, we received **528** complaints and inquiries related to transportation – a significant decrease from 718 in 2023-2024. This is largely due to the marked decline in complaints about DriveTest, thanks to efforts by that agency and the Ministry to reduce backlogs in booking road tests, which was a key topic of complaint in previous years. We received **146** complaints about DriveTest this fiscal year, but none related to road test backlogs.

Driver licensing issues

We helped many drivers with licensing problems, like suspensions and issues related to medical reviews. In a few cases, we helped people with vision impairments who required special exemptions to drive, including getting their licences reinstated or clarifying processes to reduce the number of medical reports they were required to submit.

Some other examples:

- A man whose licence had been suspended for medical reasons sought our help in having it reinstated. He had had the required medical tests within the required time frame, but the Ministry's review of his documents was not completed until after the time frame lapsed. We helped him get his licence reinstated without further testing – and a refund for the tests he had booked.
- We helped a member of the military returning to Ontario who was unable to update his licence after

running into issues with his name being spelled differently on various identity cards.

- Our intervention ensured a woman's commercial licence was quickly reinstated after it was incorrectly downgraded to a G licence without notice.

We also highlighted apparent inconsistencies and unfairness in the application of regulations and legislation, and helped drivers with licences from outside Canada navigate the process to get their driving experience recognized.

Licences for drivers from outside Canada

We often hear from drivers from outside of Canada who are denied Ontario licences, or treated as new drivers because their international experience is not recognized. We help by sharing information or escalating their concerns to the Ministry.

In one such case, after a 17-year-old complained that his foreign experience was not recognized, the Ministry clarified its policy about recognizing foreign driving credentials for novice learners to ensure these new Ontarians can book driving tests.

Some other examples:

- After DriveTest refused to accept a man's Pakistan driver's licence because of a blurry photo, we stepped in to ensure his foreign experience was recognized so he could get his Ontario licence.
- We helped a man whose new Ontario licence – issued to replace his licence from another country – went astray. We discovered the Ministry had mailed it to an old address it had on file for him. We confirmed that he received a new one, and that the one sent to the wrong address was cancelled so it could not be misused.

New tow truck driver and operator requirements

We were contacted by tow truck drivers and operators after their applications for certification were denied under the new *Towing and Storage Safety and Enforcement Act, 2021*, which came into force in January 2024. The law requires drivers and operators to get certified under the Act, but certain criminal convictions and court orders (such as weapons bans) disqualify them, and there is a limited appeal process. We inquired with the Ministry of Transportation, which confirmed that the denials were legitimate. The legislation had also been upheld by the courts as reasonable for public safety. However, in light of our inquiries, the Ministry updated its website to clarify that it would review instances where drivers believed there were mistakes on their files, such as being denied a licence for a criminal record when no such record exists.

> "Your attention to detail and comprehensive approach has provided me with clear insights and helped me move forward… I truly appreciate the effort, patience and professionalism you've demonstrated throughout this process. Thank you for your hard work and dedication."

Ignition Interlock Program

We uncovered a data issue affecting people with alcohol-related driving offences who were denied access to this program. The program allows eligible drivers to have their licence suspensions reduced and resume driving sooner if they use a device in their car that prevents it from starting if alcohol is detected on their breath. We discovered that some people's cases had been misidentified as drug-related convictions, which are not eligible for this program. We worked with the Ministry of Transportation and the Ministry of the Attorney General to identify the cause of this issue and to try to prevent it from happening again.

Case summaries

Breathe easy

Tired of the GO trains that often sat idling near his home, a man asked us for help in raising the matter with Metrolinx. He told us he believed the fumes were causing him health issues.

RESULT: We spoke to Metrolinx staff, who confirmed GO trains do not idle for more than 30 minutes at a time. In light of our inquiries, Metrolinx reviewed other possible locations for the trains to idle. Metrolinx officials also provided the man with an air purifier and extra replacement filters as a goodwill gesture.

Sticky situation

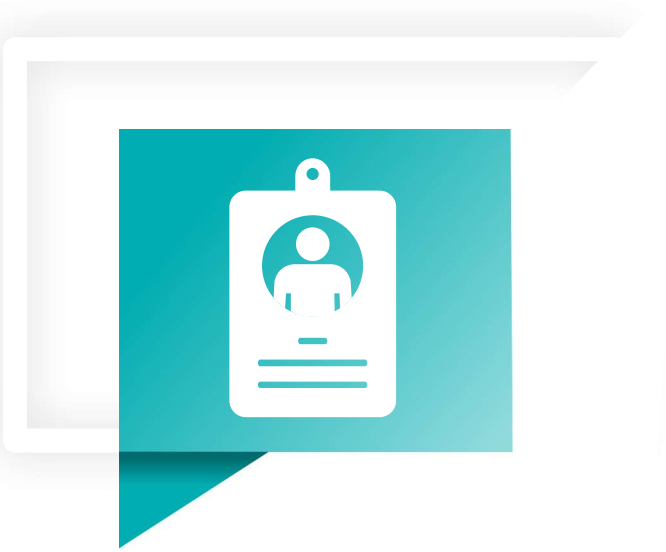
A man complained to us that he was wrongly charged more than **$1,800** for the licence plate stickers on his heavy commercial vehicle. He said the charges should not apply to him, as his vehicles are only used seasonally and not for the full year.

RESULT: We contacted senior officials at the Ministry of Transportation, who reviewed the use of the man's vehicles. Ministry staff confirmed that the charges were incorrect, and the man received a full refund.

Secret sale

A man visited a ServiceOntario location to renew his licence plate after he tried to renew it online without success. He was shocked to learn that the vehicle was no longer registered in his name and that ServiceOntario records indicated it had been sold and scrapped. He called us for help in determining how such an error could happen.

RESULT: We spoke with ServiceOntario and Ministry of Transportation officials, who verified it was not an error on their end. Rather, the man appeared to be a victim of identity fraud, and he was advised to contact police, who launched an investigation. In the meantime, we confirmed that he was able to re-register the vehicle in his name and renew his plate.



EMPLOYMENT

Overview and trends in cases

Most of the complaints and inquiries we handle regarding employment are related to the Ministry of Labour, Immigration, Training, and Skills Development and the programs and agencies it is responsible for. These include the Workplace Safety and Insurance Board (WSIB), the Occupational Health and Safety Branch, Skilled Trades Ontario, and the WSIB's internal ombudsman, the Fair Practices Commission.

In 2024-2025, we received **470** cases about the Ministry and its programs, a slight increase from 427 the previous year. The WSIB accounted for the bulk of these, with **213** cases, consistent with 218 the previous year. Complaints about the Workplace Safety and Insurance Appeals Tribunal declined from 57 in 2023-2024 to **37** in 2024-2025.

Workplace Safety and Insurance Board

Cases we receive about the WSIB often involve delays, poor communication, or disputes about claim decisions. We facilitate communication and make inquiries with the WSIB, and when needed, refer complainants to the Office of the Worker Advisor (OWA) or the Fair Practices Commission. For example:

- The daughter of a man who made multiple WSIB claims dating back to the 1990s sought our help because neither she nor her father were able to determine the status of the claims. We helped them get a detailed update from the WSIB on the man's claims, and connected him with the OWA for support if they chose to file any appeals.
- A man told us his compensation claim for a 2014 injury had stalled for nearly 10 years, and he couldn't reach his OWA advisor. We discovered there had been frequent turnover at the OWA and the man's advisor had been absent for several months. The man told us that thanks to our inquiries, a manager had prioritized his file.

Ontario Immigrant Nominee Program

Cases about the Ontario Immigrant Nominee Program (OINP) jumped to **57** in 2024-2025, from just 4 the previous year. This program assesses and nominates people for permanent residence in Ontario based on their skills and experience, although the federal government makes final determinations to approve permanent residence.

Most of the complaints we heard were about delays – several from frustrated applicants who waited for up to a year for a decision from the OINP. Some cases were urgent – for example:

- An applicant contacted us urgently as their work permit was about to expire and they had been waiting eight months for a decision from the OINP. A week after our inquiries, the OINP confirmed the application was approved.

We are monitoring the impact of delays at the OINP, and reviewing its decision-making processes more broadly, while following up directly with the Ministry on individual cases.

Case summaries

Translation error

A paralegal for an employer complained to us that a decision by the Workplace Safety and Insurance Board (WSIB) on the case of a worker from Quebec who was injured in Ontario took almost a year to process because of translation delays. She said many of the documents in the case were in French and the WSIB had to have them translated into English. The claim was submitted in December 2023, but there was no decision until November 2024.

RESULT: Our French Language Services Unit intervened in this case and found that the delay was due to a lack of French-speaking staff at the WSIB after the bilingual caseworker on the file left. The translation was also unusually delayed because of administrative errors. The WSIB has since implemented measures to prevent this from happening again, including ensuring that its translation service has processes in place to confirm receipt of large and urgent documents.

Trade trouble

An electrician whose work experience was from outside Canada was frustrated by the length of time Skilled Trades Ontario (STO) was taking to process his application to become a certified construction and maintenance electrician. He told us it wasn't clear what documentation he had to submit to receive his qualification.

RESULT: Our review found that the man's application was missing necessary paperwork to document that his experience met trade standards. At our request, STO staff contacted him directly to explain what was missing, helped him finish his application, and expedited it once the paperwork was complete.

Respectfully reviewed

A Métis man sought our help after he was cut off from Workplace Safety and Insurance Board (WSIB) assistance two weeks after getting approved for it, because his employer offered him the opportunity to take on lighter work. He told us that he felt that his Métis status was being ignored by WSIB officials, and he felt disrespected when his concerns were met with a service restriction that limited him to written correspondence only. He told us he escalated his concerns to the Fair Practices Commission (FPC) but never heard back.

RESULT: We contacted the FPC and confirmed that it had reached out to the man and had made inquiries with the WSIB. Shortly thereafter, the WSIB reinstated his benefits, approved one month's pay to recoup the loss of earnings, authorized physiotherapy and a knee brace, and reassigned his case to the Complex Injury Adjudication Unit. The man confirmed he had started physiotherapy and gotten a knee brace, thanked us for our help and told us he felt he was now being treated with more respect.



HEALTH

Overview and trends in cases

We help Ontarians with problems related to the Ministry of Health and the Ministry of Long-Term Care – and their programs, including those responsible for long-term care inspections and funding of drugs and medical devices. We also take complaints about the Ontario Health Insurance Plan (OHIP).

There are some areas of the health care system where we can't intervene directly, although we receive many complaints and inquiries about them. For instance, we received **489** cases about hospitals, and **57** about long-term care homes. We refer complainants in these cases to the Patient Ombudsman, which handles matters related to patient care. We also received **22** cases about public health units in 2024-2025, which are outside of our jurisdiction and neither we nor the Patient Ombudsman can review.

In June 2024, the province established Ontario Health atHome, a new division of Ontario Health that co-ordinates and provides home health care services, including care plans, nursing and therapy services and medical equipment. We have limited oversight of Ontario Health atHome and received **23** complaints about it in 2024-2025. When we receive complaints about the professional, personal support, or homemaking services it provides, we refer individuals to the Patient Ombudsman.

Ontario Health Insurance Plan (OHIP)

We received **65** cases in 2024-2025 about OHIP, consistent with 62 the previous year. We heard from people who had difficulty renewing their health cards, obtaining coverage, and understanding their eligibility for services.

For example:

- After a transgender youth had issues renewing his health card and was told it would take 10 weeks to review, we stepped in immediately to get the renewal expedited so the youth could get help with his ongoing health issues.
- We made sure an Ontario resident studying in another province was able to renew her OHIP card, after she had originally been told to submit unnecessary information.

Drug programs

This year, we received **54** cases about Ontario's drug programs, compared to 47 in 2023-2024. These included **8** about the Exceptional Access Program (EAP), and **35** about the Trillium Drug Program. Many were about communication issues, delays, or decisions not to provide funding for specific medications.

For example:

- We helped a man with a developmental disability get coverage for his medication and a reimbursement of **$1,800**. Our inquiries resulted in the EAP reviewing additional information from his doctor under the special case review process.
- We escalated a senior's application for the Seniors Co-Payment Program for drug expenses to Ministry of Health officials, flagging that he could face serious health consequences if he could not pay for his medication. His application was expedited and approved.

Investigations

Oversight of long-term care homes during COVID-19



Report: *Lessons for the Long Term*, released September 2023

Investigation update: The Ombudsman launched this investigation in June 2020 on his own initiative after shocking conditions in five long-term care homes were revealed by Canadian Armed Forces personnel who had been called in to support the homes during the first wave of the COVID-19 pandemic.

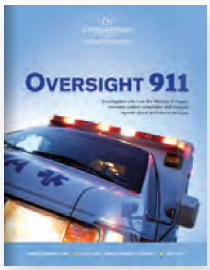
Our investigation uncovered serious problems with the Ministry of Long-Term Care's pandemic preparedness and inspection process. The Ombudsman made **76** recommendations aimed at ensuring the safety of long-term care residents and staff in future emergencies.

Since the release of our report, the Ministry's actions in response to these recommendations include:

- Creating a plan to keep its inspector staffing at full complement;
- Hiring staff with the expertise to inspect infection prevention and control;
- Introducing a policy on inspector testing and the movement of inspectors between homes; and
- Committing to ensuring that residents can always access complaint avenues.

While the implementation of some recommendations remains a work in progress, the Ombudsman is satisfied that significant corrective actions have been taken to improve the Ministry's posture for the next pandemic. We continue to work with Ministry staff and to monitor their efforts to address the remaining recommendations.

Oversight of complaints about ambulance services



Report: *Oversight 911*, released May 2021

Investigation update: The Ministry of Health accepted all **53** of the Ombudsman's recommendations in the wake of this investigation, aimed at improving how it receives and reviews complaints and reports about ambulance services. In the four years since, it has improved its public communications, internal complaint processes, recruitment and training.

These changes give the public a better idea of how complaints are handled, and improvements in recruitment and training have positively impacted the land and air ambulance branches of the Ministry.

During the 2024-2025, we received **7** complaints about delayed investigations and communication with complainants. We continue to escalate these individual files as necessary.

Case summaries

Fiscal fumble

A woman complained to us that the Trillium Drug Program made a mistake in calculating her out-of-pocket costs because they used an income tax return from the wrong year.

RESULT: After speaking with program staff, we confirmed they were required to use information from the previous tax year, but their forms did not clarify this or include clear reassessment instructions. As a result, they updated their informational documents and application form to include these details.

Decades later

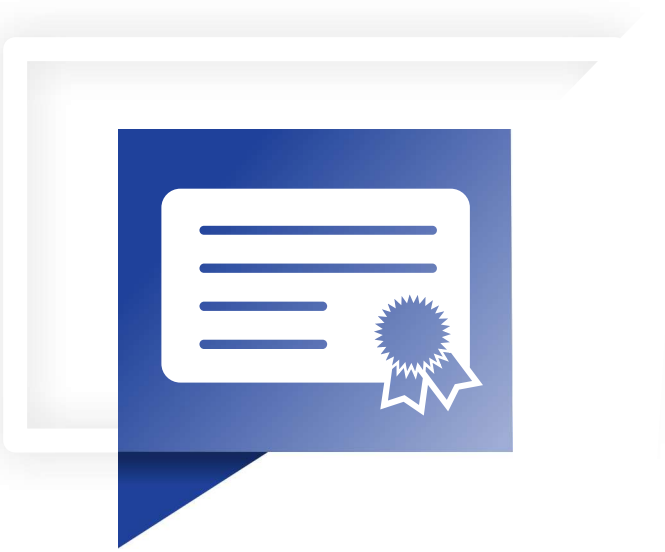
A man who was born in Portugal but has been a Canadian citizen for more than 50 years sought our help in renewing his health card. He did not have his original citizenship documents, and the Ontario Health Insurance Plan had extended his coverage to allow him time to get replacements. However, he had not been able to do so, due to serious health issues.

RESULT: After we raised the man's case with Ministry of Health officials, his request for another extension was processed on an urgent basis, and he thanked us for our help.

Language bridge

A Russian-speaking woman came to us for help in dealing with her daughter's care through Ontario Health atHome. Since this matter falls under the mandate of the Patient Ombudsman, we referred her to them. However, she struggled to navigate the automated phone system and could not reach a live representative who could help her in Russian.

RESULT: We reached out to the Patient Ombudsman's office to explain the woman's situation. They called her the same day with the help of an interpreter.



CERTIFICATES AND PERMITS

Overview and trends in cases

We help people with a wide range of problems with all kinds of documents that are important to daily life – including birth certificates, marriage certificates, death certificates, as well as permits issued by provincial and municipal agencies.

Most of the complaints and inquiries we receive relate to ServiceOntario, which provides all types of identity documents, and the Office of the Registrar General, which issues birth and death certificates. In 2024-2025, we received **218** cases about ServiceOntario, a slight increase from 187 in the previous year, and **85** cases about the Registrar General, down from 109 in 2023-2024.

Document delays and confusion

Many of the cases we handle are about delays people experience in accessing official documents – which often affect their access to other services, including health care. We often help by finding the source of the delay and connecting people with relevant officials.

Some examples:

- A mother was unable to enrol her son in a new school while she waited for months to obtain his birth certificate from the Registrar General, whose website said only that the file was "in progress." We discovered her application had actually been stalled because of errors, and due to the urgency of the situation, Registrar General staff contacted her directly to sort them out.
- We helped a woman finally get her marriage certificate after months of miscommunication, including a request that she return a document to the Registrar General that she had never received.

- A woman discovered that her granddaughter's birth had never been registered when the girl was in the care of a children's aid society. We uncovered an error on the original application and ensured it was expedited so the child could be registered for school.
- A young man who had previously been in the care of a children's aid society had trouble getting an Ontario Photo Card because the agency hadn't provided him with the documents he needed. We stepped in to get him an appointment with ServiceOntario to review what documents he did have, and he received his card.

We often receive complaints from people who don't know how to update their documents after accidental errors in filling them out.

For example:

- We helped a woman whose application to change the last name of her three children was repeatedly rejected for missing information. Each reapplication cost her time and money. After we intervened, Registrar General staff agreed to work with her directly to ensure she provided all the information they required.

Access to services for Indigenous communities

In last year's Annual Report, we described our work with Indigenous communities to address complaints about administrative barriers to obtaining birth certificates, which are generally required to access government services and programs. Many communities don't have nearby ServiceOntario locations, which makes it difficult to get help.

Over the past year, we worked with officials across multiple branches of the Ministry of Public and Business Service Delivery and Procurement to explore solutions. We continue to follow up with senior staff and with a political territorial organization representing the affected Indigenous communities.

Case summaries

Certified win

A man with a winning lottery ticket came to us for help after the Ontario Lottery and Gaming Corporation refused to release the six-figure prize to him because the only identification he had was an old and damaged birth certificate. He told us he had tried for months to get a new one, but the Office of the Registrar General insisted on birth and parental information that he was unable to provide.

RESULT: We made extensive inquiries with ServiceOntario and the Deputy Registrar General in this case. Ultimately, ServiceOntario matched his signature with one on the application for his old birth certificate, and provided him with a new one. He was then able to get the required photo ID and claim his lottery winnings.



Cases related to driver's licences can be found in the **Transportation** chapter of this report. Cases related to health cards can be found in the **Health** chapter.

Payment found

After four years of trying to change her legal last name, including a trip to India to get an affidavit verifying her name change from a previous marriage, a woman came to us for help.

RESULT: We discovered the woman's file was stalled because her payment to the Registrar General for the name change had not been registered. A day after we stepped in, the Registrar General confirmed that her file was processed, and the change of name certificate would be sent to the woman via courier.

Resolved with gratitude

A woman came to us after trying for nine months to get an error corrected on her mother's death certificate. Her mother's birthplace was incorrect on the document, and this was causing issues in managing her estate.

RESULT: We raised the issue with officials at the Registrar General, who agreed to make the correction and to contact the woman directly to explain and apologize for the delay. We followed up after the matter was resolved, and the woman thanked the Ombudsman staff member who worked on her file. She said she was grateful for "his professionalism, hard work, and efforts" and noted that his "ongoing communication with me, and exceptional effort and proactive service to escalate this matter to a senior contact at the Registrar's office resulted in a quick resolution."

> "Your service has been incredibly helpful, and I genuinely appreciate the comprehensiveness and value of the information you have provided. Your time in listening, advising, and educating me has been invaluable. I now feel more confident about how to navigate the steps I need to take. I cannot thank you enough for your time and support."



FRENCH LANGUAGE SERVICES

Overview and trends in cases

The linguistic rights of French-speaking Ontarians are enshrined in the *French Language Services Act (FLSA)*, and since May 2019, we have been responsible for monitoring compliance with the *FLSA* to protect those rights.

Reporting to the Ombudsman, French Language Services Commissioner Carl Bouchard and our French Language Services (FLS) Unit conduct outreach, review complaints and trends, and issue reports with recommendations. This work, supported by our entire Office, delivers real and lasting benefits that support the province's Francophone community.

From its inception on May 1, 2019 to March 31, 2025, the FLS Unit – a specialized team of Investigators and Early Resolution Officers – has handled **2,137** complaints and inquiries. In the past year, together with the Commissioner, they also published an investigation report and the Commissioner's Annual Report, launched a major new investigation and participated in dozens of outreach events in Francophone communities across the province.

In fiscal 2024-2025, the FLS Unit received **281** cases. Key complaint topics included issues with service in French at designated hospitals, in post-secondary programs, and in government signage. The FLS Unit also supported efforts to ensure compliance with the *FLSA* at the University of Sudbury and designated daycares, and prompted improvements in the use of French on government social media accounts.

Outreach and engagement

Commissioner Bouchard is highly accessible to Francophone communities and continued to actively engage with them in 2024-2025. At numerous events, meetings and gatherings across diverse communities and sectors, the Commissioner

and FLS Unit staff shared practical examples of how we help people access government services in French.

These engagements help strengthen the Commissioner's ongoing efforts to ensure compliance with the *FLSA*. Details of these outreach activities can be found in the Commissioner's Annual Reports, available on our website.

Ombudsman's Award for Good Governance

In February 2025, Ombudsman Paul Dubé launched this award for public sector bodies that have demonstrated exemplary administrative practices, as part of our 50th anniversary activities. For the first such award, he chose the Ontario Provincial Police (OPP) for its efforts to improve its provision of services in French.

The OPP received the award because it fixed longstanding technical problems with issuing AMBER Alerts simultaneously in English and French, and because of its efforts to provide an "active offer" of service in French, as required under the *French Language Services Act*. These improvements were noted by French Language Services Commissioner Carl Bouchard in his 2023-2024 Annual Report.

GOOD TO KNOW

We publish a separate Annual Report of the French Language Services Commissioner of Ontario. The next one, covering cases received between October 1, 2024 and September 30, 2025, will be released in December.

> "The OPP is grateful to Ombudsman Ontario for recognizing the continued improvement of our French-language service delivery capabilities, the goal of which is to forge and promote partnerships with Francophone communities."
>
> — Letter to Ombudsman from OPP Chief Thomas Carrique, April 2025

Annual Report of the French Language Services Commissioner 2023-2024



Commissioner Bouchard released his second Annual Report – covering the **395** cases received by the FLS Unit between October 1, 2023 and September 30, 2024 – in December 2024.

His report called attention to the longstanding challenges that people face in determining where they can receive services in French. He recommended that the Ministry of Francophone Affairs publish a digital directory of services covered by the *FLSA*, so people can find service in French more easily.

He also reported progress on the 17 recommendations made in previous annual reports, including in:

- Training all frontline provincial employees in their obligations under the *FLSA*;
- Ensuring government social media accounts are bilingual;
- Posting all provincial job opportunities in French as well as English; and
- Updating Ontario Regulation 398/93, which lists designated agencies offering "public services" within the meaning of the *FLSA*.

> With a digital tool that pulls together all the information on which services are available in French, and where we can find them around us, Ontarians who wish to be served in French will be able to access these services efficiently, without having to wonder whether or not they have the right to them.
>
> — French Language Services Commissioner Carl Bouchard, speaking at the release of his Annual Report, December 5, 2024



December 5, 2024: French Language Services Commissioner Carl Bouchard releases his 2023-2024 Annual Report at a press conference at Queen's Park, Toronto.

Investigations

Frontline service in French at ServiceOntario

Launched: April 2025

Investigation update: French Language Services Commissioner Carl Bouchard launched this investigation on his own initiative, focusing on in-person services offered in French at ServiceOntario locations. It is examining the extent to which ServiceOntario is complying with the *French Language Services Act (FLSA)*, which specifies designated areas where an "active offer" of frontline service in French is required, and covers ServiceOntario locations that are in or serve such areas.

The investigation is looking into:

- Whether ServiceOntario staff at locations that are required to provide service in French under the *FLSA* are aware of their obligations;
- How the *FLSA* is applied in ServiceOntario locations; and
- The quality of in-person service in French, including whether an active offer is made, and whether bilingual staff are available who can provide equivalent service in French.

> Ontarians have a legislated right to be served in French with the same quality of service delivered in English. But they are telling us those rights are not being respected, and they are not receiving an equivalent service in French at locations where they should receive help obtaining their driver's licences, health cards, and other documents that are essential to their day-to-day life.
>
> — French Language Services Commissioner Carl Bouchard, commenting in a press release about his investigation, April 2, 2025

Unilingual out-of-home government advertising



Report: *Missed Messages*, released July 2024

Investigation update: Launched in July 2023 in response to the apparent lack of French in provincial government out-of-home advertising, this investigation reviewed 17 out-of-home advertising campaigns led by or on behalf of the Ministry of Health between April 1, 2020, and March 31, 2023. Several of them contained important health information for Ontarians during the first phase of the COVID-19 pandemic. Only three of the 17 campaigns included out-of-home advertising in French – and they were not equivalent to or simultaneous with the English ads.

Commissioner Bouchard found that none of the campaigns reflected the spirit of the *French Language Services Act*, or met the government's own rules for communications in French. He made **7** recommendations to Cabinet Office, the Ministry of Health and the Ministry of Francophone Affairs. Five recommendations were accepted and two are under review – including one that all out-of-home government advertising be in a bilingual format. The ministries continue to report back to us on their efforts to address the recommendations.



March 20, 2025: Ombudsman Paul Dubé, right, and French Language Services Commissioner Carl Bouchard, at the raising of the International Francophonie Day flag, Toronto.

Cuts to French-language programs at Laurentian University



Report: *Strengthening the Designation: A Collaborative Effort*, released March 2022

Investigation update: This investigation examined the impact of the cuts made by Laurentian University to French-language programming as a result of its financial restructuring in 2021. It concluded that the university, the Ministry of Francophone Affairs, and the Ministry of Colleges and Universities failed to fulfil their responsibilities under the *French Language Services Act*.

In his December 2023 Annual Report, Commissioner Bouchard noted that all three parties had made significant progress on the report's **19** recommendations.

Among other things, for instance, the Ministry of Francophone Affairs has a new policy to ensure regular compliance assessments of all designated agencies. It has also implemented a new digital tool for designated agencies to improve communication with them about their obligations.

All three parties continue to report back to the Commissioner on their progress on the recommendations every six months.

Case summaries

Legal obligation

A Francophone woman complained to us after she went to a provincial courthouse for a family court case in a region that is designated under the *French Language Services Act* (meaning services in French must be available by law). She said she was unable to obtain services in French at the clerk's counter. She said she was told that the only bilingual clerk was absent that day.

RESULT: We raised this incident with senior managers at the courthouse in question, and with the Ministry of the Attorney General. The courthouse has since recruited more bilingual staff and arranged to have more than one bilingual person working at the clerk's counter consistently. They also made sure all courthouse staff were aware of their obligation to provide an "active offer" of service in French, and the procedures for doing so.

The Ministry also told us that all courthouse staff are provided with a list of bilingual employees, and have been instructed to contact them in the event that someone needs assistance in French. They said that regional managers regularly discuss the provision of services in French at team meetings.

Eclipse of the chansons

As part of a promotion of places in Ontario to view the total solar eclipse in April 2024, Destination Ontario posted a playlist of eclipse-themed songs on its website, such as "Ain't No Sunshine," and "I Can See Clearly Now." A Francophone man complained to us that all of the songs on the playlist were in English only, on both the English and French versions of the site. He said he had called the agency and observed that there are plenty of French songs it could have included. Instead, it removed the playlist entirely.

RESULT: We raised the matter with Destination Ontario officials, who acknowledged it was a mistake not to have included songs in both French and English on the playlist. They said they simply took it down when the man complained because it was only a few days before the eclipse. They committed to taking French songs into account for similar events in future.

A few months later, the organization updated its website style guide to require that all content is representative of English and French products, operators and artists. All staff received training on this style guide update.

Signs of the times

We noticed that signs put up by Metrolinx around the construction site of the Scarborough subway extension were in English only. Metrolinx is a government agency and its communications, including signage, are required to be in English and French.

RESULT: We pointed these signs out to Metrolinx officials, who told us they had been in place for more than three years. They noted that since that time, the organization has committed to fully bilingual signage, and said that these signs were in the process of being changed. They noted that bilingual signs were recently installed near this site as part of the same project and that the new signs will be similar.



ENERGY AND ENVIRONMENT

Overview and trends in cases

Complaints in this area involve a wide variety of issues in the energy and environment sectors. Although we can't take complaints about Hydro One (we refer them to its internal ombudsman), we can help with problems related to municipal utility companies – as well as the Ministry of Energy and Mines and its programs.

We also handle cases about the Ministry of the Environment, Conservation and Parks, the Ministry of Natural Resources, and conservation authorities across the province. These include matters relating to Indigenous hunting and fishing rights.

In 2024-2025, we received **106** cases about the provincial ministries in this category, consistent with 142 last year. We resolved these by sharing best practices with the ministries regarding fair and transparent decision-making, and suggested improvement in how decisions are communicated to the public.

Indigenous hunting and fishing rights

In recent cases where Indigenous communities and individuals have communicated concerns about consultation and their ability to exercise their hunting and fishing rights, we have worked to help the relevant government bodies improve their policies and processes, as well as to resolve the specific complaints wherever possible.

Some examples of our ongoing work:

- We helped a First Nations man whose crossbow had been confiscated by a conservation officer while he was hunting in a provincial park on traditional Haudenosaunee lands. Our review confirmed that he did not need permission to practice his traditional hunting

practices in the park. We are now reviewing how the Ministry of Natural Resources recognizes and respects established Indigenous treaty rights on Crown land across Ontario. As part of this review, we pointed out the importance of processes that are sensitive to Indigenous practices.

- We received complaints from Indigenous groups in Northern Ontario about industrial development affecting the traditionally significant Boreal caribou, a threatened species. They told us they are seeking ongoing and meaningful consultation with respect to the conservation of caribou and want the Ministry of the Environment, Conservation and Parks to enforce protective measures. We are meeting with the groups to learn more about their concerns, and have reached out to the Ministry to better understand what work it is doing in response.

Municipal hydro

Municipal utility companies provide millions of Ontarians with electricity and are majority-owned or controlled by one or more municipalities. We received **132** complaints and inquiries about municipal hydro in 2024-2025, consistent with last year's 125. The most common issues were disconnections and billing disputes.

In some urgent cases, we stepped in to help vulnerable people who faced having their electricity cut off. Some of them raised issues like lack of notice of overdue payments, or mistakes on the utility's part about the status of their accounts.

For example:

- A woman whose husband had died had her power disconnected because the hydro account was in his name. She told us the company repeatedly refused to speak with her. After we intervened, the utility restored her service and contacted the woman to set up a payment plan.
- A new father who had paused his utility payment plan while on parental leave from his small business sought our help when the utility nonetheless sent him a bill for $5,000 in arrears. We prompted the utility to investigate, and it ultimately apologized to him and set up a plan for him to pay down the arrears when he resumed his business.
- We helped save a hydro customer from disconnection when we discovered that the company had accidentally applied a debit to his bill instead of a credit. The company apologized to him for the error and corrected the account.

Land use and environmental issues

In areas of the province that do not fall within a specific municipality, it is the Ministry of Natural Resources that issues permits and authorizations for things like building and land use. We received several questions and complaints about such permits. For instance:

- A group of residents concerned about the size and potential environmental impact of a structure their neighbour was building asked us to flag their concerns to the Ministry. We found that the Ministry had done an environmental assessment and confirmed that the structure met building regulations before it issued a building permit. Ministry staff also completed a site visit and spoke with concerned neighbours to answer questions and explain its process.

Well and water safety

We also received several complaints about potential contamination of drinking water in private wells. Owners are responsible for maintaining private wells, but the Ministry of the Environment, Conservation and Parks provides technical guidance for their construction,

maintenance and use – and it conducts inspections in some cases.

Some case examples:

- A well owner was concerned about the effect nearby sewer construction could have on their water quality. We confirmed that the Ministry of the Environment, Conservation and Parks had tested the water multiple times to confirm that the construction had not contaminated the water source. The Ministry provided the results of its testing to the owner as well as information about how to best maintain their well.
- Several well owners in Chatham-Kent sought our help in getting information from the Ministry of Health about the quality of well water in their area. A report commissioned by the Ministry in 2022 recommended further testing, but residents said they had heard nothing since. When we raised the matter with Ministry of Health officials, they acknowledged the delay and lack of communication. We continue to follow up with them on plans to address remaining water quality concerns and communicate with affected residents.
- We confirmed that a municipality had a response plan in place to address residents' concerns about an issue that was causing an odour and discolouration in its drinking water. In response to several complaints from residents, we made inquiries with the local public health unit and Ministry of the Environment, Conservation and Parks, and learned the issue was due to the effects of hot, dry weather on the concentration of manganese in the water. We also spoke with the municipality about its communication with residents about the issue.

Case summaries

Peace of mine

A resident was concerned about a municipality that was using aggregate (mining waste) from an abandoned mine as part of an infrastructure project and asked us to look into their concerns about this material. They wanted information about the potential environmental harm posed by the use of mining waste.

RESULT: We contacted the Ministry of Energy and Mines. Senior staff told us the Ministry had analyzed samples from the project and determined that the material would not cause environmental harm. Through these discussions, we also raised questions about how mining waste is regulated, particularly at abandoned mines. We continue to discuss related matters with Ministry officials, including the regulation of tailings dams (where mine waste is stored) and aggregate.

Slow build

A man who had purchased a plot of undeveloped land came to us after waiting almost two years for a development permit from the Niagara Escarpment Commission. The Commission's role is to safeguard the area's environmental features, and it specifically considers the impact of development on the landscape and natural environment of the Escarpment when issuing a permit.

RESULT: Officials at the Commission explained to us that staffing shortages were causing delays, but they were working to streamline their application process and increase the timeliness of their decisions. Shortly thereafter, the landowner received conditional approval to undertake work on his land.

Keeping the lights on

A mother contacted us in a panic when she received notice that her electricity would be disconnected the next day. She told us this would seriously impact her ability to care for her daughter, who has special needs that require her to have lights on through the night.

RESULT: We stepped in quickly to figure out what happened. We learned that Ontario Works (OW) had sent a cheque to the hydro company to cover overdue payments. We connected the OW caseworker with the hydro company to confirm the cheque details, and the disconnection was cancelled.

When a tree falls...

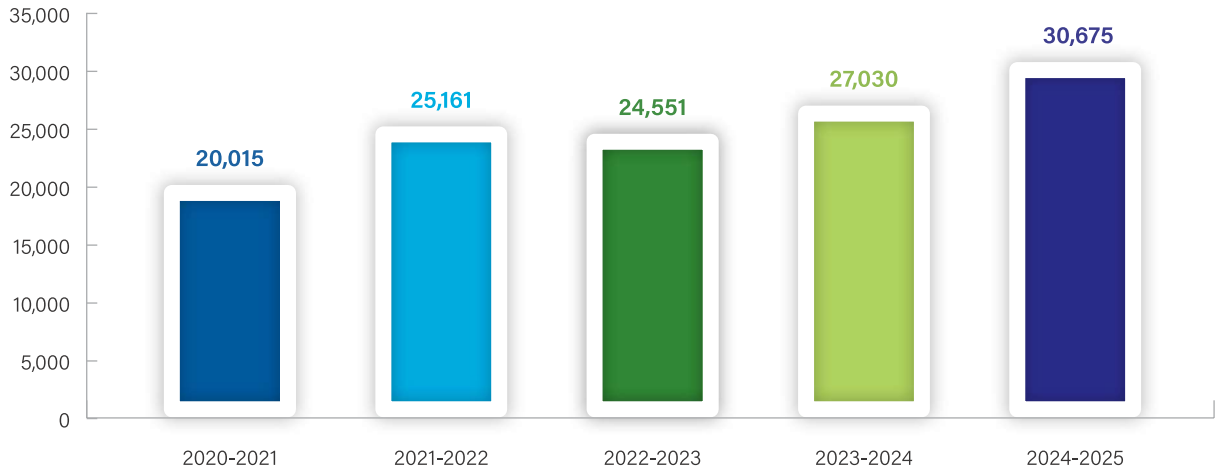
A man told us he was camping at a provincial park when a crew that was cutting trees damaged several trailers, including his. He said he wrote to the park superintendent to ask them to pay for the damage, but got no response.

RESULT: We reached out to staff at Ontario Parks, which is part of the Ministry of the Environment, Conservation and Parks. We confirmed that they had sent the man's claim to their Risk Management and Insurance Branch. After we spoke with them, they let the man know the status of his claim.

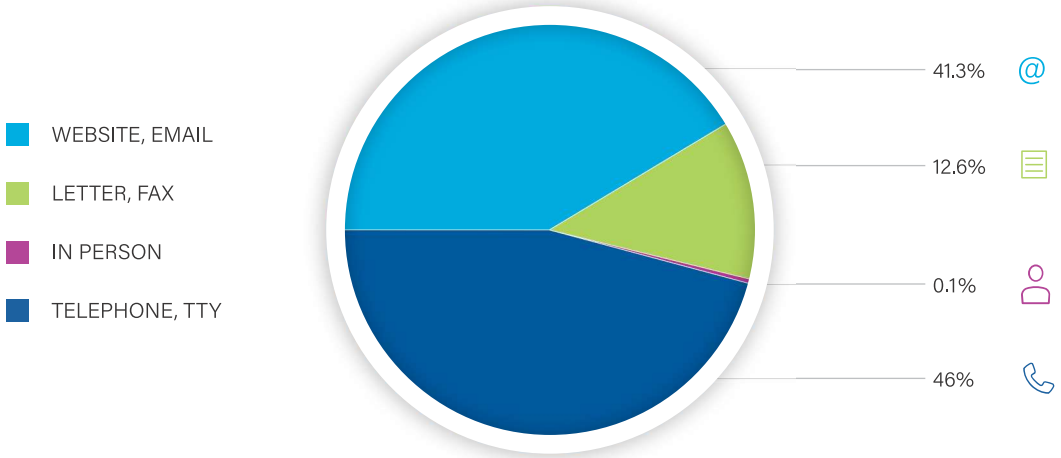
> "I would like to highlight the level of professionalism and dedication [of your Early Resolution Officer]. She explored several avenues to find a solution, made numerous calls, and was extremely patient, even when I was less so. I hope I never need to use your services again, but I would not hesitate to recommend them."

APPENDIX
STATISTICAL CHARTS

TOTAL CASES RECEIVED, FISCAL YEARS 2020-2021 – 2024-2025



HOW CASES WERE RECEIVED, 2024-2025



DISPOSITION OF CASES, 2024-2025

30,675 CASES RECEIVED IN FISCAL 2024-2025

186 consultations or questions

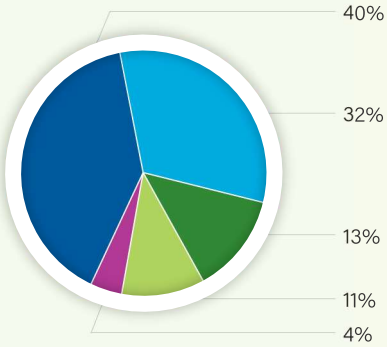
792 information submissions

118 instances of best practices suggested

CASES CLOSED 2024-2025

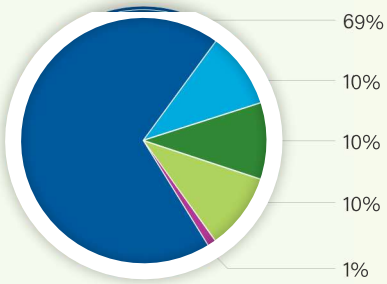
20,040 cases within the Ombudsman's authority

- INQUIRIES MADE OR REFERRAL GIVEN
- RESOLVED WITH OMBUDSMAN INTERVENTION AND/OR BEST PRACTICES SUGGESTED
- CLOSED AFTER OMBUDSMAN'S REVIEW
- DISCONTINUED BY COMPLAINANT
- RESOLVED WITHOUT OMBUDSMAN INTERVENTION



8,870 outside the Ombudsman's authority

- PRIVATE
- PROVINCIAL OUTSIDE AUTHORITY*
- FEDERAL
- BROADER PUBLIC SECTOR OUTSIDE AUTHORITY**
- OUTSIDE ONTARIO



% OF CASES CLOSED IN 2 WEEKS

42% Closed in 1 week

53% Closed in 2 weeks

**E.g., complaints about officials and bodies outside the Ombudsman's jurisdiction.*
***E.g., complaints about hospitals, long-term care homes, public health units, municipal police.*

TOTAL CASES RECEIVED FOR PROVINCIAL GOVERNMENT MINISTRIES AND SELECTED PROGRAMS, 2024-2025*

MINISTRY OF AGRICULTURE, FOOD AND AGRIBUSINESS		**11**
MINISTRY OF THE ATTORNEY GENERAL		**1,997**
ALCOHOL AND GAMING COMMISSION OF ONTARIO	39	
CHILDREN'S LAWYER	36	
COURT ADMINISTRATION	138	
HUMAN RIGHTS LEGAL SUPPORT CENTRE	16	
LAW ENFORCEMENT COMPLAINTS AGENCY	97	
LEGAL AID CLINIC	24	
LEGAL AID ONTARIO	107	
OFFICE OF THE PUBLIC GUARDIAN AND TRUSTEE	195	
ONTARIO LAND TRIBUNAL	19	
ONTARIO VICTIM SERVICES	18	
TRIBUNALS ONTARIO	1,237	
MINISTRY OF CHILDREN, COMMUNITY AND SOCIAL SERVICES		**2,457**
ASSISTANCE FOR CHILDREN WITH SEVERE DISABILITIES PROGRAM	12	
DEVELOPMENTAL SERVICES – PASSPORT PROGRAM	18	
DEVELOPMENTAL SERVICES	86	
FAMILY RESPONSIBILITY OFFICE	423	
MINISTRY FUNDED SERVICE PROVIDER - CHILDREN AND YOUTH	15	
MINISTRY FUNDED SERVICE PROVIDER - COMMUNITY AND SOCIAL SERVICES	96	
ONTARIO AUTISM PROGRAM	92	
ONTARIO DISABILITY SUPPORT PROGRAM	1,038	
SPECIAL NEEDS PROGRAMS - CHILDREN	29	
SPECIAL SERVICES AT HOME	171	
YOUTH JUSTICE CENTRES - DIRECT OPERATED	279	
YOUTH JUSTICE CENTRES - MINISTRY FUNDED	144	
MINISTRY OF CITIZENSHIP AND MULTICULTURALISM		**6**
MINISTRY OF COLLEGES, UNIVERSITIES, RESEARCH EXCELLENCE AND SECURITY		**661**
COLLEGES OF APPLIED ARTS AND TECHNOLOGY	434	
ONTARIO STUDENT ASSISTANCE PROGRAM	187	
PRIVATE CAREER COLLEGES BRANCH	27	
MINISTRY OF EDUCATION		**79**
CHILD CARE QUALITY ASSURANCE AND LICENSING BRANCH	10	
TVO – ONTARIO EDUCATIONAL COMMUNICATIONS AUTHORITY	28	
MINISTRY OF ENERGY AND MINES		**32**
ONTARIO ENERGY BOARD	23	
MINISTRY OF THE ENVIRONMENT, CONSERVATION AND PARKS		**41**
ONTARIO PARKS	10	
MINISTRY OF FINANCE		**146**
FINANCIAL SERVICES REGULATORY AUTHORITY	29	
LIQUOR CONTROL BOARD OF ONTARIO	23	
MUNICIPAL PROPERTY ASSESSMENT CORPORATION	23	
MINISTRY OF HEALTH		**408**
ASSISTIVE DEVICES / HOME OXYGEN PROGRAMS	22	
HEALTH PROFESSIONS APPEAL AND REVIEW BOARD	25	
MINISTRY FUNDED SERVICE PROVIDER	35	
ONTARIO HEALTH	121	
ONTARIO HEALTH INSURANCE PLAN - OHIP	65	
ONTARIO PUBLIC DRUG PROGRAMS	54	

**Total figures are reported for each provincial government ministry including agencies and programs falling within its portfolio. Each government agency or program receiving 10 or more cases is also included. Cases related to French language services are not included.*

TOTAL CASES RECEIVED FOR PROVINCIAL GOVERNMENT MINISTRIES AND SELECTED PROGRAMS, 2024-2025

MINISTRY OF INDIGENOUS AFFAIRS AND FIRST NATIONS ECONOMIC RECONCILIATION		**3**
MINISTRY OF INFRASTRUCTURE		**5**
MINISTRY OF LABOUR, IMMIGRATION, TRAINING AND SKILLS DEVELOPMENT		**470**
BETTER JOBS ONTARIO	14	
EMPLOYMENT PRACTICES BRANCH	20	
FAIR PRACTICES COMMISSION	16	
MINISTRY FUNDED SERVICE PROVIDERS	11	
OCCUPATIONAL HEALTH AND SAFETY BRANCH	22	
OFFICE OF THE WORKER ADVISER	18	
ONTARIO LABOUR RELATIONS BOARD	16	
SKILLED TRADES ONTARIO	18	
WORKPLACE SAFETY AND INSURANCE APPEAL TRIBUNAL	37	
WORKPLACE SAFETY AND INSURANCE BOARD	213	
MINISTRY OF LONG-TERM CARE		**33**
LONG-TERM CARE INSPECTIONS BRANCH	23	
MINISTRY OF MUNICIPAL AFFAIRS AND HOUSING		**26**
RENTAL HOUSING AND ENFORCEMENT UNIT	14	
MINISTRY OF NATURAL RESOURCES		**33**
MINISTRY OF NORTHERN ECONOMIC DEVELOPMENT AND GROWTH		**1**
MINISTRY OF PUBLIC AND BUSINESS SERVICE DELIVERY AND PROCUREMENT		**354**
CONSUMER PROTECTION ONTARIO	26	
REGISTRAR GENERAL	85	
SERVICEONTARIO	218	
MINISTRY FOR SENIORS AND ACCESSIBILITY		**2**
MINISTRY OF SPORT		**2**
MINISTRY OF THE SOLICITOR GENERAL		**7,186**
ANIMAL WELFARE SERVICES BRANCH	14	
CORRECTIONAL FACILITIES	6,870	
OFFICE OF THE CHIEF CORONER	13	
ONTARIO PROVINCIAL POLICE	163	
OPP - CHIEF FIREARMS OFFICE	13	
PRIVATE SECURITY AND INVESTIGATIVE SERVICES BRANCH	15	
PROBATION AND PAROLE	47	
MINISTRY OF TOURISM, CULTURE AND GAMING		**78**
ONTARIO LOTTERY AND GAMING	73	
MINISTRY OF TRANSPORTATION		**528**
DRIVER LICENSING	132	
DRIVETEST	146	
METROLINX/ GO TRANSIT	55	
TRANSPORTATION - MEDICAL REVIEW	81	
VEHICLE LICENSING	22	
TREASURY BOARD SECRETARIAT		**18**

CASES BY PROVINCIAL RIDING, 2024-2025*

AJAX	100
ALGOMA—MANITOULIN	158
AURORA—OAK RIDGES—RICHMOND HILL	99
BARRIE—INNISFIL	125
BARRIE—SPRINGWATER—ORO-MEDONTE	177
BAY OF QUINTE	204
BEACHES—EAST YORK	132
BRAMPTON CENTRE	106
BRAMPTON EAST	62
BRAMPTON NORTH	81
BRAMPTON SOUTH	137
BRAMPTON WEST	117
BRANTFORD—BRANT	166
BRUCE—GREY—OWEN SOUND	166
BURLINGTON	111
CAMBRIDGE	132
CARLETON	101
CHATHAM-KENT—LEAMINGTON	129
DAVENPORT	96
DON VALLEY EAST	104
DON VALLEY NORTH	114
DON VALLEY WEST	77
DUFFERIN—CALEDON	154
DURHAM	186
EGLINTON—LAWRENCE	89
ELGIN—MIDDLESEX—LONDON	149
ESSEX	137
ETOBICOKE CENTRE	96
ETOBICOKE NORTH	94
ETOBICOKE—LAKESHORE	154
FLAMBOROUGH—GLANBROOK	108
GLENGARRY—PRESCOTT—RUSSELL	158
GUELPH	104
HALDIMAND—NORFOLK	127
HALIBURTON—KAWARTHA LAKES—BROCK	170
HAMILTON CENTRE	203
HAMILTON EAST—STONEY CREEK	140
HAMILTON MOUNTAIN	96
HAMILTON WEST—ANCASTER—DUNDAS	130
HASTINGS—LENNOX AND ADDINGTON	158
HUMBER RIVER—BLACK CREEK	106
HURON—BRUCE	133
KANATA—CARLETON	78
KENORA—RAINY RIVER	83
KIIWETINOONG	15
KINGSTON AND THE ISLANDS	139
KING—VAUGHAN	91
KITCHENER CENTRE	129
KITCHENER SOUTH—HESPELER	102
KITCHENER—CONESTOGA	106
LAMBTON—KENT—MIDDLESEX	116
LANARK—FRONTENAC—KINGSTON	111
LEEDS—GRENVILLE—THOUSAND ISLANDS AND RIDEAU LAKES	139
LONDON NORTH CENTRE	177
LONDON WEST	121
LONDON—FANSHAWE	164
MARKHAM—STOUFFVILLE	99
MARKHAM—THORNHILL	52
MARKHAM—UNIONVILLE	64
MILTON	90
MISSISSAUGA CENTRE	101
MISSISSAUGA EAST—COOKSVILLE	129
MISSISSAUGA—ERIN MILLS	90
MISSISSAUGA—LAKESHORE	109
MISSISSAUGA—MALTON	113
MISSISSAUGA—STREETSVILLE	101
MUSHKEGOWUK—JAMES BAY	38
NEPEAN	108
NEWMARKET—AURORA	117
NIAGARA CENTRE	194
NIAGARA FALLS	237
NIAGARA WEST	104
NICKEL BELT	128
NIPISSING	176
NORTHUMBERLAND—PETERBOROUGH SOUTH	176
OAKVILLE	117
OAKVILLE NORTH—BURLINGTON	99
ORLÉANS	90
OSHAWA	231
OTTAWA CENTRE	169
OTTAWA SOUTH	128
OTTAWA WEST—NEPEAN	106
OTTAWA—VANIER	165
OXFORD	123
PARKDALE—HIGH PARK	94
PARRY SOUND—MUSKOKA	188
PERTH—WELLINGTON	129
PETERBOROUGH—KAWARTHA	171
PICKERING—UXBRIDGE	130
RENFREW—NIPISSING—PEMBROKE	157
RICHMOND HILL	110
SARNIA—LAMBTON	168
SAULT STE. MARIE	157
SCARBOROUGH CENTRE	88
SCARBOROUGH NORTH	51
SCARBOROUGH SOUTHWEST	88
SCARBOROUGH—AGINCOURT	72
SCARBOROUGH—GUILDWOOD	113
SCARBOROUGH—ROUGE PARK	119
SIMCOE NORTH	196
SIMCOE—GREY	253
SPADINA—FORT YORK	150
ST. CATHARINES	146
STORMONT—DUNDAS—SOUTH GLENGARRY	134
SUDBURY	175
THORNHILL	82
THUNDER BAY—ATIKOKAN	134
THUNDER BAY—SUPERIOR NORTH	106
TIMISKAMING—COCHRANE	193
TIMMINS	72
TORONTO CENTRE	181
TORONTO—DANFORTH	132
TORONTO—ST. PAUL'S	117
UNIVERSITY—ROSEDALE	112
VAUGHAN—WOODBRIDGE	101
WATERLOO	98
WELLINGTON—HALTON HILLS	134
WHITBY	144
WILLOWDALE	101
WINDSOR WEST	216
WINDSOR—TECUMSEH	132
YORK CENTRE	129
YORK SOUTH—WESTON	114
YORK—SIMCOE	142

**All cases where a postal code was available, including those related to municipalities, universities and school boards, but excluding correctional facilities.*

TOP 10 CORRECTIONAL FACILITIES BY CASE VOLUME, 2024-2025

		NUMBER OF CASES
1	CENTRAL EAST CORRECTIONAL CENTRE	1,430
2	CENTRAL NORTH CORRECTIONAL CENTRE	1,376
3	MAPLEHURST CORRECTIONAL COMPLEX	722
4	TORONTO SOUTH DETENTION CENTRE	582
5	OTTAWA-CARLETON DETENTION CENTRE	381
6	HAMILTON-WENTWORTH DETENTION CENTRE	315
7	NIAGARA DETENTION CENTRE	261
8	VANIER CENTRE FOR WOMEN	249
9	KENORA JAIL	239
10	SOUTH WEST DETENTION CENTRE	205

TOP 10 PROVINCIAL GOVERNMENT ORGANIZATIONS AND PROGRAMS BY CASE VOLUME, 2024-2025*

		NUMBER OF CASES
1	TRIBUNALS ONTARIO	1,237
2	ONTARIO DISABILITY SUPPORT PROGRAM	1,038
3	COLLEGES OF APPLIED ARTS AND TECHNOLOGY	434
4	FAMILY RESPONSIBILITY OFFICE	423
5	SERVICEONTARIO	218
6	WORKPLACE SAFETY AND INSURANCE BOARD	213
7	OFFICE OF THE PUBLIC GUARDIAN AND TRUSTEE	195
8	ONTARIO STUDENT ASSISTANCE PROGRAM	187
9	SPECIAL SERVICES AT HOME	171
10	ONTARIO PROVINCIAL POLICE	163

**Excluding correctional facilities and youth justice centres.*

CASES RECEIVED ABOUT MUNICIPALITIES, 2024-2025 ▸ TOTAL: 3,809

ADDINGTON HIGHLANDS, TOWNSHIP OF	2
ADELAIDE METCALFE, TOWNSHIP OF	1
ADJALA-TOSORONTIO, TOWNSHIP OF	6
AJAX, TOWN OF	15
ALGONQUIN HIGHLANDS, TOWNSHIP OF	7
ALNWICK/HALDIMAND, TOWNSHIP OF	13
AMARANTH, TOWNSHIP OF	4
AMHERSTBURG, TOWN OF	6
ARMOUR, TOWNSHIP OF	2
ARNPRIOR, TOWN OF	2
ARRAN-ELDERSLIE, MUNICIPALITY OF	4
ASHFIELD-COLBORNE-WAWANOSH, TOWNSHIP OF	1
ATIKOKAN, TOWN OF	4
AUGUSTA, TOWNSHIP OF	2
AURORA, TOWN OF	27
AYLMER, TOWN OF	1
BALDWIN, TOWNSHIP OF	1
BANCROFT, TOWN OF	2
BARRIE, CITY OF	20
BAYHAM, MUNICIPALITY OF	10
BELLEVILLE, CITY OF	15
BLACK RIVER-MATHESON, TOWNSHIP OF	4
BLANDFORD-BLENHEIM, TOWNSHIP OF	1
BLIND RIVER, TOWN OF	2
BLUEWATER, MUNICIPALITY OF	5
BONFIELD, TOWNSHIP OF	8
BONNECHERE VALLEY, TOWNSHIP OF	4
BRACEBRIDGE, TOWN OF	4
BRADFORD WEST GWILLIMBURY, TOWN OF	11
BRAMPTON, CITY OF	60
BRANT, COUNTY OF	14
BRANTFORD, CITY OF	23
BRIGHTON, MUNICIPALITY OF	2
BROCK, TOWNSHIP OF	4
BROCKTON, MUNICIPALITY OF	1
BROCKVILLE, CITY OF	7
BROOKE-ALVINSTON, MUNICIPALITY OF	1
BRUCE, COUNTY OF	1
BRUDENELL, LYNDOCH AND RAGLAN, TOWNSHIP OF	2
BURK'S FALLS, VILLAGE OF	1
BURLINGTON, CITY OF	14
CALEDON, TOWN OF	16
CALLANDER, MUNICIPALITY OF	5
CALVIN, MUNICIPALITY OF	3
CAMBRIDGE, CITY OF	20
CARLETON PLACE, TOWN OF	1
CARLING, TOWNSHIP OF	4
CARLOW/MAYO, TOWNSHIP OF	2
CASEY, TOWNSHIP OF	1
CASSELMAN, MUNICIPALITY OF	3
CENTRAL ELGIN, MUNICIPALITY OF	8
CENTRAL FRONTENAC, TOWNSHIP OF	4
CENTRAL HURON, MUNICIPALITY OF	2
CENTRAL MANITOULIN, MUNICIPALITY OF	1
CENTRE WELLINGTON, TOWNSHIP OF	7
CHAMPLAIN, TOWNSHIP OF	3
CHAPLEAU, TOWNSHIP OF	2
CHATHAM-KENT, MUNICIPALITY OF	17
CHATSWORTH, TOWNSHIP OF	3
CHISHOLM, TOWNSHIP OF	1
CLARENCE-ROCKLAND, CITY OF	10
CLARINGTON, MUNICIPALITY OF	11
CLEARVIEW, TOWNSHIP OF	4
COBALT, TOWN OF	5
COBOURG, TOWN OF	4
COLLINGWOOD, TOWN OF	3
CONMEE, TOWNSHIP OF	1
CORNWALL, CITY OF	14
CRAMAHE, TOWNSHIP OF	11
DAWN-EUPHEMIA, TOWNSHIP OF	2
DEEP RIVER, TOWN OF	2
DESERONTO, TOWN OF	2
DOURO-DUMMER, TOWNSHIP OF	4
DRUMMOND/NORTH ELMSLEY, TOWNSHIP OF	2
DRYDEN, CITY OF	5
DUFFERIN, COUNTY OF	3
DURHAM, REGIONAL MUNICIPALITY OF	48
DUTTON-DUNWICH, MUNICIPALITY OF	3
DYSART ET AL, MUNICIPALITY OF	4
EAST FERRIS, MUNICIPALITY OF	4
EAST GARAFRAXA, TOWNSHIP OF	2
EAST GWILLIMBURY, TOWN OF	3

Note: Municipalities that were not the subject of any cases are not listed. This does not include cases about municipal police, public health units, or library boards.

CASES RECEIVED ABOUT MUNICIPALITIES, 2024-2025

EAST HAWKESBURY, TOWNSHIP OF	2
EDWARDSBURGH/CARDINAL, TOWNSHIP OF	2
ELGIN, COUNTY OF	2
ELIZABETHTOWN-KITLEY, TOWNSHIP OF	2
ELLIOT LAKE, CITY OF	9
ENGLEHART, TOWN OF	1
ENNISKILLEN, TOWNSHIP OF	4
ERIN, TOWN OF	9
ESPANOLA, TOWN OF	2
ESSA, TOWNSHIP OF	3
ESSEX, COUNTY OF	3
ESSEX, TOWN OF	6
EVANTUREL, TOWNSHIP OF	1
FARADAY, TOWNSHIP OF	2
FAUQUIER-STRICKLAND, TOWNSHIP OF	1
FORT ERIE, TOWN OF	5
FORT FRANCES, TOWN OF	1
FRENCH RIVER, MUNICIPALITY OF	2
FRONT OF YONGE, TOWNSHIP OF	2
FRONTENAC ISLANDS, TOWNSHIP OF	1
FRONTENAC, COUNTY OF	1
GANANOQUE, TOWN OF	2
GEORGIAN BAY, TOWNSHIP OF	2
GEORGIAN BLUFFS, TOWNSHIP OF	3
GEORGINA, TOWN OF	13
GILLIES, TOWNSHIP OF	3
GODERICH, TOWN OF	1
GORE BAY, TOWN OF	1
GRAND VALLEY, TOWN OF	1
GRAVENHURST, TOWN OF	6
GREATER MADAWASKA, TOWNSHIP OF	3
GREATER SUDBURY, CITY OF	89
GREENSTONE, MUNICIPALITY OF	8
GREY HIGHLANDS, MUNICIPALITY OF	3
GREY, COUNTY OF	17
GRIMSBY, TOWN OF	9
GUELPH, CITY OF	13
GUELPH/ERAMOSA, TOWNSHIP OF	5
HALDIMAND COUNTY	5
HALIBURTON, COUNTY OF	6
HALTON HILLS, TOWN OF	5
HALTON, REGIONAL MUNICIPALITY OF	31
HAMILTON, CITY OF	120
HAMILTON, TOWNSHIP OF	4
HANOVER, TOWN OF	3
HASTINGS HIGHLANDS, MUNICIPALITY OF	4
HASTINGS, COUNTY OF	23
HAVELOCK-BELMONT-METHUEN, TOWNSHIP OF	3
HAWKESBURY, TOWN OF	5
HEAD, CLARA & MARIA, UNITED TOWNSHIPS OF	1
HEARST, TOWN OF	1
HIGHLANDS EAST, MUNICIPALITY OF	3
HILLIARD, TOWNSHIP OF	1
HORNEPAYNE, TOWNSHIP OF	1
HORTON, TOWNSHIP OF	3
HOWICK, TOWNSHIP OF	1
HUDSON, TOWNSHIP OF	1
HUNTSVILLE, TOWN OF	5
HURON EAST, MUNICIPALITY OF	1
HURON-KINLOSS, TOWNSHIP OF	3
HURON, COUNTY OF	7
IGNACE, TOWNSHIP OF	1
INNISFIL, TOWN OF	7
IROQUOIS FALLS, TOWN OF	8
JOCELYN, TOWNSHIP OF	2
KAPUSKASING, TOWN OF	4
KAWARTHA LAKES, CITY OF	47
KEARNEY, TOWN OF	1
KENORA, CITY OF	8
KILLALOE, HAGARTY AND RICHARDS, TOWNSHIP OF	4
KILLARNEY, MUNICIPALITY OF	3
KINCARDINE, MUNICIPALITY OF	3
KING, TOWNSHIP OF	9
KINGSTON, CITY OF	19
KINGSVILLE, TOWN OF	2
KIRKLAND LAKE, TOWN OF	2
KITCHENER, CITY OF	24
LA VALLEE, TOWNSHIP OF	3
LAIRD, TOWNSHIP OF	1
LAKE OF BAYS, TOWNSHIP OF	1
LAKESHORE, TOWN OF	5
LAMBTON SHORES, MUNICIPALITY OF	5

CASES RECEIVED ABOUT MUNICIPALITIES, 2024-2025

LAMBTON, COUNTY OF	12
LANARK HIGHLANDS, TOWNSHIP OF	2
LANARK, COUNTY OF	6
LARDER LAKE, TOWNSHIP OF	1
LASALLE, TOWN OF	2
LAURENTIAN HILLS, TOWN OF	2
LAURENTIAN VALLEY, TOWNSHIP OF	5
LEAMINGTON, MUNICIPALITY OF	8
LEEDS AND GRENVILLE, UNITED COUNTIES OF	10
LEEDS AND THE THOUSAND ISLANDS, TOWNSHIP OF	11
LENNOX & ADDINGTON, COUNTY OF	3
LINCOLN, TOWN OF	5
LONDON, CITY OF	107
LOYALIST TOWNSHIP	2
LUCAN BIDDULPH, TOWNSHIP OF	3
MACDONALD, MEREDITH & ABERDEEN ADDITIONAL, TOWNSHIP OF	1
MACHIN, MUNICIPALITY OF	1
MADAWASKA VALLEY, TOWNSHIP OF	3
MADOC, TOWNSHIP OF	4
MAGNETAWAN, MUNICIPALITY OF	7
MALAHIDE, TOWNSHIP OF	1
MANITOUWADGE, TOWNSHIP OF	7
MAPLETON, TOWNSHIP OF	1
MARKHAM, CITY OF	31
MARKSTAY-WARREN, MUNICIPALITY OF	11
MARMORA AND LAKE, MUNICIPALITY OF	1
MATACHEWAN, TOWNSHIP OF	3
MATTAWA, TOWN OF	2
MCGARRY, TOWNSHIP OF	5
MCKELLAR, TOWNSHIP OF	1
MCMURRICH/MONTEITH, TOWNSHIP OF	3
MCNAB/BRAESIDE, TOWNSHIP OF	1
MEAFORD, MUNICIPALITY OF	8
MERRICKVILLE-WOLFORD, VILLAGE OF	2
MIDDLESEX CENTRE, MUNICIPALITY OF	4
MIDDLESEX, COUNTY OF	1
MIDLAND, TOWN OF	4
MILTON, TOWN OF	17
MINDEN HILLS, TOWNSHIP OF	2
MINTO, TOWN OF	2
MISSISSAUGA, CITY OF	56
MISSISSIPPI MILLS, MUNICIPALITY OF	4
MONTAGUE, TOWNSHIP OF	1
MOOSONEE, TOWN OF	4
MORRIS-TURNBERRY, MUNICIPALITY OF	1
MUSKOKA LAKES, TOWNSHIP OF	9
MUSKOKA, DISTRICT MUNICIPALITY OF	15
NAIRN AND HYMAN, TOWNSHIP OF	1
NEEBING, MUNICIPALITY OF	1
NEW TECUMSETH, TOWN OF	14
NEWBURY, VILLAGE OF	2
NEWMARKET, TOWN OF	10
NIAGARA FALLS, CITY OF	32
NIAGARA-ON-THE-LAKE, TOWN OF	10
NIAGARA, REGIONAL MUNICIPALITY OF	54
NIPISSING, TOWNSHIP OF	1
NORFOLK COUNTY	25
NORTH ALGONA WILBERFORCE, TOWNSHIP OF	1
NORTH BAY, CITY OF	13
NORTH DUMFRIES, TOWNSHIP OF	3
NORTH DUNDAS, TOWNSHIP OF	4
NORTH FRONTENAC, TOWNSHIP OF	5
NORTH GLENGARRY, TOWNSHIP OF	3
NORTH GRENVILLE, MUNICIPALITY OF	12
NORTH HURON, TOWNSHIP OF	1
NORTH KAWARTHA, TOWNSHIP OF	5
NORTH MIDDLESEX, MUNICIPALITY OF	1
NORTH PERTH, MUNICIPALITY OF	8
NORTH STORMONT, TOWNSHIP OF	4
NORTHEASTERN MANITOULIN AND THE ISLANDS, TOWN OF	1
NORTHERN BRUCE PENINSULA, MUNICIPALITY OF	3
NORTHUMBERLAND, COUNTY OF	9
OAKVILLE, TOWN OF	28
OLIVER PAIPOONGE, MUNICIPALITY OF	4
ORANGEVILLE, TOWN OF	3
ORILLIA, CITY OF	5
ORO-MEDONTE, TOWNSHIP OF	7
OSHAWA, CITY OF	39
OTONABEE-SOUTH MONAGHAN, TOWNSHIP OF	4
OTTAWA, CITY OF	172

CASES RECEIVED ABOUT MUNICIPALITIES, 2024-2025

OWEN SOUND, CITY OF	5
OXFORD, COUNTY OF	11
PAPINEAU-CAMERON, TOWNSHIP OF	6
PARRY SOUND, TOWN OF	3
PEEL, REGIONAL MUNICIPALITY OF	130
PELEE, TOWNSHIP OF	1
PELHAM, TOWN OF	3
PEMBROKE, CITY OF	3
PENETANGUISHENE, TOWN OF	4
PERRY, TOWNSHIP OF	5
PERTH SOUTH, TOWNSHIP OF	3
PERTH, COUNTY OF	2
PERTH, TOWN OF	2
PETAWAWA, TOWN OF	2
PETERBOROUGH, CITY OF	24
PETERBOROUGH, COUNTY OF	3
PETROLIA, TOWN OF	1
PICKERING, CITY OF	16
PLUMMER ADDITIONAL, TOWNSHIP OF	1
PLYMPTON-WYOMING, TOWN OF	7
PORT COLBORNE, CITY OF	8
PORT HOPE, MUNICIPALITY OF	3
POWASSAN, MUNICIPALITY OF	1
PRESCOTT AND RUSSELL, UNITED COUNTIES OF	2
PRESCOTT, TOWN OF	2
PRINCE EDWARD, COUNTY OF	14
PUSLINCH, TOWNSHIP OF	6
QUINTE WEST, CITY OF	8
RAMARA, TOWNSHIP OF	9
RED LAKE, MUNICIPALITY OF	1
RENFREW, COUNTY OF	14
RICHMOND HILL, CITY OF	11
RIDEAU LAKES, TOWNSHIP OF	20
RUSSELL, TOWNSHIP OF	4
SABLES-SPANISH RIVERS, TOWNSHIP OF	4
SARNIA, CITY OF	27
SAUGEEN SHORES, TOWN OF	4
SAULT STE. MARIE, CITY OF	32
SCHREIBER, TOWNSHIP OF	1
SCUGOG, TOWNSHIP OF	7
SEGUIN, TOWNSHIP OF	2
SEVERN, TOWNSHIP OF	2
SHELBURNE, TOWN OF	1
SIMCOE, COUNTY OF	42
SIOUX LOOKOUT, MUNICIPALITY OF	5
SIOUX NARROWS-NESTOR FALLS, TOWNSHIP OF	2
SMITHS FALLS, TOWN OF	2
SMOOTH ROCK FALLS, TOWN OF	4
SOUTH BRUCE PENINSULA, TOWN OF	5
SOUTH DUNDAS, MUNICIPALITY OF	1
SOUTH FRONTENAC, TOWNSHIP OF	2
SOUTH GLENGARRY, TOWNSHIP OF	4
SOUTH HURON, MUNICIPALITY OF	1
SOUTH RIVER, VILLAGE OF	1
SOUTH STORMONT, TOWNSHIP OF	1
SOUTH-WEST OXFORD, TOWNSHIP OF	1
SOUTHGATE, TOWNSHIP OF	1
SOUTHWOLD, TOWNSHIP OF	1
SPRINGWATER, TOWNSHIP OF	3
ST. CATHARINES, CITY OF	17
ST. CLAIR, TOWNSHIP OF	4
ST. THOMAS, CITY OF	8
STIRLING-RAWDON, TOWNSHIP OF	2
STONE MILLS, TOWNSHIP OF	1
STORMONT, DUNDAS & GLENGARRY, UNITED COUNTIES OF	1
STRATFORD, CITY OF	25
STRATHROY-CARADOC, MUNICIPALITY OF	2
STRONG, TOWNSHIP OF	3
SUNDRIDGE, VILLAGE OF	2
TARBUTT, TOWNSHIP OF	2
TAY VALLEY TOWNSHIP	2
TAY, TOWNSHIP OF	5
TECUMSEH, TOWN OF	1
TEHKUMMAH, TOWNSHIP OF	1
TEMAGAMI, MUNICIPALITY OF	33
TEMISKAMING SHORES, CITY OF	2
THAMES CENTRE, MUNICIPALITY OF	5
THE ARCHIPELAGO, TOWNSHIP OF	1
THE BLUE MOUNTAINS, TOWN OF	6
THE NATION MUNICIPALITY	2

CASES RECEIVED ABOUT MUNICIPALITIES, 2024-2025

THE NORTH SHORE, TOWNSHIP OF	3
THESSALON, TOWN OF	3
THOROLD, CITY OF	11
THUNDER BAY, CITY OF	24
TILLSONBURG, TOWN OF	3
TIMMINS, CITY OF	31
TINY, TOWNSHIP OF	36
TORONTO, CITY OF	429
TRENT HILLS, MUNICIPALITY OF	6
TRENT LAKES, MUNICIPALITY OF	1
TUDOR & CASHEL, TOWNSHIP OF	1
TWEED, MUNICIPALITY OF	3
TYENDINAGA, TOWNSHIP OF	2
UXBRIDGE, TOWNSHIP OF	1
VAL RITA-HARTY, MUNICIPALITY OF	1
VAUGHAN, CITY OF	23
WAINFLEET, TOWNSHIP OF	12
WARWICK, TOWNSHIP OF	1
WASAGA BEACH, TOWN OF	18
WATERLOO, CITY OF	13
WATERLOO, REGIONAL MUNICIPALITY OF	45
WELLAND, CITY OF	17
WELLESLEY, TOWNSHIP OF	1
WELLINGTON NORTH, TOWNSHIP OF	5
WELLINGTON, COUNTY OF	13
WEST ELGIN, MUNICIPALITY OF	8
WEST GREY, MUNICIPALITY OF	2
WEST LINCOLN, TOWNSHIP OF	4
WEST NIPISSING, MUNICIPALITY OF	11
WEST PERTH, MUNICIPALITY OF	1
WESTPORT, VILLAGE OF	1
WHITBY, TOWN OF	13
WHITCHURCH-STOUFFVILLE, TOWN OF	8
WHITESTONE, MUNICIPALITY OF	3
WHITEWATER REGION, TOWNSHIP OF	3
WILMOT, TOWNSHIP OF	4
WINDSOR, CITY OF	78
WOLLASTON, TOWNSHIP OF	6
WOOLWICH, TOWNSHIP OF	2
YORK, REGIONAL MUNICIPALITY OF	60
CASES WHERE A MUNICIPALITY WASN'T SPECIFIED	50

SHARED CORPORATIONS INCLUDING CONSERVATION AUTHORITIES	
ALECTRA	51
CENTRAL LAKE ONTARIO CONSERVATION AUTHORITY	1
CONSERVATION HALTON	1
ELEXICON ENERGY	4
ENOVA POWER CORP.	5
ENTEGRUS POWERLINES	2
ESSEX POWER CORPORATION	1
GRANDBRIDGE ENERGY	3
GRAND RIVER CONSERVATION AUTHORITY	1
HALDIMAND NORFOLK HOUSING CORPORATION	1
HAMILTON CONSERVATION AUTHORITY	3
KAWARTHA CONSERVATION	1
LAKELAND POWER DISTRIBUTION LTD.	1
NEWMARKET-TAY POWER DISTRIBUTION LTD	1
NIAGARA PENINSULA CONSERVATION AUTHORITY	1
NORTH BAY-MATTAWA CONSERVATION AUTHORITY	1
NOTTAWASAGA VALLEY CONSERVATION AUTHORITY	2
OTTAWA RIVER POWER CORPORATION	1
RIDEAU VALLEY CONSERVATION AUTHORITY	2
SAUGEEN VALLEY CONSERVATION AUTHORITY	1
SOUTH NATION CONSERVATION	2
ST. CLAIR REGION CONSERVATION AUTHORITY	2
SYNERGY NORTH	1
TORONTO AND REGION CONSERVATION AUTHORITY	1
WESTARIO POWER	1

SHARED LOCAL BOARDS	
COCHRANE DISTRICT SERVICES BOARD	5
DISTRICT OF NIPISSING SOCIAL SERVICES ADMINISTRATION BOARD	3
DISTRICT OF PARRY SOUND SOCIAL SERVICES ADMINISTRATION BOARD	6
DISTRICT OF SAULT STE. MARIE SOCIAL SERVICES ADMINISTRATION BOARD	19
DISTRICT OF TIMISKAMING SOCIAL SERVICES ADMINISTRATION BOARD	5
KENORA DISTRICT SERVICES BOARD	9
MANITOULIN-SUDBURY DISTRICT SERVICES BOARD	4
RAINY RIVER DISTRICT SOCIAL SERVICES ADMINISTRATION BOARD	1
SAUGEEN MUNICIPAL AIRPORT COMMISSION	1
THUNDER BAY SOCIAL SERVICES ADMINISTRATION BOARD	11
CASES WHERE NO LOCAL BOARD WAS SPECIFIED	4

CASES RECEIVED ABOUT CLOSED MUNICIPAL MEETINGS, 2024-2025 ▸ TOTAL: 99

CASES ABOUT MUNICIPALITIES WHERE OMBUDSMAN IS THE INVESTIGATOR*	74
CASES ABOUT MUNICIPALITIES WHERE ANOTHER INVESTIGATOR HAS BEEN APPOINTED**	25

**Not all cases result in investigations; multiple cases may relate to the same meeting.*
***These cases were referred accordingly.*

SUMMARY OF COMPLETED INVESTIGATIONS

MUNICIPALITY	MEETINGS & GATHERINGS REVIEWED	ILLEGAL MEETINGS	PROCEDURAL VIOLATIONS FOUND	BEST PRACTICES SUGGESTED
AMHERSTBURG, TOWN OF	7	0	3	2
BLACK RIVER-MATHESON, TOWNSHIP OF	1	0	2	1
CALLANDER, MUNICIPALITY OF	2	0	2	0
CALVIN, MUNICIPALITY OF	0**	0	4	0
COCHRANE, TOWN OF	1	1	0	0
CORNWALL, CITY OF	1	1	0	0
ELLIOT LAKE, CITY OF	1	1	0	0
GREATER SUDBURY, CITY OF	1	0	0	0
GRIMSBY, TOWN OF*	1	1	1	0
HALTON HILLS, TOWN OF	1	1	2	0
HAMILTON, CITY OF	1	0	0	1
IROQUOIS FALLS, TOWN OF	1	0	1	0
JOCELYN, TOWNSHIP OF	5	1	2	1
LANARK HIGHLANDS, TOWNSHIP OF	3	0	1	1
LEEDS AND GRENVILLE, UNITED COUNTIES OF	1	1	0	0
LINCOLN, TOWN OF*	1	1	1	0
LONDON, CITY OF	1	0	0	0
MARKSTAY-WARREN, MUNICIPALITY OF	2	0	2	0
MCGARRY, TOWNSHIP OF	1	0	0	0
MCMURRICH/MONTEITH, TOWNSHIP OF	2	0	0	0
NORFOLK COUNTY	4	2	1	0
OSHAWA, CITY OF	1	0	1	1
RUSSELL, TOWNSHIP OF	6	0	0	1
SAUGEEN MOBILITY AND REGIONAL TRANSIT	1	1	1	1
SPRINGWATER, TOWNSHIP OF	1	0	0	0
TEMAGAMI, MUNICIPALITY OF	1	0	0	2
THE NORTH SHORE, TOWNSHIP OF	3	0	0	1
TINY, TOWNSHIP OF	0**	0	0	0
WEST ELGIN, MUNICIPALITY OF	5	3	0	0
WEST LINCOLN, TOWNSHIP OF*	1	1	1	0
WHITESTONE, MUNICIPALITY OF	8	6	2	1
WOLLASTON, TOWNSHIP OF	1	0	1	1

**A joint meeting held between three councils.*
***This review did not focus on a specific meeting, but on whether the body is subject to the open meeting rules.*

CASES RECEIVED ABOUT SCHOOL BOARDS, 2024-2025 ▸ TOTAL: 1,261

ENGLISH CATHOLIC SCHOOL BOARDS	
ALGONQUIN AND LAKESHORE CATHOLIC DISTRICT SCHOOL BOARD	2
BRANT HALDIMAND NORFOLK CATHOLIC DISTRICT SCHOOL BOARD	4
BRUCE-GREY CATHOLIC DISTRICT SCHOOL BOARD	1
CATHOLIC DISTRICT SCHOOL BOARD OF EASTERN ONTARIO	6
DUFFERIN-PEEL CATHOLIC DISTRICT SCHOOL BOARD	29
DURHAM CATHOLIC DISTRICT SCHOOL BOARD	14
HALTON CATHOLIC DISTRICT SCHOOL BOARD	17
HAMILTON-WENTWORTH CATHOLIC DISTRICT SCHOOL BOARD	5
HURON-PERTH CATHOLIC DISTRICT SCHOOL BOARD	1
KENORA CATHOLIC DISTRICT SCHOOL BOARD	1
LONDON DISTRICT CATHOLIC SCHOOL BOARD	13
NIAGARA CATHOLIC DISTRICT SCHOOL BOARD	9
NIPISSING-PARRY SOUND CATHOLIC DISTRICT SCHOOL BOARD	4
NORTHEASTERN CATHOLIC DISTRICT SCHOOL BOARD	2
OTTAWA CATHOLIC SCHOOL BOARD	14
PETERBOROUGH VICTORIA NORTHUMBERLAND AND CLARINGTON CATHOLIC DISTRICT SCHOOL BOARD	19
RENFREW COUNTY CATHOLIC DISTRICT SCHOOL BOARD	2
SIMCOE MUSKOKA CATHOLIC DISTRICT SCHOOL BOARD	16
ST CLAIR CATHOLIC DISTRICT SCHOOL BOARD	5
SUDBURY CATHOLIC DISTRICT SCHOOL BOARD	8
SUPERIOR NORTH CATHOLIC DISTRICT SCHOOL BOARD	1
THUNDER BAY CATHOLIC DISTRICT SCHOOL BOARD	7
TORONTO CATHOLIC DISTRICT SCHOOL BOARD	36
WATERLOO CATHOLIC DISTRICT SCHOOL BOARD	11
WELLINGTON CATHOLIC DISTRICT SCHOOL BOARD	2
WINDSOR-ESSEX CATHOLIC DISTRICT SCHOOL BOARD	10
YORK CATHOLIC DISTRICT SCHOOL BOARD	20
ENGLISH PUBLIC SCHOOL BOARDS	
ALGOMA DISTRICT SCHOOL BOARD	11
AVON MAITLAND DISTRICT SCHOOL BOARD	7
BLUEWATER DISTRICT SCHOOL BOARD	11
DISTRICT SCHOOL BOARD OF NIAGARA	17
DISTRICT SCHOOL BOARD ONTARIO NORTH EAST	9
DURHAM DISTRICT SCHOOL BOARD	63
GRAND ERIE DISTRICT SCHOOL BOARD	14
GREATER ESSEX COUNTY DISTRICT SCHOOL BOARD	36
HALTON DISTRICT SCHOOL BOARD	15
HAMILTON-WENTWORTH DISTRICT SCHOOL BOARD	28
HASTINGS & PRINCE EDWARD DISTRICT SCHOOL BOARD	12
KAWARTHA PINE RIDGE DISTRICT SCHOOL BOARD	25
KEEWATIN-PATRICIA DISTRICT SCHOOL BOARD	2
LAKEHEAD DISTRICT SCHOOL BOARD	7
LAMBTON KENT DISTRICT SCHOOL BOARD	7
LIMESTONE DISTRICT SCHOOL BOARD	11
NEAR NORTH DISTRICT SCHOOL BOARD	11
OTTAWA-CARLETON DISTRICT SCHOOL BOARD	142
PEEL DISTRICT SCHOOL BOARD	48
RAINBOW DISTRICT SCHOOL BOARD	7
RAINY RIVER DISTRICT SCHOOL BOARD	2
RENFREW COUNTY DISTRICT SCHOOL BOARD	3
SIMCOE COUNTY DISTRICT SCHOOL BOARD	45
THAMES VALLEY DISTRICT SCHOOL BOARD	41
TORONTO DISTRICT SCHOOL BOARD	222
TRILLIUM LAKELANDS DISTRICT SCHOOL BOARD	11
UPPER CANADA DISTRICT SCHOOL BOARD	8
UPPER GRAND DISTRICT SCHOOL BOARD	10
WATERLOO REGION DISTRICT SCHOOL BOARD	25
YORK REGION DISTRICT SCHOOL BOARD	35
FRENCH CATHOLIC SCHOOL BOARDS	
CONSEIL DES ÉCOLES CATHOLIQUES DU CENTRE-EST	15
CONSEIL SCOLAIRE CATHOLIQUE DES GRANDES RIVIÈRES	2
CONSEIL SCOLAIRE CATHOLIQUE FRANCO-NORD	1
CONSEIL SCOLAIRE CATHOLIQUE MONAVENIR	9
CONSEIL SCOLAIRE CATHOLIQUE PROVIDENCE	6
CONSEIL SCOLAIRE DE DISTRICT CATHOLIQUE DE L'EST ONTARIEN	9
CONSEIL SCOLAIRE DE DISTRICT CATHOLIQUE DES AURORES BORÉALES	1
FRENCH PUBLIC SCHOOL BOARDS	
CONSEIL DES ÉCOLES PUBLIQUES DE L'EST DE L'ONTARIO	12
CONSEIL SCOLAIRE DU GRAND NORD	5
CONSEIL SCOLAIRE PUBLIC DU NORD-EST DE L'ONTARIO	4
CONSEIL SCOLAIRE VIAMONDE	7
SCHOOL AUTHORITIES	
MOOSONEE DISTRICT SCHOOL AREA BOARD	1
CASES WHERE NO SCHOOL BOARD WAS SPECIFIED	**45**

Note: Boards that were not the subject of any cases are not listed.

CASES RECEIVED ABOUT COLLEGES OF APPLIED ARTS AND TECHNOLOGY, 2024-2025 ▸ TOTAL: 434

ALGONQUIN COLLEGE	25
CAMBRIAN COLLEGE	12
CANADORE COLLEGE	12
CENTENNIAL COLLEGE	27
COLLÈGE BORÉAL	5
CONESTOGA COLLEGE	39
CONFEDERATION COLLEGE	4
DURHAM COLLEGE	19
FANSHAWE COLLEGE	26
FLEMING COLLEGE (SIR SANDFORD FLEMING COLLEGE)	39
GEORGE BROWN COLLEGE	19
GEORGIAN COLLEGE	18

HUMBER COLLEGE	41
LA CITÉ COLLÉGIALE	10
LAMBTON COLLEGE	6
LOYALIST COLLEGE	6
MOHAWK COLLEGE	27
NIAGARA COLLEGE CANADA	18
NORTHERN COLLEGE	1
SAULT COLLEGE	3
SENECA COLLEGE	31
SHERIDAN COLLEGE	19
ST. CLAIR COLLEGE	10
ST. LAWRENCE COLLEGE	17

Note: Colleges that were not the subject of any cases are not listed.

CASES RECEIVED ABOUT UNIVERSITIES, 2024-2025 ▸ TOTAL: 274

ALGOMA UNIVERSITY	13
BROCK UNIVERSITY	5
CARLETON UNIVERSITY	10
LAKEHEAD UNIVERSITY	4
LAURENTIAN UNIVERSITY	10
MCMASTER UNIVERSITY	17
NIPISSING UNIVERSITY	11
NOSM UNIVERSITY (NORTHERN ONTARIO SCHOOL OF MEDICINE)	2
OCAD UNIVERSITY	3
ONTARIO TECH UNIVERSITY	7
QUEEN'S UNIVERSITY	12

TORONTO METROPOLITAN UNIVERSITY*	18
TRENT UNIVERSITY	7
UNIVERSITÉ DE L'ONTARIO FRANÇAIS	3
UNIVERSITY OF GUELPH	16
UNIVERSITY OF OTTAWA	15
UNIVERSITY OF TORONTO	26
UNIVERSITY OF WATERLOO	12
UNIVERSITY OF WINDSOR	19
WESTERN UNIVERSITY	17
WILFRID LAURIER UNIVERSITY	14
YORK UNIVERSITY	30
CASES WHERE NO UNIVERSITY WAS SPECIFIED	3

*Note: Universities that were not the subject of any cases are not listed. *Formerly Ryerson University.*

CASES RECEIVED ABOUT CHILDREN'S AID SOCIETIES, 2024-2025 ▸ TOTAL: 1,533

AKWESASNE CHILD AND FAMILY SERVICES	2
ALGOMA, CHILDREN'S AID SOCIETY OF	34
ANISHINAABE ABINOOJII FAMILY SERVICES	13
BRUCE GREY CHILD AND FAMILY SERVICES	22
CHILD AND FAMILY SERVICES OF GRAND ERIE	25
DILICO ANISHINABEK FAMILY CARE	32
DNAAGDAWENMAG BINNOOJIIYAG CHILD & FAMILY SERVICES	46
DUFFERIN CHILD AND FAMILY SERVICES	7
DURHAM CHILDREN'S AID SOCIETY	45
FRONTENAC, LENNOX AND ADDINGTON, FAMILY AND CHILDREN'S SERVICES OF	39
GUELPH AND WELLINGTON COUNTY, FAMILY AND CHILDREN'S SERVICES OF	25
HALTON CHILDREN'S AID SOCIETY	33
HAMILTON, CATHOLIC CHILDREN'S AID SOCIETY OF	5
HAMILTON, CHILDREN'S AID SOCIETY OF	42
HIGHLAND SHORES CHILDREN'S AID	37
HURON-PERTH CHILDREN'S AID SOCIETY	31
JEWISH FAMILY AND CHILD SERVICES	1
KAWARTHA-HALIBURTON CHILDREN'S AID SOCIETY	26
KENORA-RAINY RIVER DISTRICTS CHILD AND FAMILY SERVICES	4
KINA GBEZHGOMI CHILD & FAMILY SERVICES	5
KUNUWANIMANO CHILD & FAMILY SERVICES	6
LANARK, LEEDS AND GRENVILLE, FAMILY AND CHILDREN'S SERVICES OF	23
LINCK (CHATHAM-KENT CHILDREN'S SERVICES)	20
LONDON AND MIDDLESEX, CHILDREN'S AID SOCIETY OF	58
NIAGARA, FAMILY AND CHILDREN'S SERVICES	81
NIIJAANSINAANIK CHILD AND FAMILY SERVICES	9
NIPISSING AND PARRY SOUND, CHILDREN'S AID SOCIETY OF THE DISTRICT OF	28
NOGDAWINDAMIN FAMILY AND COMMUNITY SERVICES	15
NORTH EASTERN ONTARIO FAMILY AND CHILDREN'S SERVICES	15
OGWADENI:DEO	11
OTTAWA, THE CHILDREN'S AID SOCIETY OF	51
OXFORD COUNTY, CHILDREN'S AID SOCIETY OF	30
PAYUKOTAYNO JAMES AND HUDSON BAY FAMILY SERVICES	7
PEEL CHILDREN'S AID SOCIETY	46
RENFREW COUNTY, FAMILY AND CHILDREN'S SERVICES OF	12
SARNIA-LAMBTON CHILDREN'S AID SOCIETY	28
SIMCOE MUSKOKA FAMILY CONNEXIONS	51
ST. THOMAS AND ELGIN COUNTY, FAMILY AND CHILDREN'S SERVICES OF	20
STORMONT, DUNDAS AND GLENGARRY, THE CHILDREN'S AID SOCIETY OF THE UNITED COUNTIES OF	23
SUDBURY AND MANITOULIN, THE CHILDREN'S AID SOCIETY OF THE DISTRICTS OF	47
THUNDER BAY, THE CHILDREN'S AID SOCIETY OF THE DISTRICT OF	19
TIKINAGAN CHILD AND FAMILY SERVICES	27
TORONTO, CATHOLIC CHILDREN'S AID SOCIETY OF	26
TORONTO, CHILDREN'S AID SOCIETY OF	109
TORONTO, NATIVE CHILD AND FAMILY SERVICES OF	13
VALORIS FOR CHILDREN AND ADULTS OF PRESCOTT-RUSSELL	6
WATERLOO REGION, FAMILY AND CHILDREN'S SERVICES OF THE	52
WEECHI-IT-TE-WIN FAMILY SERVICES	9
WINDSOR-ESSEX CHILDREN'S AID SOCIETY	40
YORK REGION CHILDREN'S AID SOCIETY	40
CASES WHERE NO CHILDREN'S AID SOCIETY WAS SPECIFIED	137

Note: Children's aid societies that were not the subject of any cases are not listed.

FINANCIAL SUMMARY, 2024-2025

Our Office's budget for the fiscal year 2024-2025 was **$33.10** million. Actual expenditures (unaudited) were $30.09 million. All unspent funds were returned to the Ministry of Finance. The financial statements of the Ombudsman are audited on an annual basis; however, the annual audit occurs after the publication of the Annual Report.

	(IN $ THOUSANDS)
OPERATING EXPENSES	
SALARIES & WAGES	19,657
EMPLOYEE BENEFITS	4,631
COMMUNICATION & TRANSPORTATION	533
SERVICES	4,540
SUPPLIES & EQUIPMENT	726
TOTAL ANNUAL OPERATING EXPENSES	**30,088**



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Ombudsman
ONTARIO

ANNUAL REPORT 2024 ▸ 2025

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The Corporation of the
MUNICIPALITY OF TWEED

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To: All Ontario Municipal Councils

Collaborative Action on Sustainable Waste Management in Ontario

As members of municipal councils, we share a responsibility to make decisions that result in the most positive outcomes for both our current residents and future generations. The management of municipal waste is one of the most pressing environmental challenges we face today.

Large urban centres are increasingly looking to rural areas for land to bury garbage waste. Continuing to bury garbage in the ground will inevitably lead to serious consequences:

Globally, solutions already exist. Clean incineration technology can drastically reduce the volume of waste going to landfills while producing much needed electricity. Germany serves as an inspiring model, operating 156 municipal thermal waste incineration facilities with an aggregate annual capacity of 25 million tonnes. At the same time, Germany recycles 66.1% of its municipal waste, the highest rate in the world, driven by strong community engagement, innovative infrastructure, and early education programs that foster a culture of sustainability.

We believe Ontario can and must do better.

We are calling for:

1. The creation of a provincial working group composed of municipalities, the Provincial and Federal Governments, and manufacturing partners;
2. A commitment to exploring and implementing clean incineration, stronger recycling programs, and other sustainable practices;
3. Support from municipal councils across Ontario to advocate for immediate action at all levels of government.

We respectfully request that your council consider supporting this initiative by passing a similar resolution and communicating your support to Premier Doug Ford, the opposition parties, and other relevant stakeholders. By acting together, we can ensure that waste disposal in Ontario is managed quickly, efficiently, and sustainably protecting our environment and safeguarding our communities for generations to come.

[redacted]
Jim Flieler
Councillor, Municipality of Tweed

Resolution for Incineration and a more Robust Recycling Program

Whereas It is incumbent upon the members of council, MPP's and MPs to make the decisions that will result in the most positive outcomes for now and future generations

And Whereas with large urban centres now looking in rural areas of our province and entire country for lands to bury their garbage waste

And Whereas a large landfill site owned by a large urban centre which receives 50% of their garbage at the present time is expected to be full by 2029 creating more environmental impacts

And Whereas continuing to bury garbage in the ground will result in our future generations having lost potable groundwater as a result of garbage leachate rendering it unusable.

And Whereas burying garbage, particularly organic waste in landfills, leads to the production of methane a greenhouse gas, which escapes into the atmosphere and contributes to climate change causing more environmental destruction.
And Whereas we continue to destroy our environment jeopardizing our future generations

And Whereas we have worldwide technology that will allow us the use of clean incineration and also produce much needed electric energy

And Whereas the incineration of household and other municipal waste has a long tradition in Germany, which currently has 156 municipal thermal waste incineration facilities with an aggregate annual capacity of around 25 million tons

And Whereas with a strong focus on community involvement, innovative infrastructure, and sustainable practices, Germany has set a high bar for municipal recycling programs that the rest of the world can learn from and emulate.

And Whereas at the present time, Germany recycles 66.1%of its garbage waste at a municipal level. This places the country as the most effective and prominent country when it comes to recycling in the entire world. This highlights the citizen's strength and motivation to deal with environmental issues on a daily basis.

And Whereas German schools often integrate recycling education into their curriculum. This early exposure to the importance of recycling instills a sense of responsibility in the younger generation, creating a culture of sustainability that transcends generations.

Now Therefore be it resolved that Council direct staff to investigate the possibility of working together with Ontario Municipalities, Provincial and Federal Governments as well as our manufacturing partners to form a working group to ensure that our waste disposal issues can be resolved quickly, efficiently and effectively with the use of incineration, more robust recycling programs and sustainable practices so that our future generations will not suffer from our environmental mismanagement and to request support from these organizations as well as letters being sent to all municipalities in Ontario, Premier Ford and the opposition parties.

Municipality of Tweed Council Meeting
Council Meeting

Resolution No. 355
Title: Notice of Motion - Incineration and a More Robust Recycling Program
Date: Tuesday, August 12, 2025

Moved by Councillor J. Flieler
Seconded by Councillor P. Valiquette

BE IT RESOLVED THAT Council direct staff to investigate the possibility of working together with the Ontario Municipalities, Provincial and Federal Governments as well as our manufacturing partners to form a working group to ensure that our waste disposal issues can be resolved quickly, efficiently and effectively with the use of incineration, more robust recycling programs and sustainable practices so that our future generations will not suffer from our environmental mismanagement and to request support from these organizations as well as letters being sent to all municipalities in Ontario, Premier Ford and the opposition parties.

Carried

The Town of Goderich
57 West Street
Goderich, Ontario
N7A 2K5
519-524-8344
townhall@goderich.ca
www.goderich.ca

Friday, August 22, 2025

The Honourable Robert Black, Senator
Senate Standing Committee on Agriculture and Forestry
The Senate of Canada
Ottawa, Ontario
K1J 0A4

SENT VIA EMAIL: robert.black@sen.parl.gc.ca

RE: Standing Senate Committee on Agriculture and Forestry

Dear Honourable Robert Black,

Please be advised of the following motion passed at the Monday, August 11, 2025, Goderich Town Council Meeting:

Moved By: Councilor Thompson
Seconded By: Councilor Petrie
Whereas the agricultural sector of Huron County depends on the health of the soils in Huron County;
And Whereas soil erosion poses a very significant threat to the long-term health of the soils in Huron County;
And Whereas the Town of Goderich owns some agricultural land which is an asset for the Town;
And Whereas the Town of Goderich is committed to protecting the assets of the Town from preventable harm;
And Whereas the Standing Senate Committee on Agriculture and Forestry published a report in 2024 titled "Critical Ground: Why Soil is Essential to Canada's Economic, Environmental, Human and Social Health" (the Report) that contained twenty-five (25) recommendations in total for the federal government;
And Whereas, Recommendation 7 of Critical Ground stated that "The Government of Canada encourage provinces, territories, and municipalities to develop measures—as a form of land use planning—that best preserve and protect agricultural land in their jurisdictions;"
Therefore, be it resolved that the Town of Goderich urge the Government of Canada and the Province of Ontario to commit to recognizing a sense of urgency and act accordingly in order to protect and conserve soil as per Recommendation 25.

CARRIED

The Town of Goderich
57 West Street
Goderich, Ontario
N7A 2K5
519-524-8344
townhall@goderich.ca
www.goderich.ca

If you have any questions, please do not hesitate to contact me at 519-524-8344 ext. 210 or afisher@goderich.ca.

Yours truly,

[redacted]

Andrea Fisher
Director of Legislative Services/Clerk
/js

Cc: The Honourable Lisa Thompson, Minister of Rural Affairs, Member of Provincial Parliament – Huron-Bruce, lisa.thompson@pc.ola.org
Todd McCarthy, Minister of Environment, Conservation and Parks todd.mccarthy@pc.ola.org
Trevor Jones, Minister of Agriculture, Food and Agribusiness trevor.jones@pc.ola.org
Ben Lobb, Member of Parliament – Huron-Bruce, ben.lobb@parl.gc.ca
Julie Dabrusin, Federal Minister of Environment and Climate Change Julie.dabrusin@parl.gc.ca
Heath MacDonald, Federal Minister of Agriculture and Agri-Food and Rural Economic Development heath.macdonald@parl.gc.ca
All local Municipalities within Huron County

CORPORATION OF THE TOWNSHIP OF ARMOUR

RESOLUTION

Date: **August 12, 2025** **Motion #** 248

WHEREAS Ontario's Family Health Teams provide team-based healthcare which is critical to our communities;

AND WHEREAS healthcare in Ontario is publicly funded;

ANDWHEREAS municipalities invest significant additional public/taxpayer money in support of Family Health Teams and other healthcare-related organizations, including supports for primary care recruitment, healthcare facilities, and additional community healthcare needs;

AND WHEREAS the governance models for Family Health Teams in Ontario do not follow mandatory standards;

AND WHEREAS governance models are designed to ensure appropriate representation, transparency, and guardrails with respect to potential conflicts of interest for the organizations they represent;

AND WHEREAS many boards of Family Health Teams are not balanced in terms of representation from the communities and municipalities that they cover;

AND WHEREAS the lack of a standard and balanced governance model means that the needs of the local communities are not necessarily fully represented;

AND WHEREAS the province is directing the Primary Care Action Team (PCAT), through Dr. Jane Philpott, to ensure connected and convenient healthcare across the province;

AND WHEREAS Family Health Teams are crucial in the delivery of the mandate of PCAT;

NOW THEREFORE BE IT RESOLVED THAT The Council of the Township of Armour urges the Province of Ontario to implement a standard and mandatory governance model for the boards of Family Health Teams across the province, which ensures that community members make up 50% of the overall board membership to ensure appropriate representation for the communities which use and support healthcare in their local area;

AND THAT a copy of this resolution be forwarded to the Honourable Doug Ford, Premier of Ontario; the Honourable Sylvia Jones, Deputy Premier and Minister of Health; Dr. Jane Philpott, Chair of the Primary Care Action Team; the Association of Municipalities of Ontario (AMO); the Association of Family Health Teams of Ontario (AFHTO); and all municipalities in Ontario.

Moved by:		**Seconded by:**	
	Blakelock, Rod ☐		Blakelock, Rod ☐
	Brandt, Jerry ☑		Brandt, Jerry ☐
	Haggart-Davis, Dorothy ☐		Haggart-Davis, Dorothy ☑
	Ward, Rod ☐		Ward, Rod ☐
	Whitwell, Wendy ☐		Whitwell, Wendy ☐

Carried / Defeated [redacted]

Declaration of Pecuniary Interest by: _____

Recorded vote requested by: _____

Recorded Vote:	For	Opposed
Blakelock, Rod	☐	☐
Brandt, Jerry	☐	☐
Haggart-Davis, Dorothy	☐	☐
Ward, Rod	☐	☐
Whitwell, Wendy	☐	☐

TOWNSHIP OF ARMOUR

DISTRICT OF PARRY SOUND

56 ONTARIO STREET
PO BOX 533
BURK'S FALLS, ON
P0A 1C0

(705) 382-3332
(705) 382-2954
Fax: (705) 382-2068
Email: rward@armourtownship.ca
Website: www.armourtownship.ca

Mayor's Report – Governance of Family Health Teams

To: Members of Council
From: Rod Ward, Mayor
Date: August 12, 2025

Subject: Support for Standardized Governance Models for Family Health Teams

Family Health Teams are a vital part of Ontario's healthcare system, particularly in rural and underserved communities like ours. These teams provide collaborative, team-based care that improves patient outcomes and relieves pressure on hospitals and emergency services.

Our municipality, like many others across the province, continues to invest local taxpayer dollars to support healthcare delivery — through physician recruitment efforts, infrastructure, and other community health initiatives. However, despite this investment and our community's reliance on these services, municipal and community voices are often underrepresented on the boards that govern Family Health Teams.

Currently, there is no mandatory governance framework for these boards, which has led to inconsistent representation and, in some cases, governance structures that do not reflect the communities they serve. This can lead to decisions being made without sufficient local input, oversight, or accountability.

The attached resolution calls on the Province of Ontario to implement a standardized and mandatory governance model for Family Health Teams, requiring that at least 50% of board members be community representatives. This would help ensure local interests are considered in decision-making, and strengthen transparency and trust in our healthcare system.

I recommend Council's support for this resolution and the forwarding of it to the appropriate provincial bodies and municipal partners.

Sincerely,

[redacted]

Rod Ward
Mayor

West Lincoln
Your Future Naturally

318 Canborough St. P.O. Box 400
Smithville, ON L0R 2A0
T: 905-957-3346
F: 905-957-3219
www.westlincoln.ca

Aug 12, 2025

Niagara Region

Dear Ann-Marie Norio:

Re: Endorse the Development of a Code of Conduct for Human Trafficking Prevention in Niagara Region

This is to confirm that at the Aug 11, 2025 Council Meeting the following resolution was adopted with respect to the above noted matter:

WHEREAS human trafficking in Niagara is currently a persistent challenge impacting the hospitality and tourism sectors;

WHEREAS human trafficking is a critical issue due to the region's proximity to the U.S. border and the thriving tourism and hospitality sectors, which create environments where sexual and labour exploitation can go unnoticed;

WHEREAS women, newcomers, racially-marginalized people, people experiencing poverty, people living with disabilities, and children in the child welfare system are disproportionately targeted and impacted by the harms perpetuated by traffickers;

WHEREAS 60% of human trafficking cases in Ontario occur along the corridor linking Toronto and Niagara;

WHEREAS data from the Niagara Regional Police Service comparing 2023 to 2024 indicates the number of human trafficking investigations increased by 61%; the number of victims identified increased by 700%; the number of accused charged increased by 190%; the number of criminal charges laid increased by 75%; and the number of referrals from NRPS' Human Trafficking Unit to Victim Services Niagara increased by 133%;

WHEREAS human trafficking thrives in secrecy, but with leadership and commitment, local government can be on the front line of prevention and protection;

WHEREAS local businesses and organizations are key to preventing human trafficking through proactive measures such as The 4 Ps: prevention, protection, partnership, and prosecution;

WHEREAS local area municipalities have already begun to assist in making the Niagara region inhospitable to human traffickers;

WHEREAS Tools of Empowerment for Success (TOES) Niagara and Brock University have undertaken work funded by Women and Gender Equality Canada to develop a Code of Conduct to Prevent Human Trafficking in the Niagara Region through education, increasing awareness, and providing resources, including prevention strategies; and

WHEREAS TOES Niagara and Brock University created a Steering Committee of representatives from across tourism, business, education, law enforcement, government, and non-profit sectors to engage in broad community collaboration through focus groups, surveys, and feedback sessions to develop the Code of Conduct for Human Trafficking Prevention in the Niagara Region.

NOW THEREFORE BE IT RESOLVED:

1. That Township of West Lincoln **RECOGNIZE** that human trafficking in Niagara has serious impacts on the health and wellness of local residents and their families, as well as negative economic impacts on local businesses and communities;

2. That Township of West Lincoln **ENDORSE** the work of TOES Niagara and Brock University in developing a Code of Conduct for the Prevention of Human Trafficking in the Niagara Region;

3. That Township of West Lincoln **COMMIT** to reviewing and assessing the applicable local government sectoral guidelines and responsibilities outlined in The Code upon its finalization, with the intent to implement measures that align with Regional priorities and capacity;

4. That Township of West Lincoln **WRITE** letters to all of Niagara's 12

Local Area Municipalities encouraging them to also endorse the work of TOES Niagara and Brock University in the development of the Code of Conduct for the Prevention of Human Trafficking in the Niagara Region and commit to reviewing and assessing the applicable local government sectoral guidelines and responsibilities outlined in The Code upon its finalization, with the intent to implement measures that align with municipal priorities and capacity; and

5. That a copy of this motion **BE SENT** to Niagara's four MPs; Niagara's four MPPs; the Association of Municipalities of Ontario (AMO); the Federation of Canadian Municipalities (FCM); Mayors and Regional Chairs of Ontario (MARCO); Ontario's Big City Mayors (OBCM); and the Ontario and Canadian Associations of Chiefs of Police.

If any further information is required, please contact the undersigned at 905-957-3346, Ext 5129.

Yours Truly,

[redacted]

Justin J. Paylove
Manager, Legislative Services/Clerk
jpaylove@westlincoln.ca

JJP/jmt

cc. Dean Allison, MP
Sam Oosterhoff, MPP
Chris Bittle, MP
Tony Baldinelli, MP
Fred Davies, MP
Jennifer Stevens, MPP
Wayne Gates ,MPP
Jeff Burch, MPP
Federation of Canadian Municipalities
Association of Municipalities of Ontario
Niagara Region Municipalities
Mayors and Regional Chairs of Ontario (MARCO)
Ontario's Big City Mayors (OBCM)
Ontario and Canadian Associations of Chiefs of Police

Dufferin Aggregates
2300 Steeles Ave W, 4th Floor
Concord, ON L4K 5X6
Canada

August 14, 2025

Luke Rapus
Aggregates Technical Specialist
Ministry of Natural Resources and Forestry
Guelph District
1 Stone Road West
Guelph, Ontario
N1G 4Y2

RECEIVED
AUG 18 2025
Township of Puslinch

Attention: Mr. Rapus

Re: Monthly Monitoring Report – July 2025
Mill Creek Pit, License #5738
Township of Puslinch, Wellington County

Please find enclosed the required monitoring data for the month of July 2025. There were no exceedances to report.

If you have any questions, please do not hesitate to call.

Sincerely,

[redacted]

Matthew Erdmann
Site Superintendent

CC: Township of Puslinch
Sonja Strynatka (GRCA)
Kevin Mitchell (Dufferin Aggregates)
University of Guelph

Dufferin
Aggregates

Monthly Reporting
Mill Creek Aggregates Pit
July 2025

Date	DP21 (mASL)	Threshold Value (mASL)	Exceedance
2-Jul-25	305.83	305.49	NO
7-Jul-25	305.82	305.49	NO
16-Jul-25	305.79	305.49	NO
22-Jul-25	305.76	305.49	NO
29-Jul-25	305.78	305.49	NO

Date	BH13 (mASL)	DP21 (mASL)	Head Difference (m)	Threshold Value (m)	Exceedance
2-Jul-25	306.21	305.83	0.38	0.10	NO
7-Jul-25	306.23	305.82	0.41	0.10	NO
16-Jul-25	306.20	305.79	0.41	0.10	NO
22-Jul-25	306.19	305.76	0.43	0.10	NO
29-Jul-25	306.06	305.78	0.28	0.10	NO

Date	DP17 (mASL)	Threshold Value (mASL)	Exceedance
2-Jul-25	305.31	305.17	NO
7-Jul-25	305.30	305.17	NO
16-Jul-25	305.31	305.17	NO
22-Jul-25	305.28	305.17	NO
29-Jul-25	305.27	305.17	NO

Date	BH92-12 (mASL)	DP17 (mASL)	Head Difference (m)	Threshold Value (m)	Exceedance
2-Jul-25	305.94	305.31	0.63	0.06	NO
7-Jul-25	305.96	305.30	0.66	0.06	NO
16-Jul-25	305.93	305.31	0.62	0.06	NO
22-Jul-25	305.87	305.28	0.59	0.06	NO
29-Jul-25	305.86	305.27	0.59	0.06	NO

Date	DP3 (mASL)	Threshold Value (mASL)	Exceedance
2-Jul-25	304.74	304.54	NO
7-Jul-25	304.75	304.54	NO
16-Jul-25	304.76	304.54	NO
22-Jul-25	304.71	304.54	NO
29-Jul-25	304.74	304.54	NO

Date	DP6 (mASL)	DP3 (mASL)	Head Difference (m)	Threshold Value (m)	Exceedance
2-Jul-25	305.89	304.74	1.15	0.58	NO
7-Jul-25	305.94	304.75	1.19	0.58	NO
16-Jul-25	305.89	304.76	1.13	0.58	NO
22-Jul-25	305.83	304.71	1.12	0.58	NO
29-Jul-25	305.90	304.74	1.16	0.58	NO

Date	DP2 (mASL)	Threshold Value (mASL)	Exceedance
2-Jul-25	304.32	303.50	NO
7-Jul-25	304.35	303.50	NO
16-Jul-25	304.23	303.50	NO
22-Jul-25	304.07	303.50	NO
29-Jul-25	304.06	303.50	NO

Date	BH92-27 (mASL)	DP2 (mASL)	Head Difference (m)	Threshold Value (m)	Exceedance
2-Jul-25	304.70	304.32	0.38	0.32	NO
7-Jul-25	304.68	304.35	0.33	0.32	NO
16-Jul-25	304.59	304.23	0.36	0.32	NO
22-Jul-25	304.41	304.07	0.34	0.32	NO
29-Jul-25	304.46	304.06	0.40	0.32	NO

Date	DP1 (mASL)	Threshold Value (mASL)	Exceedance
2-Jul-25	304.27	303.91	NO
7-Jul-25	304.29	303.91	NO
16-Jul-25	304.23	303.91	NO
22-Jul-25	304.08	303.91	NO
29-Jul-25	304.05	303.91	NO

Date	BH92-29 (mASL)	DP1 (mASL)	Head Difference (m)	Threshold Value (m)	Exceedance
2-Jul-25	304.84	304.27	0.57	0.23	NO
7-Jul-25	304.82	304.29	0.53	0.23	NO
16-Jul-25	304.79	304.23	0.56	0.23	NO
22-Jul-25	304.62	304.08	0.54	0.23	NO
29-Jul-25	304.63	304.05	0.58	0.23	NO

Date	DP5CR (mASL)	Threshold Value (mASL)	Exceedance
2-Jul-25	303.33	302.79	NO
7-Jul-25	303.34	302.79	NO
16-Jul-25	303.29	302.79	NO
22-Jul-25	303.17	302.79	NO
29-Jul-25	303.17	302.79	NO

Date	OW5-84 (mASL)	DP5CR (mASL)	Head Difference (m)	Threshold Value (m)	Exceedance
2-Jul-25	303.60	303.33	0.27	0.15	NO
7-Jul-25	303.59	303.34	0.25	0.15	NO
16-Jul-25	303.55	303.29	0.26	0.15	NO
22-Jul-25	303.48	303.17	0.31	0.15	NO
29-Jul-25	303.45	303.17	0.28	0.15	NO

No exceedances to report for the month of July.

Note: A beaver dam has been observed on private property upstream of DP5CR, which is likely to impact the water levels at DP5CR. Similar to what has occurred in the recent past at this location, the beaver dam may potentially cause action threshold exceedances. It is recommended that the appropriate authority arrange to have the beaver dam removed.

Dufferin Aggregates

Monthly Reporting
Mill Creek Aggregates Pit
July 2025

			Max. Allowable as per PTTW- Main Pond			Max. Allowable as per PTTW- Silt Pond		
			(Imperial Gallons)		(Litres)	(Imperial Gallons)		(Litres)
Total Monthly Precipitation (mm):	62.7	Kitchener/Waterloo (Actual)	2,500	per minute	11,365	2,597	per minute	11,806
Total Monthly Normal Precipitation (mm):	96.2	Waterloo-Wellington A (30-year Normal)	1,800,000	per day	8,183,000	3,739,477	per day	17,000,000

Date	Below Water Table Extraction SP4	Below Water Table Extraction Phase 2	Water Pumped from Main Pond (gals)	Water Pumped from Active Silt Pond (gals)	Main Pond Level (mASL)	Exceedance Y/N (BELOW 305.5 mASL)	Phase 2 Pond Level (mASL)	Exceedance Y/N (BELOW 305.0 mASL)	Phase 3 Pond Level (mASL)	Exceedance Y/N (BELOW 303.85 mASL)	Phase 4 Pond Level (mASL)	Exceedance Y/N (BELOW 304.5 mASL)
1-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
2-Jul-25	2,500	-	1,228,968	-	306.60	N	306.12	N	304.97	N	306.38	N
3-Jul-25	2,500	-	1,244,806	-	306.63	N	306.13	N	304.98	N	306.36	N
4-Jul-25	2,500	-	899,674	-	306.62	N	306.11	N	304.97	N	306.37	N
5-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
6-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
7-Jul-25	2,500	-	1,270,542	-	306.62	N	306.10	N	304.95	N	306.34	N
8-Jul-25	2,500	-	884,716	-	306.60	N	306.08	N	304.94	N	306.37	N
9-Jul-25	2,500	-	994,041	-	306.61	N	306.09	N	304.92	N	306.36	N
10-Jul-25	2,500	-	959,726	-	306.62	N	306.12	N	304.93	N	306.38	N
11-Jul-25	-	-	675,746	-	306.61	N	306.11	N	304.91	N	306.35	N
12-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
13-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
14-Jul-25	2,500	-	1,294,959	-	306.63	N	306.12	N	304.92	N	306.36	N
15-Jul-25	2,500	-	1,183,435	-	306.62	N	306.13	N	304.90	N	306.37	N
16-Jul-25	2,500	-	1,238,867	-	306.62	N	306.12	N	304.90	N	306.36	N
17-Jul-25	2,500	-	1,151,099	-	306.61	N	306.11	N	304.92	N	306.34	N
18-Jul-25	-	-	-	-	306.58	N	306.08	N	304.88	N	306.32	N
19-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
20-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
21-Jul-25	2,500	-	1,300,018	-	306.57	N	306.09	N	304.85	N	306.30	N
22-Jul-25	2,500	-	1,254,925	-	306.55	N	306.06	N	304.83	N	306.31	N
23-Jul-25	2,500	-	1,244,366	-	306.56	N	306.07	N	304.82	N	306.29	N
24-Jul-25	2,500	-	1,232,268	-	306.54	N	306.08	N	304.84	N	306.28	N
25-Jul-25	-	-	1,090,608	-	306.55	N	306.07	N	304.83	N	306.30	N
26-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
27-Jul-25	-	-	-	-	-	-	-	-	-	-	-	-
28-Jul-25	2,500	-	1,049,693	-	306.53	N	306.05	N	304.82	N	306.29	N
29-Jul-25	2,500	-	1,214,230	-	306.54	N	306.04	N	304.83	N	306.28	N
30-Jul-25	2,500	-	1,187,834	-	306.52	N	306.05	N	304.81	N	306.26	N
31-Jul-25	2,500	-	1,264,163	-	306.53	N	306.06	N	304.82	N	306.27	N
Total	47,500	0	22,600,520	0								

Notes:
No exceedances to report for the month of July.

THE

PUSLINCH PROFILE FEATURES:

Delish Kitch







In the heart of the Puslinch community, Delish Kitch is proving that “home-based” can also mean high-quality, health-conscious, and incredibly flavourful. Operating from a fully inspected home kitchen since 2011, Delish Kitch is dedicated to creating gluten-free, refined sugar-free, and organic baked goods that prioritize both nutrition and taste. With a specialty in naturally leavened sourdough bread made without commercial yeast or sugar, Delish Kitch has carved out a unique place in the local food scene, especially for those seeking cleaner, more thoughtful food choices. Their offerings include sourdough loaves, bagels, pizza shells, granola, crackers, and a curated selection of sweets - all handcrafted using specialty flours like Ontario buckwheat and tigernut, one of the rarest and most unique ingredients in North American sourdough baking.

Founded by a self-taught sourdough baker with a mission to serve the community healthy and delicious alternatives, Delish Kitch’s menu is available exclusively through pre-order. There is no storefront, no walk-ins, just intentional baking with purpose and care. Delish Kitch bakes sourdough on alternate Thursdays. Customers can pick up their fresh orders on bake day, or choose a pickup time that best fits their schedule. For added flexibility, Delish Kitch also offers a Freezer Menu, allowing customers to order and pick up products at any time that suits their needs.

905-515-6848

delishkitch.ca

info@delishkitch.ca

6655 Concession 1, Puslinch, ON

DRINKING WATER SOURCE PROTECTION
Our Actions Matter

LAKE ERIE SOURCE PROTECTION REGION

September 8, 2025

Notice of Pre-Consultation – Draft Updates to the Grand River Source Protection Plan and Assessment Report

You are receiving this notice because your municipality may be affected by proposed updates to Wellhead Protection Areas (WHPAs) and Intake Protection Zones (IPZs) or may have responsibilities related to implementing Source Protection Plan policies.

The Grand River Source Protection Authority (GRSPA), as the lead authority in the Lake Erie Source Protection Region, in collaboration with the Lake Erie Region Source Protection Committee (LERSPC), has initiated an amendment to the Grand River Assessment Report and Source Protection Plan under Section 34 of the *Clean Water Act, 2006*.

Updates to the Grand River Assessment Report

Technical studies for the Guelph-Guelph/Eramosa Township water supply system have identified new WHPA-Q and IPZ-Q areas where certain activities may pose a risk to drinking water. The updated Assessment Report will identify the following as Significant Drinking Water Threats within these vulnerable areas:

- Permitted municipal water takings
- Permitted and non-permitted non-municipal water takings, like domestic water takings
- Activities that reduce groundwater recharge

To incorporate these findings into the Assessment Report, the following updates are proposed:

- General formatting edits to Chapter 17 on water budget framework and methodology
- A new Chapter 24 on the Tier 3 Water Budget and Risk Assessment for the City of Guelph and Guelph/Eramosa Township

Updates to the Grand River Source Protection Plan

Proposed amendments to the Source Protection Plan under this Section 34 amendment include:

Volume I

- New Section 34: G-GET water quantity information in Table 3-4 in Section 3.5
- Revisions to definitions in Section 8.0

Volume II

- New policies for Amaranth and East Garafraxa in Dufferin County, the City of Guelph and Halton Region
- New and revised policies for Wellington County and Region of Waterloo
- Removed “Interpretation of Source Protection Plan” policy from amended chapters
- Updated definitions and acronyms across amended chapters
- Removed map schedules from amended chapters, as drinking water system and vulnerable area mapping is included in the Assessment Report
- General edits to policy language, lists, and summary tables

Commenting on the proposed updates:

Draft updated sections of the documents are available on the Grand River Conservation Authority's **file sharing site. [Please refer to the email accompanying this notice for the access link.]**

We respectfully request that you review the proposed updates in relation to your policy implementation responsibilities and submit any comments by October 20, 2025, to:

Stacey Bruce
Source Protection Program Coordinator
Lake Erie Source Protection Region
519-621-2763 ext. 2303
sbruce@grandriver.ca

If you have any questions or would like to discuss any of the material, please contact Stacey Bruce at the phone number or email above.

Municipal Endorsement and Public Consultation

Before formal public consultation begins, the GRSPA must receive council resolutions from affected municipalities endorsing the proposed amendments, as required under Section 34(3) of the *Clean Water Act*, 2006.

We are requesting a resolution of support from your council.
Please send the resolution to Stacey Bruce **by the end of November 2025**.

A public consultation on the proposed amendments is expected in late 2026. Comments received will be reviewed by the LERSPC and used to update the draft documents, which will be submitted by the GRSPA to the MECP for review and approval.

Sincerely,

Kaitlyn Rosebrugh

[redacted]

Senior Source Protection Program Coordinator
Lake Erie Source Protection Region

Delegate Request - Entry #14753

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

Two (2)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

Sunrise Therapeutic Riding Association & Learnng Centre County Housing Development Fund Application

Type of Presentation

This request is to present a verbal delegation

Type of Attendance

In person

Name of Delegate

Ann Caine

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Name of Second Delegate

Peter Cummins

Mailing Address of Second Delegate

[redacted]

Phone Number of Second Delegate

[redacted]

Email Address of Second Delegate

[redacted]

Purpose of delegation (state position taken on issue, if applicable)

To advocate for access to affordable supportive housing on behalf of young adults with cognitive disabilities and special needs. Specifically, we wish to have the opportunity to speak to the importance and impact of the Township's support for our application for funding under the recently announced Wellington County Housing Development Fund Application. We wish to ensure all Council members are aware of the current status of the project and how that fits with the criteria set out by the county for this specific grant opportunity.

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

Yes

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

Delegate Request - Entry #14820

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

One (1)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

Audrey Meadows - ZBA

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

Via Zoom

Name of Delegate

Rob Stovel

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

Delegation will address the Audrey Meadows proposed ZBA application and provide an update to Council.

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

No

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

Delegate Request - Entry #14837

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

One (1)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

Report COR 2025-037 Major Site Alteration

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

In person

Name of Delegate

John McNie

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

Opposition to major site alteration.

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

No

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

Delegate Request - Entry #14842

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

One (1)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

site alteration

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

In person

Name of Delegate

George Anastasakos

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

Site alteration will effect the quality of life for surrounding residents

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

No

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

Delegate Request - Entry #14862

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

One (1)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

Report COR-2025-037 Major Site Alteration Recommendation Report P11/MAR – Gino Martinello, 4670 Sideroad 10 North

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

In person

Name of Delegate

Mike McColl

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

Just retired and worried about my quality of life if this project moves ahead.

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

No

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

Delegate Request - Entry #14865

Type of Meeting

Planning and Development Advisory Committee

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

One (1)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

Sideroad Solar PV

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

Via Zoom

Name of Delegate

Zachary Rypalowski

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

Presentation of proposed solar generation facility located at 3972 Sideroad 20 S in Puslinch, ON, seeking municipal support letter.

A formal presentation is being submitted to accompany the delegation

Yes

File Upload

Sideroad-Presentation-for-Puslinch-Township.pdf

The delegation will require the use of audio-visual equipment (power point presentation)

Yes

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch



INTEGRATIVE
project solutions ltd

POWERING A SUSTAINABLE FUTURE

Integrative Project Solutions Ltd.
In cooperation with the IESO LT2 RFP

Prepared for The Township of Puslinch

OUR RENEWABLE MISSION



Our mission is to deliver cost-effective and **environmentally responsible** energy solutions. We combine reliable partnerships with our developmental and operational **expertise** to power a sustainable future for the generations to come.



Our approach is comprehensive and fully tailored for **turnkey delivery**. We oversee every stage of project life-cycle & deliver end-to-end solutions for renewable projects, from initial consultation to seamless installation, launch of generation, and continuous O&M support.

Introducing Sideroad Solar Park

Location – 3972 Sideroad 20 S, Puslinch, ON

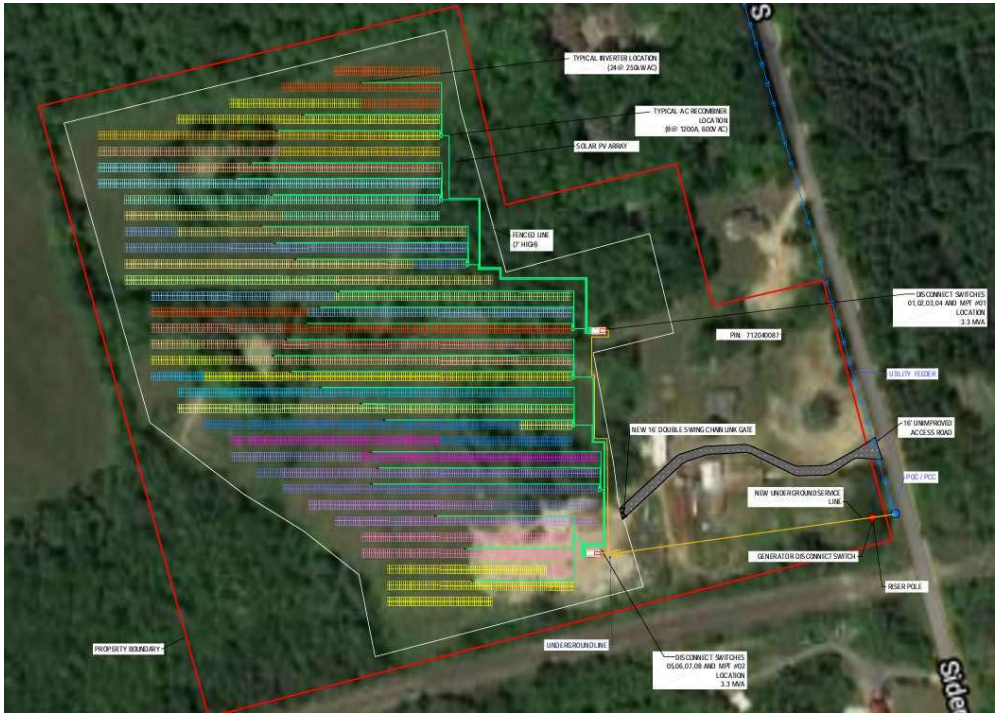
Capacity – 6.9MW DC / 6.0MW AC

Connection – Puslinch DS, Feeder F1 (27.6 kV)

Hydro One Status – Passed at 5,000 kW AC (PCIR ID 21,477)




Sideroad 20 S


TYPICAL INVERTER LOCATION
(24@ 250kW AC)
TYPICAL A/C RECOMBINER
LOCATION
(6@ 1200A, 600V AC)
SOLAR PV ARRAY
FENCED LINE
(7' HIGH)
DISCONNECT SWITCHES
01,02,03,04 AND MPT #01
LOCATION
3.3 MVA
PIN: 712040087
UTILITY METER
NEW 16' DOUBLE SWING CHAIN LINK GATE
16' UNIMPROVED
ACCESS ROAD
POC / PCC
NEW UNDERGROUND SERVICE
LINE
GENERATOR DISCONNECT SWITCH
RISER POLE
PROPERTY BOUNDARY
UNDERGROUND LINE
DISCONNECT SWITCHES
05,06,07,08 AND MPT #02
LOCATION
3.3 MVA

Community Benefits

Engineering and Consulting Jobs – 10 to 20 local consulting subcontractors engaged for planning applications, surveys, and studies

Construction Employment – Hundreds of jobs across civil works, electrical installation, and commissioning

O&M Employment – Dozens of long-term (25+ years) local roles for landscape maintenance, road access, inspections, and electrical services



Community Benefits

Investment in Local Community – 18 Million dollars directed into local contractors, suppliers, and services during development, construction, and operation

Clean, Non-Emitting Energy – Generation of enough energy to supply over 1,200 Ontario homes with electricity without producing any air pollution or the constant reliance on natural resources

Climate Action – Cuts approximately 7,000 tonnes of greenhouse gases every year (equivalent to taking 1,500 gas-powered cars off the road)



Community Benefits

Stable Local Revenues – Long-term municipal property tax contributions and steady local procurement

Ideal Location – Not located on prime agricultural land, well-screened, located near electrical demand, and coordinated with Township staff to minimize impacts

Indigenous Involvement – Planned profit sharing with Kasabonika Lake First Nation to help support our indigenous communities



THANK YOU FOR YOUR TIME AND CONSIDERATION



INTEGRATIVE PROJECT SOLUTIONS LTD.

www.integrativeprojectsolutions.com

Join us in driving green energy development and building a sustainable, energy-efficient future for generations to come.

Delegate Request - Entry #14821

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

Two (2)

Type of Delegation

This is a request to delegate on a general topic

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

Via Zoom

Name of Delegate

Rick Standish

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Name of Second Delegate

Shannon Standish

Mailing Address of Second Delegate

[redacted]

Phone Number of Second Delegate

[redacted]

Email Address of Second Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

We are writing to express our serious concerns regarding the safety of the intersection at Leslie Rd and Watson Rd S in Puslinch, ON.

With the arrival of warmer weather, there has been a noticeable increase in motorcycles and sports cars traveling at excessive speeds through our neighborhood. This has greatly heightened our concerns for the safety of the many families who reside along this road - particularly those with young children - as well as for daily commuters.

Of particular concern is that this intersection lies along a daily school bus route that our children take to and from school daily. Our bus driver has repeatedly voiced concerns about being passed unsafely by other vehicles, including alarming instances where drivers have ignored stop signs. These reckless actions present a real and immediate danger to not only our children but our neighbour's children, along with all residents in the area.

In addition, pulling out of our laneway has become increasingly hazardous. A combination of a telephone pole and seasonal foliage significantly limits visibility, making it difficult to safely see oncoming traffic - especially when vehicles are traveling at high speeds. This further contributes to the overall safety concern in the area. Our neighbours have also voiced this concern.

If someone from the township were to come out and inspect the intersection, they would see clear evidence of the dangerous behavior we are describing - including multiple tire marks from vehicles making reckless maneuvers. This only reinforces the need for timely intervention.

We kindly request the opportunity to have a representative from the township investigate at your earliest convenience to improve safety at this intersection as it’s been an ongoing concern.

Thank you for your time and attention to this important matter. We look forward to your response in the near future.

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

No

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

Delegate Request - Entry #14837

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

One (1)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

Report COR 2025-037 Major Site Alteration

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

In person

Name of Delegate

John McNie

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

Opposition to major site alteration.

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

No

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

Delegate Request - Entry #14842

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

One (1)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

site alteration

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

In person

Name of Delegate

George Anastasakos

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

Site alteration will effect the quality of life for surrounding residents

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

No

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

Delegate Request - Entry #14862

Type of Meeting

Council

Meeting Date

September 17, 2025

How many delegates are requesting to make this presentation?

One (1)

Type of Delegation

This is a request to delegate on a topic on the upcoming agenda

Identify which agenda item you are requesting to delegate on?

Report COR-2025-037 Major Site Alteration Recommendation Report P11/MAR – Gino Martinello, 4670 Sideroad 10 North

Type of Delegation

This request is to present a verbal delegation

Type of Attendance for verbal delegation

In person

Name of Delegate

Mike McColl

Mailing Address of Delegate

[redacted]

Phone Number of Delegate

[redacted]

Email Address of Delegate

[redacted]

Purpose of delegation (please describe the conern/position taken on issue, if applicable)

Just retired and worried about my quality of life if this project moves ahead.

A formal presentation is being submitted to accompany the delegation

No

The delegation will require the use of audio-visual equipment (power point presentation)

No

Acknowledgement

I (we) have read, understand and acknowledge the Rules and Procedures relating to Delegations as prescribed by the Procedural By-law 2022-046.

Township of Puslinch

REPORT FIN-2025-024

TO: Mayor and Members of Council

PREPARED BY: Mary Hasan, Director of Finance/Treasurer

PRESENTED BY: Mary Hasan, Director of Finance/Treasurer

MEETING DATE: September 17, 2025

SUBJECT: 2026 Proposed User Fees and Charges
File No. C11 FIN

RECOMMENDATIONS

THAT Report FIN-2025-024 entitled 2026 Proposed User Fees and Charges be received; and

That Council directs staff to proceed with holding a Public Meeting on September 17, 2025 at 7:00 p.m. to obtain public input on the proposed User Fees and Charges By-law as outlined in Schedule A to Report FIN-2025-024; and

That staff report back to Council with the results of the Public Meeting.

Purpose

The purpose of this report is to provide Council with the proposed changes to the User Fees and Charges By-law and to obtain direction from Council to proceed with holding a Public Meeting to solicit input on the proposed User Fees and Charges. This report is prepared in consultation with Township staff within all Township departments.

Background

In addition to property tax revenues, municipalities may charge for goods and services, such as recreational rentals, development applications, building permits, etc. through authority which is set and approved by a By-law adopted by Council.

Budget Development and Control Policy

Clause 5 of the Budget Development and Control Policy includes information regarding User Fees and Charges as outlined below:

i. *User fees and charges shall be automatically adjusted annually based on the CPI for Ontario from May to May.*
ii. *When recommending a new user fee and charge or where the pressure on user fees and charges indicates an alternate rate change over and above the CPI inflation rate to ensure tax subsidization does not increase, the Township will consider changes to the user fees and charges that closely reflect the actual cost for providing the service while keeping in line with comparator municipalities.*

The CPI for Ontario from May 2024 to May 2025 is 1.70%. The proposed fees outlined in Schedule A to Report FIN-2025-024 have been established or amended to closely reflect the actual cost for providing the service including CPI increases of 1.70% while keeping in line with comparator municipalities.

Outlined below are the proposed changes to the fees by department (excluding those fees that have been automatically increased by the CPI of 1.70%).

Benchmarking Analysis

Council at its meeting held on August 16, 2023 directed staff to select approximately 10 high frequency user fees and perform a benchmarking analysis to assess whether the Township's fees are comparable to comparator municipalities.

Township staff chose 10 high frequency user fees (one from each Township department as outlined in Schedules A to J of the 2026 Proposed User Fees and Charges).

These 10 high frequency user fees were compared to the following comparator and boundary municipalities:

- Cambridge
- Centre Wellington
- Erin
- Guelph
- Guelph Eramosa
- Hamilton
- Mapleton
- Milton
- Minto

- Wellington North

The results of the benchmarking analysis are further outlined in the table below:

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE WITH CPI	2026 RATE (NO TAX)	2025 Average	2025 Median
Agreements - Registered Note A	Flat Fee	$1,480.00	$1,505.00	$1,505	$1,526	$1,191
Online Service Fee Note B	Total Transaction Amount	1.75%	1.75%	1.75%	$1.90	$2.20
Oversize-Overweight Load Permits	Per Trip	$119.00	$121.00	$121.00	Note G	Note G
Open Air Burning Permit Inspection Fee Note C	Per Inspection	$48.00	$49.00	$75.00	$75.49	$81.98
Sewage Systems - New Installation Note D	Flat Fee	$753.00	$766.00	$766.00	$731.68	$732.50
Comprehensive Development Consultation Note E	Flat Fee	$5,000	$5,085	$5,085	$6,836	$5,793
Septic Compliance Letter Note C	Flat Fee	$90.00	$91.00	$98.00	$98.00	$98.00
Soccer Field - No Lights Note F	Per Hour	$32.12	$32.67	$38.87	$38.87	$33.17
Soccer Field - No Lights Note F	Per Day	$326.73	$332.29	$332.29	$204.13	$204.03
Arena Floor Note F	Per Hour	$81.64	$83.03	$86.93	$86.93	$70.80
Hall - Non-Prime Note F	Per Hour	$67.74	$68.90	$75.27	$75.27	$65.62
Hall - Non-Prime Note F	Full Day Rental	$460.54	$468.37	$510.91	$510.91	$458.00

Note A – Township staff recommend that the fee for Agreements – Registered be increased by CPI only. This fee was originally developed based on an estimate of the Township's actual costs to provide the service, including staff time to prepare agreements and the legal costs of registering the agreement on title. While comparator municipalities did not have a directly equivalent fee, Township staff used fees related to the drafting and registration of encroachment agreements as a basis for comparison, as these were the most similar.

Note B – Township staff recommend that the Township's Online Service Fee remain at 1.75% of the total transaction amount in accordance with Visa and Mastercard merchant recommendations.

Note C – As outlined in the table above, it is recommended that the Open Air Burning Permit Inspection and Septic Compliance Letter fees be increased to the average fee of the comparator and boundary municipalities. It is recommended that these fees be increased to the average fee for the cost recovery associated with these services while keeping in line with comparator and boundary municipalities.

Note D - As outlined in the table above, there are fees where the average or median benchmarking fee is lower than the Township's fee. In these examples, a decrease to the

Township fee is not recommended as the Township's immediate neighbors are in line with or higher than the Township's fee.

Note E - Staff recommend that the fee for the Comprehensive Development Consultation be increased by CPI only. Among comparator municipalities, only the Township and the City of Guelph credit their pre-consultation fees toward a subsequent Planning Act application. The Comprehensive Development Consultation process allows applicants to receive feedback from Township staff and third-party consultants on requirements, such as required studies, before submitting a formal Planning Act application. To encourage early consultation, the fee is credited toward a related future application. Given this credit, staff recommend that any significant increase to the fee be considered alongside the review of the Township's Planning Application Fees. Staff intend to undertake this detailed review as part of the 2027 User Fees and Charges By-law.

Note F – As outlined in the table above, it is recommended that the hourly fees for the Soccer Field – No Lights, Arena Floor, and Hall Non-Prime, as well as the per-day fee for the Hall Non-Prime (including the reduced rates and non-residential/commercial rates for each of these fees), be increased to the average fee of the comparator and boundary municipalities. This recommendation will better align the Township's services with comparator and boundary municipalities while enabling the cost recovery associated with these services with a more sustainable approach. Township staff do not recommend reducing the Soccer Field – No Lights per-day fee to the comparator average/median, as the recommended daily rate of $332.29 is consistent with the hourly fee multiplied by eight hours.

Note G – The Township currently charges oversize/overweight load permit fees on a per-trip basis, whereas the majority of comparator municipalities apply an annual fee structure. Staff recommend maintaining the Township's current per-trip fee approach, as it more accurately reflects the direct impact of each trip on municipal infrastructure and that the per-trip fee be increased by CPI only.

Fire and Rescue Services

New Auxiliary Vehicle Ministry of Transportation (MTO) Rate

The MTO has increased the rate for fire response service on provincial highways to $570.50 effective January 1, 2025 (the previous rate was $559.86 Per Hour Per Truck). The MTO has also established a new auxiliary vehicle rate of $285.25 effective January 1, 2025 which is based on 50% of the full-size apparatus rate. The Township's Pumper 32 truck qualifies for the lower MTO rate. Both of these fees have been incorporated in the Fire and Rescue Services appendices of the proposed User Fees and Charges By-law.

Building

The *Building Code Act* requires that the total amount of building permit fees meet the total costs for the municipality to administer and enforce the *Building Code Act* and regulations. Building permit fees were established to fully recover the Township's cost of providing building permit services, including an allocation of administrative overhead/indirect costs. Any surplus revenue from building permit fees is transferred to a reserve, to be drawn upon in years of declining building activity.

The Township's Building Surplus reserve balance from 2021 to 2024 is outlined below:

	2021	2022	2023	2024
Building Reserve	$601,700	$623,909	$972,604	662,979

The Building department ended 2024 with an operating deficit of $281K (2023 – surplus of $352K). This is calculated as actual revenues of $423K (2023 - $932K) less actual expenditures of $704K (2023 - $580K). The operating deficit of $281K was transferred from the Building Surplus Reserve.

Below is the operating surplus/deficit transferred to/from the Building Surplus Reserve from 2019 to 2024:

- 2019 – deficit of $110K transferred from the Building Surplus Reserve.
- 2020 – deficit of $51K transferred from the Building Surplus Reserve.
- 2021 – surplus of $81K transferred to the Building Surplus Reserve.
- 2022 – surplus of $39K transferred to the Building Surplus Reserve
- 2023 – surplus of $352K transferred to the Building Surplus Reserve
- 2024 – deficit of $281K transferred from the Building Surplus Reserve.

As outlined above, the surpluses transferred to the Building Surplus Reserve from 2019 to 2024 are greater by an amount of $30K in comparison to the deficits transferred from the Building Surplus Reserve. Essentially, the Building Surplus Reserve is doing exactly what it was intended for (ie. providing funds to pay for years where the current building permit fees are not recovering the current work).

Please note, the Township's Employment and Residential Land Study is expected to support increased residential and non-residential development. This growth will help boost building permit revenue and assist with increased transfers to the Building Surplus Reserve. The Township continues to monitor expected and actual revenues and will report back as required.

Based on the above, it is recommended that the fees in the Building department appendices be increased by the CPI inflation rate of 1.70% for cost recovery purposes similar to other departments.

Tent Permit Fees

The Township currently charges a tent permit fee of $251 (2025) and $255 (proposed for 2026). For the Fall Fair, the Township issues the permit to itself as the applicant given that the event takes place on Township property. While municipalities must comply with the *Building Code Act, 1992* and the *Building Code*, the Act does not require municipalities to pay building permit fees on their own properties. Building permit fees are intended to recover the reasonable costs of administering and enforcing the Act, rather than to generate revenue. As the Township does not incur recoverable costs when reviewing or inspecting permits for its own properties, the fee is not practically applicable in these circumstances. Staff recommend that the tent permit fee remain in place for external applicants but be waived where the Township is the applicant for its own properties.

Planning and Development

Application Reactivation

In the 2025 User Fees and Charges By-law the Application Reactivation Fee was identified as a flat fee, whereas it should have been labeled as an Administration fee. The reactivation fee was established for applications which are reactivated after being dormant for a period of two (2) years. An application is considered dormant when no additional submission material has been provided in respect to an application after a period of two (2) years. The fee recommended is for the cost recovery associated with this service. Third party fees associated with the review of the application by Township consultants will be subject to third party cost recovery.

The anticipated costs include the following:

- Township staff time involved in processing the application, facilitating the review and developing comment summaries.
- Planning Consultant costs for reviewing the application.
- Public Notification costs.

Preliminary Planning Consultation

It is recommended that the Preliminary Planning Consultation fee be increased to $500.00 to better reflect the actual costs incurred for the review of these applications. This process was established to replace the Township's previous mandatory pre-consultation process. The Preliminary Planning Consultation will offer applicants a high-level review of their preliminary

planning proposal from a planning policy perspective. The fee recommended is for the cost recovery associated with this service. To encourage applicants to apply for a subsequent related Comprehensive Development Consultation, the Preliminary Planning Consultation fee will be credited towards a subsequent related Comprehensive Development Consultation application.

The anticipated costs include the following:

- Township staff time involved in processing the application and facilitating the review.
- Consultant costs for reviewing the proposal.

Consultation – Subsequent Submissions

It is recommended that an administration fee of $100.00 plus third-party cost recovery be established for subsequent submissions of Preliminary Planning Consultation and Comprehensive Development Consultation. Staff have found that not all applicants are prepared to move forward to an application following the completion of their Preliminary Planning Consultation or their Comprehensive Development Consultation. Staff recommend that the administration fee and recovery of third-party fees be established for applicants to continue consulting with the Township prior to submitting a subsequent planning application if desired. These subsequent fees would not be credited toward subsequent related applications.

Zoning By-law Amendment – Aggregate

Staff are recommending that an explanatory note be added to the Township's User Fees and Charges By-law to clarify when the Zoning By-law Amendment – Aggregate fee applies as follows:

The Zoning By-law Amendment – Aggregate fee is appliable in the following circumstances:

1) *When a property is being proposed to be re-zoned to an extractive or seeking to amend or expand its existing extractive zoning*
2) *When a property is zoned extractive and is being proposed to be rezoned either on a temporary (including requests for renewals) or permanent basis (including applications to rezone to a non-extractive after-use)*

Staff are recommending this explanatory note be added due to the significant cost and staff resources required to review not only the applications where extractive uses are being proposed but also to amend existing extractive zones or application to rezone former aggregates sites for an after-use following ARA license surrender.

By-law

Refund of Site Alteration Permit/Application Fees

Staff are recommending that a refund of application fee be included under Schedule G to clarify how refunds will be processed. The proposed schedule is similar to the refund schedule established for Planning Act Applications:

> *Refund of Permit/Application Fees*
> *In the case of a withdrawal or abandonment of an application, staff shall determine the amount of paid fees that may be refunded to the applicant, if any, in accordance with the following:*
> *a.) 80 percent (80%) if administrative functions have only been performed;*
> *b.) 70 percent (70%) if administrative and internal review functions have only been performed;*
> *c.) 45 percent (45%) if administrative, internal review, and a completed application has been circulated with comments;*
> *d.) 35 percent (35%) if application has been sent for second submission and comments have been received;*
> *e.) no refund shall be made if the application has been approved by staff and/or Council*

Parks

Commemorative Bench and Tree Program

As outlined in the Township's Donation Policy passed on February 20, 2025 through Council Resolution No. 2025-054, the following fees have been incorporated into the proposed User Fees and Charges By-law:

- Bench - $2,500 (includes bench, installation, maintenance and commemorative plaque for a ten-year period); and
- Native Tree - $1,350 (includes tree, installation, maintenance and commemorative plaque for the tree's lifetime).

Puslinch Community Centre Grounds Service Levels

Staff are seeking Council's direction regarding the service level for the outdoor facilities at the Puslinch Community Centre Grounds (PCC) in Aberfoyle. Currently, these facilities are available for rental only during the operating hours of the Optimist Recreation Centre (ORC). This practice was established based on past rental trends, as the grounds have historically been underutilized during Friday and Saturday evenings. To reduce operating costs during these low-use periods, staff are not scheduled on-site, and indoor washrooms remain closed.

While staff have accommodated occasional outdoor rental requests during these times where practical, recent feedback has highlighted concerns regarding the lack of washroom access. The PCC grounds currently do not have portable washroom facilities. By comparison, at other Township outdoor facilities, renters are either provided with a key for washroom access or portable washrooms are available.

Therefore, staff are seeking Council direction to increase rental availability during identified times outside of ORC operating hours. There will continue to be no facilities staff scheduled and indoor facilities will remain closed to outdoor renters. Renters are encouraged to plan accordingly as access to a public washroom during this time will be limited to a portable toilet facility only. When the PCC or ORC is rented, access to indoor washrooms is restricted to the PCC or ORC rental group only. Individuals or groups who have rented an outdoor facility do not have access to the PCC or ORC, as it is not included in their rental agreement.

The rental of a portable washroom will require an $800.00 annual increase to the Parks operating budget.

Renters who wish to have additional permissions such as a food truck, bouncy castle, etc. on site as part of their event must submit a request in advance. If approved, they are expected to provide all required documentation prior to the event date. As well, when multiple rentals are scheduled at the PCC, ORC and the outdoor facilities, renters are notified in advance that parking and general activity levels may be busier than usual.

Recreation and Community Wellness Advisory Committee Recommendations

Through the benchmarking analysis completed by the Recreation and Community Wellness Advisory Committee it was found that comparator municipalities do not offer reduced rates for seniors' community events or seniors' recreation programming and that reduced rates for all other organizations (e.g. minor sports) range from 30% to 50% where offered. At the July 9, 2025 Council Meeting, Council directed staff to engage with community groups within the Township that are currently eligible for reduced rates in order to communicate the proposed amendments to the Township's User Fees and Charges By-law, to promote understanding of the rationale of the changes, and to seek their feedback regarding the impacts of the proposed amendment to their operations. Subsequently, a Reduced Rate Rationale and Eligibility Feedback Form was sent to the community groups, and their responses are included as Schedule B to this report.

Further, Council directed staff to analyze the labour costs the Township incurs through staffing a facility rental. The minimum facility rental period is one hour for all PCC, ORC, and Parks rentals, however the Township is required to schedule staff for a minimum of three hours in accordance with legislation. This results in additional wages and benefits costs ranging from $63.00 to $190.00. If rentals extend beyond three hours, the labour costs increase accordingly.

Considering the benchmarking analysis and the feedback received, staff recommend that the recommendations outlined in Report COR-2025-029 presented to Council at its July 9, 2025 Council Meeting and attached to this Report as Schedule C, be incorporated in the proposed User Fees and Charges By-law. This recommendation will better align the Township's services with comparator municipalities while maintaining its valued relationship with all Township community groups.

Financial Implications

The fees approved as part of the User Fees and Charges By-law will be incorporated in the 2026 Operating Budget.

Applicable Legislation and Requirements

Section 391(1) of the *Municipal Act*

Section 7(1) of the *Building Code Act*

Section 69 of the *Planning Act*

Engagement Opportunities

The Township will incorporate a number of engagement opportunities associated with the Proposed User Fees and Charges process as outlined below:

- Recreation and Community Wellness Advisory Committee Input
- Social Media Posts and/or Advertisements at:
  - Facebook.ca/TownshipofPuslinch
  - Twitter.com/TwpPuslinchON
  - Instagram.com/TownshipofPuslinch
- Township Website Banner and Budget Page at puslinch.ca/government/budget/
- Community Engagement Survey at EngagePuslinch.ca open from August 29, 2025 to September 24, 2025 at 12:00 p.m.
- Wellington Advertiser Advertisement
- Public Information Meeting on September 17, 2025 at 7:00 p.m.
- Media releases related to EngagePuslinch.ca survey.

Attachments

Schedule A: Proposed User Fees and Charges By-law

Schedule B: Reduced Rate Eligibility Feedback Received

Schedule C: Report COR-2025-029 - Recreation and Community Wellness Advisory Committee User Fees and Charges By-law Recommendations

Respectfully submitted:	Contributors:	Reviewed by:
Mary Hasan, Director of Finance/Treasurer	Mike Fowler, Director of Public Works, Parks, and Facilities Justine Brotherston, Director of Corporate Services/Municipal Clerk Jamie MacNeil, Fire Chief Andrew Hartholt, Chief Building Official Michelle Cassar, Deputy Treasurer Mehul Safiwala, Junior Planner Laura Emery, Communications and Committee Coordinator Sarah Huether, Manager of Corporate Services/Deputy Clerk	Courtenay Hoytfox, CAO

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NO 2025- XXX

A by-law to permit the Municipality to impose fees or charges with respect to services or activities provided, related costs payable, and for the use of its property, and to repeal By-law 067-2024.

WHEREAS Section 391(1) of the *Municipal Act, 2001, S.O. 2001, c. 25*, as amended, a municipality may pass By-laws imposing fees or charges for services or activities provided or done by or on behalf of it, for costs payable by it for services or activities provided or done by or on behalf of any other municipality or any local board, and for the use of its property including property under its control; and

WHEREAS Section 7(1) of the *Building Code Act, 1992, S.O. 1992, c. 23,* as amended, provides that a municipality may pass By-laws imposing fees and charges; and

WHEREAS Section 69 of the *Planning Act, R.S.O. 1990, c.P.13,* as amended provides that the Council of a municipality may by By-law establish a tariff of fees for the processing of applications made in respect of planning matters; and

WHEREAS The Council of the Corporation of the Township of Puslinch deems it appropriate to update the Township's User Fees and Charges By-law.

NOW THEREFORE the Council of the Corporation of the Township of Puslinch enacts as follows:

1. For the purpose of this By-law:

a.) **"Cost(s)"** means any and all disbursements incurred by the municipality, and includes, but is not restricted to, any registration costs, title search costs, corporate search costs, survey costs, reference plan costs, advertising costs, outside counsel fees, paralegal fees, site inspection costs and any applicable taxes;

b.) **"Fire Department"** means a fire department established by the Township of Puslinch in accordance with the provisions of the *Fire Protection and Prevention Act, 1997, S.O. 1997, c. 4* as amended;

c.) **"Fire Department Specific Response Fees"** means cost recovery fees for **fire department** attendance at a **property** for which the **property owner(s)** have **fire department** insurance coverage;

d.) **Indemnification Technology®** shall mean **fire department** incident reporting, data collection and **property** insurance policy wording interpretation to maximize billing opportunities on behalf of fire departments by invoicing insurance companies for costs of fire department attendance with respect to insured perils;

e.) **"Property"** means any real property located within the geographical boundaries of the Township of Puslinch. Real property includes buildings, contents and structures of any nature and kind in or upon such lands to which service is provided. Real property can also include **property** to which the **fire department** is under a service agreement to provide **fire department** response services, automatic aid or mutual aid.

f.) **"Property Owner(s)"** means the registered owner of **property** or any person, firm, corporation, partnership or society and their heirs, executors, administrators or other legal representatives, including a property manager, tenant, occupant, mortgagee in possession, receiver, manager, trustee or trustee in bankruptcy having control over or possession of the **property** or any portion thereof;

g.) **"Township"** means the Corporation of the Township of Puslinch.

2. The fees, costs and charges, as outlined in the schedules attached hereto and forming part of this By-law shall be automatically adjusted annually based on the Consumer Price Index for Ontario from May to May.

3. Any person requesting, applying or utilizing the services, applications or approvals listed in the attached schedules and forming part of this By-law shall pay the fees listed for that service, application or approval as set out in the attached schedules.

4. These fees, **costs**, and charges are applicable to residents and non-residents at the rates noted unless there is a specified exemption in the attached schedules.

5. No request by any person for a service, application or approval listed in the attached schedules shall be acknowledged or performed by the **Township** unless and until the person requesting the service, application or approval has paid the fees, **costs** or charges as set out in the attached schedules, unless noted otherwise.

6. All **Township** accounts and invoices are due and payable when rendered.

7. All unpaid fees, **costs** or charges imposed by this By-law on a person constitute a debt of the person to the **Township**.

8. The Treasurer shall add the fees, **costs** and charges imposed pursuant to this By-law to the tax roll for any **property** in the **Township** for which all of the **property owners** are responsible for paying the fees, **costs** and charges under this By-law and collect them in the same manner as municipal taxes in accordance with Section 398 of the *Municipal Act, 2001, S.O. 2001, c. 25* as amended.

9. If peer or legal review **costs** are incurred by the **Township** in the processing of an application or approval by the **Township**, the applicant is required to pay these **costs** to the **Township**. The following are the applications or approvals subject to peer or legal review **costs:**

    a. Agreements – Subdivision/Condominium
    b. Application Reactivation
    c. Consultation – Subsequent Submissions
    d. Garden Suites and Renewals (Zoning)
    e. Lifting of Holding Designation (Zoning)
    f. Part Lot Control Exemption By-law
    g. Radiocommunication Tower Pre-Consultation Fee
    h. Radiocommunication Tower Proposals
    i. Red Line Agreement Review
    j. Sign Refusal Appeal - Council Approval
    k. Sign Variance - Council Approval
    l. Sign Variance - Staff Approval
    m. Site Alteration Normal Farm Practices Waiver
    n. Site Alteration Permit Application Fee - Minor
    o. Site Alteration Permit Application Fee – Intermediate
    p. Site Alteration Permit Application Fee – Large
    q. Site Alteration Permit Application Fee - Major
    r. Third and Subsequent Submission
    s. Zoning By-law Amendment – Aggregate

10. The **Township** is not obligated to further process an application or approval until all outstanding third-party **costs**, fees and other disbursements have been paid by the applicant.

11. The fees, **costs** and charges listed in the schedules to this By-law shall, where applicable, be subject to any applicable provincial and federal taxes.

12. Any fee, **cost** or charge:

    a. authorized by a by-law or council resolution that comes into effect on the same or a later date than this By-law; or

b. included in a valid agreement entered into by the **Township** and one or more other parties,

shall be the approved and imposed fee, **cost** or charge for the service, activity or use of **property** specified.

13. The payment of any fee**, cost** or charge in this By-law shall be in Canadian currency.

14. The following Schedules form part of this By-law:

Schedule	Department
A	Administration
B	Finance
C	Public Works
D	Fire and Rescue Services
E	Building
F	Planning and Development
G	By-law
H	Parks
I	Optimist Recreation Centre
J	Puslinch Community Centre

15. The fees, **costs** and charges, as outlined in the schedules attached hereto and forming part of this By-law, shall be implemented and take effect on January 1, 2026.

Fire Department Specific Response Fees

16. The **property owner** shall be responsible for the payment of **fire department specific response fees** imposed by this By-law in accordance with Schedule D attached to this By-law.

17. The **Township** may use **Indemnification Technology®** to assess applicable insurance coverage for **fire department specific response fees**.

18. Where the **Township** believes and/or **Indemnification Technology®** indicates **fire department specific response fees** are applicable but the **property owner** does not have, in part or in full, insurance coverage for **fire department** charges for the **property**, the **Township** may adjust the **fire department specific response fees** to the extent of insurance coverage upon provision by the **property owner** of evidence, to the satisfaction of the **Township**, that no such insurance coverage exists or to demonstrate the limits of such coverage.

Cancellation Terms – Parks, Optimist Recreation Centre, Puslinch Community Centre

19. A refund of 80 percent will be provided where 30 days' notice of cancellation is given prior to the rental date for the following:

a. Puslinch Community Centre rentals.
b. Parks and Optimist Recreation Centre rentals of eight or more bookings.

20. A full refund will be provided where 72 hours or 3 days' notice of cancellation is given prior to the rental date for Parks rentals and Optimist Recreation Centre rentals.

Payment Terms – Parks, Optimist Recreation Centre, Puslinch Community Centre

21. One-Time Rentals - Payment is required within five business days of contract creation.

22. Recurring Rentals Throughout the Year - Payment is required on a quarterly basis. The first payment is required within five business days of contract creation. Future payments are required quarterly.

23. Recurring Seasonal Bookings - Payment is required in two instalments. The first payment is required within five business days of contract creation. The second payment is required halfway through the season.

Exemptions, Fee Waivers, Fee Reductions

24. Government organizations are exempt from the agreement fees imposed by this By-law.

25. The Optimist Club of Puslinch is exempt from the photocopy fees imposed by this By-law for **Township** Clean-up and Remembrance Day. The Aberfoyle Agricultural Society is exempt from the photocopy fees imposed by this By-law for the Fall Fair and the Junior Garden Club.

26. The following events are exempt from the rental fees imposed by this By-law:

    a. Fall Fair
    b. Santa Claus Parade
    c. Canada Day
    d. Family Day
    e. Remembrance Day

27. The Winter Classic Tournament held during the Family Day Long Weekend including events held on the statutory holiday are exempt from the payment of rental fees with the exception of part-time staffing **costs.**

28. The following requests are not eligible for a fee reduction or waiver:

    a. Religious services
    b. Licences, development charges, cash in lieu of parkland, planning fees, permits, inspections, insurance, personnel costs

29. Eligible organizations can obtain one complimentary two-hour room rental for one meeting during non-prime times in the Meeting Room.

30. Usage of **Township** property must comply with the **Township**'s requirements including but not limited to necessary insurance, permits and approvals within the required timelines.

31. Reduced rates are not offered during prime-time for facilities or parks that have a prime-time and non-prime time rate.

32. A 90% reduced rate shall apply to Seniors' Community Events that meet the eligibility criteria.

33. A 90% reduced rate shall apply to Whistle Stop Co-operative Pre-school and Guelph Community Health Centre (The Playgroup).

34. Seniors' Recreation Programs that meet the eligibility criteria shall receive a 70% reduced rate in 2026, and a 50% reduced rate in 2027 and onwards.

35. A 75% reduced rate shall apply to organizations that host community events and meet the eligibility criteria.

36. All other organizations that meet the eligibility criteria shall receive a 62.5% reduced rate in 2026, and a 50% reduced rate in 2027 and onwards.

Reduced Rate Eligibility Criteria

37. Organizations applying for a reduced rate must meet the following eligibility criteria:

a. Be in existence for at least one year; and
b. have its principal address in the **Township**; and
c. be a not-for-profit organization or an unincorporated community group; and
d. offer services that benefit the **Township** and its residents; and
e. be in good financial standing with the **Township** and not in litigation with the **Township**; and
f. be in compliance with any other **Township** by-laws and policies; and,

For the purposes of this By-law, Puslinch Minor Sports Organizations, Puslinch Religious Organizations, Guelph Community Health Centre (The Playgroup), YMCA/YWCA of Guelph, and the Aberfoyle Agricultural Society are deemed to meet the eligibility criteria.

38. For the purposes of this By-law, services that benefit the **Township** and its residents include:

a. Charitable community services
b. Artistic endeavours, including literature, dance, music, theatre, painting, sculpture, movies, photography and live performances
c. Specific cultural and heritage activities
d. Programs that improve the health and well-being of the community
e. Programs that encourage participation in organized athletic activities
f. Services or events directed for youth and older adults
g. Public safety enhancement services

39. The following organizations are not eligible for a reduced rate:

a. Adult sports organizations ie. Old Timers, Puslinch Kodiak's, Morriston Men's League, The Aberfoyle Dukes.
b. County, Provincial and Federal organizations.
c. Groups or organizations affiliated with any political party or event.
d. Individuals, commercial organizations, and coalitions such as ratepayer associations.
e. Hospitals, hospital foundations and hospital auxiliary groups or agencies.
f. Educational institutions including universities, colleges, schools and associated auxiliary groups.

40. The following information will be required to review an organization's eligibility:

a. A copy of the letters patent or articles of incorporation, if applicable.
b. A copy of its Notification of Charitable Registration letter from the Canada Revenue Agency with any supporting documentation indicating the organization's status and terms of registration, if applicable.
c. A copy of mandate, constitution and by-laws, as applicable.
d. A copy of the reporting as outlined in Paragraph 41 of this By-law.

41. In order to maintain the reduced rate eligibility status, the following information must be submitted annually electronically on the Township's website at www.puslinch.ca by 2:00 pm on the last business day of January or to the attention of the Corporate Services Department at the address noted below:

The Corporation of the Township of Puslinch
7404 Wellington Road 34
Puslinch, ON, N0B 2J0
Attention: Reduced Rate Eligibility Program

a. Number of resident and non-resident participants; and,
b. Financial reports for membership fees and/or donations collected for the programming/services including how the funds are used to support the program/service.

42. Should any part of this By-law including any part of the schedules, be determined by a Court of competent jurisdiction to be invalid or of no force and effect, such invalid part of the By-law shall be severable and that the remainder of this By-law

including the remainder of the Schedules, as applicable, shall continue to operate and to be in force and effect.

43. This By-law shall be known as the “User Fees and Charges By-law”.

44. That By-law No. 067-2024 is hereby repealed, effective January 1, 2026.

READ A FIRST, SECOND AND THIRD TIME AND FINALLY PASSED THIS 8th DAY OF OCTOBER 2025.

_____
James Seeley, Mayor

_____
Justine Brotherston, Municipal Clerk

SCHEDULE A: ADMINISTRATION REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Agreements - Major - Not Registered	Flat Fee	$603.00	$613.00	$0.00	$613.00	1.7%	E	For recovery of the costs of facilitating and preparing agreements, ie. a lease agreement on Township lands. See Report FIN-2024-024.
Agreements - Minor - Not Registered	Flat Fee	$300.00	$305.00	$0.00	$305.00	1.7%	E	For recovery of the costs of facilitating and preparing agreements, ie. miscellaneous agreements. See Report FIN-2024-024.
Agreements - Registered	Flat Fee	$1,480.00	$1,505.00	$0.00	$1,505.00	1.7%	E	For recovery of the costs of facilitating and preparing agreements, ie. an encroachment agreement or a conditional building permit. See Report FIN-2024-024.
Red Line Agreement Review *	Administration fee	$100.00	$101.00	$0.00	$101.00	1.0%	E	See Report FIN-2024-024
Title Search	Flat Fee	$175.00	$178.00	$0.00	$178.00	1.7%	E	See Report FIN-2024-024
Doors of Puslinch Poster	Per Poster	$10.00	$10.17	$1.32	$11.49	1.7%	T	See Report FIN-2024-028
Freedom of Information	Charged at the rate permitted per the legislation.						E	Regulated by Statute - See Report FIN-2017-024.
Logo Pins	Per Pin	$5.00	$5.09	$0.66	$5.75	1.7%	T	See Report FIN-2024-024
Routine Disclosure	Per Request	$5.00	$5.09	$0.00	$5.09	1.7%	E	Note 1
Signature of Commissioner	Per Document	$26.02	$26.46	$3.44	$29.90	1.7%	T	See Report FIN-2024-024
Third Party Cost Recovery	Actual costs incurred + $100.00 cumulative administration fee for all invoices						T	Material, equipment, labour/benefits, administration costs, third party consultant/specialist costs - See Report FIN-2020-034

* the fees denoted with an asterisk are also subject to the Township's disbursements and third party consultant fees including legal reviews incurred for the processing of the application.

Note 1: Routine Disclosure

Applies to records that may not be subject to the Municipal Freedom of Information and Protection of Privacy Act and may include but are not limited to the following types of record requests:
*building drawings, septic drawings, surveys, occupancy permits, Committee of Adjustment or Planning and Development Advisory Committee records, environmental records, site plan records, detailed financial records/invoices and Council records that are not available in a digital format (agendas and minutes) $5.00 per request including the first 15 minutes of search time; $7.50 shall be charged for each additional 15 minutes spent by Township staff to search for the records.

SCHEDULE B: FINANCE REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Online Service Fee	Total Transaction Amount	1.75 Percent	1.75 Percent			0.0%	E	In accordance with Visa and Mastercard merchant recommendations. See Report FIN-2022-029
Photocopying/Printing	Per Page	$0.32	$0.33	$0.04	$0.37	3.1%	T	This fee is exempt for Township Clean-up and Remembrance Day in accordance with Council Resolution No. 2017-363. This fee applies when more than ten (10) single-sided pages are requested. Any pages exceeding this allowance will be charged at the established per-page rate for black and white photocopying/printing.
Returned Cheque Fee	Per Returned Cheque	$45.00	$46.00	$0.00	$46.00	2.2%	E	For any cheques that do not clear the Township's bank account. See Report FIN-2024-024.
Tax Certificate	Per Certificate	$68.00	$69.00	$0.00	$69.00	1.5%	E	
Tax Sale Charges	Actual costs incurred						T	Cost recovery of fees and disbursements as charged by consultants and solicitors.
Third Party Cost Recovery	Actual costs incurred + $100.00 cumulative administration fee for all invoices						T	Material, equipment, labour/benefits, administration costs, third party consultant/specialist costs - See Report FIN-2022-029.
Tile Drainage Loan Application and Inspection Fee	Flat Fee	$241.00	$245.00	$0.00	$245.00	1.7%	E	See Report FIN-2018-028

SCHEDULE C: PUBLIC WORKS REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Entrance Permit - Commercial/Industrial	Flat Fee	$474.00	$482.00	$0.00	$482.00	1.7%	E	See Report FIN-2019-027 and By-law No. 2020-032
Entrance Permit - Farm	Flat Fee	$255.00	$259.00	$0.00	$259.00	1.6%	E	See By-law No. 2020-032
Entrance Permit - Field/Woodlot	Flat Fee	$237.00	$241.00	$0.00	$241.00	1.7%	E	See Report FIN-2019-027 and By-law No. 2020-032
Entrance Permit - Residential	Flat Fee	$284.00	$288.00	$0.00	$288.00	1.4%	E	See Report FIN-2019-027
Entrance Permit - Temporary	Flat Fee	$175.00	$178.00	$0.00	$178.00	1.7%	E	See By-law No. 2020-032
Entrance Permit Security Deposit	Security Deposit	$1,000.00	$1,000.00	$0.00	$1,000.00	0.0%	E	Deposit fully refundable upon completion of the entrance and pending no damages to the roadway. See Report FIN-2021-025
Haul Route Permit	Flat Fee	$119.00	$121.00	$0.00	$121.00	1.7%	E	See Report FIN-2024-024.
Haul Route Permit Security Deposit	Security Deposit	To be determined by the Designated Official.				0.0%	E	See Council Resolution No. 2024-314 from the September 25, 2024 Council Meeting.
Municipal Street Naming: Initial Application Review	All costs associated with any third party review, if required.						T	This fee is applicable to all Municipal Street Naming and Renaming requests in accordance with the Municipal Street Naming Policy - See Report FIN-2022-029.
Municipal Street Renaming: Application Notice Requirement	Flat Fee	$744.00	$757.00	$0.00	$757.00	1.7%	E	This fee is applicable to Municipal Street Renaming requests that comply with the naming standards in accordance with the Municipal Street Naming Policy - See Report FIN-2022-029.

SCHEDULE C: PUBLIC WORKS REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Municipal Street Renaming: Aid Distribution Per Residential Property (if opted in) on the Street Proposed to be Renamed	Flat Fee	$212.00	$215.00	$0.00	$215.00	1.4%	E	This fee is to be paid in full by the Requester for Municipal Street Renaming requests that comply with the naming standards - See Report FIN-2022-029. This fee is to be shared equally by the Township and the Requester for Municipal Street Renaming requests that do not comply with the naming standards - See Report FIN-2022-029.
Municipal Street Renaming: Aid Distribution Per Legal Business (if opted in) on the Street Proposed to be Renamed	Flat Fee	$530.00	$539.00	$0.00	$539.00	1.7%	E	This fee is to be paid in full by the Requester for Municipal Street Renaming requests that comply with the naming standards - See Report FIN-2022-029. This fee is to be shared equally by the Township and the Requester for Municipal Street Renaming requests that do not comply with the naming standards - See Report FIN-2022-029.
Municipal Street Renaming: Street Name Signage	Per Sign	$264.00	$268.00	$34.84	$302.84	1.5%	T	This fee is applicable to Municipal Street Renaming requests that comply with the naming standards in accordance with the Municipal Street Naming Policy - See Report FIN-2022-029.
Municipal Street Renaming: Street Name Signage Installation	Flat Fee	$106.00	$107.00	$13.91	$120.91	0.9%	T	This fee is applicable to Municipal Street Renaming requests that comply with the naming standards in accordance with the Municipal Street Naming Policy - See Report FIN-2022-029.

SCHEDULE C: PUBLIC WORKS REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Municipal Street Renaming: Private Streets	To a Maximum of	$530.00	$539.00	$0.00	$539.00	1.7%	E	Additional fees may be borne by the owner of a private street where the street re-naming requires the amendment of existing documents. Upon verification, the Township shall notify the requester of the additional fees and the Township and the requester shall each be responsible to pay 50% of the cost to a maximum of $1,000 total ($500 paid by the Township and $500 paid by the requester). Any amount exceeding $1000 shall be the responsibility of the private street owner.
Oversize-Overweight Load Permits	Per Trip	$119.00	$121.00	$0.00	$121.00	1.7%	E	
Third Party Cost Recovery	Actual costs incurred + $100.00 cumulative administration fee for all invoices						T	Material, equipment, labour/benefits, administration costs, third party consultant/specialist costs

SCHEDULE D: FIRE AND RESCUE SERVICES REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Burning Permit Violations or Unauthorized Open Air Burning	Note 1						E	Emergency responses to illegal burning or burning without a permit.
Daycare & Home Daycare Inspections	Per Inspection	$119.00	$121.00	$15.73	$136.73	1.7%	T	As mandated in the Fire Code.
Emergency Responses to Incidents such as Collisions/Fires/Hazardous Material Releases on Roadways	Note 1						E	Township residents are exempt from payment of fee for emergency responses where emergency occurs on a Township of Puslinch or County of Wellington Road.
Fire Alarm False Alarm Calls	Note 1						E	A false alarm call after the second false alarm in any calendar year.
Fire Department Specific Response Fees	Note 1 and Note 2						T	See Report FIR-2019-010
Fire Extinguisher Training	Per Person	$18.11	$18.42	$2.39	$20.81	1.7%	T	
Fire Safety Plan Review	Per Plan	$144.00	$146.00	$18.98	$164.98	1.4%	T	
Industrial/Commercial/Institutional/ Assembly/Apartment	Base Inspection	$119.00	$121.00	$15.73	$136.73	1.7%	T	Any inspections completed by the fire department that are new, complaint driven, requested or mandated.
Industrial/Commercial/Institutional/ Assembly/Apartment	Plus each tenant/occupant/ apartment unit	$30.00	$31.00	$4.03	$35.03	3.3%	T	Any inspections completed by the fire department that are new, complaint driven, requested or mandated.
Information or Fire Reports	Flat Fee	$113.00	$114.00	$0.00	$114.00	0.9%	E	Requested for emergency incidents or other fire related information. See Report FIN-2024-024.
Key Boxes	Per Box	$178.00	$181.00	$23.53	$204.53	1.7%	T	For rapid entry for firefighters. See Report FIN-2020-044.
Occupancy Load	Flat Fee	$119.00	$121.00	$0.00	$121.00	1.7%	E	
Open Air Burning Permit Inspection Fee	Per Inspection	$48.00	$75.00	$9.75	$84.75	56.3%	T	As a result of a request to modify the terms and conditions of the Open Air Burning Permit. See Report FIN-2025-024.
Open Air Burning Permit	Per Permit	$28.00	$29.00	$0.00	$29.00	3.6%	E	Permit must be renewed annually. See Report FIN-2023-030.
Post Fire Watch	Note 1						E	
Replacement of Equipment and Resources Used	Actual costs incurred						T	Materials used in emergency responses.
Sale of Fireworks Permit	Per Permit	$119.00	$121.00	$0.00	$121.00	1.7%	E	

SCHEDULE D: FIRE AND RESCUE SERVICES REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Setting Off or Discharge of High Hazard Fireworks Permit	Per Permit	$119.00	$121.00	$0.00	$121.00	1.7%	E	Fireworks By-law No. 039/14
Setting off or Discharge of Low Hazard Fireworks Exemption Waiver	Per Waiver	$119.00	$121.00	$0.00	$121.00	1.7%	E	See Report FIN-2024-024. Fireworks By-law No. 039/14
Third Party Cost Recovery	Actual costs incurred + $100.00 cumulative administration fee for all invoices						T	Material, equipment, labour/benefits, administration costs, third party consultant/specialist costs - See Report FIN-2022-029.
Water Tank Locks	Per Lock	$21.50	$21.87	$2.84	$24.71	1.7%	T	For locking water tank lids closed.
Special Events	No fee at this time							Requests for Attendance.
Authorized Requester Agreement - Search Fee	No fee at this time							Standard information product per record search fee - See Report FIN-2017-024.

Note 1: Standard Rate as approved by the Ministry of Transportation (MTO) adjusted
periodically in accordance with the consumer price index:
MTO rate in effect as of January 1, 2025: $570.50 Per Hour Per Truck and a Auxiliary Vehicle Rate of $285.25 (the lower auxiliary vehicle rate is applicable for Pumper 32 Truck)
MTO rate in effect as of January 1, 2026: Not released at time of by-law preparation.

Note 2: Fire Department Specific Response Fees
Fire department specific response fees shall be the total of:
a. Current MTO* rate per unit per hour or portion thereof for each unit
b. rate per person per hour or portion thereof for each firefighter
c. other costs including but not limited to: foam, metered water, and any other consumable supplies. Air tank re-filling, cleaning equipment, DSPA or similar type units, cost to replace damaged or destroyed equipment, specialized response costs from automatic/mutual aid agreements, fire protection agreements, water bomber drops, etc.

* The MTO rate per unit per hour is set by the Ministry of Transportation. This rate is adjusted periodically in accordance with the consumer price index.
Such fees shall be charged and calculated on the basis of each fire department vehicle attending, resources consumed in attendance to the property incident. The time shall be measured from the time of departure of each unit from the fire department's facilities to the time the unit is cleared for the next call out.

SCHEDULE E: BUILDING REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Minimum Permit Fee	Flat Fee	$186.00	$189.00	$0.00	$189.00	1.6%	E	For all work unless otherwise noted. See Report FIN-2024-024.
NEW BUILDING, ADDITIONS, MEZZANINES								
Group A & B: Assembly & Care and Detention Buildings								
Shell	Per Sq. Foot	$2.91	$2.96	$0.00	$2.96	1.7%	E	See Report FIN-2017-024
Finished	Per Sq. Foot	$3.25	$3.30	$0.00	$3.30	1.5%	E	See Report FIN-2017-024
Group C: Residential Buildings								
Houses, Townhouses, and Apartments	Per Sq. Foot	$2.32	$2.36	$0.00	$2.36	1.7%	E	
Manufactured Home	Per Sq. Foot	$1.75	$1.78	$0.00	$1.78	1.7%	E	
Garage/carport/shed/boathouse	Per Sq. Foot	$0.91	$0.92	$0.00	$0.92	1.1%	E	See Report FIN-2018-028
Deck, porch, dock	Flat Fee	$186.00	$189.00	$0.00	$189.00	1.6%	E	
Group D & E: Business and Personal Service and Mercantile Buildings								
Shell	Per Sq. Foot	$2.20	$2.23	$0.00	$2.23	1.4%	E	See Report FIN-2017-024
Finished	Per Sq. Foot	$2.59	$2.63	$0.00	$2.63	1.5%	E	See Report FIN-2017-024
Group F: Industrial Buildings								
Shell	Per Sq. Foot	$0.88	$0.89	$0.00	$0.89	1.1%	E	See Report FIN-2017-024
Finished	Per Sq. Foot	$1.13	$1.14	$0.00	$1.14	0.9%	E	See Report FIN-2017-024
Farm Buildings								
New Building	Per Sq. Foot	$0.37	$0.38	$0.00	$0.38	2.7%	E	See Report FIN-2017-024
INTERIOR FINISHES AND ALTERATIONS - ALL CLASSIFICATIONS								
Finishes to all areas	Per Sq. Foot	$0.61	$0.62	$0.00	$0.62	1.6%	E	
SEWAGE SYSTEMS								
New Installation	Flat Fee	$753.00	$766.00	$0.00	$766.00	1.7%	E	
Replacement or alteration	Flat Fee	$564.00	$573.00	$0.00	$573.00	1.6%	E	
ALTERNATIVE SOLUTIONS								
All buildings/systems within scope of Part 9	Flat Fee	$603.00	$613.00	$0.00	$613.00	1.7%	E	See Report FIN-2017-024
All buildings/systems within scope of Part 3	Flat Fee	$1,209.00	$1,229.00	$0.00	$1,229.00	1.7%	E	See Report FIN-2017-024
SPECIAL CATEGORIES AND MISCELLANEOUS								
Change of Use Permit (No Construction)	Flat Fee	$241.00	$245.00	$0.00	$245.00	1.7%	E	See Report FIN-2017-024
Construction prior to issuance of a permit	100% of permit fee						E	Fee is in addition to all other required permit fees.
Conditional Permits	20% of permit fee						E	Fee is in addition to all other required permit fees.

SCHEDULE E: BUILDING REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Demolition Permit	Flat Fee	$186.00	$189.00	$0.00	$189.00	1.6%	E	
Designated Structure Permit	Flat Fee	$501.00	$509.00	$0.00	$509.00	1.6%	E	Listed per Div.A, 1.3.1.1 Solar installation
Fireplace/Woodstove	Flat Fee	$186.00	$189.00	$0.00	$189.00	1.6%	E	
Inspection of works not ready	Flat Fee	$186.00	$189.00	$0.00	$189.00	1.6%	E	At the discretion of the Chief Building Official. Includes code violations and deficiencies.
Occupancy Permit	Flat Fee	$186.00	$189.00	$0.00	$189.00	1.6%	E	
Occupancy without an Occupancy Permit	Flat Fee	$300.00	$305.00	$0.00	$305.00	1.7%	E	At the discretion of the Chief Building Official. This fee is not imposed as it relates to the current initiative of closing old open building permits as approved by Council in the 2018 Budget.
Portables	Flat Fee	$241.00	$245.00	$0.00	$245.00	1.7%	E	
Reproduction of Digital Drawings	Per Page	$5.30	$5.39	$0.70	$6.09	1.7%	T	Current rate covers the cost for the digital reproduction of (1) digital copy of drawings - See Report FIN-2022-029.
Revision to Approved Plans	Flat Fee	$376.00	$382.00	$0.00	$382.00	1.6%	E	Before or after a permit is issued - significant changes to approved plans requiring further review. Minor revisions which result in no fee include eliminating a closet, finishing a three-piece bathroom, cosmetic changes, layout changes, removing non-load bearing walls, etc.
Sign Permits	Flat Fee	$313.00	$318.00	$0.00	$318.00	1.6%	E	With building permit
Storefront replacement	Flat Fee	$241.00	$245.00	$0.00	$245.00	1.7%	E	
Tents	Flat Fee	$251.00	$255.00	$0.00	$255.00	1.6%	E	Tents and air-supported structures shall be in conformance with the Building Code and Section 2.9 of the Fire Code. See Report FIN-2019-031
Third Party Cost Recovery	Actual costs incurred + $100.00 cumulative administration fee for all invoices						T	Material, equipment, labour/benefits, administration costs, third party consultant/specialist costs - See Report FIN-2020-034
Transfer of Permit	Flat Fee	$186.00	$189.00	$0.00	$189.00	1.6%	E	

INTERPRETATION

The following requirements are to be applied in the calculation of permit fees:

· Floor area of the proposed work is to be measured to the outer face of exterior walls and to the centre line of party walls or demising walls.
· Unfinished loft space, habitable attics, mezzanines and interior balconies are to be included in all floor area calculations.
· Unfinished basement space and attached residential garages are not included in floor area calculations.
· The occupancy categories in this Schedule correspond with the major occupancy classifications in the Ontario Building Code. For multiple occupancy floor areas, the permit fees for each of the applicable occupancy categories may be used.

SCHEDULE E: BUILDING REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS

· In the case of interior alterations or renovations, area of proposed work is the actual space receiving the work, e.g. tenant suite.
· For classes of permits not described in this Schedule, a reasonable permit fee shall be determined by the Chief Building Official.

SCHEDULE F: PLANNING AND DEVELOPMENT REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Additional Public Information Meeting	Flat Fee	$3,200.00	$3,254.00	$0.00	$3,254.00	1.7%	E	See Report FIN-2024-024.
Agreements - Minor - Not Registered	Flat Fee	$300.00	$305.00	$0.00	$305.00	1.7%	E	For recovery of the costs of facilitating and preparing agreements, ie. maintenance and operations agreement. See Report FIN-2024-024.
Agreements - Registered	Flat Fee	$2,261.00	$2,299.00	$0.00	$2,299.00	1.7%	E	For recovery of the costs of facilitating and preparing agreements, ie. planning act applications and building permit agreements (ie. permission to have a second dwelling while another is being built), etc. See Report FIN-2024-024.
Agreements - Subdivision/Condominium *	Administration fee	$2,261.00	$2,299.00	$0.00	$2,299.00	1.7%	E	For recovery of the costs of facilitating and preparing agreements and clearing conditions for approvals of Subdivision and Condominium Agreements. See Report FIN-2024-024.
Red Line Agreement Review *	Administration fee	$100.00	$101.00	$0.00	$101.00	1.0%	E	See Report FIN-2024-024
Title Search	Flat Fee	$175.00	$178.00	$0.00	$178.00	1.7%	E	See Report FIN-2024-024
Application Reactivation *	Administration Fee	$3,200.00	$3,254.00	$0.00	$3,254.00	1.7%	E	See Report FIN-2024-024.
Compliance Letter - Type 1	Flat Fee	$89.00	$90.00	$0.00	$90.00	1.1%	E	Note 3
Compliance Letter - Type 2	Flat Fee	$136.00	$138.00	$0.00	$138.00	1.5%	E	Note 4
Consent Review and Condition Clearance	Flat Fee	$160.00	$162.00	$0.00	$162.00	1.3%	E	
Consent Review and Condition Clearance - Safe Access Clearance	Flat Fee	$57.00	$58.00	$0.00	$58.00	1.8%	E	See Report FIN-2022-029
Garden Suites and Renewals (Zoning) *	Administration fee	$1,425.00	$1,449.00	$0.00	$1,449.00	1.7%	E	See Report FIN-2019-034
Lifting of Holding Designation (Zoning) *	Administration fee	$1,516.00	$1,542.00	$0.00	$1,542.00	1.7%	E	See Report FIN-2023-025
Minor Variance - Type 1	Flat Fee	$950.00	$966.00	$0.00	$966.00	1.7%	E	Note 1 and See Report FIN-2024-024.
Minor Variance - Type 2	Flat Fee	$1,612.00	$1,639.00	$0.00	$1,639.00	1.7%	E	Note 2 and See Report FIN-2024-024.
Ownership List Confirmation	Flat Fee	$81.00	$82.00	$0.00	$82.00	1.2%	E	See Report FIN-2019-027
Part Lot Control Exemption By-law *	Administration fee	$1,516.00	$1,542.00	$0.00	$1,542.00	1.7%	E	See Report FIN-2023-025
Permitted Use Letter	Flat Fee	$89.00	$90.00	$0.00	$90.00	1.1%	E	See Report FIN-2024-024

SCHEDULE F: PLANNING AND DEVELOPMENT REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Preliminary Planning Consultation	Flat Fee	$300.00	$500.00	$0.00	$500.00	66.7%	E	For recovery of the costs to review planning policy relating to preliminary planning proposals. This fee will be credited towards a subsequent related Comprehensive Development Consultation fee. See Report FIN-2025-024.
Comprehensive Development Consultation	Flat Fee	$5,000.00	$5,085.00	$0.00	$5,085.00	1.7%	E	For recovery of the costs to review and provide comments on a comprehensive development/planning proposal or application. This fee will be credited towards a subsequent related Planning Act Application. See Report FIN-2024-024.
Consultation - Subsequent Submissions*	Administration fee	N/A	$100.00	$0.00	$100.00	100.0%	E	See Report FIN-2025-024 - request for further consultation prior to application submission. This fee is not credited towards a subsequent related Planning Act Application.
Radiocommunication Tower Pre-Consultation Fee *	Administration fee	$1,079.00	$1,097.00	$0.00	$1,097.00	1.7%	E	See Report FIN-2024-024
Radiocommunication Tower Proposals *	Administration fee	$2,977.00	$3,028.00	$0.00	$3,028.00	1.7%	E	See Report FIN-2021-25 - Township administration fee and third party fee. Radiocommunication Tower and Antenna Protocol Policy
Site Plan Application and Agreement - New Application	Flat Fee	$24,952.00	$25,377.00	$0.00	$25,377.00	1.7%	E	See Report FIN-2024-024.
Site Plan Application and Agreement - Amendment Application	Flat Fee	$6,106.00	$6,210.00	$0.00	$6,210.00	1.7%	E	See Report FIN-2024-024.
Third and Subsequent Submission *	Administration fee	$200.00	$203.00	$0.00	$203.00	1.5%	E	See Report FIN-2024-024.
Third Party Cost Recovery	Actual costs incurred + $100.00 cumulative administration fee for all invoices						T	Material, equipment, labour/benefits, administration costs, third party consultant/specialist costs - See Report FIN-2020-034
Zoning By-Law Amendment - Aggregate *	Administration fee	$80,000.00	$81,360.00	$0.00	$81,360.00	1.7%	E	See Report FIN-2023-025 and Report FIN-2024-024.
Zoning By-Law Amendment	Flat Fee	$17,625.00	$17,925.00	$0.00	$17,925.00	1.7%	E	See Report FIN-2022-029, Report FIN-2023-025, and Report FIN-2024-024.

INTERPRETATION

SCHEDULE F: PLANNING AND DEVELOPMENT REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS

* the fees denoted with an asterisk are also subject to the Township's disbursements and third party consultant fees including legal reviews incurred for the processing of the application.

Note 1: Minor Variance - Type 1
Any minor variance application to permit any of the following on residential properties:

- Lot line setbacks for single family dwellings and accessory structures
- Height variances for single family dwellings and accessory structures
- Maximum size of accessory structure variances
- Maximum size of accessory unit variances

Note 2: Minor Variance - Type 2
All other minor variance applications not listed under Type 1.
Note 3: Compliance Letter - Type 1
Includes known building permit history and status as well as applicable zoning designation and permitted uses.
Note 4: Compliance Letter - Type 2 (Type 1 fee plus 50%)
Includes known building permit history and status as well as applicable zoning designation and permitted uses, the status of registered site plans and securities but does not include a title search.
Note 5: Zoning By-law Amendment Aggregate
The Zoning By-law Amendment – Aggregate fee is applicable in the following circumstances:
a.) When a property is being proposed to be re-zoned to an extractive or seeking to amend or expand its existing extractive zoning.
b.) When a property is zoned extractive and is being proposed to be rezoned either on a temporary (including requests for renewals) or permanent basis (including applications to rezone to a non-extractive after-use) .
Refund of Application Fees
In the case of a withdrawal or abandonment of an application, staff shall determine the amount of paid fees that may be refunded to the applicant, if any, in accordance with the following:
a.) 80 percent (80%) if administrative functions have only been performed;
b.) 70 percent (70%) if administrative and zoning functions have only been performed;
c.) 45 percent (45%) if administrative, zoning, and a completed application has been circulated with comments;
d.) 35 percent (35%) if application has been sent for second submission and comments have been received;
e.) no refund shall be made if the application has been approved by Committee and/or Council.

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
After Hours Response for Violation	Per Site Attendance	$350.00	$356.00	$0.00	$356.00	1.7%	E	See Report FIN-2024-024
Dog Tags	Per Tag	$35.00	$36.00	$0.00	$36.00	2.9%	E	No more than 3 dogs are permitted per dwelling unit, to a maximum of 5 dogs per property (only where a legal accessory apartment is permitted).
Replacement Dog Tag	Per Tag	$11.68	$11.88	$0.00	$11.88	1.7%	E	See Report FIN-2020-044
Fence Viewer's Application	Per Application	$362.00	$368.00	$0.00	$368.00	1.7%	E	
Filming Permit Fee	Flat Fee	$604.00	$614.00	$0.00	$614.00	1.7%	E	Filming of special events on Township lands/roads.
Filming Permit Security Deposit	Per Filming Permit - days 1 to 3	$5,000.00	$5,000.00	$0.00	$5,000.00	0.0%	E	For filming projects one (1) to three (3) days in duration - see Report FIN-2022-029 and Filming Policy No. 2022-005.
Filming Permit Security Deposit	Per Filming Permit - each subsequent day after day 3	$2,000.00	$2,000.00	$0.00	$2,000.00	0.0%	E	After three days of filming, an additional $2,000 will be required for each subsequent day. See Report FIN-2022-029 and Filming Policy No. 2022-005.
Kennel Licence - New Application	Per Application	$571.00	$580.00	$0.00	$580.00	1.6%	E	See By-law No. 024-2021
Kennel Licence - Renewal Application	Per Application	$228.00	$231.00	$0.00	$231.00	1.3%	E	See By-law No. 024-2021
Kennel Licence - Alteration Application	Per Application	$228.00	$231.00	$0.00	$231.00	1.3%	E	See Report FIN-2023-025
Kennel Licence - Retiring Application	Per Application	$85.00	$86.00	$0.00	$86.00	1.2%	E	See By-law No. 024-2021
Liquor License Letter	Per Inspection	$187.00	$190.00	$0.00	$190.00	1.6%	E	Requested or required inspection of licensed sales establishments (as defined by the Liquor Licence Establishment Board of Ontario) that requires an inspection and/or a letter.
Lottery Licence	3% of prize value						E	Fee regulated by AGCO (Nevada, Raffle, Bazaar, etc.).
Municipal Addressing Sign	Flat Fee	$24.54	$24.96	$3.24	$28.20	1.7%	T	
Municipal Addressing Post	Flat Fee	$24.54	$24.96	$3.24	$28.20	1.7%	T	
Property Standards Appeal Fee	Flat Fee	$308.00	$313.00	$0.00	$313.00	1.6%	E	See Report FIN-2019-031
Publicized Displays Application Fee	Flat Fee	$158.00	$160.00	$0.00	$160.00	1.3%	E	See Report FIN-2022-029 and Publicized Displays By-law No. 2022-008
Publicized Displays Appeal Fee	Flat Fee	$31.85	$32.39	$0.00	$32.39	1.7%	E	See Report FIN-2022-029 and Publicized Displays By-law No. 2022-008

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Reinspection Fee	Flat Fee Per Reinspection	$79.00	$80.00	$0.00	$80.00	1.3%	E	Not charged on first inspections (ie. the inspection to determine if a violation is occurring). Reinspection will be charged each subsequent time by-law attends the site to inspect and compliance has not been achieved (does not include inspections for the purpose of gathering further information). See Report FIN-2022-029.
Septic Compliance Letter	Flat Fee	$90.00	$98.00	$0.00	$98.00	8.9%	E	Fee charged is consistent for all Township departments. See Report FIN-2025-024.
Sign Permit - Temporary	Flat Fee	$113.00	$114.00	$0.00	$114.00	0.9%	E	See Sign By-law No. 2024-062.
Sign Refusal Appeal - Council Approval *	Administration Fee	$1,079.00	$1,097.00	$0.00	$1,097.00	1.7%	E	See Sign By-law No. 2024-062.
Sign Variance - Council Approval *	Administration Fee	$1,285.00	$1,307.00	$0.00	$1,307.00	1.7%	E	See Sign By-law No. 2024-062.
Sign Variance - Staff Approval *	Administration Fee	$206.00	$209.00	$0.00	$209.00	1.5%	E	See Sign By-law No. 2024-062.
Site Alteration Normal Farm Practices Waiver *	Administration Fee	Subject to recovery of all actual third party costs. May be required to provide a Security Deposit at the discretion of the Designated Official.					E	See Site Alteration By-law No. 2023-057.
Site Alteration Permit Application Fee - Minor *	Administration Fee	$1,030.00	$1,047.00	$0.00	$1,047.00	1.7%	E	Non-refundable and due at the application submission for the coordination and administration of an application. See Site Alteration By-law No. 2023-057.
Site Alteration Permit Security Deposit - Minor **	Security Deposit	$3,000.00	$3,000.00	$0.00	$3,000.00	0.0%	E	Due prior to permit issuance. See Site Alteration By-law No. 2023-057.
Site Alteration Permit Application Fee - Intermediate *	Administration Fee	$2,060.00	$2,095.00	$0.00	$2,095.00	1.7%	E	Non-refundable and due at the application submission for the coordination and administration of an application. See Site Alteration By-law No. 2023-057.
Site Alteration Permit Security Deposit - Intermediate **	Security Deposit	$5,000.00	$5,000.00	$0.00	$5,000.00	0.0%	E	Due prior to permit issuance. See Site Alteration By-law No. 2023-057.
Site Alteration Permit Application Fee - Large *	Administration Fee	$3,605.00	$3,666.00	$0.00	$3,666.00	1.7%	E	Non-refundable and due at the application submission for the coordination and administration of an application. See Site Alteration By-law No. 2023-057.
Site Alteration Permit Security Deposit - Large **	Security Deposit	$10,000.00	$10,000.00	$0.00	$10,000.00	0.0%	E	Due prior to permit issuance. See Site Alteration By-law No. 2023-057.

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Site Alteration Permit Application Fee - Major *	Administration Fee	$5,150.00	$5,237.00	$0.00	$5,237.00	1.7%	E	Non-refundable and due at the application submission for the coordination and administration of an application. See Site Alteration By-law No. 2023-057.
Site Alteration Permit Security Deposit - Major **	Security Deposit	To be determined by the Designated Official.				0.0%	E	Due prior to permit issuance. See Site Alteration By-law No. 2023-057.
Site Alteration Permit Service Fee	Per m^3	$0.24	$0.24	$0.00	$0.24	0.0%	E	Paid at time of application. See Site Alteration By-law No. 2023-057.
Violation Fees	The Township may recover its costs of remedying a violation of the Site Alteration By-law No. 2023-057 by invoicing the Owner, by instituting court proceedings or by adding the cost, including interest, to the tax roll, and the exercise of any other available remedy.						E	Double all application fees. See Site Alteration By-law No. 2023-057.
Inspector Attendance at a Property Due to Verified Violation	Per Site Attendance	$154.00	$156.00	$0.00	$156.00	1.3%	E	Per site attendance by the Inspector as a result of a verified violation. See Site Alteration By-law No. 2023-057.
Designated Official Meeting	Per Meeting	$450.00	$457.00	$0.00	$457.00	1.6%	E	Administration fee and cost recovery of third party consultant fees for attendance. See Report FIN-2024-024.
Site Alteration Permit Renewal Fee	Per Application	50% of the original application administration fee.					E	See Site Alteration By-law No. 2023-057.
Special Events Permit	Per Letter	$90.00	$91.00	$0.00	$91.00	1.1%	E	See Report FIN-2022-029
Swimming Pool Enclosure Permit	Flat Fee	$258.00	$262.00	$0.00	$262.00	1.6%	E	See Report FIN-2024-024.
Third Party Cost Recovery	Actual costs incurred + $100.00 cumulative administration fee for all invoices						T	Material, equipment, labour/benefits, administration costs, third party consultant/specialist costs - See Report FIN-2020-034

INTERPRETATION

* the fees denoted with an asterisk are also subject to the Township's disbursements and third party consultant fees including legal reviews incurred for the processing of the application.

** Security Deposit funds are held by the Township and will be returned to the applicant upon fulfilment of all Permit Conditions. This includes any costs incurred by the Township related to enforcement of the permit conditions or the Site Alteration By-law. If the funds are drawn upon, the applicant is required to top up the funds to the amount determined in Schedule "C" of the Site Alteration By-law No. 2023-057 or as determined by the Designated Official.

Refund of Permit/Application Fees

In the case of a withdrawal or abandonment of an application, staff shall determine the amount of paid fees that may be refunded to the applicant, if any, in accordance with the following:

a.) 80 percent (80%) if administrative functions have only been performed;

b.) 70 percent (70%) if administrative and internal review functions have only been performed;

c.) 45 percent (45%) if administrative, internal review, and a completed application has been circulated with comments;

d.) 35 percent (35%) if application has been sent for second submission and comments have been received;

e.) no refund shall be made if the application has been approved by staff and/or Council

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Ball Diamonds - No Lights - Non Resident Rental or Commercial Rental	Per Hour	N/A	$40.69	$5.29	$45.98	100.0%	T	See Report COR-2025-029
Ball Diamonds - No Lights	Per Hour	$32.00	$32.55	$4.23	$36.78	1.7%	T	See Report FIN-2024-024
62.5% Reduced Rate - Ball Diamonds - No Lights	Per Hour	N/A	$12.21	$1.59	$13.79	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Ball Diamonds - No Lights	Per Hour	N/A	$9.77	$1.27	$11.03	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Ball Diamonds - No Lights	Per Hour	$8.00	$8.14	$1.06	$9.20	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Ball Diamonds - No Lights	Per Hour	$3.20	$3.26	$0.42	$3.68	1.7%	T	See Report COR-2025-029
Ball Diamonds - Lights - Non Resident Rental or Commercial Rental	Per Hour	N/A	$48.13	$6.26	$54.38	100.0%	T	See Report COR-2025-029
Ball Diamonds - Lights	Per Hour	$37.85	$38.50	$5.01	$43.51	1.7%	T	
62.5% Reduced Rate - Ball Diamonds - Lights	Per Hour	N/A	$14.44	$1.88	$16.31	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Ball Diamonds - Lights	Per Hour	N/A	$11.55	$1.50	$13.05	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Ball Diamonds - Lights	Per Hour	$9.34	$9.63	$1.25	$10.88	3.1%	T	See Report COR-2025-029
90% Reduced Rate - Ball Diamonds - Lights	Per Hour	$3.78	$3.85	$0.50	$4.35	1.9%	T	See Report COR-2025-029
All Ball Diamonds - Non Resident Rental or Commercial Rental	Per Day	N/A	$240.65	$31.28	$271.93	100.0%	T	See Report COR-2025-029
All Ball Diamonds	Per Day	$189.30	$192.52	$25.03	$217.55	1.7%	T	
62.5% Reduced Rate - All Ball Diamonds	Per Day	N/A	$72.20	$9.39	$81.58	100.0%	T	See Report COR-2025-029
70% Reduced Rate - All Ball Diamonds	Per Day	N/A	$57.76	$7.51	$65.26	100.0%	T	See Report COR-2025-029
75% Reduced Rate - All Ball Diamonds	Per Day	$47.31	$48.13	$6.26	$54.39	1.7%	T	See Report COR-2025-029
90% Reduced Rate - All Ball Diamonds	Per Day	$18.95	$19.25	$2.50	$21.75	1.6%	T	See Report COR-2025-029
Ball Diamonds - Dragging - Non Resident Rental or Commercial Rental	Per Occurrence	N/A	$61.49	$7.99	$69.48	100.0%	T	See Report COR-2025-029
Ball Diamonds - Dragging	Per Occurrence	$48.36	$49.19	$6.39	$55.58	1.7%	T	
62.5% Reduced Rate - Ball Diamonds - Dragging	Per Occurrence	N/A	$18.45	$2.40	$20.84	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Ball Diamonds - Dragging	Per Occurrence	N/A	$14.76	$1.92	$16.68	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Ball Diamonds - Dragging	Per Occurrence	$12.08	$12.30	$1.60	$13.90	1.8%	T	See Report COR-2025-029
90% Reduced Rate - Ball Diamonds - Dragging	Per Occurrence	$4.83	$4.92	$0.64	$5.56	1.8%	T	See Report COR-2025-029
Soccer Field - No Lights - Non Resident Rental or Commercial Rental	Per Hour	N/A	$48.59	$6.32	$54.90	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
Soccer Field - No Lights	Per Hour	$32.12	$38.87	$5.05	$43.92	21.0%	T	See Report FIN-2017-012 and Report FIN-2025-024
62.5% Reduced Rate - Soccer Field - No Lights	Per Hour	N/A	$14.58	$1.89	$16.47	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
70% Reduced Rate - Soccer Field - No Lights	Per Hour	N/A	$11.66	$1.52	$13.18	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
75% Reduced Rate - Soccer Field - No Lights	Per Hour	$8.05	$9.72	$1.26	$10.98	20.7%	T	See Report COR-2025-029 and Report FIN-2025-024

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
90% Reduced Rate - Soccer Field - No Lights	Per Hour	$3.20	$3.89	$0.51	$4.39	21.5%	T	See Report COR-2025-029 and Report FIN-2025-024
Soccer Field - Lights - Non Resident Rental or Commercial Rental	Per Hour	N/A	$49.75	$6.47	$56.22	100.0%	T	See Report COR-2025-029
Soccer Field - Lights	Per Hour	$39.14	$39.80	$5.17	$44.97	1.7%	T	See Report FIN-2023-025
62.5% Reduced Rate - Soccer Field - Lights	Per Hour	N/A	$14.93	$1.94	$16.87	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Soccer Field - Lights	Per Hour	N/A	$11.94	$1.55	$13.49	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Soccer Field - Lights	Per Hour	$9.79	$9.95	$1.29	$11.24	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Soccer Field - Lights	Per Hour	$3.91	$3.98	$0.52	$4.50	1.7%	T	See Report COR-2025-029
Soccer Field - No Lights - Non Resident Rental or Commercial Rental	Per Day	N/A	$415.36	$54.00	$469.36	100.0%	T	See Report COR-2025-029
Soccer Field - No Lights	Per Day	$326.73	$332.29	$43.20	$375.49	1.7%	T	See Report FIN-2017-012
62.5% Reduced Rate - Soccer Field - No Lights	Per Day	N/A	$124.61	$16.20	$140.81	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Soccer Field - No Lights	Per Day	N/A	$99.69	$12.96	$112.65	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Soccer Field - No Lights	Per Day	$81.64	$83.07	$10.80	$93.87	1.8%	T	See Report COR-2025-029
90% Reduced Rate - Soccer Field - No Lights	Per Day	$32.69	$33.23	$4.32	$37.55	1.6%	T	See Report COR-2025-029
Soccer Field - Lights - Non Resident Rental or Commercial Rental	Per Day	N/A	$506.20	$65.81	$572.01	100.0%	T	See Report COR-2025-029
Soccer Field - Lights	Per Day	$398.19	$404.96	$52.64	$457.60	1.7%	T	See Report FIN-2023-025
62.5% Reduced Rate - Soccer Field - Lights	Per Day	N/A	$151.86	$19.74	$171.60	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Soccer Field - Lights	Per Day	N/A	$121.49	$15.79	$137.28	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Soccer Field - Lights	Per Day	$99.55	$101.24	$13.16	$114.40	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Soccer Field - Lights	Per Day	$39.82	$40.50	$5.26	$45.76	1.7%	T	See Report COR-2025-029
Ball Diamond Advertising	Per Season	$211.95	$215.56	$28.02	$243.58	1.7%	T	
62.5% Reduced Rate - Ball Diamond Advertising	Per Season	N/A	$80.84	$10.51	$91.34	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Ball Diamond Advertising	Per Season	N/A	$64.67	$8.41	$73.07	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Ball Diamond Advertising	Per Season	$52.92	$53.89	$7.01	$60.90	1.8%	T	See Report COR-2025-029
90% Reduced Rate - Ball Diamond Advertising	Per Season	$21.20	$21.56	$2.80	$24.36	1.7%	T	See Report COR-2025-029
Horse Paddock - Non Resident Rental or Commercial Rental	Per Day	N/A	$307.89	$40.03	$347.91	100.0%	T	See Report COR-2025-029
Horse Paddock	Per Day	$242.19	$246.31	$32.02	$278.33	1.7%	T	
62.5% Reduced Rate - Horse Paddock	Per Day	N/A	$92.37	$12.01	$104.37	100.0%	T	See Report COR-2025-029

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
70% Reduced Rate - Horse Paddock	Per Day	N/A	$73.89	$9.61	$83.50	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Horse Paddock	Per Day	$60.51	$61.58	$8.01	$69.58	1.8%	T	See Report COR-2025-029
90% Reduced Rate - Horse Paddock	Per Day	$24.23	$24.63	$3.20	$27.83	1.7%	T	See Report COR-2025-029
Picnic Shelter - Non Resident Rental or Commercial Rental	Per Hour	N/A	$30.76	$4.00	$34.76	100.0%	T	See Report COR-2025-029
Picnic Shelter	Per Hour	$24.19	$24.61	$3.20	$27.81	1.7%	T	
62.5% Reduced Rate - Picnic Shelter	Per Hour	N/A	$9.23	$1.20	$10.43	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Picnic Shelter	Per Hour	N/A	$7.38	$0.96	$8.34	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Picnic Shelter	Per Hour	$6.03	$6.13	$0.80	$6.93	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Picnic Shelter	Per Hour	$2.41	$2.45	$0.32	$2.77	1.7%	T	See Report COR-2025-029
Picnic Shelter - Non Resident Rental or Commercial Rental	Per Day	N/A	$123.08	$16.00	$139.07	100.0%	T	See Report COR-2025-029
Picnic Shelter	Per Day	$96.81	$98.46	$12.80	$111.26	1.7%	T	
62.5% Reduced Rate - Picnic Shelter	Per Day	N/A	$36.92	$4.80	$41.72	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Picnic Shelter	Per Day	N/A	$29.54	$3.84	$33.38	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Picnic Shelter	Per Day	$24.21	$24.62	$3.20	$27.81	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Picnic Shelter	Per Day	$9.67	$9.85	$1.28	$11.13	1.8%	T	See Report COR-2025-029
Tennis Courts - No Lights - Non Resident Rental or Commercial Rental	Per Hour	N/A	$29.11	$3.78	$32.90	100.0%	T	See Report COR-2025-029
Tennis Courts - No Lights	Per Hour	$22.90	$23.29	$3.03	$26.32	1.7%	T	See Report FIN-2021-025
62.5% Reduced Rate - Tennis Courts - No Lights	Per Hour	N/A	$8.73	$1.14	$9.87	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Tennis Courts - No Lights	Per Hour	N/A	$6.99	$0.91	$7.90	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Tennis Courts - No Lights	Per Hour	$5.71	$5.82	$0.76	$6.58	2.0%	T	See Report COR-2025-029
90% Reduced Rate - Tennis Courts - No Lights	Per Hour	$2.27	$2.33	$0.30	$2.63	2.6%	T	See Report COR-2025-029
Tennis Courts - Lights - Non Resident Rental or Commercial Rental	Per Hour	N/A	$43.69	$5.68	$49.37	100.0%	T	See Report COR-2025-029
Tennis Courts - Lights	Per Hour	$34.36	$34.95	$4.54	$39.49	1.7%	T	See Report FIN-2021-025
62.5% Reduced Rate - Tennis Courts - Lights	Per Hour	N/A	$13.11	$1.70	$14.81	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Tennis Courts - Lights	Per Hour	N/A	$10.49	$1.36	$11.85	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Tennis Courts - Lights	Per Hour	$8.59	$8.74	$1.14	$9.87	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Tennis Courts - Lights	Per Hour	$3.44	$3.50	$0.45	$3.95	1.7%	T	See Report COR-2025-029
Bench	Per Bench	$2,500.00	$2,500.00	$325.00	$2,825.00	0.0%	T	See Donation Policy No. 2025-001
Native Tree	Per Native Tree	$1,350.00	$1,350.00	$175.50	$1,525.50	0.0%	T	See Donation Policy No. 2025-001
Personnel Costs	Per Hour Per Personnel	Actual Costs Incurred					T	

SCHEDULE H: PARKS REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Fireworks Security Deposit	Per Display	$500.00	$500.00	$0.00	$500.00	0.0%	E	Clean up of Township lands after fireworks display.
Baseball Equipment and Lights Security Deposit	Per Season	$50.00	$50.00	$0.00	$50.00	0.0%	E	Lights key provided to ball diamond rentals with light use. Equipment key provided to renters with a minimum of eight rentals.
Picnic Shelter Washroom Key Security Deposit	Per Rental	$50.00	$50.00	$0.00	$50.00	0.0%	E	
Horse Paddock Security Deposit	Per Rental	$300.00	$300.00	$0.00	$300.00	0.0%	E	
INTERPRETATION								
· Booking availability of Township fields are dependent on field conditions.								
· Lights fees are effective after 8:30 p.m.								
· Ball Diamond dragging is upon request and approval - June 15, 2016 Special Council Meeting.								
· Ball Diamond Advertising is available from May to October								
· Horse Paddock rental is restricted to horse paddock and tractor pull area.								
· Personnel Costs are applicable for any additional staffing requirements for events at the discretion of the Director of Public Works, Parks and Facilities subject to operational demands and staff availability. See Report REC-2023-004 and Report FIN-2023-030.								
· Example of Commercial Rentals include Auctions, Sale of Merchandise - See Report FIN-2019-031								

SCHEDULE I: OPTIMIST RECREATION CENTRE REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Arena Floor - Non Resident Rental or Commercial Rental	Per Hour	N/A	$108.66	$14.13	$122.79	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
Arena Floor	Per Hour	$81.64	$86.93	$11.30	$98.23	6.5%	T	See Report FIN-2025-024
62.5% Reduced Rate - Arena Floor	Per Hour	N/A	$32.60	$4.24	$36.84	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
70% Reduced Rate - Arena Floor	Per Hour	N/A	$26.08	$3.39	$29.47	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
75% Reduced Rate - Arena Floor	Per Hour	$20.34	$21.73	$2.83	$24.56	6.8%	T	See Report COR-2025-029 and Report FIN-2025-024
90% Reduced Rate - Arena Floor	Per Hour	$8.16	$8.69	$1.13	$9.82	6.5%	T	See Report COR-2025-029 and Report FIN-2025-024
Ice - Non - Prime - Non Resident Rental or Commercial Rental	Per Hour	N/A	$86.56	$11.25	$97.82	100.0%	T	See Report COR-2025-029
Ice - Non - Prime	Per Hour	$68.09	$69.25	$9.00	$78.25	1.7%	T	
62.5% Reduced Rate - Ice - Non-Prime	Per Hour	N/A	$25.97	$3.38	$29.34	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Ice - Non-Prime	Per Hour	N/A	$20.78	$2.70	$23.48	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Ice - Non-Prime	Per Hour	$16.95	$17.31	$2.25	$19.56	2.1%	T	See Report COR-2025-029
90% Reduced Rate - Ice - Non-Prime	Per Hour	$6.80	$6.93	$0.90	$7.83	1.8%	T	See Report COR-2025-029
Ice - Prime - Non Resident Rental or Commercial Rental	Per Hour	N/A	$306.39	$39.83	$346.22	100.0%	T	See Report COR-2025-029
Ice - Prime	Per Hour	$241.02	$245.11	$31.86	$276.97	1.7%	T	See Report FIN-2023-030
Gymnasium - Non Resident Rental or Commercial Rental	Per Hour	N/A	$53.39	$6.94	$60.33	100.0%	T	See Report COR-2025-029
Gymnasium	Per Hour	$42.00	$42.71	$5.55	$48.26	1.7%	T	See Report FIN-2024-024
62.5% Reduced Rate - Gymnasium	Per Hour	N/A	$16.02	$2.08	$18.10	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Gymnasium	Per Hour	N/A	$12.81	$1.67	$14.48	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Gymnasium	Per Hour	$10.50	$10.68	$1.39	$12.07	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Gymnasium	Per Hour	$4.20	$4.27	$0.56	$4.83	1.7%	T	See Report COR-2025-029
Personnel Costs	Per Hour Per Personnel	Actual Costs Incurred					T	
Rink Board Advertising	Per Year	$423.88	$431.09	$56.04	$487.13	1.7%	T	

SCHEDULE I: OPTIMIST RECREATION CENTRE REVIEW OF MUNICIPAL RATES AND SERVICE CHARGES
EFFECTIVE 2026

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
62.5% Reduced Rate - Rink Board Advertising	Per Year	N/A	$161.66	$21.02	$182.67	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Rink Board Advertising	Per Year	N/A	$129.33	$16.81	$146.14	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Rink Board Advertising	Per Year	$105.93	$107.77	$14.01	$121.78	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Rink Board Advertising	Per Year	$42.40	$43.11	$5.60	$48.71	1.7%	T	See Report COR-2025-029

INTERPRETATION

· Ice - Non-Prime: Weekdays from 9:00 am to 5:00 pm

· Ice - Prime: Weekdays from 5:00 pm to 10:00 pm, Saturdays, Sundays

· Arena and Ice rentals include the use of the change rooms

· Personnel Costs are applicable for any additional staffing requirements for events at the discretion of the Director of Public Works, Parks and Facilities subject to operational demands and staff availability. See Report REC-2023-004 and Report FIN-2023-030.

· Example of Commercial Rentals include Auctions, Sale of Merchandise - See Report FIN-2019-031

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Meeting Room - Non Resident Rental or Commercial Rental	Per Hour	$39.43	$40.10	$5.21	$45.31	1.7%	T	
Meeting Room	Per Hour	$31.54	$32.08	$4.17	$36.25	1.7%	T	
62.5% Reduced Rate - Meeting Room	Per Hour	N/A	$12.03	$1.56	$13.59	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Meeting Room	Per Hour	N/A	$9.62	$1.25	$10.88	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Meeting Room	Per Hour	$7.82	$8.02	$1.04	$9.06	2.6%	T	See Report COR-2025-029
90% Reduced Rate - Meeting Room	Per Hour	$3.14	$3.21	$0.42	$3.63	2.2%	T	See Report COR-2025-029
Hall - Non-Prime - Non Resident Rental or Commercial Rental	Per Hour	$84.64	$94.09	$12.23	$106.32	11.2%	T	See Report FIN-2025-024
Hall - Non-Prime	Per Hour	$67.74	$75.27	$9.79	$85.06	11.1%	T	See Report FIN-2025-024
62.5% Reduced Rate - Hall - Non-Prime	Per Hour	N/A	$28.23	$3.67	$31.90	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
70% Reduced Rate - Hall - Non-Prime	Per Hour	N/A	$22.58	$2.94	$25.52	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
75% Reduced Rate - Hall - Non-Prime	Per Hour	$16.95	$18.82	$2.45	$21.26	11.0%	T	See Report COR-2025-029 and Report FIN-2025-024
90% Reduced Rate - Hall - Non-Prime	Per Hour	$6.77	$7.53	$0.98	$8.51	11.2%	T	See Report COR-2025-029 and Report FIN-2025-024
Hall - Non-Prime - Non Resident Rental or Commercial Rental	Full Day Rental	$575.64	$638.64	$83.02	$721.66	10.9%	T	See Report FIN-2025-024
Hall - Non-Prime	Full Day Rental	$460.54	$510.91	$66.42	$577.33	10.9%	T	See Report FIN-2025-024
62.5% Reduced Rate - Hall - Non-Prime	Full Day Rental	N/A	$191.59	$24.91	$216.50	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
70% Reduced Rate - Hall - Non-Prime	Full Day Rental	N/A	$153.27	$19.93	$173.20	100.0%	T	See Report COR-2025-029 and Report FIN-2025-024
75% Reduced Rate - Hall - Non-Prime	Full Day Rental	$115.16	$127.73	$16.60	$144.33	10.9%	T	See Report COR-2025-029 and Report FIN-2025-024
90% Reduced Rate - Hall - Non-Prime	Full Day Rental	$46.03	$51.09	$6.64	$57.73	11.0%	T	See Report COR-2025-029 and Report FIN-2025-024
Hall - Prime - Non Resident Rental or Commercial Rental	12 Hour Rental	$1,015.75	$1,033.02	$134.29	$1,167.31	1.7%	T	See Report FIN-2023-030 and Report FIN-2023-032.
Hall - Prime	12 Hour Rental	$604.05	$614.32	$79.86	$694.18	1.7%	T	See Report FIN-2023-032.
Hall - Prime - Non Resident Rental or Commercial Rental	Per Hour	$84.65	$86.13	$11.20	$97.32	1.7%	T	See Report FIN-2023-032 and Report FIN-2024-024.
Hall - Prime	Per Hour	$67.74	$68.90	$8.96	$77.86	1.7%	T	See Report FIN-2023-032.
Hall - Set-up Fee - Non Resident Rental or Commercial Rental	Per Hour	$84.65	$86.13	$11.20	$97.32	1.7%	T	
Hall - Set-up Fee	Per Hour	$67.74	$68.90	$8.96	$77.86	1.7%	T	
Use of Kitchen Facilities - Non Prime - Non Resident Rental or Commercial Rental	Per Hour	$48.41	$49.24	$6.40	$55.64	1.7%	T	
Use of Kitchen Facilities - Non Prime	Per Hour	$33.07	$33.64	$4.37	$38.01	1.7%	T	
62.5% Reduced Rate - Use of Kitchen Facilities - Non Prime	Per Hour	N/A	$12.62	$1.64	$14.25	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Use of Kitchen Facilities - Non Prime	Per Hour	N/A	$10.09	$1.31	$11.40	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Use of Kitchen Facilities - Non Prime	Per Hour	$8.27	$8.41	$1.09	$9.50	1.7%	T	See Report COR-2025-029
90% Reduced Rate - Use of Kitchen Facilities - Non Prime	Per Hour	$3.29	$3.36	$0.44	$3.80	2.2%	T	See Report COR-2025-029

TYPE OF REVENUE/USER	Unit/Descr	2025 RATE (NO TAX)	2026 RATE (NO TAX)	13% HST	RATE INCL HST	% CHANGE	HST STATUS	COMMENTS
Licenced Events - Fenced Outdoor Patio - Non Resident Rental or Commercial Rental	Flat Rate	$86.58	$88.05	$11.45	$99.50	1.7%	T	
Licenced Events - Fenced Outdoor Patio	Flat Rate	$69.26	$70.44	$9.16	$79.60	1.7%	T	
62.5% Reduced Rate - Licenced Events - Fenced Outdoor Patio	Flat Rate	N/A	$26.42	$3.43	$29.85	100.0%	T	See Report COR-2025-029
70% Reduced Rate - Licenced Events - Fenced Outdoor Patio	Flat Rate	N/A	$21.13	$2.75	$23.88	100.0%	T	See Report COR-2025-029
75% Reduced Rate - Licenced Events - Fenced Outdoor Patio	Flat Rate	$17.30	$17.61	$2.29	$19.90	1.8%	T	See Report COR-2025-029
90% Reduced Rate - Licenced Events - Fenced Outdoor Patio	Flat Rate	$6.92	$7.04	$0.92	$7.96	1.8%	T	See Report COR-2025-029
Personnel Costs	Per Hour Per Personnel	Actual Costs Incurred					T	
Facility Rental Security Deposit - Hall Rental Only or Hall and Meeting Room Rental	Per Booking	$1,500.00	$1,500.00	$0.00	$1,500.00	0.0%	E	See Report FIN-2022-029
Facility Rental Security Deposit - Meeting Room/Kitchen Facility Only	Per Booking	$365.00	$365.00	$0.00	$365.00	0.0%	E	See Report FIN-2022-029

INTERPRETATION

· An 8 hour booking is required for the Meeting Room if renting with a full day or 12 hour booking of the Hall.
· A minimum of a 3 hour booking required for all hourly Hall and Kitchen Facility rentals.
· Additional hours beyond the 12 hour full day rental maximum subject to availability.
· Hall rentals include the use of the kitchen facility (dishes, silverware, cooking utensils, dishwasher, coffee maker, etc. included).
· Hall - Non-Prime: Monday to Thursday and Sunday Rentals; Hall - Prime: Friday and Saturday
· If the outdoor patio has been included on the Special Occasion Permit or Caterer's Endorsement, Township Staff will fence the outdoor patio.
· The security deposit is fully refundable after the Event, provided there are no damages to the facility, the access key is returned, and all terms of the Township's Alcohol Risk Management policy, the Special Occasion Permit or Caterer's Endorsement, any Township agreements and all applicable federal, provincial and municipal laws, policies, guidelines, regulations and by-laws, including without limitation, the Liquor Licence and Control Act, 2019 are adhered to.
· The Hall - Set-up Fee - is after 5:00 p.m. on Friday only and must include a Saturday rental. This service is only available if the hall is not booked 7 days prior to the event date.
· Personnel Costs are applicable for any additional staffing requirements for events at the discretion of the Director of Public Works, Parks and Facilities subject to operational demands and staff availability. See Report REC-2023-004 and Report FIN-2023-030.
· Example of Commercial Rentals include Auctions, Sale of Merchandise - See Report FIN-2019-031.

From: Township of Puslinch
To: Laura Emery
Subject: New Entry: Reduced Rate Eligibility Feedback Form
Date: Friday, August 1, 2025 1:49:32 PM

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Community Group Name:

Puslinch Pickleball

How would these proposed changes to facility rental rates impact your community group's operations, if at all? Please share your thoughts below.

At the current rate we are being charged we do have a substantial buffer to allow us to cover the cost to replace nets and balls and allow us to contribute to the park eg. new windscreens for the tennis courts 2026. Going forward with the increase we will not have any excess funds as we try to keep the fees to play affordable for all. Our current financial success is due to the numbers in our membership along with the reduced rate. Once the courts are open in the new complex on Clair Rd we may lose some members which could have an impact on us financially. The answer below is "no" meaning currently.

Would the changes described above impact your group financially?

No

Is a two year phased in approach sufficient to assist with this transition?

Yes

Considering that operating costs are not fully funded by rental fees, do you have an alternative reduced rate that you would propose?

We feel the reduced rate for seniors should be a reduced rate of 70-75%. At a seniors stage of life a number are on reduced

incomes. It is important that seniors remain active and social. We need more seniors activities in the Township. Offering a reduced rate for Township senior residents may help this.

Is there any further information or comments you would like to share with Council.

We appreciate being able to participate in the survey and also the opportunity the Township has given us of building our club financially. Thank you.

Sent from Township of Puslinch

From: Township of Puslinch
To: Laura Emery
Subject: New Entry: Reduced Rate Eligibility Feedback Form
Date: Wednesday, August 6, 2025 4:35:14 PM

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Community Group Name:

Puslinch minor ball

How would these proposed changes to facility rental rates impact your community group's operations, if at all? Please share your thoughts below.

Puslinch minor ball is growing every year and with that comes more equipment purchases and uniforms. When rental fees are increased this eats into the money we have set aside for those purchases and then also for any donations we planned on giving out. We also provide subsidies for families who need it so that their children can participate in our programs. When fees increase the directly affects what we can offer up for subsidies.

Would the changes described above impact your group financially?

Yes

If yes, please explain below:

Any increase in fees would bite into our financials.
See above comment

Is a two year phased in approach sufficient to assist with this transition?

Yes

Considering that operating costs are not fully funded by rental fees, do you have an alternative reduced rate that you would propose?

Work at advertising in ball diamonds or hockey rink. When the advertising is affordable more companies will sponsor and bring in more money

Is there any further information or comments you would like to share with Council.

We understand everything is increasing, gas, minimum wage etc. so we know fees also have to increase. With that we need mention things like baseball bases and pitching plates would need to be replaced more often as they are being used by many groups.

Sent from Township of Puslinch

From: Township of Puslinch
To: Laura Emery
Subject: New Entry: Reduced Rate Eligibility Feedback Form
Date: Wednesday, August 6, 2025 2:40:24 PM

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Community Group Name:

Puslinch Minor Soccer Club

How would these proposed changes to facility rental rates impact your community group's operations, if at all? Please share your thoughts below.

Our association will stay the course with traditional rentals from the Puslinch Township and accept the increases. We are over capacity for the number of fields that the township has and already source out other facilities. We do not anticipate a change in our day-to-day operations as a result of this increase. It is what it is.

Would the changes described above impact your group financially?

Yes

If yes, please explain below:

We will need to increase our budget line for facilities/fields and will pass on the increase to our membership through an increase in player fees.

Is a two year phased in approach sufficient to assist with this transition?

Yes

Considering that operating costs are not fully funded by rental fees, do you have an alternative reduced rate that you would propose?

Not at this time

Is there any further information or comments you would like to share with Council.

Nothing with regards to this increase in rental costs.
Would like to advise that we are in desperate need of another 9v9 field though!

Sent from Township of Puslinch

From: Township of Puslinch
To: Laura Emery
Subject: New Entry: Reduced Rate Eligibility Feedback Form
Date: Friday, August 8, 2025 9:54:12 AM

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Community Group Name:

Friends of Mill Creek

How would these proposed changes to facility rental rates impact your community group's operations, if at all? Please share your thoughts below.

AS I do not see in table above the rate changes for the community centre rooms I will assume it will be a minimum impact

Would the changes described above impact your group financially?

No

Is a two year phased in approach sufficient to assist with this transition?

Yes

Considering that operating costs are not fully funded by rental fees, do you have an alternative reduced rate that you would propose?

No

Sent from Township of Puslinch

REPORT COR-2025-029

TO:	Mayor and Members of Council
PREPARED BY:	Laura Emery, Communications & Committee Coordinator Sarah Huether, Interim Manager of Corporate Services/Deputy Clerk
PRESENTED BY:	Laura Emery, Communications & Committee Coordinator
MEETING DATE:	July 9, 2025
SUBJECT:	Recreation and Community Wellness Advisory Committee User Fees and Charges By-law Recommendations

RECOMMENDATION

That Report COR-2025-029 entitled Recreation and Community Wellness Advisory Committee User Fees and Charges By-law Recommendations be received for information; and

That Council direct staff to seek feedback from community groups that are eligible for a reduced rate regarding potential impacts of the proposed amendments to the Township's User Fees and Charges By-law; and,

That Council direct staff to report back with the feedback received as part of the proposed 2026 User Fees and Charges By-law; and,

That Council direct staff to incorporate a non-resident rental surcharge of 25% to all Township facility non-resident rentals as part of the 2026 User Fees and Charges By-law.

Purpose

The purpose of this report is to provide Council with the recommendations from the Recreation and Community Wellness Advisory Committee with respect to reduced rates for eligible user groups and non-resident user fees and to seek Council's direction to engage with impacted community groups.

Background

Council at its September 24, 2024 meeting directed the Recreation and Community Wellness Advisory Committee to conduct an analysis of comparator and boundary municipalities regarding what they provide for reduced rates for eligible user groups, as well as reviewing the

annual financial and membership details for the Township's current eligible user groups. Subsequently, the Recreation and Community Wellness Advisory Committee at its meeting on June 17, 2025 resolved as follows:

Resolution No. 2025-018: Moved by Beth Charles and
Seconded by Joanna Jefferson

That Committee Memo MEMO-2025-001 entitled Reduced Rate Eligibility Analysis be received; and,

Whereas the reduced rate eligibility analysis was completed through researching the Township's comparator municipalities reduced rates without consultation with user groups that may be impacted by the proposed changes; and,

Therefore it be resolved,

That the Committee recommends that Council direct staff to separate Seniors' Events or Programs into Seniors' Recreation Programs and Seniors Events; and,

That the Committee recommends that Council direct staff to change the reduced rate from 90% to 50% for sports and recreation activities related to Seniors' Recreation Programs that meet the eligibility criteria; and,

That this reduction is phased in over a two-year period; and,

That the Committee recommends that Council direct staff to maintain the 90% reduced rate eligibility for Seniors Events; and,

That the Committee recommends that Council direct staff to change the reduced rate from 75% to 50% for sports and recreation activities related to organizations that meet the eligibility criteria; and,

That this reduction is phased in over a two-year period; and,

That engagement with the user groups take place prior to any reduction in reduced rates be decided.

CARRIED

Additionally, the Recreation and Community Wellness Advisory Committee was directed to conduct analysis of comparator and boundary municipalities regarding non-resident rental rates. Subsequently, the Recreation and Community Wellness Advisory Committee at its meeting on June 17, 2025 resolved as follows:

Resolution No. 2025-019: Moved by Margaret Hauwert and Seconded by Beth Charles

That Committee Memo MEMO-2025-002 entitled Resident and Non-Resident Analysis be received; and,

That the Committee recommends that Council implement a non-resident rental surcharge of 25% to all Township facility non-resident rentals as part of the 2026 User Fees and Charges By-law.

CARRIED

Comments

Seniors Reduced Rate Eligibility

The Recreation and Community Wellness Advisory Committee recommends subject to community feedback that Section 33 of the User Fees and Charges By-law be amended to state:

> "A 90% reduced rate shall apply to Seniors' Community Events that meet the eligibility criteria, and a 50% reduced rate shall apply to Seniors' Recreation Programs that meet the eligibility criteria".

During the Recreation and Community Wellness Advisory Committee's analysis of comparator and boundary municipalities it was found that reduced rates are not offered for any seniors' community events and recreation programming. However, the Committee acknowledges the importance in its mandate to support and foster the Township's senior community and recommends that a 50% reduced rate for seniors' events and programming still be offered for those eligible groups. The reduction in the reduced rate is to be phased in over a two-year period. This would result in a 70% reduced rate in 2026 and a 50% reduced rate in 2027, pending the organizations continue to meet the reduced rate eligibility requirements.

It is recommended that Senior Community Events continue to receive a 90% reduced rate as these events serve a vital role in enhancing the quality of life for our senior community. For example, a singular event such as senior's lunch-in hosted by a local Puslinch organization would qualify so long as the organization hosting the event met the eligibility criteria. The eligibility criteria will be further detailed with the annual user fees and charges by-law following engagement with community groups.

All Other Organizations Reduced Rate Eligibility

The Recreation and Community Wellness Advisory Committee recommends all other organizations that meet the 75% reduced rate eligibility criteria should be reduced to 50%, phased in over a two-year period. This would result in a 62.5% reduced rate in 2026 and a 50% reduced rate in 2027, pending the organizations continue to meet the reduced rate eligibility requirements. This recommendation is supported by the comparator and boundary municipality analysis that found that the Township offers the most generous reduced rate programs, while comparators provide a between a 30% to 50% discount for eligible user groups. Schedule "A" provides the analysis completed by the Reduced Rate Eligibility Analysis Sub-committee.

The recommendations made by the Recreation and Community Wellness Advisory Committee do not apply to those user groups who host large community events through their endeavours (ex. Optimist Club of Puslinch and the Aberfoyle Agricultural Society). Therefore, these groups would maintain their 75% reduced rate.

Using the 2025 User Fees and Charges By-law fees, the below chart provides a comparison of facility rental rates and the recommended reduced rental rates for Council's reference.

Facility	No Reduced Rate	50% Reduced Rate	75% Reduced Rate	90% Reduced Rate
ORC Gymnasium	$53.48	$26.74	$13.37	$5.35
Baseball Diamond (No Lights)	$32.00	$16.00	$8.00	$3.20
Soccer Field (No Lights)	$32.12	$16.06	$8.05	$3.20
Tennis Courts (No Lights)	$22.90	$11.45	$5.71	$2.27
PCC Hall (Resident rate, non-prime time)	$67.74	$33.87	$16.95	$6.77

Non-Resident Rental Rates

Through the Recreation and Community Wellness Advisory analysis, it is recommended that the 2026 User Fees and Charges By-law be updated to include a non-resident rental surcharge of 25% for all Township facilities, rented by non-Puslinch residents. This recommendation is supported by the comparator and boundary municipality analysis as most comparators include

a non-resident user fee in their User Fees and Charges By-law. Schedule "B" provides a complete analysis completed by the Resident and Non-Resident Rate Recreation and Community Wellness Advisory Committee Sub-committee.

Using the 2025 User Fees and Charges By-law fees, the below chart provides a comparison of the 2024 facility user fees and the fee for with a 25% surcharge:

Facility	User Fee	25% Surcharge Non-resident User Fee
ORC Gymnasium	$53.48	$66.85
Baseball Diamond (No Lights)	$32.00	$40.00
Soccer Field (No Lights)	$32.12	$40.15
Tennis Courts (No Lights)	$22.90	$38.63
PCC Hall (Resident rate, non-prime time)	$67.74	$84.64 (currently implemented)
Ice Rink (Prime)	$241.02	$301.28

Financial Implications

As detailed throughout the report.

Applicable Legislation and Requirements

Section 391 (1) of the Municipal Act

Engagement Opportunities

There is an opportunity for specific engagement to the affected user groups who's reduced rate may be impacted by these recommendations.

Attachments

Schedule A – MEMO-2025-001 Reduced Rate Eligibility Sub-committee Memo
Schedule B – MEMO-2025-002 Resident and Non-Resident Rate Analysis

Respectfully submitted,

Laura Emery,
Communications & Committee Coordinator

Reviewed by:

Justine Brotherson,
Interim Director of Corporate Services/Municipal Clerk

COMMITTEE MEMO

TO:	Recreation and Community Wellness Advisory Committee
FROM:	Reduced Rate Eligibility Sub-Committee Members Stephanie McCrone & Jessica Goyda
MEETING DATE:	June 17, 2025
SUBJECT:	Reduced Rate Eligibility Analysis

Recommendation

That Committee Memo MEMO-2025-001 entitled Reduced Rate Eligibility Analysis be received; and,

Whereas the reduced rate eligibility analysis was completed through researching the Township's comparator municipalities reduced rates without consultation with user groups that may be impacted by the proposed changes; and,

Therefore it be resolved,

That the Committee recommends that Council direct staff to change the reduced rate from 90% to ___% for sports and recreation activities related to Seniors' Events and Programs that meet the eligibility criteria; and,

That this reduction is completed over a two-year period; and,

That the Committee recommends that Council change Section 29 of the User Fees and Charges By-law to increase the duration or frequency of one complimentary two-hour room rental for one meeting during non-prime times in the Meeting Room to a ___- hour room rental and/or ___ complimentary two-hour room rental(s) for ___ meeting(s) during non-prime times in the Meeting Room.

Purpose

The purpose of this Committee Memo is to inform the Recreation and Community Wellness Advisory Committee on the findings of comparator and boundary municipalities reduced rental rates for prescribed community groups as well as the reduced rate eligibility criteria.

Comments

Based on the information collected from comparator and boundary municipalities, an overall summary is listed below.

Eligibility Criteria Comparison

Whereas the Township has eligibility requirements for reduced rates included within the Use Fees and Charges By-law, this is not the case in any of the other comparator municipalities. Wellington North is in the process of putting a policy in place for reduced rates, however, at the time of writing this report, there is no policy. Although, the sub-committee believes there may be adjustments required to the eligibility requirements for the Township of Puslinch. It is recommended that it is good practice to keep the eligibility requirements included in the User Fees and Charges By-law and have the eligibility criteria submitted to Township staff on an annual basis to ensure clear and transparent expectations to the public.

Some of the comparator and boundary municipalities do include language in their User Fees and Charges By-laws as it relates to providing reduced rates for minor sports groups. For instance – Centre Wellington, who does provide a discount of 30% for sports facilities requires that 80% of their membership resides in Township of Centre Wellington and 100% of the users are youth (under the age of 18).

Rate Comparisons for Sports Facilities, Halls and Boardrooms and Pre-School

Sports Facilities – Youth Minor Sports and Seniors

- Puslinch offers one of the most generous reduced rental rates among the comparator and boundary municipalities as it relates to sports facilities.

Puslinch Rate Reductions Available

- 75% discount for eligible organizations.
- 90% discount for Seniors' Events or Programs that meet criteria.

Comparator Municipalities vary significantly in how reduced rates are applied to sports facilities. The chart below provides a high-level overview which can be viewed in greater detail in the attached Schedule A.

Municipality	Ice Rental Discount (Minor Sports)	Fields/Diamonds Discount (Minor Sports)	Other Youth Sport Discounts	Seniors Discount on Sports Facility Rental
Cambridge	40%	Not specified	Not specified	None
Centre Wellington	30%	30%	30% on floor sports	None
Erin	15%	None or youth > adult	None	None

Guelph	45% subsidy	45% subsidy	Pools, gyms: 45%	None
Guelph Eramosa	None	None	35% for school field trips	None
Hamilton	43% (subsidized groups)	50% youth affiliated	Gyms: 50% subsidized	None
Mapleton	17%	$15.50/participant /year	$15.50/participant/year	None
Minto	18%	Annual fee/participant	Arena, Ball, Soccer: per participant	None
Milton	No info	50% youth (fields), 25% (beach vball)	None	None
Wellington North	25%	20–40% (local minor orgs)	25% for arena floor sports	None

Based on the information gathered from comparator and boundary municipalities, here are some key points.

- Puslinch's 75–90% discounts for eligible groups including youth sports and seniors are exceptional relative to comparator municipalities.
- Most other comparator municipalities provide 30–50% discounts for youth/minor sports.
- Seniors' discounts are rare or unspecified in most comparator municipalities.
- Some comparator municipalities use a flat annual fee (e.g., Mapleton, Minto), while Puslinch uses a percentage-based discount.

Currently, seniors receive a 90% discount on facility rentals, while local youth sports organizations receive a 75% reduction. These rates are significantly more generous than those offered by comparator and boundary municipalities. In the interest of equity, any adjustments to these discounts should ensure consistent treatment across all eligible groups.

Offering reduced rental rates to external program providers remains an effective tool to ensure residents continue to benefit from accessible and diverse recreational opportunities. However, the existing discount structure is more generous than that of comparator municipalities. Moderately adjusting the discount rates would help ensure that the Township can continue to support community programming while managing fiscal responsibilities. It is important that any changes be implemented in a manner that maintains incentives for private and non-profit organizations to offer services locally. Changes and modification to discount rates need to consider the right balance between keeping things affordable for program providers and making sure the Township can cover its costs in a sustainable way.

Notably, Puslinch is the only municipality among its comparators where senior groups are currently eligible for a reduced rate for sports facility rentals. The Township may wish to review and potentially revise the eligibility criteria for senior discounts to better reflect regional practices.

Through the sub-committee's findings and analysis, it is recommended that a gradual reduction of facility rental discounts be implemented for sports facilities for both youth and seniors, in order to be more in line with comparator and boundary municipalities. Aligning Puslinch's discount rates with those of comparator municipalities would help maintain accessibility while improving cost recovery. A revised, uniform discount structure would promote fairness among all eligible groups.

To minimize the impact on affected groups and provide time for financial planning, it is further recommended that the Township implement a phased approach over two years. This will help maintain affordability in the short term while gradually aligning Puslinch with the practices of member municipalities and supporting the long-term sustainability of recreational services.

Community Groups – Halls and Boardrooms

The Township of Puslinch provides for one complimentary 2-hour meeting per year for eligible groups. Eligible groups are those that provide services benefiting the Township and its residents.

Compared to our comparator municipalities, in some cases, Puslinch's policy is more limited in terms of the frequency and duration of complimentary facility use. For example:

- In Centre Wellington, a community group located within the Township and already a regular facility renter can use the meeting room(s) at no charge.
- A Centre Wellington community group located within the Township, even if not a regular facility renter, can access a meeting room for 2 hours per month at no charge (e.g., Food Bank, Lions Club).
- In Wellington North, local user groups identified as providing benefit to the community at large receive one meeting per month at no cost.

The sub-committee recommends that staff consider increasing the duration or frequency of complimentary or discounted meeting space use during non-prime times for eligible groups. This would better align with comparable municipalities and further support organizations that contribute to community well-being.

Additionally, the following community events are exempt from the rental fees in the User Fees and Charges By-law:

- Fall Fair
- Santa Claus Parade
- Canada Day and Family Day
- Remembrance Day

- The Winter Classic Tournament held during the Family Day Long Weekend including events held on the statutory holiday are exempt from the payment of rental fees with the exception of part-time staffing costs

Although data from comparator municipalities is limited, the Township appears to offer a more generous exemption for community special events. This approach supports the community's most valued traditions while remaining fiscally responsible and equitable. The exemptions currently in place for the special events listed above are key parts of Puslinch's community calendar. They help bring people together, build local pride, and get all ages involved. By continuing to support them, the Township shows it values these traditions and wants to keep the community engaged. Therefore, it is recommended that the current policy for special events exemptions be maintained.

Pre-School

The Township currently provides a significant facility rental reduction to Whistlestop Co-operative Pre-School, a provider of early childhood education and care in the community. Although research indicates that comparator municipalities generally do not offer similar rental discounts to preschools, these municipalities benefit from a broader range of both public and private early learning options, which reduces the necessity for direct municipal support. In contrast, Puslinch lacks comparable alternatives, placing greater importance on the continued operation of Whistlestop. It is recommended that any future changes to the rental reduction should consider the lack of alternatives in the Township and the potential impact on families.

Summary

In summary, the analysis conducted by the Reduced Rate Eligibility sub-committee provides important insights into the Township of Puslinch's facility rental discounts and eligibility criteria.

The Township of Puslinch currently offers some of the most generous rental discounts in the region, including a 75% reduction for eligible youth sports organizations and a 90% reduction for senior groups. These rates exceed those of comparator municipalities, where youth sport discounts generally range between 30–50%, and senior discounts are largely absent. Puslinch is also unique in embedding its eligibility criteria within its User Fees and Charges By-law, which enhances transparency and accountability.

Although this level of support enhances access to recreational opportunities—particularly for youth and seniors—it also presents challenges in terms of long-term financial sustainability. As such, the report recommends a gradual two-year phase-in of revised, more moderate discount rates. This would bring Puslinch closer in line with regional practices while maintaining accessibility and minimizing disruption to community programming.

In terms of meeting spaces, Puslinch currently offers one complimentary 2-hour meeting per year for eligible community groups, which is more limited compared to other municipalities.

Increasing the frequency or duration of complimentary use, particularly during non-prime hours, would better support local organizations and align with neighbouring policies.

The Township also exempts several key community events—such as Canada Day, the Santa Claus Parade, and the Winter Classic—from rental fees. These exemptions reflect strong community values and traditions, and it is recommended these exemptions remain in place.

Lastly, the Township's support for the Whistlestop Co-operative Pre-School stands out as unique among its comparators, which generally do not provide rental discounts to preschool programs. Given the limited availability of early childhood education providers in Puslinch, any future adjustments to this support should carefully consider the potential impact on local families.

Overall, the recommendations aim to strike a balance between community support and fiscal responsibility, ensuring sustainable, fair, and accessible use of Township facilities.

Financial Implications

Potential Increases and Decreases in Facility Rental Income based on the information provided throughout this report.

Attachments

Schedule A – Comparator and Boundary Municipality Reduced User Fees and Eligibility Review

Schedule A
Comparator and Boundary Municipality Reduced User Fees and Eligibility Review

Sports Facilities

City of Cambridge

- Ice Rental – 40% off for Minor Sports. (local only or all organizations/clubs)

Township of Centre Wellington

- Minor Sport Group-defined as 80% of their membership resides in Township of Centre Wellington and 100% of the users are youth (under the age of 18)
- Ice Rental - 30% Discount off hourly rental rate for Minor Sports Organizations
- (Gymnasium)Floor Sports - 30% Discount off hourly rental rate for Minor Sports Organizations
- Fields and Baseball Diamonds 30% Discount off hourly rental for Minor Sports

Town of Erin

- Ice Rental – 15% discount off hourly rental rates for minor sports (Local?)
- Baseball Diamonds – Youth League games are more per hour than Adult League games
- Soccer Fields – no discount

City of Guelph

City of Guelph has a 45% subsidy for all youth organizations/sports group. This applies to Ice, , Gymnasiums, Sport Fields & Baseball Diamonds. Subsidy does not apply to non prime time rates.

Township of Guelph/Eramosa

- Royal Distributing Athletic Performance Centre – 35% Discount for indoor field rental for publicly funded school field trips
- No Discount for Seniors or Youth Organizations

City of Hamilton –

- Ice Rental – 43% discount for subsidized groups (information on what qualifies as subsidized group not available)
- Sports Fields and Baseball Diamonds – 50% discount for youth affiliated rental

- Gymnasiums - 50% discount for subsidized groups (information on what qualifies as subsidized group not available)

Township of Mapleton

- Ice Rental - 17% Discount off hourly rental rate for Minor Sports Organizations
- Baseball Diamonds – Annual Fee of $15.50 per registrant in Mapleton Minor Baseball – based on honours system for organization to report accurate registration numbers. Otherwise, diamonds are rented for $42.50/game
- Soccer Field - Annual Fee of $15.50 per registrant in Mapleton Minor Soccer – based on honours system for organization to report accurate registration numbers. Otherwise, fields are rented for $25.50/game

Town of Minto

- Ice Rental - 18% Discount off hourly rental rate for Minor Sports Organizations
- Arena Floor Sports (Non-ice use for Lacrosse, Floor Hockey) , Sports Fields and Baseball Diamonds - Minor Sports group pay an annual fee per participant based on an honours system.
  Arena Floor Sports (Lacrosse/Floor Hockey) - $44.25/participant/season
  Minor Baseball - $39.82/participant/season
  Minor Soccer - $39.82/participant/season

City of Milton

- Ice Rental – No Information Available (local?)
- Baseball Diamonds, Sports Fields, Cricket Pitch - Youth affiliated rate of 50% discount
- Beach Volleyball - Youth affiliated rate of 25% discount

Township of Wellington North

- Ice Rental - 25% Discount off hourly rental rate for Minor Sports Organizations (local?)
- Arena Floor Sports (Non-ice use for Lacrosse, Floor Hockey) - 25% Discount off hourly rental rate for Minor Sports Organizations
- Baseball Diamonds – 20% Discount for Local Minor Sports Organizations (no lights) for games and 40% Discount for Local Minor Sports Practice
- Soccer Fields – Minor Soccer pays a seasonal flat rate of $7250.00

Community Groups and Halls and Boardrooms

City of Cambridge

No Information Available

Township of Centre Wellington

- Community Group (user-group): located within the Township of Centre Wellington and is a regular facility rental can use the meeting room(s) at no charge
- Community Group (non-user group): located within the TWP, not a facility renter, can use a meeting room for 2 hours per month at NO Charge. (ie. Food Bank, Lions Club, etc.)
- Canadian Blood Services-receives an approx. 75% discount on community hall day reservations
- Special Events-an event that requires outdoor grounds as well as indoor hall and/or floor space for two or more consecutive days receive a 15% discount

Town of Erin

- Meeting Rooms for Not for Profit receive a 20% discount

City of Guelph

- 40% discount for registered non profit groups.
- 15% surcharge for commercial and non-residents

Township of Guelph/Eramosa

- *10% Discount for Instructional Recreational/Cultural Community Programming Rental – registration must be open to the general public*

City of Hamilton

- Hall rentals/community Rooms – 50% discount for subsidized groups ((information on what qualifies as subsidized group not available)

Mapleton Township

- Service organizations listed below can rent halls or boardrooms at no cost. To be eligible for this list, each organization must delegate to council to make the request and also have staff support. *Eligible groups must be either a local based minor sports group OR a group that an demonstrate that they give back to the community.*
  -100 Women Who Care - Drayton & District Figure Skating Club - Drayton Kinsmen Club-Drayton Kinettes -Drayton Minor Hockey-Drayton Minor Soccer -Drayton Moorefield Minor Ball -Drayton Rotary Club -Mapleton Agricultural Society -Mapleton Buds and Blooms -Mapleton Chamber of Commerce -Mapleton Historical Society -Moorefield & District Horticultural Society -Moorefield Optimist Club -Palmerston and District Hospital Foundation -Reach Forth Hockey Club -Seniors' Centre for Excellence -Community Craft

Show Committee (c/o Mary Miller) -Royal Canadian Legion Branch 416 -Drayton Peel Firefighters Association -Masonic Lodge

City of Milton

- No information available for local community groups

Town of Minto

- For frequent user groups/community groups – there are individualized by-law agreements that set out the terms and fees for each group. These include church groups, community groups and agricultural society.

Township of Wellinton North

- Local User Groups (identified as those who provide benefit to the community at large) receive 1 meeting per month at no cost
- Community Signature Special Events such as Optimist Day, Mount Forest Fireworks Festival and Canada Day – Entire Community Grounds is rented for $500 for the duration of event
- Lions Club Bingo – Rents Large Hall every week – Rate is $200, normally $393 (49% discount)
- Blood Donor Clinic – Large Hall – Rate is $200, normally $393 (49% discount)

Seniors

City of Cambridge

Township of Centre Wellington

Does not offer any specific Seniors Discounts for Facility Rentals

Town of Erin

Does not offer any specific Seniors Discount for Facility Rentals

City of Guelph

Guelph has the Evergreen Centre which runs programs for seniors

Township of Guelph/Eramosa

Does not offer any specific Seniors Discounts for Facility Rentals
There is the Rockmosa Older Adult Centre which is run out of the same building as the Rockwood Library. It has a membership and runs programs, workshops and socials. Must be 55+

City of Hamilton

- Pool – Seniors receive 33% discount on pool admission
  Drop in Skating – Seniors receive 33% discount on admission
  No Other Seniors Discounts are available for facility rentals

Township of Mapleton

- Mapleton does not offer any specific Seniors Discounts for Facility Rentals, however, there is a centre for Seniors within Mapleton that is identified as the Seniors' Centre for Excellence (SCE). It is fully Grant funded

City of Milton

- No Information Available for Seniors Discount for Facility Rental

Town of Minto

- For frequent user groups/community groups – there are individualized by-law agreements that set out the terms and fees for each group. These include church groups, community groups and agricultural society.

Township of Wellington North

- Seniors programming of shuffleboard and card playing runs every Wednesday during the day. The hall is rented for this group at $21/hour – normally rented for $38/hour at non prime times (44% discount)

COMMITTEE MEMO

TO:	Recreation and Community Wellness Committee
FROM:	Residents/Non-Residents Sub-Committee: Tracey McQueen, Beth Charles, Joanna Jefferson
MEETING DATE:	June 17, 2025
SUBJECT:	Resident and Non-Resident Analysis

RECOMMENDATIONS

That Committee Memo MEMO-2025-002 entitled Resident and Non-Resident Analysis be received; and,

That the Committee recommends that Council implement a non-resident rental surcharge of 25% to all Township facility non-resident rentals as part of the 2026 User Fees and Charges By-law.

Purpose

In accordance with Council's direction, the Resident and Non-Resident Subcommittee was asked to investigate best practices regarding the application of resident versus non-resident rental rates, reviewing the Township's comparator and boundary municipalities rates. This includes but was not limited to researching if a resident versus non-resident rate is established across all facilities or just particular types of facilities, and the price difference between resident and non resident rates.

Background

It has been observed that Puslinch residents place a higher value on their local community facilities compared to non-residents. In 2022, a resident and non-resident rate was created for rentals at the Puslinch Community Centre for the Archie MacRobbie Hall.

The sub-committee was tasked with reviewing and comparing the resident and non resident rates for facility rentals that are in place across the Township's comparator and boundary municipalities – Cambridge, Centre Wellington, Erin, Guelph, Guelph Eramosa, Hamilton, Mapleton, Milton, Minto and Wellington North.

Comments

Many municipalities outside of Puslinch apply non-resident fees either universally across all facilities or selectively based on demand. While the application of such fees varies and is not always consistent, it typically reflects each municipality's individual philosophy and the level of demand for specific facilities.

Implementing a non-resident surcharge aligns with common practices observed in other municipalities and presents an opportunity for additional revenue generation. Currently the Puslinch Community Centre already has this surcharge in place. Therefore, the sub-committee recommends that for private groups composed of non-residents, a non-resident surcharge of 25% should be applied to all facility rental contracts.

Financial Implications

There are no significant financial implications anticipated, aside from minimal staff time. This includes but is not limited to the initial implementation of new formulas into the system and efforts related to awareness and communication of the changes amongst the staff and community.

Attachments

None

Non-Resident User Fees

Non-resident user fees are designed to ensure that individuals from outside the community contribute fairly to the upkeep and operational costs of the facilities and programs they use. Evaluating these fees is essential for maintaining financial sustainability, ensuring equitable access for residents, and aligning with best practices in municipal cost recovery.

	Programs	Facilities								
	User Fees & Memberships	Gymnasia	Ice	Dry Floor	Outdoor Fields (Soccer/Baseball)	Outdoor Courts (Tennis/Pickleball)	Parks and Amenities	Community Hall	Meeting Room	Other
Centre Wellington										In progress
Cambridge	20% surcharge for aquatic leadership		Private/Adult +20%				90%-100% surcharge for out of city events	Per affiliation policy	Per affiliation policy	Reduced rates available through affiliation policy
Erin			19% surcharge prime ice only. Capital surcharge applies to all bookings (res/non-res)							80% residency requirement for community group discounts (youth/adult)
Guelph	15% surcharge on all programs		15% surcharge for commercial/non-resident							80% residency requirement for community group discounts (youth/adult)
Guelph Eramosa	Walking track charge for non-res (free for residents)									Non-resident groups can rent at higher rate only if offering programs for whole community

Hamilton	$15.35 surcharge on clip cards & memberships. Non-resident registered rates vary by type & age.	30% - 50% surcharge for non-resident (based on size)		Premium daily rate for non-residents or commercial				30% surcharge		95% residency requirements for minor sport/community group (50% subsidy)
Mapleton										None
Milton	10% surcharge (excludes drop in). Approx 20% surcharge on memberships.				10% surcharge per hour	Reduced rates not available				Non-resident registration 2 days residents, 75% Residency requirements for league/annual bookings.
Minto			Minor non-residents pay adult rate (approx 20% more)							
Wellington North			35% surcharge per hour (prime & nonprime)	15% on adult rentals						

Observations Programs

Only 3 municipalities in this review charge additional fees on programs. Milton and Guelph has a percentage that applied to most programs, with some exclusions for drop in programs. Milton offers a “Play and Sport” Membership, which is available to residents and non-residents. There is a surcharge of approximately 20% on the cost of this membership. Milton also allows residents to register for programs 2 full days prior to non-residents.

Hamilton applies a flat rate surcharge for multi-pass cards, memberships and drop in programs. For registered programs, non-resident rates vary by type of program and age of participants. Some non-resident program fees are as much as 50% more than resident fees.

Guelph Eramosa uses another approach for use of the walking track, which is free for residents. Non-residents pay a nominal fee per use.

While not applicable in Puslinch it is interesting to note that aquatic leadership courses were heavily discounted for residents in all municipalities. This is done to help fill shortages in aquatic staff.

Observations Facilities

Non-resident surcharges are also commonly applied to both indoor and outdoor facilities. Where a standard percentage surcharge is applied, the range was an additional 10% - 20% above the adult rate. The non-resident rate is often the same as the commercial rate, especially for dry floor arena bookings. Hamilton, for example, has only a flat day rate for commercial and non-resident use of the dry floor (at a higher rate), while residents and minor sport groups can book by the hour. Hamilton also had the highest surcharge on ice time and use of community halls (30% - 50%). This likely reflects the high demand for these types of facilities.

All municipalities offer some kind of free access to meeting rooms/halls for affiliated sport and community groups (e.g., for monthly meetings or AGMs).

A**ff**iliation and Allocation Policies

These types of policies, whether formal or informal, outline the requirements for community and sport groups to qualify for discounted rental rates. In allocation policies, non-resident group are always considered once municipal, affiliated organization (residents) and school board requests have been fulfilled.

Residency requirements are found in the affiliation policies for 4 of the municipalities reviewed. Residency requirements range from 80% - 95%. The subsidy available to these groups is significant and as noted, these groups have priority for booking. In some other municipalities, the residency requirements may be lower for certain sports where participants are drawn from a wider geographic range or for youth sport.

Township of Puslinch

Strategic Plan 2026-2030

Project Goals

Develop a coordinated roadmap for the Township that balances community needs, financial sustainability, and long-term resilience.

Scope

Define the Township's priorities, goals, and actions for 2026-2030, providing a framework to guide decision-making, resource allocation, and community outcomes.

Timeline

Phase 1 - Phase 6

09/25 - 03/26

Stakeholders

Council
Staff
Advisory Committees
Residents
Community Groups
Business Community
Development Community

Engagement

Workshops
Public Open House
Community Survey
Staff Survey
Target Interviews

Deliverables

Strategic Plan Document
Executive Summary
Council Presentation
Implementation Toolkit

TOWNSHIP OF
PUSLINCH
EST. 1850

Purpose

The strategic plan will define the Township's vision, values, and strategic priorities for the 2026–2030 period. It will serve as a foundational document to guide policy, budgeting, service delivery, and performance measurement.

Goals

Align municipal efforts with Council and community priorities

Engage staff, residents, and stakeholders meaningfully

Develop a clear, measurable, and inspiring plan

Ensure implementation is tracked and adaptable

Phase 1

Launch & Planning

Timeline

September 2025

Key Activities

Define the scope of work

Confirm the process, goals, and phasing in detailed workplan

Form the project team

Deliverables

Approval of scope of work document

Detailed workplan

Phase 2 → Environmental Scan

Timeline

September-October 2025

Key Activities

Review internal documents

SWOT analysis

Identify trends and benchmarking

Deliverables

Background report

SWOT summary

Phase 3

Engagement: Council, Committees, & Staff

Timeline

October-November 2025

Key Activities

Council workshop

Leadership & staff workshop

Staff survey

Advisory Committee workshops

Deliverables

Engagement summary (what we heard)

Draft vision statement & value pillars

Phase 4

Engagement: Community, Stakeholders, & Sector Groups

Timeline

November-December 2025

Key Activities

Community survey

Target interviews with community groups & development community

Review of BR&E interviews

Public Open House

Deliverables

Community input summary (what we heard)

Revised vision statement & value pillars

Phase 5

Drafting the Strategic Plan

Timeline

January 2026

Key Activities

Refine strategic focus areas & value pillars

Define goals & priorities

Deliverables

Draft Strategic Plan

Presentation Deck

Phase 6

Final Review & Adoption

Timeline

February-March 2026

Key Activities

Council and Public Review & Presentation

Final revisions and approval

Deliverables

Final Strategic Plan document

Council Adoption


Strategic Plan Project Timeline (Gantt Chart)
Tasks
Council approval of scope & timelines
Environmental Scan & SWOT Report
Youth Advisory Committee Workshop
Staff Workshop & Survey
Committee of Adjustment & PDAC Workshop
Recreation & Community Wellness Workshop
Heritage Committee Workshop
Council Meeting Workshop
Council Presentation: Draft Vision & Values
Community Survey
Community Open House
Review BR&E Interviews
Targeted Interviews
Council Presentation: Revised Vision & Values
Draft Strategic Plan & Deck
Final Plan & Adoption
Oct 2025
Nov 2025
Dec 2025
Jan 2026
Feb 2026
Mar 2026
Apr 2026
Timeline
Phases
Phase 1
Phase 2
Phase 3
Phase 4
Phase 5
Phase 6

Key Dates

September

2025/09/17 Scope of Work Approval

October

2025/10/29 Background Report

November

2025/10/06 Youth WS
2025/10/09 Staff WS
2025/10/14 PDAC WS
2025/10/21 Rec. WS
2025/11/03 HC WS
2025/11/19 Council WS

2025/11/26 What We Heard Presentation

Key Dates

November Cont.

2025/11/01 Community Survey
2025/11/01 BR&E Review
2025/11/19 Com. Open House

December

2025/11/01 - 2025/12/01
Target Interviews

2025/12/17 What We Heard Presentation

January-March

2026/01/01 Draft Strategic Plan & Presentation

2026/02/01 - 2026/03/01
Final Strategic Plan & Council Adoption

REPORT CAO-2025-002

TO: Mayor and Members of Council

PREPARED BY: Courtenay Hoytfox, CAO

PRESENTED BY: Courtenay Hoytfox, CAO

MEETING DATE: September 17, 2025

SUBJECT: County Housing Development Fund Application

RECOMMENDATION

That Report CAO-2025-002 entitled County Housing Development Fund Application be received for information; and

That Puslinch Council endorse the recommendations outlined in the report as [presented/amended]; and

That Township staff be directed to make an application to the County Housing Development Fund for the projects as outlined in this report.

Purpose

The purpose of this report is to provide Council with information regarding the County Housing Development Fund Application and to seek Council direction on making an application.

Background

On May 20, 2025, County staff presented a report to the Administration, Finance, and Human Resources Committee (AFHR) recommending that the $7,000,000 previously raised for the Continuum of Care project be allocated to County member municipalities to support the development of housing that addresses the availability gap between low-end market housing and subsidized housing, on the following basis:

1. Each of the 7 Local Municipalities may access up to a $1,000,000 maximum.
2. Municipalities may apply for several projects, provided that the total request does not exceed $1,000,000.
3. Projects may take advantage of opportunities offered by non-profit organizations and/or private sector concerns, and must be designed to meet local needs as determined by the Local Municipal Council.

4. In the case of projects based on unit purchase, applications must identify location and number of units, target demographic of the purchaser, type of accommodation and expected unit price range. Applications must also demonstrate that the project is self- financing, replicable, equity generating for purchasers, and requires no County assistance beyond the initial cash contribution. Term of affordability must be noted.
5. If projects are based on rental accommodation applications must identify location and number of units, target demographic of the renter, type of accommodation and expected rental rates. Reliance on County subsidy programmes - if any - must also be noted.
6. Rental projects designed to be incorporated into private sector developments must indicate location and number of units, target demographic of renter, type of accommodation, expected affordable rental rates and term of affordability.
7. If requested, County Housing Staff can provide advice on potential projects prior to submission of an application by the Municipality.
8. Applications will be presented to the County's AF&HR Committee. Projects deemed viable will be recommended to County Council for approval with appropriate conditions.
9. Following approval of an application, the Local Municipality and the County will enter into a contract for the transfer and use of the funds.
10. Funds will be released to the Municipality on a schedule agreed to by the local Treasurer and the County Treasurer.
11. Applications will be received until September 30, 2026.
12. Projects must have all local permissions in place no later than December 31, 2027.
13. Funds not accessed by December 31, 2027, will be deemed forfeited.
14. The development fund will close the earlier of December 31, 2027, or when the $7,000,000 fund has been allocated.
15. Any unallocated funds or forfeited funds will be returned to the County's Housing.
16. Development Reserve fund for the provision of Provincially mandated housing programmes.

Recommendation

Project 1 - Sunrise Therapeutic Riding Centre Residence Expansion

Sunrise Therapeutic Riding & Learning Centre (Sunrise) is a Canadian registered charity, established in 1982, that operates on a 102-acre farm in Puslinch. The Mission of Sunrise is to develop the full potential of children and adults with special needs through therapy, education, horse riding, recreation, and life skills programs, farm-related and social activities, and further develop and expand Sunrise's programming to support a Respite and Residence Village community. The project includes an expansion to provide a 14-unit supportive housing residence.

Sunrise completed their Site Plan Control application for the residence expansion (and other works) in 2023 with the agreement being registered on title in June 2023. Their building permits were submitted in March 2025 and are currently under review.

Sunrise has submitted additional materials for review, which will be incorporated as appropriate into the Township's application to the County's Housing Development Fund, subject to Council direction. These materials are appended as schedules to this report. Staff recommend that the Township apply for $800,000 to support the Sunrise residence expansion.

Sunrise has prepared a short video showcasing their mission and emphasizing the importance of the residence expansion project:

https://youtube.com/watch?v=R7vLpr6Kdd0&feature=share

Project 2 - Township of Puslinch Additional Residential Unit (ARU) Grant Program

In November 2022, Bill 23 received Royal Assent enacting legislation that allows municipalities to permit up to three ARUs as a right on residential lots. The Township has since included provisions in its zoning by-law to comply with the provincial legislation.

ARUs are a form of gentle housing intensification that increase the supply of rental housing and can help make home ownership more attainable. Among their many benefits, ARUs can generate rental income to offset costs such as maintenance, taxes, and financing. They also contribute to a broader range of rental housing options, including opportunities for multigenerational living, while being dispersed throughout neighbourhoods and the community.

Many municipalities offer finical incentives related to intensification through ARUs such as:

1. Waiving or reducing building permit fees
2. Waiving of reducing development charges
3. Waiving or reducing parkland dedication fees
4. Grants or rebates
5. Pre-approved building plans
6. Streamlined applications or approval processes with pre-approved building plans
7. Deferred or low/no-interest loans
8. Tax incentives/property tax relief
9. Infrastructure charge credits or reductions

Staff recommend that the Township submit an application to the County Housing Development Fund for $200,000 to support a Township Additional Residential Unit (ARU) Grant Program. It is recommended that the ARU Grant Program provide grants of $10,000 each, supporting the construction of up to 20 ARUs. High-level eligibility criteria and program details have been developed below. Should this initiative be approved by both Puslinch Council and County Council, staff will prepare a comprehensive Grant Program for Council's consideration and approval.

Draft Township Additional Residential Unit (ARU) Grant Program

Program Fundamentals:

The program provides a financial incentive to help offset the costs associated with constructing an ARU, in compliance with the Township's Zoning By-law, the Ontario Building Code, and all other applicable law. Grants of $10,000 will be awarded to eligible property owners who have been issued a building permit for the construction of an ARU.

As a condition of funding, property owners must enter into an agreement with the Township requiring that an occupancy permit be issued for the ARU within 18 months of the building permit issuance. Extension requests may be considered; however, if the ARU is not completed, grant funds must be returned to the Township.

Property owners will be required to provide documentation of eligible costs incurred. Grant funds may be applied toward one or more of the following:

- Upgrading private servicing (well or septic)
- Professionally prepared permit drawings
- Hard construction costs (labour and materials)

Draft Eligibility Criteria

1. The Grant Application Form must be completed and signed by the registered owner of the property containing the ARU.
2. A maximum of one ARU grant may be awarded per property.
3. The property containing the ARU must be located within the Township of Puslinch.
4. The ARU must be constructed under a valid building permit issued by the Township.
5. The building permit application for the ARU must have been submitted to the Township of Puslinch no earlier than the date of the program launch.
6. All property taxes must be paid in full and up to date.
7. There must be no outstanding charges, orders, or compliance issues issued by the Township of Puslinch for the property.
8. The property must be free of construction liens at the time of application.
9. Construction of the ARU must not have commenced prior to the issuance of a valid Building Permit.

Applications to the County Housing Development Fund will be received until September 30, 2026. Staff are aiming to submit an application in September 2025 following Council direction.

Financial Implications

As outlined in the report.

Applicable Legislation and Requirements

None

Engagement Opportunities

Township staff report.

Attachments

Schedule A – Sunrise Capital Campaign Brochure
Schedule B – Sunrise Brochure Insert
Schedule C – Sunrise Draft County Housing Development Fund Application
Schedule E – Sunrise Business Plan
Schedule F – Sunrise Letter of Support from MPP Mike Schreiner
Schedule G – Sunrise Letter of Support from MP Dominique O'Rourke

Respectfully submitted,

Courtenay Hoytfox
CAO

VILLAGE AT SUNRISE FARM



CAPITAL CAMPAIGN







SUNRISE THERAPEUTIC RIDING & LEARNING CENTRE

WHERE ADULTS WITH SPECIAL NEEDS WILL LIVE AND WORK WITH DIGNITY AND PURPOSE

"SUNRISE IS FAMILY, SUNRISE IS HOME"





"For us, it's peace of mind. It's the relaxation of knowing that other than our family, there's actually a family out there at Sunrise that is willing to love our daughter and support her, as much as we do"

-Lori F (parent of adult participant)

"I would absolutely love to live at Sunrise... it would be a freeing, independent feeling to know I live here and I help take care of these horses that I love so much."

-Brooke F (adult participant)



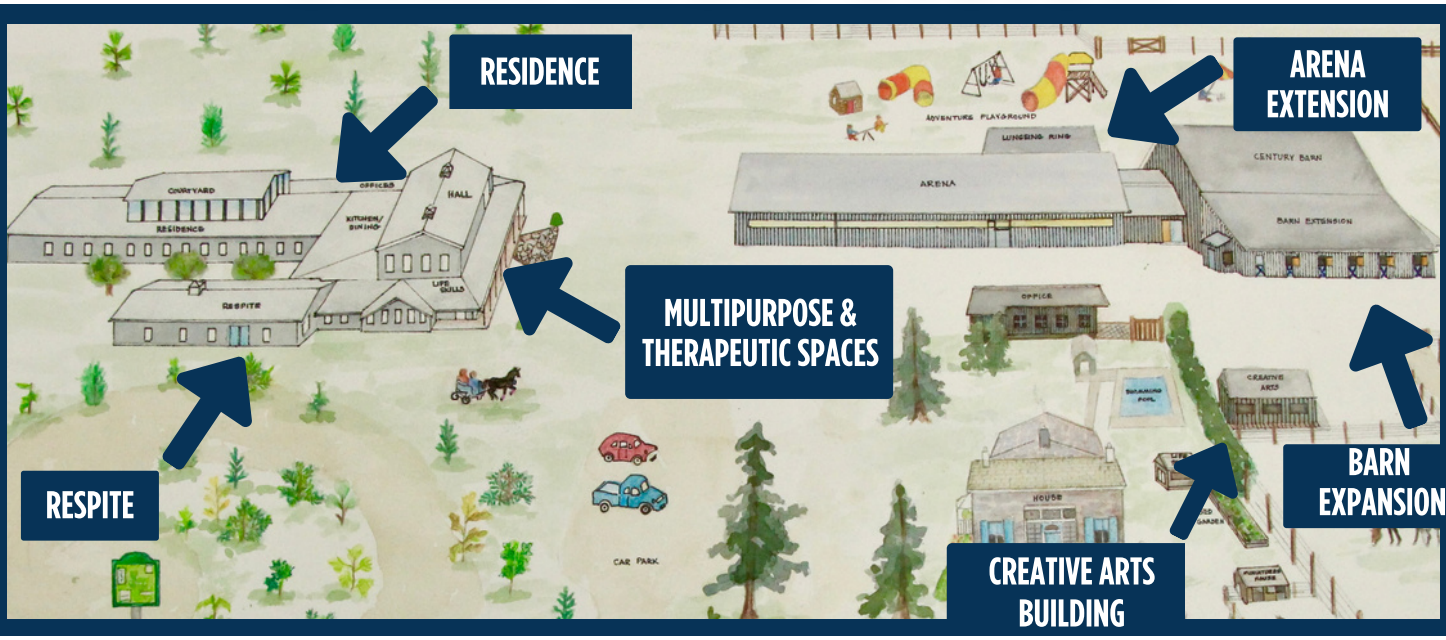




"When our son is at Sunrise, I know he's safe, he's thriving and he belongs... it gives him an identity, it gives him purpose, it makes him feel needed"

-Janice F (parent of adult participant)

CAMPAIGN VISION



ADULTS WITH SPECIAL NEEDS ARE IN CRISIS

ALMOST
25,000
ADULTS WITH DEVELOPMENTAL DISABILITIES ARE IN CORE HOUSING NEED

IN CANDA
10,000
ADULTS WITH INTELLECTUAL DISABILITIES UNDER 65 ARE LIVING IN LONG TERM CARE AND NURSING HOMES

THE WAIT
FOR SUPPORTIVE AFFORDABLE HOUSING IS OVER
10 YEARS

75%
OF ADULTS WITH INTELLECTUAL DISABILITIES IN CANADA WHO DO NOT LIVE WITH THEIR PARENTS ARE LIVING IN
POVERTY

ADULTS WITH SPECIAL NEEDS ARE AT
SIGNIFICANT RISK
OF EXPERIENCING
HOMELESSNESS

60 %
OF
FOODBANK USERS
IN ONTARIO HAVE A DISABILITY

"SUNRISE HAS THE VISION, THE PLAN AND THE EXPERTISE TO MEET THE OVERWHELMING DEMAND FOR A RESIDENTIAL / RESPITE FACILITY."


Reception Hall


Interior Courtyard


Studio Suite

- ☑ Rezoning Completed (2018)
- ☑ Arena Expansion Design Completed
- ☑ Barn Expansion Design Completed
- ☑ Creative Arts Facility Design Completed
- ☑ Residence/Respite Design Completed
- ☑ Site Plan Application Approved (2022)
- ☑ Site Plan Agreement Signed (2023)

"A peaceful, smooth transition to an organization our daughter has come to view almost like family, would be wonderful... a facility located on the grounds of Sunrise would be the answer to many prayers."

-Mike V (Parent of adult participant)

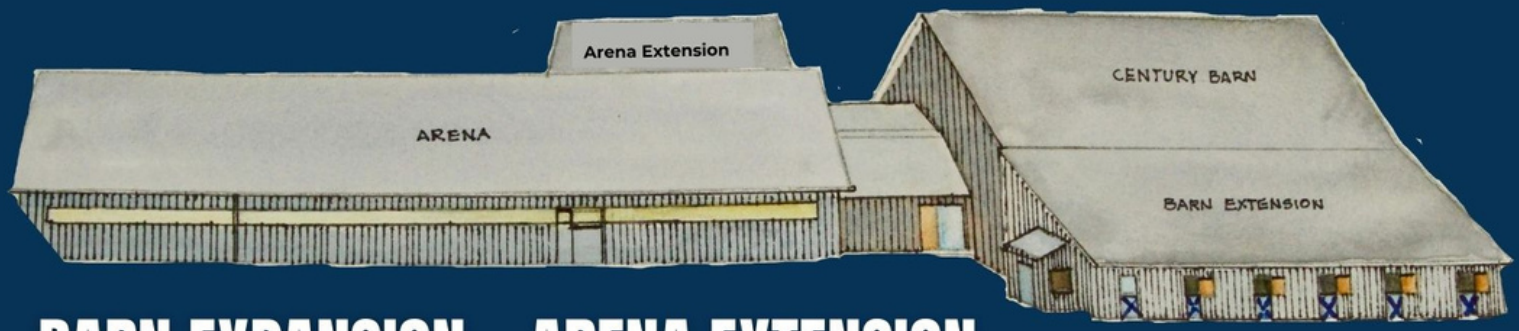
CAMPAIGN PROJECTS

RESIDENCE & RESPITE BUILDING

- 25,000 sq ft
- 14 Studio suites with shower room
- 6 Respite Rooms
- Therapy Facilities (Multisensory, Music)
- Life Skills Program Space
- Program and Residence Offices



$9.2 MILLION



BARN EXPANSION

- 2,880 sq ft
- Additional Stalls
- Teaching Facilities
- Expanded Program Space for Residents and Day Program Participants

ARENA EXTENSION

- 3,600 sq ft
- Expanded Program Space for Residents and Day Program Participants
- Confidential Therapy Space for Equine Facilitated Wellness

CREATIVE ARTS BUILDING

- 2,400 sq ft
- Dedicated space for Woodworking and Creative Arts

$650,000 $540,000 $170,000

NAMING OPPORTUNITIES

5 MILLION
- RESIDENCE BUILDING

1 MILLION
- RESPITE WING
- ARENA EXPANSION
- BARN EXPANSION

500,000
- DINING HALL
- MULTIPURPOSE HALL
- TEACHING KITCHEN

250,000
- BOARD ROOM
- COMMUNITY ROOM
- SITTING ROOM
- MULTI-SENSORY ROOM
- MUSIC THERAPY ROOM
- RECEPTION HALL
- INTERIOR COURTYARD
- CREATIVE ARTS BUILDING

100,000
- RESIDENTIAL STUDIO SUITE
- LIFE SKILLS QUIET ROOM
- ARENA WARM UP AREA

50,000
- OVERNIGHT RESPITE ROOM
- HORSE STALL

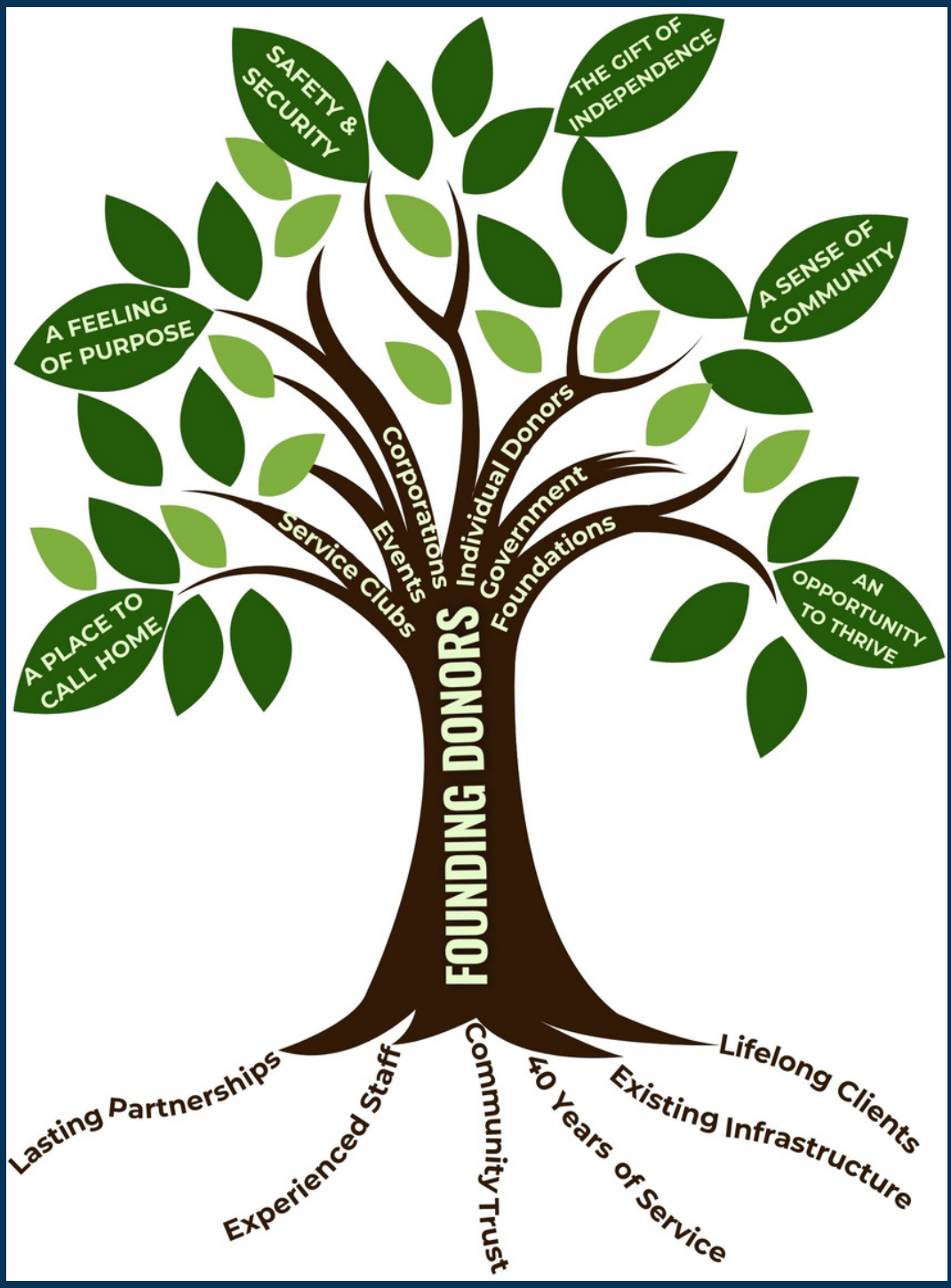
25,000
- RESIDENCE LAUNDRY ROOM
- BARN QUIET ROOM
- FEED ROOM
- BLANKET ROOM
- HAY STORAGE ROOM
- GREEN CLASSROOM - NATURE/ EQUINE





"As parents, we get older and it's always at the back of our minds ...what will happen to our adult children? Will they be loved? Taken care of? We won't live forever. We are hoping that there will be a place they can go, a safe and secure place where we won't have to worry."

- Mike Hamp (parent of adult participant)



SUNRISE
Therapeutic Riding & Learning Centre

MISSION STATEMENT

To develop the full potential of children and adults with special needs through therapy, education, horse riding, recreation, and life skills programs, farm-related and social activities.



OVER 40 YEARS OF INNOVATION AND COMMUNITY SERVICE

- 1982 Sunrise opened a part-time, seasonal weather dependent therapeutic riding program.
  - Three horses & five riders
- In 14 years moved four times, to different rental facilities - still seasonal - no indoor riding arena
- 1990 Began a summer day camp, which continues to set a 'community recognized' high standard of inclusive programming
- 1996 moved to present permanent 102-acre farm home , with indoor riding arena , in Puslinch , ON
  - Expanded all programming and the inclusive summer day camp
- Established a CanTRA Therapeutic Riding Instructor residential training school, for Canadian & International candidates.
  - Remains the only residential training school of its kind in Canada

Achieved through community support from service clubs / event fundraising/ successful grant proposals / private & corporate donations:

- 2000 to 2022 - Children's Accessible Playground *in-ground swimming pool * Government sponsored job skills training *Children's Nature Discovery Centre * Butterfly gardens & frog pond *Low Ropes Challenge course * Life Skills horticultural program * Planted 20 acre Therapy / Memorial Forest
- Served thousands of vulnerable children and adults since 1982
- Presently up to 145 riders weekly - six school special education classes
- 250 children in annual inclusive day camp programs
- 24 adults in Life Skills (over 4 days each week)
- Supported by Canadian certified, highly experienced staff & 275 to 300 volunteers annually

Quoted Sources:
- 2001 participation and Activity Limitation Survey: Issue 4. CMHC. 2010.
- Freeing our people: Updates from the Long Road to deinstitutionalization. Canadian Centre for Policy Alternatives. 2017
- Research insight: Housing conditions of persons with disabilities. CMHC. 2018.
- Literature reviews on Housing Needs: Developmental Disabilities, CMHC. 2019.
- Hunger report - feed Ontario. 2021.

VILLAGE AT SUNRISE FARM

STAGE 2 – Foundation Funding

Mar 2025 Status Update

VISION: A community where children and adults with special needs are treated with care and respect. Using horses and the farm environment as facilitators, to assist those with special needs to reach their full potential, and continue to play a meaningful role in the community.

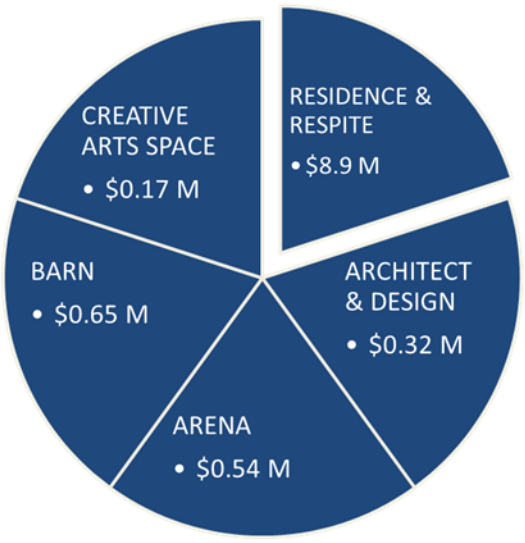


Campaign Video - https://youtube.com/watch?v=R7vLpr6Kdd0&feature=share

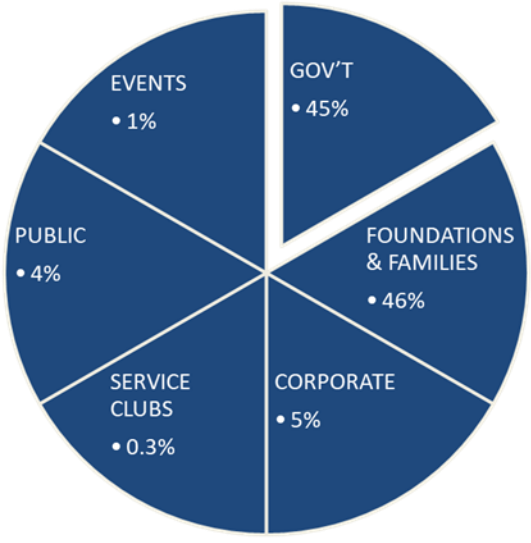
VALUES:

Respect For people, horses and the environment
Innovation We strive for excellence in all our inclusive programs and services
Personal Growth We believe that every person should be treated with dignity, and empowered to reach their full potential
Fiscal Responsibility We adhere to clear and comprehensive accounting policies for our operations and fundraising practices.

Funding

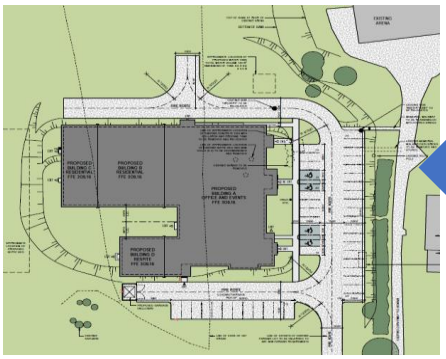


Total Cost $10.5 M



Projected Sources Of Financing

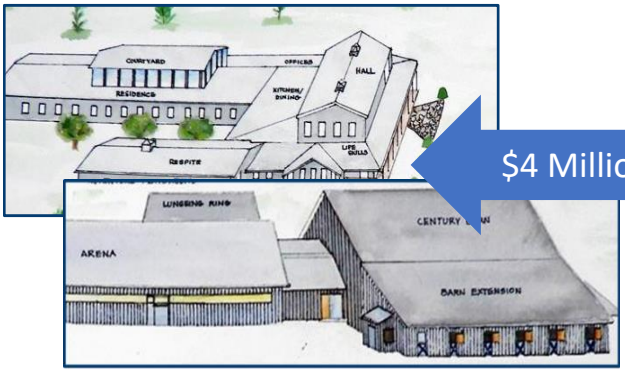
VILLAGE AT SUNRISE FARM



$189 Thousand

COMPLETED – STAGE 1

- Rezoning
- Site Plan Agreement
- Residence/Respite Design
- Arena Expansion Design
- Barn Expansion Design
- Creative Arts Building Design



$4 Million

CURRENT - STAGE 2

- Construction Drawings
- Building Permit Application
- “Foundation Funding”



$6.3 Million

FUTURE - STAGE 3

- Bidding/Tender
- Government Funding (~$4.5M)
- Completion of Capital Campaign (~$1.8M)
- Construction

Success in Stage 2 opens the door to MEANINGFUL discussions with government funding options with the County of Wellington Housing Department (Ontario Priorities Housing Initiative funding), and Canada Mortgage and Housing (Co-investment program).

Sunrise Therapeutic Riding & Learning Centre, #6920 Conc.1, RR#2, Puslinch, ON NOB 2J0.
Registered Charity: # 11920 6027 RR0001
For further information contact anita@sunrise-therapeutic.ca

County Housing Development Fund Application

Project Name

Village At Sunrise Farm

Main Contact Name

Ann Caine, Chair, Sunrise Advisory Council

Details

Please refer to points 3 through 6 of the staff recommendations attached to provide details below

Project Description

Sunrise is a Canadian registered charity, established in 1982, that operates on a 102-acre farm in Puslinch, Ontario. This project will continue to evolve our facilities and programs to also provide respite services and AFFORDABLE SUPPORTIVE (24/7) RENTAL HOUSING FOR PERSONS WITH COGNITIVE DISABILITIES OR SPECIAL NEEDS, a vulnerable and under-served population. Please see the attached Business Plan prepared in October 2024 for extensive additional detail. Click here to hear from Sunrise participants themselves about this project.

Project Partners - based on involvement with construction, management and/or financial

The Business Plan provides an extensive list of patrons, supporters, advisors, and consultants involved with or supporting the project. They cover governance/management, advisory council, project Steering Committee, Development campaign, facilities management, building project, financial and program.

Project Milestone Data - approval by local Council, construction start/finish, occupancy

Land for the project is secured (1996). Zoning is in place (2019). The Site Plan Agreement is registered (2023). The Building Permit application has been filed and is under review. Local permissions are anticipated within 2025, well in advance of the December 2027 deadline required for the development fund application. Allowing for complete project funding to be put in place, substantial completion is estimated to be by end of 2028 with occupancy in Spring 2029.

Required Funding Release Dates - indicate phasing*

Sunrise has incurred just over $300,000 in costs on this project to date. To support near term project expense we would propose release of $250,000 as soon as County approvals are in place with the balance ($750,000) by January 2027.

See the business plan for estimated project timing

*Note that final timing will be negotiated and included in agreement between County and Local Municipality

Application submission is deemed to represent approval by the local Municipal Council.

Signature on behalf of Municipality

Name

Title

Signature

Date

Recommendations: (Sunrise Comments)

That the funds previously raised for the Continuum of Care project (approximately $7,000,000) be made available to the Local Municipalities of Wellington County for the development of housing to address the availability gap between low end market housing and subsidized housing on the following basis:

1. Each of the 7 Local Municipalities may access up to a $1,000,000 maximum.
2. Municipalities may apply for several projects, provided that the total request does not exceed $1,000,000.
3. Projects may take advantage of opportunities offered by non-profit organizations and/or private sector concerns, and must be designed to meet local needs as determined by the Local Municipal Council.

- Sunrise Therapeutic Riding & Learning Centre (Sunrise) is a Canadian registered charity, established in 1982, that operates on a 102-acre farm in Puslinch
- The Mission of Sunrise is to develop the full potential of children and adults with special needs through therapy, education, horse riding, recreation, and life skills programs, farm-related and social activities, and further develop and expand Sunrise's programming to support a Respite and Residence Village community.
- Sunrise has a >40-year track record of successful innovation, project completion, and growth.
- The wait lists for affordable housing are significant. Even more so for individuals with special needs. We propose a unique housing concept providing autonomy with security, support and on-site programming delivered by an organization that understands the target population in a way that few can. We offer an inclusive community and a place to belong, while providing a balance of independence and personal choices. We believe this will be a "showcase" in the Township and a model that will be noticed and replicated elsewhere.
- Our project directly addresses the most recent 2020-2024 Recommended Activities articulated in Objective 3 of Section 6.2 in A PLACE TO CALL HOME FIVE YEAR UPDATE as well as Section 4.4.8 of the Wellington County Official Plan . That is, we will help address the objective of extending the offering of comprehensive range of supportive housing options for residents with cognitive disabilities or special needs specifically. We believe this is an often acknowledged BUT also often overlooked segment of the at-risk population when it comes to housing needs.

4. In the case of projects based on unit purchase, applications must identify location and number of units, target demographic of the purchaser, type of accommodation and expected unit price range. Applications must also demonstrate that the project is self financing, replicable, equity generating for purchasers, and requires no County assistance beyond the initial cash contribution. Term of affordability must be noted.
5. If projects are based on rental accommodation applications must identify location and number of units, target demographic of the renter, type of accommodation and expected rental rates. Reliance on County subsidy programmes - if any - must also be noted.

- The holistic vision is for expansion of the Sunrise facilities to grow existing program capacity, and to develop on-site residential and respite services for those with special needs. The core of that plan is a 14-apartment Affordable Supportive Housing (24/7) residence (rental units). Initially, Sunrise is designating 5 of the units as Affordable, with the balance identified as Market Rate. This is done to provide greater flexibility in the operating budget to strengthen financial viability of the total project. Sunrise is committed to exploring all alternatives to increase the number of affordable units, up to and including all 14 suites.

- Each resident will have a private studio suite.
- The target demographic is young adults with special needs that are ambulatory and capable of living in their suites largely independently. Staff will be available for support for safety and security as well as for nutrition/meal/housekeeping support/transportation.
- Residents will have access to shared dining, recreational, and program space.
- The entire facility is designed to meet OBC barrier-free requirements, not just the areas required to meet minimum standards.
- Rental rates for affordable units will average at or below 80% of the Canada Mortgage and Housing Corporation's (CMHC) Average Market Rent (AMR) for the area, as determined by the County. This criteria is typically included in County of Wellington RFPs for affordable housing.
- Target clients typically have monthly allowances from ODSP for living costs as well as Passport Funding to allow participation in the community. Both are Government of Ontario programs designed to support individual with cognitive disabilities or special needs. There are also federal programs, including the Canada Pension Plan Disability benefit. These programs, personal sources of funds, and/or additional direct funding from Developmental Services Ontario (Sunbeam Developmental Services for our region) are expected to cover ongoing operating expenses.
- In addition to raising private funds, Sunrise will continue to seek additional capital funding support through the county RFP processes that distribute Ontario Priorities Housing Initiative (OPHI) allocations as well as Canada Mortgage and Housing capital (grants and loans) to complete the building of this facility. Allocation by the Township of the available funding under this specific program will be of significant benefit when discussing support with other levels of government.
- As a charity providing affordable dwelling units, Sunrise will also be seeking deferral of development charges by the County under

6. Rental projects designed to be incorporated into private sector developments must indicate location and number of units, target demographic of renter, type of accommodation, expected affordable rental rates and term of affordability.
7. If requested, County Housing Staff can provide advice on potential projects prior to submission of an application by the Municipality.
8. Applications will be presented to the County's AF&HR Committee. Projects deemed viable will be recommended to County Council for approval with appropriate conditions.
9. Following approval of an application, the Local Municipality and the County will enter into a contract for the transfer and use of the funds.
10. Funds will be released to the Municipality on a schedule agreed to by the local Treasurer and the County Treasurer.
11. Applications will be received until September 30, 2026.
12. Projects must have all local permissions in place no later than December 31, 2027.
13. Funds not accessed by December 31, 2027, will be deemed forfeited.
14. The development fund will close the earlier of December 31, 2027, or when the $7,000,000 fund has been allocated.
15. Any unallocated funds or forfeited funds will be returned to the County's Housing Development Reserve fund for the provision of Provincially mandated housing programmes.
16. That the report entitled, "SWOT Analysis of Alternative Housing Development Models" be distributed to Local Municipal CAOs.

Sunrise Therapeutic Riding & Learning Centre

BUSINESS PLAN

Village At Sunrise Farm

Facilities and Program Expansion

Affordable Supportive (24/7) Rental Housing For Adults With Disabilities

Prepared for: County of Wellington Project CW2024-0065 RFP
Request For Proposal - Development of Affordable Rental Housing

Primary Contacts:	Ann Caine, Chair, Sunrise Advisory Council Lynne O'Brien, Executive Director Peter Cummins, Steering Committee Chair
Address:	6920 Concession 1, Puslinch, ON NOB 2J0
Telephone:	Office Phone: 519-837- 0558 ext.31
URL:	https://sunrise-therapeutic.ca/
Email address:	lynne@sunrise-therapeutic.ca

4 October 2024 (amended 23 August 2025)



"I would absolutely love to live here… it would be such a freeing, independent feeling to know that I live here and I help take care of these animals and they make me feel great.... it would be great for my mental health. Instead of only being here a couple days a week I'd be here all the time. That's what I want to reach for one day, is to be here all the time."
Adult Life Skills Participant

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EXECUTIVE SUMMARY

Sunrise Therapeutic Riding & Learning Centre (Sunrise) is a Canadian registered charity, established in 1982, that operates on a 102-acre farm in Puslinch, Ontario, just south of Guelph.

The Mission of Sunrise is to develop the full potential of children and adults with special needs through therapy, education, horse riding, recreation, and life skills programs, farm-related and social activities, and further develop and expand Sunrise's programming to support a Respite and Residence Village community.

Sunrise is the only Canadian Therapeutic Riding Association (CanTRA) nationally accredited as a residential instructor training school and exam centre, and has a >40-year track record of successful innovation, project completion, and growth. Sunrise serves individuals aged 3 to adult with a range of physical, cognitive and/or emotional disabilities, providing variety of therapeutic recreational programs, education, and life skills training. We have a vision to continue to evolve our facilities and programs to also provide respite services and AFFORDABLE SUPPORTIVE (24/7) RENTAL HOUSING FOR PERSONS WITH COGNITIVE DISABILITIES & SPECIAL NEEDS, a vulnerable and underserved population.

The wait lists for affordable housing in general are significant. We propose a unique housing concept providing autonomy with security, support and on-site programming delivered by an organization that understands the target population in a way that few can. We offer an inclusive community and a place to belong, while providing a balance of independence and personal choices.

In this plan we demonstrate that this, along with the many partnerships cultivated over more than 40 years of operation, provide assurance of the ability to design, fund, and operate the proposed residence. We still have plenty to learn, but our track record of innovation and growth supports the ability to expand our partnerships and operation into adjacent spaces, moving from "Day Programs" into "24/7 Programs" for the same population.

The capital and operating budget information provided make a strong case for the viability of the project and support the significant requested financial participation of The County of Wellington. T**he Site Plan Agreement is in place** (June 2023). We have a team committed to delivering a project that meets the expressed requirements and preferences of funding organizations. Most importantly we are motivated by a passion to serve children and adults with special needs, and their families.

PROPONENT INFORMATION

History

Sunrise Therapeutic Riding & Learning Centre (Sunrise) is incorporated in Ontario and is a Canadian registered charity (see Appendix 1) that operates on a 102-acre farm in Puslinch, Ontario, just south of Guelph. Sunrise was established in 1982 and started operations with 5 riders and 3 horses. Sunrise rented facilities for the first 14 years, and operated seasonally/weather dependent programs. Continuous growth in demand and support led to the purchase of the current farm property in 1996. Today we serve 120 riders per week, have over 20 horses, provide Life Skills Training year-round for 24 individuals, run two inclusive children's camps, offer a year-round Equine Assisted Learning program which each summer also accommodates close to 90 students from the Upper Grand District School Board enrichment program, provide an Equine Facilitated Wellness therapy program, and enjoy the support of over 250 volunteers.

MISSION	**To develop the full potential of children and adults with special needs through therapy, education, horse riding, recreation, and life skills programs, farm-related and social activities, and further develop and expand Sunrise's programming to support a Respite and Residence Village community**
VALUES	**Respect F**or people, horses, and the environment **Innovation** We strive for excellence through continuous improvement in our inclusive programs and services **Personal Growth** We believe that every person should be treated with dignity and empowered to reach their full potential **Fiscal Responsibility** We adhere to clear and comprehensive accounting policies in our operations and fundraising practices

Sunrise has a track record of successful innovation, project completion, and growth. Highlights of that journey include:

- Initiation in 1990 of an inclusive camping program for children of all abilities
- The 1996 acquisition of a permanent farm home for the program
- Established the only accredited residential therapeutic riding instructor training school in Canada in 2001. Sunrise trains students from across Canada and around the world.
- A successful $1million capital campaign was initiated in 2006 to fund a swimming pool, farm discovery camp centre, and an accessible adventure playground.
- The 2011 initiation of a personal support worker training program
- Extensive renovations to the arena and paddocks in 2014 funded by the Ontario Trillium Foundation and The Rotary Club of Guelph Charitable Foundation
- The 2015 initiation of a farm and horticulture-based life skills day program for adults with developmental disabilities.
- Completion in January 2020 of improvements to the current riding arena facilities to further improve year-round comfort and utility, funded by the Ontario Trillium Foundation.

Current Programs

Sunrise is a CanTRA accredited Therapeutic Riding Centre. The Canadian Therapeutic Riding Association (CanTRA) is an internationally-recognized organization setting standards and providing accreditation and instructor certification services for member centres across Canada. Sunrise instructors are all CanTRA certified, and set goals for riders with input from Sunrise's consultant physiotherapist, occupational therapists and/or speech-language pathologist. Sunrise is unique in being the ONLY CanTRA centre in Canada to offer a residential instructor training program for the training and certification of instructors.

Sunrise serves individuals aged 3 to adult with a wide range of physical, cognitive and/or emotional disabilities. The majority of our clients come from Guelph and Wellington County, but also from Waterloo, Halton, Dufferin and Hamilton Regions. They may be referred by a physician or therapist. Programs and facilities are specifically designed to serve our target population in a unique farm environment. Delivery of our programs and service involves numerous partnerships as outlined in the Partnership Information section of this business plan. A full description of all current programs can be found in Appendix 2

Additionally, **Sunrise Therapy Forest** has recently been created to establish managed forest and meadow habitats at Sunrise to enhance existing biodiversity through planting of native species, and provide new habitats and food sources for pollinators. It will also provide accessible natural spaces for innovative, inclusive programming for children and adults with disabilities, with a focus on fitness, wellness and nature appreciation.



Our newest program in development is the Sunrise partnership with **The Raw Carrot** (https://therawcarrot.com/). Sunrise has obtained the rights for Guelph and surrounding area to a **social enterprise** opportunity that hires individuals with disabilities to prepare and package product sold in retail locations in the local community. The Raw Carrot, based in Paris Ontario, is a well-established social enterprise organization with verified impact. This enterprise will provide employment opportunity for both current non-resident and potential future resident clients.



Vision

The Sunrise Board of Directors and senior staff have long had a desire to provide both respite and AFFORDABLE SUPPORTIVE (24/7) HOUSING FOR PERSONS WITH DISABILITIES on the farm. The idea first arose through discussion over the years with concerned aging parents, whose adult children were still living in the family home, with aging parents, but were seeing a lack of alternative community supportive living opportunities. Countless parents, riders, therapists and medical personnel have given testimony to the need, and to the positive impact being on the farm at Sunrise has on participants.

The holistic vision for expansion of the facilities is to expand capacity for existing service delivery through additions to the arena and barn and to create a "Village environment" by developing an on-site residential and respite facility that not only provides support for those with special needs, but also reaches out to their family members, providing a sense of community inclusion and caring. The core of that plan is a 14-apartment Affordable Supportive Housing (24/7) residence. This is the focus of the balance of this business plan. Other elements of program and facility expansion, while related, will stand on their own merit and be funded outside of this proposal.

Importantly, residents will also have access to existing facilities, transportation services provided by Sunrise to facilitate employment and other personal appointments, and be able to participate in current and newly established programming. This makes the value of our living proposition superior for many individuals versus other options. In our opinion, the standard measures of "physical proximity to retail/social/health/recreational facilities and traditional public transportation services" are disproportionately valued when considering living situations for those with special needs. They bias the assessment to urban living, albeit with the hope of good outcomes. However, in the absence of support services 24/7 residents in those environments are challenged to actually access and benefit from those facilities and services. For many, those situations are isolating, and lack the real inclusiveness associated with community. This can lead to unintended health and mental-health challenges for some. We are choosing to address those traditional measure as secondary to health, mental health, and wellbeing associated with superior support, community, and living environment, and instead address them using alternative mechanisms, including provision of transportation.

See https://youtube.com/watch?v=R7vLpr6Kdd0&feature=share to hear from Sunrise participants themselves about this project.

Finally, our project directly addresses the most recent 2020-2024 Recommended Activities articulated in Objective 3 of Section 6.2 in A PLACE TO CALL HOME FIVE YEAR UPDATE as well as Section 4.4.8 of the Wellington County Official Plan . That is, we will help address the objective of extending the offering of comprehensive range of supportive housing options for residents with disabilities specifically. We believe this is an often acknowledged BUT also often overlooked segment of the at-risk population when it comes to housing needs.

DEVELOPMENT/MANAGEMENT TEAM / BOARD OF DIRECTORS INFORMATION

Sunrise is the beneficiary of an extensive list of patrons, supporters, advisors, and consultants. The tables below identify only those relevant to this application. It is an impressive list, and helps greatly to demonstrate the expertise and access that will deliver this ambitious project.

Sunrise Board of Directors – Governance and oversight of Sunrise

The Sunrise Therapeutic Riding & Learning Centre Board of Directors, membership outlined below, is in full support of this project. Please see Appendix 3 for a copy of the resolution of the board as it relates to this submission.

Contact information	Skills, knowledge, qualifications
Honorary Director - Tommy Hunter, CM, O. Ont.	Canadian country music performer
Susan Fielding - President	Independent Government Relations Consultant. Past Puslinch Township Councilor. Senior Associate, The Earnscliffe Strategy Group
Vice President - Karen Curtis	Community Development Coordinator for Parkinson's Society, Southwestern Ontario (retired). Rotarian
Secretary / Treasurer - David Kennedy, CPA CA	Chartered Accountant. Director of Finance and Corporate Operations Wellington-Dufferin-Guelph Public Health. Past Director of Corporate Services/Deputy CAO Municipality of Meaford. Past Director of Finance for the City of Guelph
Director - Donna Christie	Special Education Teacher (retired)
Russel Hurst, MBA	Exec Dir, Ontario Agri Business Association, Puslinch Township Councillor
Brianne Gardner, MBA	Co-founder Velocity Investment Partners

Sunrise Advisory Council/Committee Members - Local professionals providing support and advice on specific areas of operations.

Sunrise operates day-to-day with an extensive network of volunteers and consultants. The table below outlines a selection of those volunteers and consultants that are particularly relevant when considering the experience and skill set available at Sunrise in working with, and understanding the needs of, our target population. We believe Sunrise is uniquely qualified to offer AFFORDABLE SUPPORTIVE (24/7) HOUSING FOR PERSONS WITH COGNITIVE DISABILITIES & SPECIAL NEEDS in this innovative model.

Contact information	Skills, knowledge, qualifications
Ann Caine, SRN (15years OVC Nursing Administrator, University of Guelph, retired). 519-829-8182	Chair, Sunrise Advisory Council

Gordon Maxwell, 20 Norwich St E, Guelph, ON N1H 2G6, 519-836-2091	Lawyer. Legal Advisor
Dr. Christopher J. Stemerdink MD CCFP FCFP Medicine Professional Corporation, Suite 102, 806 Gordon St., Guelph, ON N1G 1Y7 519-836-1455	Medical Advisory Committee
Andrea Gow, Speech Language Pathologist (R) 519-993-0377	Medical Advisory Committee
Nicola Harman, Social Worker (R), CanTRA Coach/Examiner, Educational Assistant UGDSB 519-277-0595	Medical Advisory Committee
Angela Meyer, Pediatric Occupational Therapist (R) 1-289-489-0773	Medical Advisory Committee
Carol Peachey-Hill, Occupational Therapist 519-835-8725	Medical Advisory Committee
Winnie Warywoda, Physiotherapist 519-767-8106	Medical Advisory Committee
Ron Martin, Project Manager Frey Building Contractors 3435 Hawkesville, ON, N0B 1X0 519-741-6156 Ron@freybc.comBroadway St.	Contractor
Jeff Tiessen. Founder and president of Disability Today Publishing Group, the leading source for information for and about Canada's disability community.	Three-time Paralympian, gold medalist and World Record holder
Gayle Ecker	Director, Equine Guelph
Anne Day. Editor, Puslinch Pioneer, Past President of the Guelph Rotary Trillium Club	Advisor on Marketing & Publicity
Matthew Bulmer	Wellington County Councillor (Ward 7)
Bob Ireland	Philanthropist, Rotarian, & recipient of the King Charles III Coronation medal

Project Steering Committee – Oversight and execution of this project

A small and flexible Steering Committee has been established with the responsibility of providing oversight to the execution of this project, including

- Translating the vision into an executable project
- Managing the interface with major funding and regulatory agencies related to this project
- Establishment of a separate committee to manage and execute a Development (Capital) Campaign
- Understand and manage the interface between the current ongoing operation, including ultimately rolling the new facilities and programs into the existing infrastructure and operation.

As we have reached the point where we are awaiting completion of the review of our building permit submissions to the Township of Puslinch, we are beginning to expand the structure to address both more complex project execution and extensive capital campaign activities. A number of potential additional members have been identified and discussions are ongoing.

The Steering Committee membership is outlined below.

Contact information	Skills, knowledge, qualifications
Peter Cummins, B.Sc. Phm, MBA, Steering Committee Chair 226-979-6370	Vice President Research and Development (R) McNeil Consumer (Johnson & Johnson, Inc.). Treasurer for the Salvation Army, Guelph, ON for the past 28 years. Chair of the Building Steering Committee for the construction of The Salvation Army church building at 1320 Gordon St, Guelph, ON (2005)
Ann Caine, SRN (nurse, retired). Sunrise Advisory Council Chair, Volunteer Fundraiser 519-829-8182	Sunrise Advisory Council Committee Chair; Past Sunrise Executive Director; volunteer Fundraiser; CanTRA Advisory Council Chair; CanTRA Accreditation and Standards Chair. 15years OVC Nursing Administrator, University of Guelph
David Kennedy, CPA CA Secretary Treasurer, Sunrise Therapeutic Riding & Learning Centre	Chartered Accountant. Director of Finance and Corporate Operations Wellington-Dufferin-Guelph Public Health. Past Director of Corporate Services/Deputy CAO Municipality of Meaford. Past Director of Finance for the City of Guelph
Sara Sayyed Co-Manager, Building Brighter Futures Capital Campaign sara.sayyed2009@gmail.com	Senior Policy Advisor City of Guelph. Leadership Council Member The Guelph-Wellington Local Immigration Partnership. Member Board Of Directors Guelph General Hospital, Grants Committee Member Guelph Community Foundation, Community Services Director at the Muslim Society of Guelph
Kenneth Boyd Assistant Manager, Capital Campaign. boydk@me.com	General Manager (R), Research Programs Ontario Ministry of Agriculture and Food. Former Executive Director Canadian Farm Builders Association, Rotarian
Kathy Holmes, BA, BSW (R) kdholmes5@gmail.com	Registered Social Worker (R), Team Leader St.Martin's Manor (Young Parent Residential, Day, and Outreach programs)
Lynne O'Brien	Executive Director, Sunrise Therapeutic Riding & Learning Centre

Project Development Campaign (Capital Fundraising) Members – Confirmed

Sunrise has a history of successful ongoing (annual) fundraising, with the largest previous capital campaign raising approximately $1MM in 2008. We have assembled an impressive list of patrons & advisors to provide "weight" to our campaign. The have international, national, regional, and local visibility. This has been made possible by the 40 years of networking by Sunrise management, staff and Board members. The endorsement and commitment by these members is rooted in their understanding of the value and impact of Sunrise on the lives and wellbeing of children and adults with disabilities, as well as their confidence that Sunrise is able to execute the vision it sets for itself.

The following are confirmed members of our Development Campaign team. It includes no less than SIX ORDER OF CANADA recipients, and is outlined below.

Contact information	Role
Janet Ecker, CM Former Minister of Finance for Ontario and the first woman to deliver a budget in the province. Former Minister of Education, Minister of Community and Social Services and Government House Leader. Former President and CEO of the Toronto Financial Services Alliance. Senior Fellow of the C.D. Howe Institute. Lt Governor in Council University of Toronto. Director Canadian Medical Association.	**Honorary Director**
Bruce Cockburn, OC Canadian singer/songwriter	**Honorary Patron**
Dr. Roberta Bondar, CC, O. Ont, FRCPC, FRSC Canada's first female astronaut. Physician. Holder of the NASA Space Medal and inducted into the International Women's Forum Hall of Fame and Canadian Medical Hall of Fame for her groundbreaking research in space medicine.	**Honorary Director**
Dr. Ian Millar, CM Canadian Equestrian Team Captain for show jumping ®. He is a two-time winner of the Show Jumping World Cup and an Olympic silver medalist. Nicknamed "Captain Canada" in his sport, he holds the record for most Olympic appearances by any athlete in any sport	**Honorary Director**
Tommy Hunter, CM, O. Ont. Canadian country music performer	**Honorary Director**
Susan Frasson President Coldpoint Holdings/ Wood Development Group, Guelph, ON	**Advisor**
Sara Sayyed Senior Policy Advisor City of Guelph. Director, Guelph General Hospital Board	**Campaign Co-Manager**
Ken Boyd General Manager (R), Research Programs Ontario Ministry of Agriculture and Food. Rotarian	**Assistant to Campaign Managers**
Ann Caine, SRN (nurse, retired). Advisory Council Chair, Sunrise Therapeutic Riding & Learning Centre Rotarian	**Fundraiser**

As noted above, the structure of the broader Capital Campaign Team is now being established to significantly increase fundraising reach and outcomes.

PARTNERSHIP INFORMATION

Sunrise Therapeutic Riding & Learning Centre has cultivated many partnerships over 40 years. Some of those are obvious from the lists of names and related organizations identified in the previous section of this report. We will try not to repeat too many of those in this section but encourage reviewers of this document to consider the prior section as part of the partnership discussion also.

Our partnerships have evolved in parallel to the innovation and expansion of programs and services. The project outlined in this document will require we leverage and deepen existing partnerships AND establish additional new relationships. This is an ongoing task.

We have divided existing partnerships into five categories for the purpose of illustrating the depth of existing partnerships.

Facility

- Frey Building Contractors, 3435 Broadway St., Hawkesville, ON, N0B 1X0
  - Frey have been valuable partners on exploration, design, and construction of several past projects for Sunrise funded through the Ontario Trillium Foundation. Frey has supported Sunrise by contributing a portion of the cost of those projects as a donation back to the program. Frey have provided preliminary cost estimate services and information for the current project.
- Capital Paving, Inc, Cox Construction, Ltd., Canada Building Materials Ltd (CBM), Con Cast Pipe.
  - Sunrise has been able to bring the above four companies together in partnership to provide services/product in kind to address Sunrise facility needs. Maintenance of driveway & yard, and the construction of footings/foundations for various projects have been donated in the past. Outside of the current project, Capital paving alone has made a 5-year commitment of tens of thousands of dollars of work per year in support of the current operation. In-kind services have been offered for the current project.
- Classy Lane Training Centre
  - Classy Lane is a neighbor of Sunrise. The facility can accommodate 222 horses, and is home for some of North America's top trainers. Classy Lanes has long taken all of Sunrise's barn waste and has provided winter laneway and barnyard snow clearing, reducing cost and staffing demands for Sunrise's operation. The proposed project will also benefit from those ongoing operating cost savings
- Wasteco
  - Wasteco has removed all garbage from Sunrise weekly without cost since 1996.

Project

For the current project specifically, the following table identifies primary partners involved in the planning and construction.

Contact information (Name, Company, Phone, Email)	Skills, knowledge, qualifications
Builder: Selection pending	Sunrise Therapeutic Riding & Learning Centre will select a Builder experienced in accessible residential development. Frey Building Contractors have been providing support to this and other projects during initial development work and will be included in the companies invited to bid.
Project/Construction Manager: Jack Tacoma, P.Eng (R)	Founding partner of Tacoma Engineers, Jack has volunteered to provide oversight (on-site) of the construction project for Sunrise. Rotarian
Planner: GSP Group, Hugh Handy, 519 569 8883	GSP Group has been working with Sunrise and is experienced in residential development. GSP guided us through the re-zoning process
Fryett Turner Architects Inc. 519 846 2201 Robert Turner, Nicola Augustin	Fryett Turner has built a diverse portfolio within both the public and private sectors. Clients include residential and commercial developers, corporations, municipalities, healthcare institutions, educational institutions, and nonprofit organizations. They are the architects of record on the project.

J. David McAuley, Architect	David's firm provided the original design for the current project. As David transitioned into retirement he has continued as a volunteer on the project, making himself available for consultation. He brings significant expertise in the area of affordable, accessible, and sustainable housing development.
Property Management Oversight and Advisory Support: Michael Balnar, former owner of Balnar Management, Ltd. (providing free advisory and oversight services)	Sunrise currently provides property management for its existing facilities and will be hiring additional maintenance staff to fulfill property management requirements. Balnar Management Ltd. is a second and third generation family business, established in 1977. Well known and highly regarded in the Guelph/Waterloo communities. Balnar provided asset and property management services for companies, partners and investors. Currently they manage over 1,700 units.
Housing Consultant: Tim Welch, TWC Inc., twelch@twcinc.ca, (519) 624-9271	TWC Inc. has worked with the County of Wellington housing staff on a planning approach for development of new affordable housing; acted as a development consultant for over 30 affordable housing developments in Southern Ontario. Tim assisted in the submission of our successful CMHC SEED application ($56,000 grant + $14,000 loan). We connected with Tim in August 2024 and we expect will be contracted for strategic support, review of financial plans, and support with CMHC applications as we progress the project.
Suzanne Swanton Board Member, 10C Shared Space Guelph, Ontario Former Senior Housing Consultant Tim Welch Consulting Inc. 519-830-5353	Suzanne has provided comment & advice, in an informal capacity, on our project with emphasis on strategic options, project planning, and financial support options.
Other: Friends of Sunrise Limited (FOSL) davidakennedy33@gmail.com	FOSL a corporation formed by a small group of philanthropists specifically to facilitate Sunrise's operation. It is the owner of the land and as the landlord fully supports Sunrise in developing supportive housing on the property and has designated Sunrise to act on its behalf on related matters. A long-term lease (Appendix 4) between FOSL and Sunrise is in place covering a 40-yr horizon, effective 2019. Sunrise is the majority shareholder of FOSL and has legal signing authority on behalf of FOSL for all matters relevant to this project. (See Appendix 5 for a copy of the agreement)

Financial

Sunrise receives financial support from a wide range of individuals and business. We would refer you to the two most current Annual Reports found in Appendix 6 for a more complete list .

Program

Partnerships related to program and service delivery to date include:

- Medical Advisory Committee members identified previously
- COPS Program, Waterloo Regional Police Services. Mentoring program for youth at risk.
- Shelldale Community Centre Youth at Risk Program. Guelph.
- Upper Grand District School Board, Guelph.
- Waterloo Regional School Board, Waterloo.
- Guelph Wish Fund For Children
- Camphill Communities, Angus, ON. A not-for-profit organization dedicated to creating unique and inspiring residential, vocational and learning opportunities for people with cognitive and developmental disabilities in both rural and urban settings. Sunrise and Camphill have been exchanging best-practices with each other for several years.
- John & Sabnam Vos, Administrators of Sunbeam Lodge in Kitchener, will provide advice and direction with respect to the full scope of operating considerations, including property management, budgeting, and funding. John's parents were the founders of Sunbeam Homes, now Sunbeam Community & Developmental Services, and he has worked in this space for over 48 years.
- Kathy Holmes is a retired social worker and is new to our Steering Committee. She was Team Leader for Young Parent program at St. Martin's Manor, Hamilton, for 17 years. She was responsible for the overall operation of the program, in particular the Residence, Day Programs and Community Outreach Programs. The addition of the Vos's and Kathy is a significant step forward in our capability to prospectively and properly plan to move from providing "Day Programming" to 24/7 Residential and Respite programming.

Other

Sunrise received CMHC SEED Grant funding in the form of grants totaling $56,000 and $14,000 in interest free loan in 2018 through 2021. With the assistance of consultants such as TWC and/or Suzanne Swanton we will be expanding our efforts with CMHC.

Sunrise works closely with Michael Chong, MP, O'Rourke MP, and Ted Arnott, MPP(R), Joseph Racinsky MPP, Mike Schreiner, MPP, and Mayor Cam Guthrie and their offices. All have been long-time supporters. Meetings with them and office staff have resulted in continuing assistance to explore and access both federal, provincial, and municipal funding for capital and operating aspects of this project. Ted Arnott has facilitated and attended an on-site meeting with the Minister of Children, Community, and Social Services as well as the Parliamentary Assistant to the Minister to discuss ongoing operating funding support options.

Sunrise will be requesting consideration for assistance with our remaining soft-costs from the Guelph/Wellington Joint Social Services Land Ambulance Committee as well as exploring Rent Assistance support for some of our units, and other potential development related incentives available from the County. The Township of Puslinch has awarded this specific project 2 Community grants in 2021 & 2022 totaling $21,066.

DESIGN CONCEPT & DRAWINGS

As noted in the first section of this business plan, the holistic vision is for expansion of the Sunrise facilities to grow existing program capacity, and to develop on-site residential and respite services for those with special needs. The core of that plan is a 14-apartment Affordable Supportive Housing (24/7) residence (rental units). Initially, Sunrise is designating 5 of the units as Affordable, with the balance

identified as Market Rate. This is done to provide greater flexibility in the operating budget to strengthen financial viability of the total project. Sunrise is committed to exploring all alternatives to increase the number of affordable units, up to and including all 14 suites.

The residence is a portion of a larger planned building to also house respite services, expanded Life Skills day programming, and administrative services. All financial information incorporated into this business plan is specific to the allocation relevant to that portion of the building that is residential. There are no costs included for any other areas of the facility.

With respect to Planning Approvals, our site was previously zoned Agricultural. No Official Plan amendment was required but a Zoning Bylaw Amendment was, and has been completed. Severances or easements are not complicating factors in this project. Sunrise has completed the process of Site Plan Approval and the **Site Plan Agreement has been signed**. Proof of registration of the Site Plan can be found in Appendix 7.

Appendix 8 contains a site plan drawing and floor plan for the project. The building floor plan shows the complete building. Space required to support the residential portion of our plans is highlighted in blue. Each resident will have a private studio suite and will have access to shared cooking, dining, recreational, and program space. Supervision, support, and security will be available 24/7 from paid staff. The entire facility is designed to meet OBC barrier-free requirements, not just the areas required to meet minimum standards.

Construction Drawings have been prepared by the architect, and have been submitted for building permits. Energy Efficiency and Building Design requirements/preferences in the Ontario Priorities Housing Initiative (OPHI) Programme Guidelines and the CMHC Affordable Housing Fund program are being included in the design. Fryett Turner Architects (Robert Turner & Nicola Augustin) are the architects working on our project. Robert Turner has experience in single dwellings, low- and medium-rise residential projects, health care facilities, detention facilities, commercial and retail buildings. He is skilled at coordinating technically complex construction projects and balancing the requirements of design, technology, build-ability and programming.

The architects have contracted with several engineering firms to inform the project, ensuring that firms selected have experience in meeting CMHC requirements, where relevant. The following Engineering firms are working on our project.

- Structural - Strik, Baldinelli, Moniz Ltd
- Mechanical - M.A. BRYAN ENGINEERING INC.
- Electrical - Rombald Inc.
- Photometric Study - Rombald Inc.
- Hydrogeological - MBN Environmental Engineering Inc.
- Geotechnical - CMT Engineering Inc.
- Landscape Design - Aboud & Associates Inc.
- Site grading, storm water management, sewage system design - Van Harten Land Surveyors - Engineers
- Energy Modelling - M A Bryan
- Accessibility Consultant - TBD
- Quantity Surveyor – TBD

We are in the process of preparing to solicit bids from construction firms interested in the job under a Construction Management arrangement. Initially, that will involve participation with the architect to help optimize design details from the building/construction perspective. It will also importantly include the CM firm managing tendering to sub-trades in order to get the complete price of construction. We are aware, that it is likely we will need to translate results of the construction management tendering into a fixed price contract such as a CCDC 2 or CCDC 5B contract.

Absent funding limitations the following are target dates.

Permit (excavation, foundation, demolition)	2025-09-14
Building Permit*	2025-09-14
Construction Start	2027-06-15
Substantial Completion	2028-12-15
Occupancy	2029-03-01

*It is our understanding, based on discussions with the County staff, that availability of Building Permits meets the RFP criteria for start of construction. The Construction Start date above reflects "shovels in the ground"

Sunrise acknowledges the stated preference for projects that incorporate construction apprentices. This preference will be incorporated into our tendering process, and include tracking participation for reporting, if required.

TARGET TENANT GROUP

Sunrise has built a strong community over 40 years of working closely with children and adults with disabilities, and their families. Our programs have been supported and delivered by credentialed staff, and a large team of volunteers, who are knowledgeable and trained in the specific requirements of adults with a diversity of special needs.

The vision for this affordable, supportive housing project has grown out of many years working with thousands of vulnerable and underserved individuals, and therefore the primary initial target tenant group, the majority of whom are from Wellington County and Guelph, will be from the existing Sunrise families. This is not intended to exclude any other eligible individuals who meet the proposed residential criteria. This population is high on the list of target populations identified in the Ontario Priorities Housing Initiative (OPHI) Programme Guidelines, and in the Guelph-Wellington document A Place To Call Home. Indeed, it is also noteworthy that the vacancy rate for studio (bachelor) suites in A Place To Call Home is ZERO. Our proposed development is for studio suites exclusively.

Selection of prospective residents will be determined by a knowledgeable arms-length panel following predetermined criteria for eligibility. Procedures will be implemented to ensure objectivity and impartiality in the selection process. The Chair of the Medical Advisory Committee has drafted "intake" forms that have been circulated for review to the members of the Sunrise medical committee, and the Sunrise Board of Directors. Financial eligibility criteria for occupancy of affordable suites will also be a factor in resident selection.

FINANCIAL OVERVIEW

Capital

Sunrise has operated successfully as a non-profit/charitable organization continuously for over 40 years. It has a track record of steady and sustainable growth in both facilities and in services and programs. It enjoys tremendous community support both in human capital terms (large volunteer base) and in terms of ongoing financial support. Sunrise does not rely significantly on government funding for current operations, but has been the recipient of several government grants for specific projects. The most recent Annual Reports can be found in Appendix 6 and associated audited financial statements are attached as Appendix 9.

We anticipate significant demand for the limited number of residential rental units in this unique facility. We are in a strong position to be able to leverage existing infrastructure and programming to be efficient and effective with our offering.

With respect to capital costs, the affordable housing element of our expansion plans have been outlined in detail in Form 8 of this application. The cost of the Residence portion has been calculated as 64.8% of the total building construction cost, based on area and cost per square foot of the different sections of the building. The inputs into those calculations are based on the architects' drawings and preliminary cost estimates from Frey Building Contractors. Calculations will be refined as construction drawings are completed and the Quantity Engineer completes preliminary costing. The balance of the building includes Respite, Program, and Administrative space. See Appendix 8

The residence includes 14 Bachelor Suites of approximately 38 to 41 sq m each, which approaches the (40 sq m guideline in the RFP document). Our units all include support services (24/7) for adult residents with disabilities. As such, while they will have their own "front door" and dedicated personal space. They do not require full kitchens, and will benefit greatly from the more extensive shared common spaces for socializing, recreation, programming, and communal dining opportunities. These common spaces provide over 500 sq m beyond the total area of the units themselves. We are initially planning to allocate 5 of the suites as Affordable, with potential to convert some or all of the remaining Market Rate suites to Affordable. See TABLE 1 for data related to our grant request calculation.

Sunrise is contributing the land for this residence. An informal assessment of the "value" of the land to a project such as this is approximately $1 million, based on currently available vacant rural properties in the area between 1 and 2 acres. The cost of land within the City of Guelph required for such a residence would far exceed that. Sunrise has also already invested over $140,000 in project soft costs and has $400,000 available in the current capital fund. Our budgets also include provision for $1 million in mortgage, if required. The balance of $3.2MM for the residence is planned to be raised through a combination of capital campaign proceeds, potential additional RFP applications for conversion of additional market rate units to affordable, and CMHC Affordable Housing Fund participation. Sunrise is in the process of rolling out a Development Campaign with an already impressive list of volunteers (see Development/Management Team / Board of Directors Information section) and previously (2006) raised

TABLE 1 – Calculation of Grant Request

Total cost residence	$5,936,130
Cost/unit (14 units)	$424,009
75% of unit cost	$318,007
Max total grant allowed (5 units)	$1,590,035
Total current grant request	$1,166,200
Proponent Equity To Date	$540,000
Financing (Mortgage)	$1,000,000
Balance to be raised*	$3,229,930

*see Form 8 Budget of RFP

$1MM in a single campaign. We are confident of the ability to exceed that amount in 2024 through 2027.

Finally, Sunrise is not carrying any current debt so all newly raised capital funds (grants, donations) will be fully available for current capital project plans.

Operating

A detailed operating budget has been prepared in Form 8 covering contemplated expansion of facilities and services, including the Affordable Supportive Housing (24/7) component. Since the expansion is to be integrated into the ongoing Sunrise operation on the current site, estimation of incremental operating costs and creation of an operating budget was straightforward. Where appropriate, conservative assumptions have been made, including appropriate contingency on revenue, salaries, and property maintenance as well as provision for replacement reserves.

The Sunrise budget may differ from other simple affordable housing unit proposals in that our budget includes planned revenue from programming and services related to the **supportive element** of our strategy. The budget in Form 8 breaks out the various costs and revenues associated with the supportive elements from those directly related to the housing element of the project. A large portion of the costs possibly not typically seen in a regular affordable housing application are the staff costs. It covers 24/7 staffing to provide assistance, security and support with things such as meals, cleaning, and laundry. Target clients typically have monthly allowances from ODSP for living costs as well as Passport Funding to allow participation in the community. Both are Government of Ontario programs designed to support individual with disabilities. There are also federal programs, including the Canada Pension Plan Disability benefit. These programs, personal sources of funds, and/or additional direct funding from Developmental Services Ontario (Sunbeam Developmental Services for our region) are expected to cover those expenses.

We have included in our 5-year Pro-Forma Income Statement a general assumption of an average 1% per year increase in the affordable rent, 1.5% per year in other income, and a 2% per year increase in operating costs. (See the note in Form 8 25 yr Estimate for exception identified for mortgage costs and impact). We are confident that this addition to our operation will be self-sustaining, with a modest projected surplus over the 5-year period.

	Year 1	Year 2	Year 3	Year 4	Year 5
Income					
Affordable Rental Revenue	$53,861	$54,384	$54,912	$55,440	$55,968
Market Rate Rental Revenue	$122,286	$123,456	$124,740	$126,024	$127,308
Non-Rental Revenue *	$720,750	$731,561	$742,535	$753,672	$764,977
Total Revenue	$896,897	$909,401	$922,187	$935,136	$948,253
*Fees (meals, housekeeping, supervision, security), Other (Donations, Fundraising, Program). Utilities included in rent					
Expense					
Maintenance Wages and Benefits	$18,996	$19,376	$19,764	$20,159	$20,562
Maintenance Materials and Services	$44,920	$45,818	$46,734	$47,669	$48,622
Utilities	$24,745	$25,240	$25,744	$26,259	$26,784
Administration	$569,822	$581,218	$592,842	$604,699	$616,792
Other	$21,626	$22,059	$22,500	$22,950	$23,409
Mandatory payments	$154,294	$155,988	$157,716	$159,479	$161,277
Total Expense	$834,403	$849,699	$865,300	$881,215	$897,446
Net Income (Loss)	$62,494	$59,702	$56,887	$53,921	$50,807

MARKETING PLAN

We are acutely aware of the magnitude of the wait lists for affordable supportive housing for our target population, having had constant communications with Christian Horizons, Camphill Communities, additional providers, and also our many parents of adult children with developmental delay.

This is a unique housing concept, where stimulating and empowering programming will be available to all residents as part of the project. Our approach addresses challenges in operating traditional adult group homes and affordable apartments where residents may choose not to attend, or are limited in their ability to attend, available external community programming. This results in reduced social contact. Our proposed model will offer an inclusive package, outlined in a 'Memorandum of Understanding' for all potential residents . All residents will have access to 24/7 staff support. They will interact with the Day Life Skills, and adult respite participants, staff, and many volunteers while always having access to their own private living area and the advantage of a vibrant farm community.

There will be particular focus on good nutrition, with a daily meal plan provided by the trained staff from the community kitchen. **Health care and active living will be a major component of this country environment.**

The operating plan, and budget, includes an accessible van to transport residents to any necessary or desired locations in the City of Guelph or surrounding area. This could be for employment, healthcare appointments, and or/recreational activities.

We believe the offering will be particularly well differentiated vs alternatives in the market. With the implementation of the provincial Journey To Belonging strategy where "people with developmental disability are included in their community and have the lives they want" there is emphasis on good outcomes, access to people with the skills to help, needs-based funding, and person-directed decision making.

The Ministry of Children, Community and Social Services have recently provided an update on the timing for implementation of the Journey To Belonging model. The timing of our project is well positioned to participate in that process. Implementation and Transition is taking place 2024-2027. Provincial Roll-Out is scheduled 2027-2031. Since Sunrise's project does not involve the complication of transitioning from an old operating funding model to the new model, we have opportunity to design our approach from the beginning to be compatible with, or even compete in, the new framework. This will be explored with Sunbeam Community & Developmental Services and the Ministry.

Based on the above, we are confident our facility and operating model will be extremely attractive to potential residents and their families/caregivers. **We anticipate strong demand for what is a limited number of residences, and a significant interest in this innovative model by community members and the media.**

When the project moves into the construction phase, marketing materials regarding the Sunrise affordable supportive housing opportunity will be readied for circulation, first to the Sunrise community of families, and subsequently to the surrounding community.

Marketing activities will be developed and executed in consideration of the guidelines articulated in Section 14.2 Rent-Up of the "County of Wellington Housing Services: Resource Guide for the Development of Affordable Rental Housing."

Appendices 1 through 9 Follow

APPENDIX 1 – PROOF OF INCORPORATION AND CHARITABLE STATUS

APPENDIX 2 – CURRENT PROGRAM DESCRIPTIONS

APPENDIX 3 - BOARD RESOLUTION

APPENDIX 4 - CERTIFIED COPY OF THE LEASE

APPENDIX 5 - SUNRISE AGREEMENT TO ACT FOR FOSL

APPENDIX 6 - ANNUAL REPORT 2021-22 and 2022-23

APPENDIX 7 – PROOF OF SITE PLAN AGREEMENT REGISTRATION

APPENDIX 8 - SITE & FLOOR PLAN

APPENDIX 9 - AUDITED FINANCIAL STATEMENTS 2021-22

AUDITED FINANCIAL STATEMENTS 2022-23

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Mike Schreiner, MPP
Guelph

Acting CAO Courtenay Hoytfox
Township of Puslinch

September 8, 2025

Dear CAO Hoytfox,

I am writing to encourage you to invest in Village at Sunrise Farm, the supportive housing project at Sunrise Therapeutic Riding & Learning Centre.

Sunrise is a well-known provider of horse riding therapy, life skills programs, and social activities that guide young people with developmental disabilities closer to independence. They serve many individuals from Guelph. I have visited their Centre and met with their leadership numerous times as a Member of Provincial Parliament.

Our region desperately needs more supportive housing for people with developmental disabilities. I have met with dozens of families about the lack of housing for their loved ones. Many of them have been on wait lists for years, or even decades. Province-wide, over 52,000 people with developmental disabilities are on a wait list for vital services.

The leadership team at Sunrise are extremely dedicated to the Village at Sunrise Farm project. They have already secured some capital funding and in-kind support. In addition, I have offered to help them develop an operating model that the provincial government can endorse.

I am confident that with your support, Sunrise will be able to begin construction quickly and provide these urgently needed housing units. Your consideration of this important community project is greatly appreciated.

Sincerely,

[redacted]

Mike Schreiner
MPP, Guelph

Dominique O'Rourke
Member of Parliament for Guelph

September 9, 2025

To whom it may concern,

As the Member of Parliament for Guelph, I am pleased to offer my support for Sunrise Therapeutic Riding and Learning Centre's Village at Sunrise Farm project. For over 40 years, Sunrise has provided much needed programs, therapy and recreation for children and adults with disabilities. This work has had an immense impact on Wellington County and the city of Guelph.

Affordable housing is an issue that is felt deeply by vulnerable and high-risk communities. Adults living with disabilities, in particular, face some of the highest rates of housing insecurity across the country. Much of this insecurity stems from the lack of supportive and affordable housing that meets the needs of this community. This has tragically led to more than 10,000 adults with intellectual disabilities, under the age of 65, living in long-term care homes.

The Village at Sunrise project will help to address this urgent need in our local community. The proposed 14 studio suites, respite facilities and program spaces will provide adults with disabilities a place where they can live, socialize, and grow. Moreover, Sunrise has made significant progress on the project to date. They have done the required zoning, completed a site plan agreement, created a detailed design, and submitted for their building permits.

I thank you for your time and consideration of their application and hope they are able to keep moving forward with this much needed innovative project that will be a benefit to our community for decades to come.

Sincerely,

[redacted]

Dominique O'Rourke
Member of Parliament for Guelph

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REPORT CAO-2025-003

TO: Mayor and Members of Council

PREPARED BY: Courtenay Hoytfox, CAO

PRESENTED BY: Courtenay Hoytfox, CAO

MEETING DATE: September 17, 2025

SUBJECT: AMO 2025 Conference Debrief

RECOMMENDATION

That Report CAO-2025-003 entitled AMO 2025 Conference Debrief be received for information.

Purpose

The purpose of this report is to provide Council with information regarding the Township's delegations at the 2025 AMO Conference.

Background

Council directed staff to submit a number of delegation requests with various Ministries at the 2025 AMO conference. Below are the submitted requests, including the detailed issues that the Township requested to discuss with the Ministers or Ministry staff and key takeaways. The Township's presentation materials for each ministry, where delegation requests were successful, is appended to this report as Schedules A-C. The TAPMO review of the ARA policy changes was not available at the time of publishing this report and will be circulated to Council once received.

Ministry of Economic Development, Job Creation and Trade: Bill 5 – Special Economic Development Zones Act, 2025 - Unsuccessful Delegation Request

Summary of delegation request: The Township of Puslinch recognizes the province's intent to address economic and supply chain concerns but has serious reservations about the proposed *Special Economic Development Zones Act, 2025*. Key concerns include unclear criteria for project designation, erosion of municipal planning authority, gaps in provincial oversight, and the risk of projects being advanced without local consultation or demonstrable benefit. The Township respectfully requests a delegation with the Ministry to discuss these issues and urges the province to pause the legislation until meaningful consultation with municipalities is undertaken.

Key Takeaways: N/A

Ministry of Environment, Conservation and Parks: Excess Soil Management – Liquid Soil Depots – Successful Delegation Request

Summary of delegation request: The Township of Puslinch is facing a significant increase in illegal excess soil importation due to its location along Highway 401 and Highway 6, raising concerns about groundwater protection given the Township's reliance on well water and the prevalence of below-water-table aggregate operations. While the Township appreciates the province's decision to defer the exemption date, it strongly opposes exempting aggregate reuse and small liquid soil depots from requiring Environmental Compliance Approvals without appropriate oversight. The Township urges the province to implement robust monitoring and enforcement measures and requests an opportunity to meet with the Ministry to discuss these concerns.

Key Takeaways: The Township discussed the issues with liquid soil depots and reiterated its position on the deferred legislation. In addition, the Township discussed its challenges around fill importation generally and requested support from the ministry establishing clear guidelines outlining the ministry's role where there is illegal fill importation and where the Township has a regulatory by-law. The Township emphasized the need for more consistent communication between ministry and Township enforcement staff, and local ministry staff have since followed up to continue these discussions.

Ministry of Transportation: Beautification of Downton Morriston & potential closure of Concession 1 at Highway 6 – Successful Delegation Request

Summary of delegation request: The Township of Puslinch values its ongoing dialogue with the Ministry of Transportation on the Morriston Bypass project and seeks to explore interim improvements to address traffic and safety concerns in Morriston. These include potential enhancements such as crosswalks, signage, planters, and other downtown improvements, as well as discussing the possible closure of Concession 1 at Highway 6 and installation of a traffic light at Leslie Road. The Township looks forward to continued collaboration with the Ministry on these priorities.

Key Takeaways: The ministry confirmed that established phasing for the bypass project can be shared with the Township and committed to preparing a communications plan to effectively inform the public. The Township emphasized the importance of interim safety measures, such as crosswalks and traffic lights. The MTO indicated it is open to receiving input from the Township following the completion of the Morriston study in 2026 and advised that a meeting to discuss traffic light installation is scheduled for the week of October 20.

Ministry of Natural Resources: Non-permitted uses within ARA licensed areas & Prohibition of new or expanded ARA licenses on prime agricultural lands – No Response to the Delegation Request

Summary of delegation request: The Township of Puslinch is concerned that the operation of many Aggregate Resources Act (ARA) licensed sites no longer reflects the intent of the *Planning Act* for extraction to be an interim use, with ongoing amendments, insufficient enforcement, and the continuation of accessory uses undermining rehabilitation commitments. These practices, combined

with oversight gaps identified by the Auditor General, create inequities for host municipalities and communities while placing additional strain on local infrastructure. The Township urges the province to strengthen monitoring and enforcement, prevent aggregate licensing on prime agricultural lands, and ensure fair compensation for municipalities impacted by the processing and transport of aggregate materials.

Key Takeaways: N/A

Ministry of Finance: OMERS Manual Changes - No Response to the Delegation Request
Summary of delegation request: The Township of Puslinch is concerned that OMERS has implemented mid-year changes to its Employer Manual without consulting participating employers, creating unforeseen budgetary pressures that municipalities must absorb through adjustments to projects and services. These changes undermine the municipal budget process and limit the ability to plan effectively on behalf of taxpayers. The Township also notes challenges in receiving timely clarification from OMERS and requests an opportunity to discuss these concerns with the Ministry in light of the upcoming governance review.

Key Takeaways: N/A

Ministry of Agriculture, Food and Agribusiness: Minimum Distance Separation – Successful Delegation Request
Summary of delegation request: The Township of Puslinch requests a delegation with the Ministry of Agriculture, Food and Agribusiness to discuss supporting rural housing development through land severances while safeguarding the long-term viability of agricultural operations. The Township supports rural severances as a way to help address housing needs while maintaining rural character but emphasizes that farming operations must not be compromised. To reduce future conflicts, the Township recommends that new rural lot purchasers be made aware of normal farming impacts such as noise, odours, and dust through disclosure requirements built into the severance process.

Key Takeaways: The ministry listened to the Township's request; however no actions or commitments were made.

Financial Implications

None

Applicable Legislation and Requirements

None

Engagement Opportunities

On-going engagement with Ministry staff.

Attachments

Schedule A – Township Delegation Presentation to the MECP
Schedule B – Township Delegation Presentation to the MTO
Schedule C – Township Delegation Presentation to the OMAFA
Schedule D – TAPMO Review of ARA Policies (circulated separately once received)

Respectfully submitted,

Courtenay Hoytfox
CAO

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AMO Delegation to the MECP

Excess Fill, Liquid Soil Depots, and Enforcement



Key Priorities for this Presentation

- Illegal Excess Soil Importation in Rural Area
- Clear Enforcement Processes
- Oversight Must Match Increased Soil Activity
- Concerns with Liquid Soil Depot



Current Issues

- As of August 1st, 2025 50% of the Township's active by-law enforcement files are related to site alteration (21 Files).
- The Township has multiple files where fill in excess of 10,000-100,000 cubic metres of fill has been brought to properties illegally and in violation of legislated quality standards.
- With the forth coming changes to landfill site restrictions, municipalities like the Township of Puslinch stand to become overrun with excess soils being deposited and destroying agricultural lands.



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Specific Concerns with Liquid Soil Depots

- Concerns with ECA Exemptions for Liquid Soil Depots
- Stricter enforcement of Liquid Soil Depots and ancillary uses on ARA licensed sites
- Land Compatibility Concerns



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Township's Request

- The Township respectfully requests that:
  - **Strengthen Communication Channels:** Improve the flow of information between MECP staff and municipal staff/Council.
  - **Improve Collaboration and Enforcement Roles:** Enhance municipalities' enforcement capabilities by limiting opportunities to circumvent local laws and improving coordination with provincial ministries through regular communication and clearly defined roles and responsibilities, particularly where municipal by-laws are in effect.
  - **Prioritize Municipal Relationships:** Recognize municipalities as key stakeholders and acknowledge, through action, their critical connection to the community.

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Thank you

Excess Fill, Liquid Soil Depots, and Enforcement

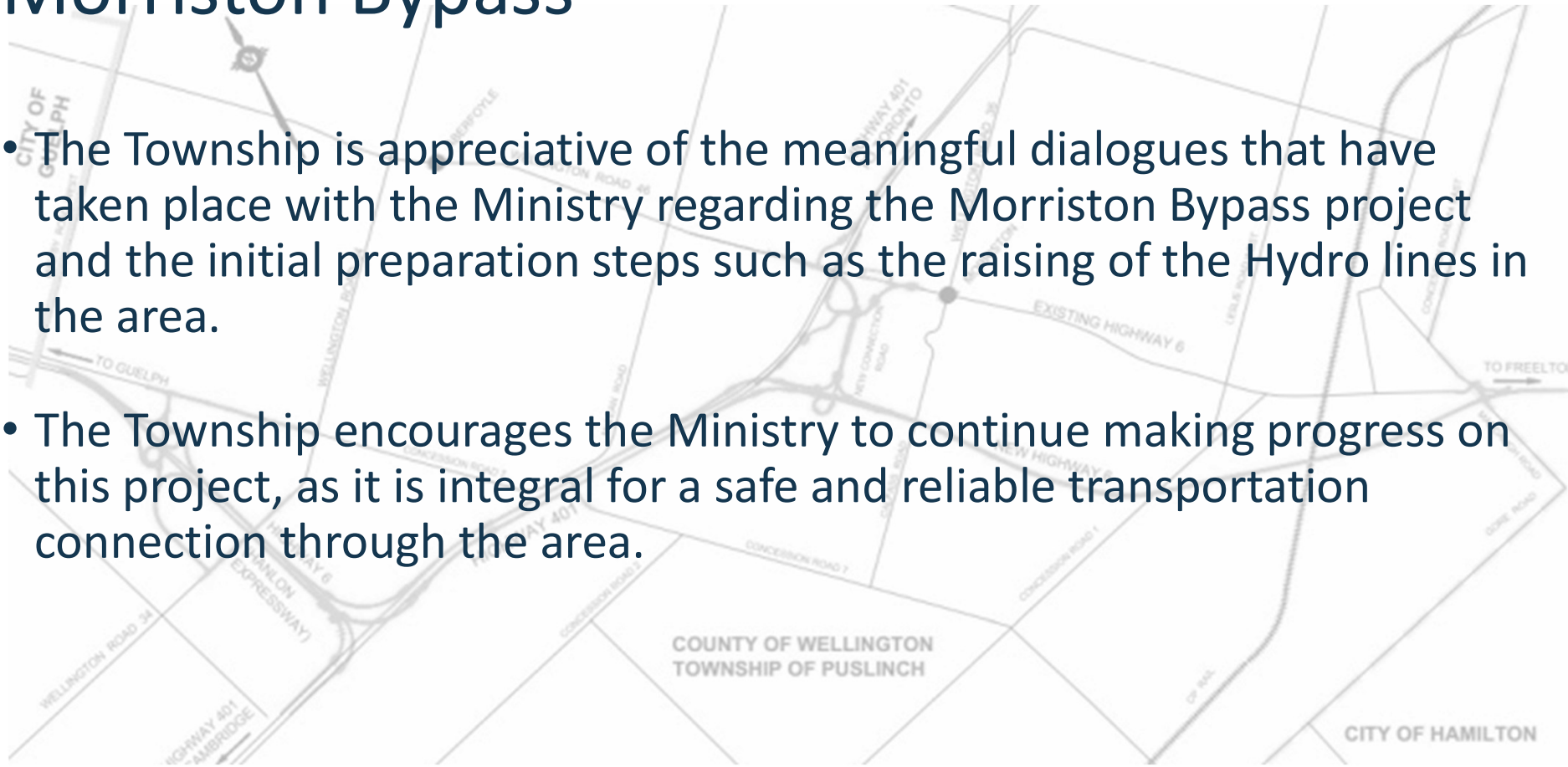
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AMO Delegation to the MTO

Morriston Traffic and Beautification

Morriston Bypass

- The Township is appreciative of the meaningful dialogues that have taken place with the Ministry regarding the Morriston Bypass project and the initial preparation steps such as the raising of the Hydro lines in the area.
- The Township encourages the Ministry to continue making progress on this project, as it is integral for a safe and reliable transportation connection through the area.



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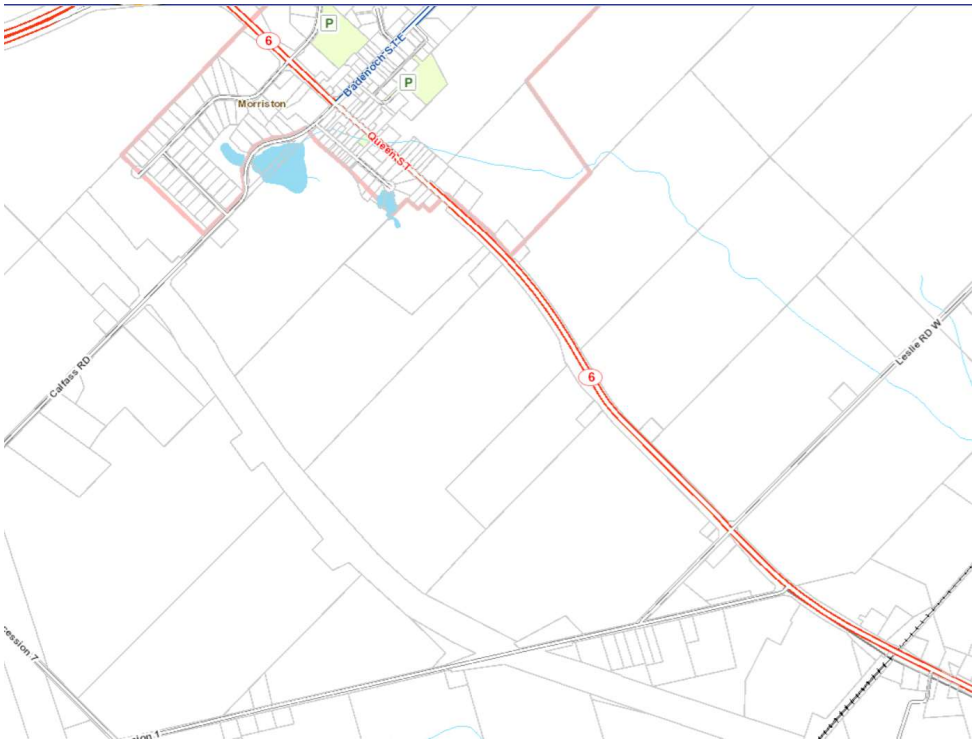
Footage of Traffic Challenges

- Downtown Morriston 8 Minute Timelapse Video – June 2025
  - https://youtu.be/JCsX_CqSpWw
- Highway 401 to Highway 6 Exit – June 2025
  - https://youtu.be/JPkSAo2a_kA
- Highway 6 Exit Morriston – June 2025
  - https://youtu.be/oGnELy6u3lg
- Highway 6 into Downtown Morriston – June 2025
  - https://youtu.be/V36rAPh9RSg
- Downtown Morriston – August 2025
  - https://youtube.com/shorts/iX6ApQZp9sU

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Interim Step 1 –
Safety & Traffic Concession 1 at Highway 6

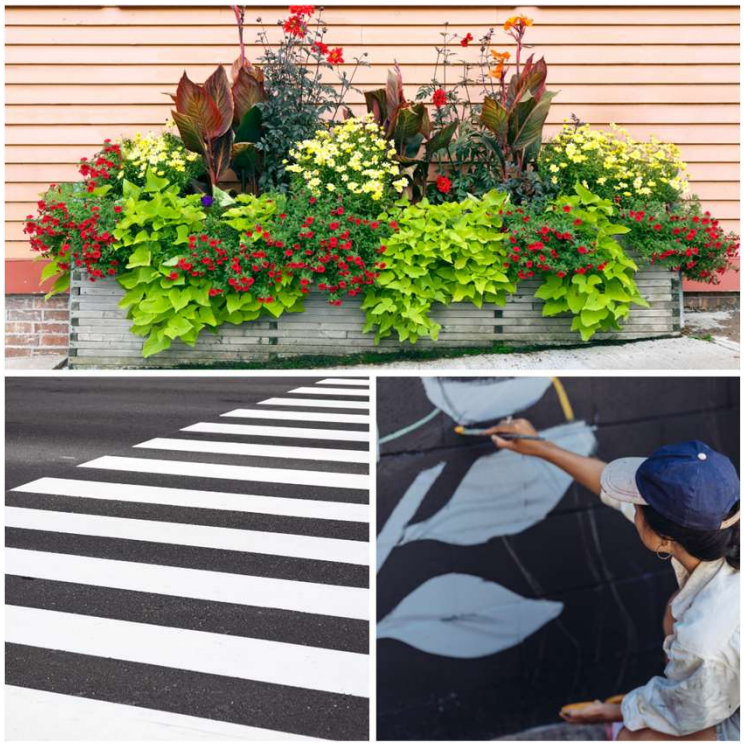
- MTO Installation of a traffic light on Highway 6 at Concession 1 and Leslie Rd W
- Closure of Concession 1 at Highway 6 South of Leslie Rd W



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Interim Steps – Beautification of Morriston

- By way of update from the last delegation, the Township has issued an RFP for the Downtown Revitalization Project and anticipates having recommendations by March 2026 and will update MTO staff accordingly as it relates to cost sharing opportunities. This may include the following initiatives:
  - Crosswalks to improve connectivity in the downtowns of Aberfoyle and Morriston and to provide pedestrian traffic safe access from one side of the road to the other;
  - Pedestrian lighting;
  - Placemaking and gateway signage;
  - Bench seating;
  - Community murals; and
  - Seasonal community planers



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Thank you!

Morriston Traffic and Beautification

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AMO Delegation to the OMAFA

Minimum Distance Separation & Rural Housing



Supporting Rural Housing Through Severances

- Puslinch supports rural severances to help meet housing demand.
- Severances help maintain the rural character of the Township.
- A balanced approach is needed to ensure compatibility with agriculture.







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Protecting the Agricultural Community

- Farm operations must not be restricted by nearby development.
- Long-term viability of agriculture is a priority.
- Farms need flexibility to evolve and expand.



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Ensuring Compatibility Through Awareness

- New rural residents should be aware of agricultural realities.
- Disclosure requirements (e.g., noise, odour, dust) should be part of the process.
- Township seeks collaboration with the Ministry on balanced policy.



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Opportunities for Support

- The Township respectfully requests that:
  - OMAFA assist with advocacy efforts with MMAH to modernize rural severance guidelines and continue to prioritize agriculture but without limiting development opportunities.
  - OMAFA and MMAH to develop support documents for the local municipality to raise awareness about the realities of rural living and agricultural practices.

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Thank you

Minimum Distance Separation & Rural Housing

TAPMO

Top Aggregate Producing Municipalities of Ontario

Sent via email to aggregates@ontario.ca

Amendment to 9.3.3 Report CAO-2025-003 AMO Update

September 16, 2025
Sheena Tower
MNR – PD – Development and Hazard Policy Branch
300 Water Street, 2nd Floor, South Tower
Peterborough, ON
K9J 8M5

Dear Ms. Tower,

Re: ERO 025-0216 - Updating and modernization of operational policies supporting the delivery of the provincial Aggregate Resources Act program

The Top Aggregate Producing Municipalities of Ontario (TAPMO) thanks the MNFR for the chance to comment on the proposed changes to the *Aggregate Resources Act* (ARA). This submission has been prepared on behalf of our membership base.

TAPMO advocates for three key priorities in the provincial aggregate policy framework. First, we call for a proactive and streamlined consultation and approval process that is fair, consistent, and accessible, reducing unnecessary appeals and delays while ensuring clear municipal requirements and meaningful community engagement. Second, TAPMO emphasizes that taxpayers should not be subsidizing aggregate operations. Property taxes must reflect the true cost of municipal services, and aggregate levies must be set at levels that adequately cover infrastructure repairs caused by aggregate haulage. Third, we support the development of sustainable, constructive solutions that balance the growth of Ontario's aggregate sector with the needs of municipalities and nearby residents, including stronger collaboration among all stakeholders, clearer technical standards, and more robust planning for haul route impacts.

<u>Proposed Policy Changes</u>

Our understanding of the policy changes includes the revocation of 28 outdated policies, formerly housed in one manual, and their replacement with a streamlined set of theme-based policies. Three are updates (Water Report, Cultural Heritage Report, and Matters to be Considered), and one is a new requirement (Maximum Predicted Water Table Report). Many of the rescinded policies were primarily internal staff guidance or are no longer required under the updated standards. The modernization is not eliminating policy directions or regulatory requirements, but rather improving the format, clarity, and usability of the framework.

Specifically:

- The Water Report replaces the former Hydrogeological Report Standards for licences, permits, and wayside permits. The draft policy clarifies reporting levels (Level 1 and Level 2) and integrates requirements under the Clean Water Act and Provincial Planning Statement, while aligning with the new Maximum Predicted Water Table Report.
- The Cultural Heritage Report policy will consolidate existing Cultural Heritage Resource Report Standards into a single updated policy, requiring comprehensive assessments of archaeological resources, built heritage, and cultural heritage landscapes in alignment with the Ontario Heritage Act and the Provincial Planning Statement.
- The Matters to be Considered in the Issuance of a Licence policy will update and replace the previous framework, providing clearer direction on how Section 12 of the ARA (covering environmental, social, agricultural, and planning considerations) will be applied in reviewing licence applications.
- The Maximum Predicted Water Table Report is a new requirement intended to establish the highest elevation of groundwater at a site. This provides clear technical direction to applicants and staff on how to prepare and evaluate applications for below-water-table extraction. The policy lists best practices and reporting requirements to ensure consistency across applications.

TAPMO understands that the rescinded policies were primarily internal guidance for staff or are no longer required given the format of the modernized standards. We understand that no policy directions or regulations are being lost through this transition. Collectively, these changes are to simplify the policy framework, eliminate duplication, and provide updated guidance consistent with legislative and regulatory amendments made since 2020.

This submission focusses on the Water Report and the Matters to be Considered in the Issuance of a Licence.

<u>Key considerations for the Water Report and the Maximum Predicted Water Table Report proposal:</u>

1. In Section 3.2 of the Water Report we recommend that the following issues should be added as part of the required study:
    a. Water Balance study identifying changes to runoff, evapotranspiration and infiltration at the site.
    b. Cumulative impact assessments to include the water taking from existing Permit to Take Water holders and the cumulative impact of all below-water-table operations within five kilometers (not a scientific based area).
2. For the Maximum Predicted Water Table Report, Section 5 of the Policy allows for the use of adjacent site information. This approach should clarify that reliance on off-site information for the issuance of a license is intended to be limited to exceptional circumstances.
3. Qualified Persons (QPs) should have the discretion to apply their professional judgment in determining the appropriate level of effort for technical studies. A

flexible approach will ensure that assessments remain balanced, meeting both regulatory requirements and site-specific considerations.

Key considerations for the "Matters to be Considered" proposal:

1. The current Policy A.R. 2.01.10 provides for the general recognition of the air, land and water. The proposed Policy is including more direction in technical areas to defaulting to Provincial standards or limits: as examples;
    a. Provincial limits for a Blast Design Report [2.2(b)]
    b. Ministry of the Environment, Conservation and Parks (MECP) administration of various legislation addressing off-site effects such as dust, noise, vibration, and impacts to water including discharge and drainage.
2. The scoping of the studies and effects provides no sensitivity to local context or nuanced issues, including if there are sensitive receptors further away that should be considered. It should be clarified that local context and requirements should factor into these reviews.
3. The current Policy A.R. 2.01.10 does not include official plans as part of the policy framework to consider. The proposed Policy does include official plan comments in Comments from Municipality [2.3(c)]. This would be a good opportunity to ensure this reference is fully incorporated into the Planning and Land Use category [2.7(g)].

Conclusions:

The general housekeeping realignment of the updated operational policies and the Cultural Heritage Report are helpful to streamline study requirements.
There remains an opportunity in this proposal to provide clarity on the appropriateness of local standards and local context as essential inputs into technical and land use planning studies.

On behalf of our member organizations, I request that TAPMO be included in future consultation opportunities and information sessions related to subsequent ERO postings on Aggregate Resources Act policy updates. This will help ensure that municipal perspectives are incorporated early in the policy development process.

I look forward to a conversation on these items to offer any clarification needed to help support the TAPMO recommendations.

Sincerely,

Original Signed

Don MacLeod,
Executive Director
Top Aggregate Producing Municipalities of Ontario (TAPMO)

REPORT COR-2025-035

TO:	Mayor and Members of Council
PREPARED BY:	Mehul Safiwala, Junior Planner
PRESENTED BY:	Justine Brotherston, Director of Corporate Services/Municipal Clerk
MEETING DATE:	September 17, 2025
SUBJECT:	Zoning By-law Amendment Application - D14/ONT(Ertl) 6676-6678 Wellington Road 34 Request for Council to deem the application complete

RECOMMENDATION

That Report COR-2025-035 entitled Zoning By-law Amendment Application D14/ONT(Ertl) Request for Council to deem the application to be complete be received; and

That Council deem the zoning amendment application to be complete; and,

That staff be directed to proceed with notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the *Planning Act, 1990*.

Purpose

The purpose of this report is to:

1. Advise Council of the application for a Temporary Use Zoning By-law Amendment for the property described as Part of South Half Lot 8, Concession 3; Township of Puslinch, (the "Subject Lands"). The proposed Zoning By-law Amendment is to amend the Township of Puslinch Zoning By-law 23-2018, as amended, to permit a Temporary Use of a liquid soil management operation (the "Proposed Use") on a portion of the Property for a period up to three years.

2. Obtain confirmation from Council that the application can be deemed to be complete and provide notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the *Planning Act, 1990* (Act).

Background

Application

The proposed Zoning By-law Amendment Application is to amend the Township of Puslinch Zoning By-law 23-2018, as amended, to permit temporary zoning permissions specifically to permit a hydrovac truck liquid soil operations use, which includes the importing, sorting, distribution of liquid soil for an aggregate pit rehabilitation, and associated truck and employee parking.

The application required one submission in order to determine that all required documents and studies to support the application had been received.

Township staff and consultants will begin a fulsome review of the application based on the application merits once the application has been deemed complete by Council.

Consultation:

1. Pre-Consultation

A Comprehensive Development Review was submitted for the proposed rezoning on January 27, 2025 and the applicant was provided with preliminary comments from Township Staff and its consultants representing the Township, County of Wellington, and external agencies.

The following reports and plans were submitted with the pre-consultation application on January 27, 2025:

- Pre-Consultation meeting cover letter – 6678 Wellington Road 34 – GSP Group – January 27, 2025;
- Site Layout – GSP Group – April 13, 2023

2. Process to Deem the Application Complete

Comments

The Zoning By-law Amendment Application, including the prescribed fee, was submitted to the Township on August 8, 2025. The first circulation of the application is reviewed to determine if all required documents and studies have been submitted in support of the application. There is a thirty (30) day timeline to review applications for completeness in accordance with the Act.

The following reports and plans were submitted with the Zoning By-law Amendment application:

1st Submission – July 2nd, 2025:

- Zoning By-law Amendment Application Form – July 2nd, 2025
- Planning Justification Report – GSP Group – July 2025
- Response to Peer Review of Acoustic Assessment Report – GHD Limited - October 30, 2023
- Design and Operations Report – GHD Limited - March 26, 2024
- Drinking Water Threat Disclosure Report – GHD Limited - December 17, 2021
- Site Servicing Study – GHD Limited - June 20, 2025
- Response to Source Water Protection letter – GHD Limited – June 9, 2025
- ECA for Air & Noise – MECP - October 11, 2024
- Stormwater Management Plan Application for an Industrial Sewage Works – Stormwater Environmental Compliance Approval – GHD Limited – February 9, 2021
- ECA for Waste Approval – MECP - October 10, 2024
- Updated Traffic Operations Assessment – GHD Limited - May 28, 2025
- Response to Peer Review Comments on Pre-consultation request to support Temporary Use Zoning By-law Amendment – GHD Limited – June 11, 2025
- Stormwater Management Report – Erosion and Sediment Control Plan - GHD Limited – 13 December, 2021
- Development Concept – GSP Group – June 6, 2023
- Updated Acoustic Assessment Report – GHD Limited - April 3, 2024
- Emission Summary and Dispersion Modelling Report - GHD Limited – December 10, 2021
- Response to Comments – Hydroc-Vac Truck Disposal Area – GHD Limited - June 9, 2025
- Response to Review of Temporary Use By-Law Amendment Application by Valcoustics Canada Limited – GHD Limited - June 12, 2025
- Environmental Impact Assessment Report– GHD Limited - May 9, 2022
- Response to Peer Review Comment items 4, 6 & 7 on an Environmental Impact Assessment - GHD Limited - February 20, 2024
- Concept Plan - GHD Limited - May 28, 2025

Recommendation

Staff recommend that Council deem the application to be complete at this time as the Township's staff and consultants have determined that all the required documents and studies have been provided for the application. The applicant has paid the required fee to the Township and is responsible for paying all third-party costs should the application require more than two submissions.

Should Council deem the application to be complete, the timelines in the *Planning Act* stipulate 90 days to process the application. The Township continues to process applications as close to the stipulated timelines as practical. The legislation sets out the following process to be completed:

- Circulate the statutory notice to properties within a 120 metre buffer, in addition to all required agencies;
- Peer review all submitted materials to the satisfaction of the Township;
- Present the application to the Township Planning and Development Advisory Committee for comments (tentatively scheduled for November 12, 2025);
- Schedule and conduct at least one public meeting (November 20, 2025);
- Advertise the complete application and public meeting in the Wellington Advertiser in accordance with statutory notice requirements and installing physical signage on the property; and
- Provide Council with a planning recommendation report and proposed by-law (Date to be determined).

Financial Implications

As outlined throughout the report.

Applicable Legislation and Requirements

County of Wellington Official Plan
Township of Puslinch Zoning By-law 2018-023
Planning Act, R.S.O. 1990, as amended

Attachments
Schedule “A” – Key Map

Respectfully submitted,

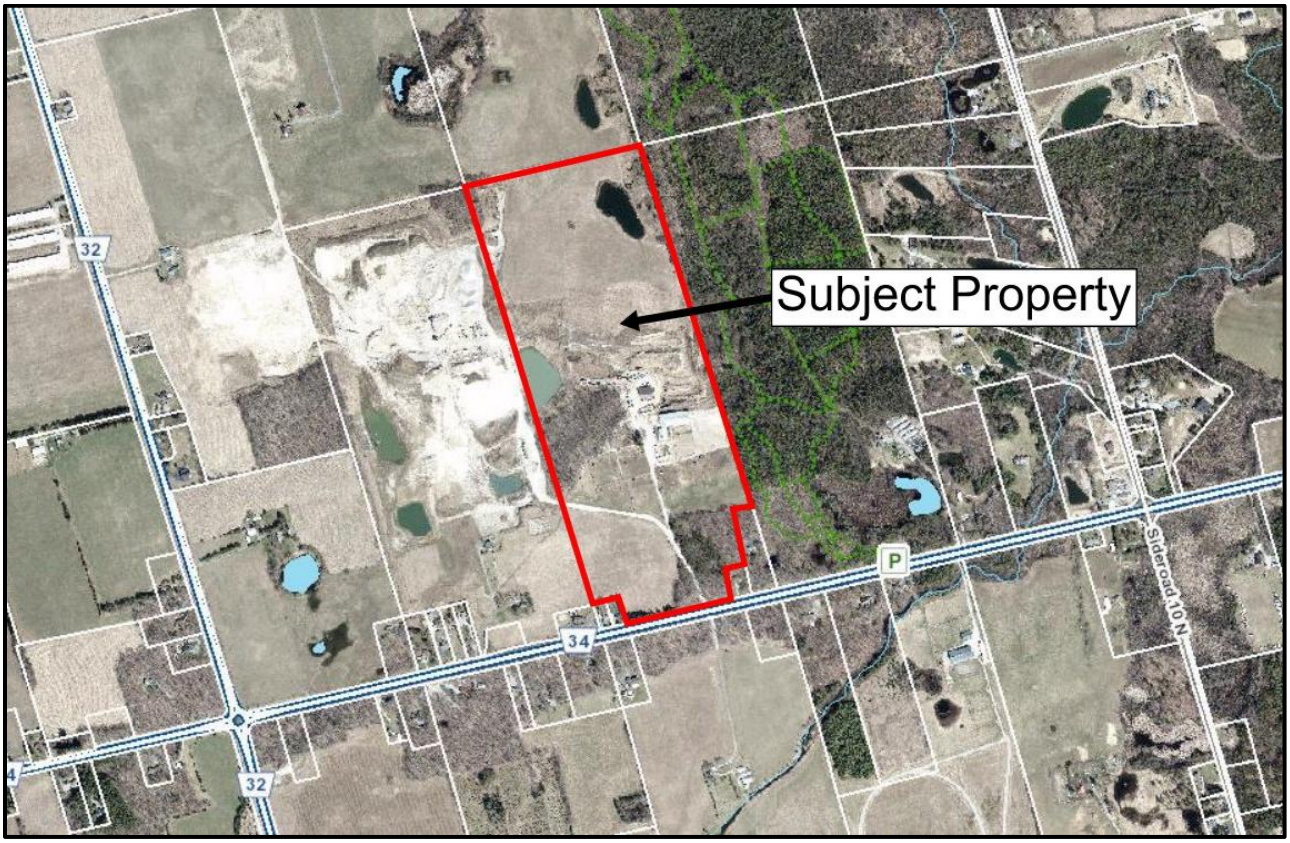
Mehul Safiwala
Junior Planner

Reviewed by:

Justine Brotherston
Director of Corporate Services/
Municipal Clerk

Schedule "A"

KEY MAP



REPORT COR-2025-036

TO:	Mayor and Members of Council
PREPARED BY:	Mehul Safiwala, Junior Planner
PRESENTED BY:	Justine Brotherston, Director of Corporate Services/Municipal Clerk
MEETING DATE:	September 17, 2025
SUBJECT:	Zoning By-law Amendment Application (D14/AUD) Audrey Meadows Phase II Update

RECOMMENDATION

That Report COR-2025-036 entitled Zoning By-law Amendment Application (D14/AUD) Audrey Meadows Phase II Update; and

That Council direct staff to hold a Public Information Session prior to bringing forward a recommendation report for Council's consideration.

Purpose

The purpose of this report is to:

1. Advise Council of the application for a Zoning By-law Amendment for the property described as Part of Lots 17, 18, and 19 Concession 8; Township of Puslinch, (the "Subject Lands"). The proposed Zoning By-law Amendment is to amend the Township of Puslinch Zoning By-law 23-2018, as amended, to facilitate the development of a residential subdivision consisting of 22 single detached dwelling lots described as "Audrey meadow phase II".

2. Obtain confirmation from Council to hold a Public Information Meeting including providing advanced notice.

Background

Application

The Zoning By-law Application was deemed complete on November 23, 2021 and required four submissions in order to address all comments from Township Staff and consultants. Each further submission addressed outstanding comments provided to the applicant by Township staff and consultants.

The Zoning By-law Amendment Application, including the prescribed fee, was submitted to the Township on June 22, 2021. The Application was deemed complete on November 23, 2021. There were 3 subsequent submissions, and the statutory public information meeting was held on May 25, 2022. Council was not able to make a decision regarding the Zoning By-law Amendment until such time that the County of Wellington made a decision regarding Official Plan Amendment (OPA) OP-2021-02.

On April 23, 2025 the County of Wellington approved OP-2021-02 to redesignate a portion of the Subject Lands from Secondary Agricultural to Country Residential. Following approval of the OPA the applicant contacted the Township to reactivate the application, and the fourth review of the Zoning By-law Amendment Application was circulated on July 16, 2025 to Township staff, consultants, County of Wellington Staff and external agencies all deficiencies, with the exception of Wellington County Source Water Protection were addressed as outlined in Schedule "C".

The following reports and plans were submitted with the Zoning By-law Amendment application:

- Planning Justification Report prepared by Stovel and Associates Inc.;
- Planning Justification Letter prepared by Stovel and Associates Inc., dated April 16, 2021;
- Draft Zoning By-law Amendment prepared by Stovel and Associates Inc.;
- Environmental Impact Study prepared by Stovel and Associates Inc. And EIS addendum report dated December 31, 2021;
- Functional Servicing and Stormwater Management Report prepared by Triton Engineering Services Limited dated June 2021, and addendum letter dated August 16, 2021;
- Letter regarding Section 4.9.7 Paris and Galt Moraine Policy Area prepared by Groundwater Science Corp., dated June 20, 2021;

- Traffic Brief prepared by Triton Engineering Services Limited, dated June 2021;
- Groundwater and Surface Water Monitoring Program Report prepared by Hydrogeology Consulting Services;
- Zoning By-law Amendment Application, dated June 22, 2021;
- Geotechnical Investigation prepared by Naylor Engineering Associates Ltd., dated November 25, 2004; and
- Drinking Water Source Protection Screening Form, dated April 20, 2021.
- Water Supply and Nitrate Loading Assessment prepared by Groundwater Science Corp., dated July 2025;
- Draft Zoning By-law Amendment dated 2025; and
- Letter regarding Provincial Planning Statement (2024) prepared by Stovel and Associates Inc., dated October 31, 2024.

And the following steps have been completed to date:

- Circulated the statutory notice to properties within a 120 metre buffer, in addition to all required agencies on April 20, 2022.
- Statutory notice circulated in the Wellington Advertiser on April 20, 2022.
- Joint Public Information Meeting May 25, 2022.

Given it has been three years since the statutory public meeting was held, staff are recommending that a non-statutory Public Information Session be held in advance of the recommendation report being brought before Council for consideration.

Should Council direct staff to hold a Public Information Session, the next step in the process is to be completed:

- Circulate the statutory notice to properties within a 120 metre buffer, in addition to all required agencies;
- Advertise the public information session in the Wellington Advertiser; and
- Provide Council with a planning recommendation report and proposed by-law (Date to be determined).

Financial Implications

As outlined throughout the report.

Applicable Legislation and Requirements

County of Wellington Official Plan
Township of Puslinch Zoning By-law 2018-023
Planning Act, R.S.O. 1990, as amended

Attachments

Schedule “A” – Key Map
Schedule “B” - Audrey Meadow Phase II Update Report prepared by NPG Planning Solutions
Schedule “C” – Application Submission Comment Summaries

Respectfully submitted,	**Reviewed by:**
Mehul Safiwala **Junior Planner**	**Justine Brotherston** **Director of Corporate Services/** **Municipal Clerk**

Schedule "A"

KEY MAP



Planning Report for the Township of Puslinch
Prepared by NPG Planning Solutions Inc.

To: Courtenay Hoytfox, CAO
Township of Puslinch

From: Jeremy Tran, Manager, Urban Design & Development Planning
NPG Planning Solutions Inc.

Subject: Update Report – Audrey Meadows Phase 2
Zoning By-law Amendment Application D14-AUD
PUSLINCH CON 8 PT LOTS 17 TO;19 PLAN 61M153 PT LOT 23 AND; RP 61R22424 PARTS 1 TO 3

Attachments: 1 - Aerial Map of Subject Lands
2 - Concept Plan provided by applicant
3 - Draft Zoning By-law provided by Applicant

SUMMARY

A Zoning By-law Amendment Application (the "Application") was submitted on June 22, 2021 for the lands shown in **Attachment 1** (the "Subject Lands"). The Application was deemed complete on November 23, 2021. The last Public Meeting for this application took place in May 2022.

The purpose of the Application is to rezone a portion of the Subject Lands from Agricultural (A) to Rural Residential (RUR). The application is required to facilitate a subdivision that tentatively consists of twenty-two (22) single detached dwellings, a stormwater management facility, a public street and natural environment lands.

Since the last submission in 2022, there has not been any development on this Application as the Applicant addressed outstanding comments. Recently, the County of Wellington approved an Official Plan Amendment application, re-designating a portion of the Subject Lands from Secondary Agricultural to Country Residential. The Applicant then resubmitted the Zoning By-law Amendment Application with additional information

including a revised draft Zoning By-law, a Water Supply and Nitrate Loading Assessment (2025) and a letter discussing the relevant changes in the Provincial Planning Statement (2024). The Township had circulated this submission to relevant commenting agencies for comments.

This report provides Council with a summary of the relevant changes to the Application since the last submission in 2022, which includes changes in the provincial and County policy framework, changes to the requested Zoning By-law Amendment and additional materials submitted. Additionally, a summary of technical comments received and discussion of next steps are also included in this report.

It is recommended that a Public Information Session be scheduled for the Zoning By-law Amendment application.

INTRODUCTION

The Subject Lands are currently vacant and have frontage along Victoria Road South. The Subject Lands are located North of Wellington Road 34 (being a Regional Road). The land's legal description is Puslinch Concession 8 Part of Lots 17 to 19; Plan 61M153 Part of Lot 23; Registered Plan 61R22424 Parts 1 to 3. The Subject Lands are approximately 48.86 hectares in size and irregular in shape.

Environmental features exist on and adjacent to the Subject Lands, including provincially significant wetlands and unevaluated wetlands, significant woodlands, regulated watercourses. The regulated watercourses also include associated floodplain. A large portion of the Subject Lands are within the GRCA regulation limit.

PURPOSE

The purpose of the Application for Zoning By-law Amendment ("the Application") is to amend the Township of Puslinch Comprehensive Zoning By-law No. 023-18 (the "Puslinch Zoning By-law") to permit a subdivision tentatively consisting of 22 single detached dwellings, a stormwater management facility, natural environment lands and a public street.

In detail, the proposed Zoning By-law Amendment would rezone a portion of the Subject Lands currently zoned Agricultural (A) to a Rural Residential Site-Specific Zone (RUR(spXX)). The portions of the Subject Lands zoned Natural Environment (NE) with an Environmental Protection Overlay would remain as existing. The Concept Plan illustrating the contemplated subdivision is shown on **Attachment 2** (Concept Plan provided by the Applicant) of this report. Details of the proposed Zoning By-law Amendment are outlined in the Draft Zoning By-law (2025) proposed by the Applicant and included as **Attachment 3** of this report. The changes in the Draft Zoning By-law are summarized in the Summary of Changes section below.

SUMMARY OF CHANGES

Provincial Planning Statement (2024)

Since the last resubmission in 2022, the Provincial Planning Statement (2024) (the "PPS") came into effect in October 2024 and consolidated the previous Provincial Policy Statement (2020) and the A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019) (the "Growth Plan"). The Growth plan previously stated that "new multiple lots or units for residential development will be directed to settlement areas, but may be allowed on rural lands in site-specific locations with approved zoning or designation in an official plan that permitted this type of development as of June 16, 2006". Since this policy is no longer in effect, multiple lots or units for residential development may be considered on rural lands.

The Applicant provided a memo evaluating the changes introduced by the PPS (2024) as part of the 2025 resubmission.

Official Plan Amendment (OP-2021-02)

On April 23, 2025, the County of Wellington approved the Official Plan Amendment application (OP-2021-02) to redesignate a portion of the Subject Lands from Secondary Agricultural to Country Residential. The Core Greenland and Greenland designation remained as existing on the Subject Lands.

As such the following policies are now applicable to the Subject Lands:

6.9 Country Residential Areas

6.9.1 Defined

Country Residential Areas are low density rural subdivisions on individual services. New Country Residential Areas are not allowed.

6.9.2 Permitted Uses

Residential uses in single detached houses at low densities are allowed in country residential areas.

An Additional Residential Unit may be allowed subject to the provisions of Section 4.4.6 of this Plan.

Revised Zoning By-law Amendment

The differences between the previous Draft Zoning By-law (2021) and the most recent Draft Zoning By-law (2025) are summarized below.

Table 1: Draft Zoning By-law Changes

Provision	2021 Draft Zoning By-law	2025 Draft Zoning By-law
Zone Change	Rural Settlement Residential Site-Specific Zone (RSR(spXX))	Rural Residential Site-Specific Zone (RUR(spXX))
Permitted Uses	Only the following uses are permitted: Accessory Apartment Bed and Breakfast Boarding/Lodging/Rooming House Community Garden Dwelling, Duplex Dwelling, Single Detached Group Home Home Business Private Home Day Care Public Park Public School Home Industry Additional Residential Unit (Attached and Detached)	Only the following uses are permitted: Dwelling, Single Detached Park, Public
Setbacks to the Natural Environment Zone	15 m from a wetland and 0 m from a woodland/forest	30 m from a wetland and 10 m from the dripline of the woodland/forest

For clarity, the other site-specific provisions proposed in the 2021 submission are still retained in the 2025 submission. These site-specific provisions relate to minimum required lot area, minimum lot frontage, minimum interior side yard and a holding provision, requiring a subdivision agreement(s) (or a condominium agreement(s)) to satisfy all requirements, including financial, servicing, environmental and other requirements to the satisfaction of the Township.

REPORTS AND STUDIES SUBMITTED

Additional Information provided as part of the recent submission in support of the Zoning By-law Application:

- Water Supply and Nitrate Loading Assessment prepared by Groundwater Science Corp., dated July 2025;
- Draft Zoning By-law Amendment dated 2025; and
- Letter regarding Provincial Planning Statement (2024) prepared by Stovel and Associates Inc., dated October 31, 2024.

In support of the Application, the following items were also previously submitted:

- Planning Justification Report prepared by Stovel and Associates Inc.;
- Planning Justification Letter prepared by Stovel and Associates Inc., dated April 16, 2021;
- Draft Zoning By-law Amendment prepared by Stovel and Associates Inc.;
- Environmental Impact Study prepared by Stovel and Associates Inc. And EIS addendum report dated December 31, 2021;
- Functional Servicing and Stormwater Management Report prepared by Triton Engineering Services Limited dated June 2021, and addendum letter dated August 16, 2021;
- Letter regarding Section 4.9.7 Paris and Galt Moraine Policy Area prepared by Groundwater Science Corp., dated June 20, 2021;
- Traffic Brief prepared by Triton Engineering Services Limited, dated June 2021;
- Groundwater and Surface Water Monitoring Program Report prepared by Hydrogeology Consulting Services;
- Zoning By-law Amendment Application, dated June 22, 2021;
- Geotechnical Investigation prepared by Naylor Engineering Associates Ltd., dated November 25, 2004; and
- Drinking Water Source Protection Screening Form, dated April 20, 2021.

REVIEW COMMENTS RECEIVED TO DATE

2025 Township Comments:

NPG Planning Solutions – Technical issues related to the proposed Draft Zoning By-law are being coordinated with other commenting agencies. Conclusion of these issues will be addressed in the future Recommendation Report.

Wellington Source Water Protection – Additional information is required, as requested in March 2022, including the estimate of the total proposed water taking as a cumulative total for the proposed development, the recent annual report submission and the 2004 hydrogeological analysis; and further investigation given to the recharge and infiltration options.

Harden Environmental Services Ltd. - No outstanding hydrogeological concerns. The Water Supply and Nitrate Loading Assessment (2025) provides a number of recommendations which will be addressed in future *Planning Act* application(s).

GEI Consultants – No outstanding engineering concerns. Future technical review of the subdivision design will be undertaken when a draft plan of subdivision application is made.

NRSI – No outstanding ecological concerns. Technical comments will be addressed through the Draft Plan of Subdivision stage.

Salvini Consulting Inc. – No outstanding traffic concerns.

Building – No comments.

Fire and Rescue Services – No comments

Public Works, Parks and Facilities – No comments.

By-law enforcement – No comments.

2022 Township Comments:

Planning and Development Advisory Committee (2022) – The Committee approves the application in principle, subject to the following:

- Hydrogeological Study
- Traffic Study
- Consideration for rear lot buffering from adjacent development
- Conformance with provincial legislation

2025 County Comments:

Planning Staff requests that the natural features forming part of the Greenlands System be placed within the Natural Environment Zone to preserve and protect the feature which also functions as a distinct buffer between the subject development and the urban boundary of the City of Guelph.

The Township, the Township's ecological consultants and the Grand River Conservation Authority (GRCA) will need to be satisfied with the proposed setbacks from natural features (woodlands dripline and wetlands) and County planning staff supports clearly delineate setback requirements within the proposed amending by-law.

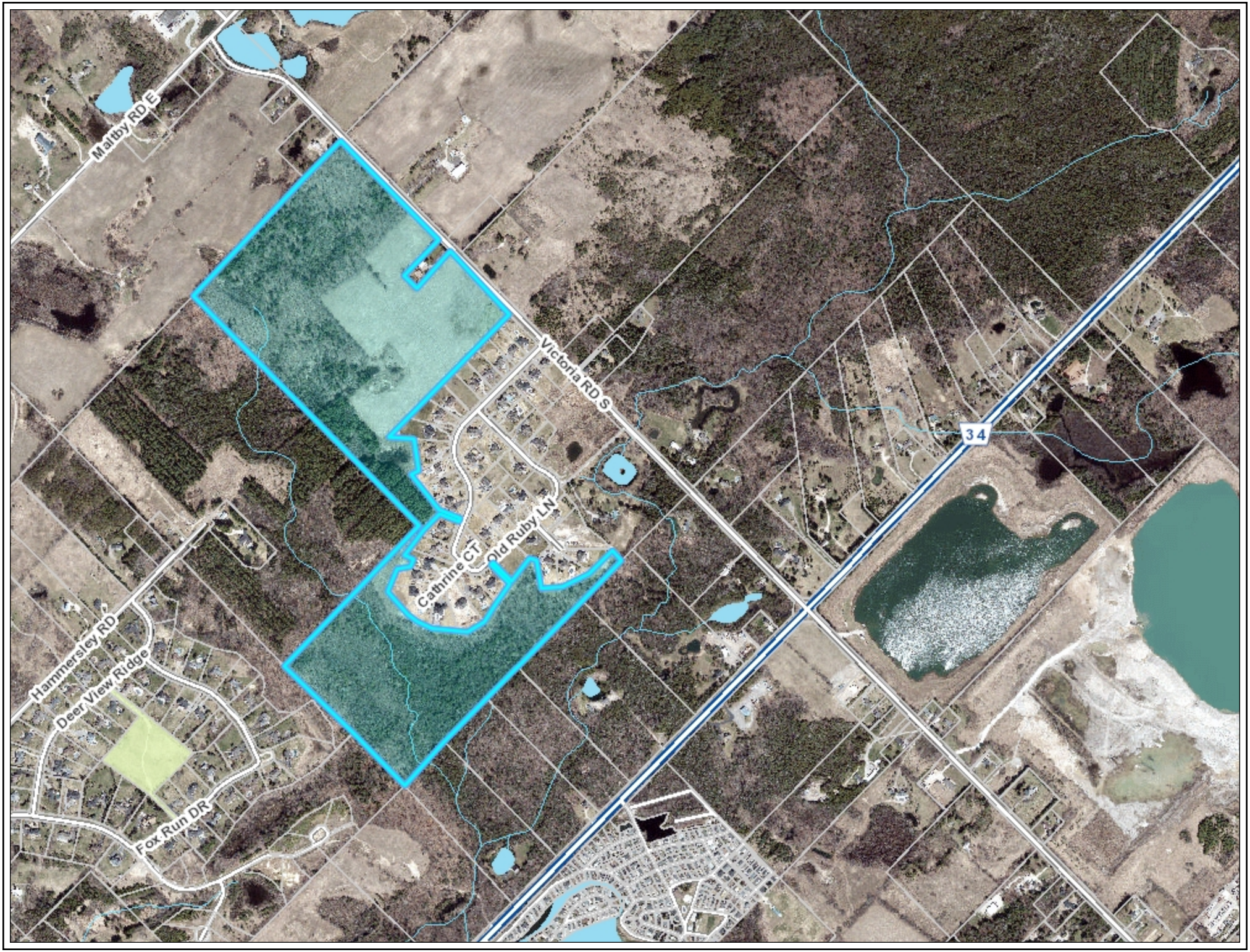
2025 Agency Comments:

Grand River Conservation Authority (GRCA) – No outstanding concerns.

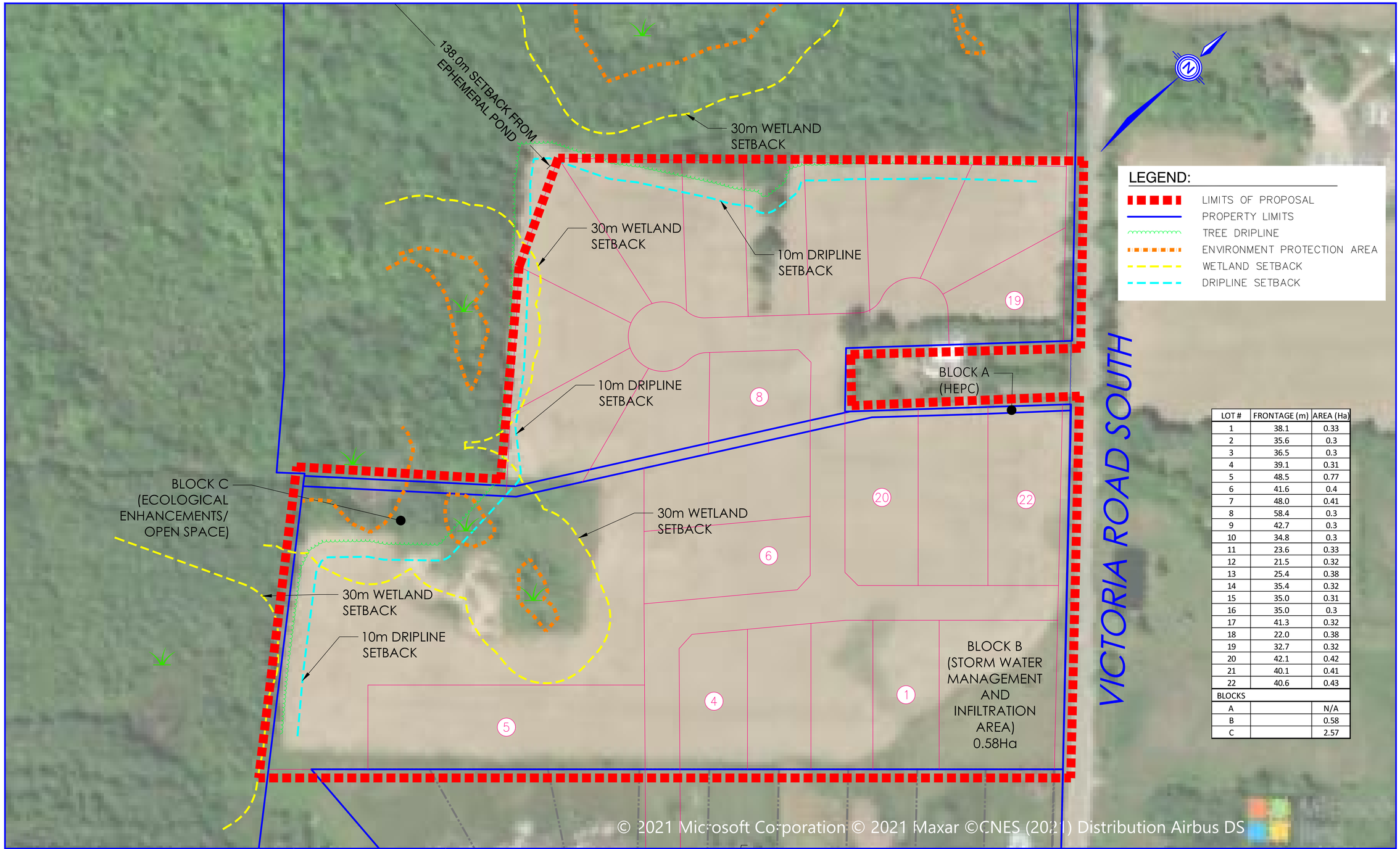
NEXT STEPS

We recommend a public information session be scheduled prior to considering a recommendation on the Zoning By-law Amendment Application. As the last statutory Public Meeting was held in 2022 and give the changes outlined above, the additional engagement opportunity will allow the public to be better informed of the application in today's planning context.

Attachment 1 - Aerial map of the Subject Lands



Attachment 2 - Concept Plan provided by the Applicant



LOT #	FRONTAGE (m)	AREA (Ha)
1	38.1	0.33
2	35.6	0.3
3	36.5	0.3
4	39.1	0.31
5	48.5	0.77
6	41.6	0.4
7	48.0	0.41
8	58.4	0.3
9	42.7	0.3
10	34.8	0.3
11	23.6	0.33
12	21.5	0.32
13	25.4	0.38
14	35.4	0.32
15	35.0	0.31
16	35.0	0.3
17	41.3	0.32
18	22.0	0.38
19	32.7	0.32
20	42.1	0.42
21	40.1	0.41
22	40.6	0.43
BLOCKS		
A		N/A
B		0.58
C		2.57

NOTES:

No	DATE	REVISION	INITIAL
1	2021/11/25	NRSI SUBMISSION	R.S.

PROPOSED RESIDENTIAL DEVELOPMENT

PARTS 17,18 & 19, CONCESSION 8
TOWNSHIP OF PUSLINCH

AUDREY MEADOWS LTD.
P.O. BOX 1805
GUELPH, ONTARIO N1H 7A1

FIGURE 1

PROJECT No A2680

DESIGNED BY: C.J.D.W.
CHECKED BY: P.F.Z.
APPROVED BY: P.F.Z.
DATE: November 2021

TRITON ENGINEERING SERVICES LIMITED
Consulting Engineers

SCALE: N.T.S.
UNLESS OTHERWISE SHOWN

DRAWING NUMBER 01

ARCH full bleed D (36.00 x 24.00 Inches)

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER __-2022

Being a by-law to amend By-law 023/18, as amended being the Zoning By-law for the Township of Puslinch

WHEREAS, the Council of the Corporation of the Township of Puslinch deem it appropriate and in the public interest to amend By-law Number 023/18 pursuant to Section 34 of the Planning Act, R.S.O. 1990 as amended;

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF PUSLINCH HEREBY ENACT AS THE FOLLOWS:

1. THAT Table 2.1 a. Residential is hereby amended by adding the following to the first column: "Rural Residential", to the second column the short form: "RUR" and to the third column the following description, which pursuant to section 2.1 b of Bylaw 023/18 as amended, does not form part of the Zoning By-law.

2. THAT Schedule "A" of the By-law 023/18 is hereby amended by rezoning a portion of Part of Lots 17, 18 and 19 Concession 8, within the Township of Puslinch from Agriculture (A) Zone to Rural Residential Zone – Holding (RUR-"H") as shown on Schedule "A" of this By-law;

3. THAT the subject land as shown on Schedule "A" to this By-law shall be subject to the following site-specific provisions for the Rural Residential Zone:

Zone Standard	Rural Residential (RUR)
Minimum Lot Area (ha)	0.3*
Min. Lot Frontage (m)	20
Minimum Front Yard (m)	6
Minimum Interior Side Yard (m)	2
Minimum Required Exterior Side Yard (m)	6
Minimum Rear Yard (m)	6
Maximum Permitted Lot Coverage	40
Maximum Permitted Building Height (m)	11
Minimum Required Landscaped Open Space	30
Permitted Uses	Dwelling, Single-Detached Park, Public

**Use-Specific Special Provisions: (1) The minimum lot area may be reduced where site-specific hydrogeological studies have been completed by the owner and approved by the Township, which demonstrate that the proposed lot(s) will meet the minimum lot area recommendations of the studies.*

4. THAT the subject land as shown on Schedule "A" to this By-law shall be subject a **HOLDING PROVISION,** as set out below:

i) A Holding (H) Provision is hereby established and identified on Schedule 'A' attached hereto, by the letter "H" in parentheses following a zoning symbol established in this By-law.

ii) Where a zoning symbol is followed by the letter "H" in parentheses, the provisions of the By-law applicable to the zone symbol shall only apply upon the removal of the letter "H" by an Amendment By-law as approved by Council in accordance with the provisions of Section 36 of the Planning Act.

iii) Until the removal of the letter "H":

a) No land, building or structure shall be used for any purpose other than that for which it was lawfully used prior to the passing of this By-law with the exception of a use by a public authority or existing agricultural use once the specific items listed in section iv) (a) has been satisfied;

iv) The (H) Holding Provision shall only be lifted for all other uses when the Township of Puslinch is satisfied that the following items have been addressed:

a) A subdivision agreement(s) (or condominium agreement(s)) between the Owner and the Township of Puslinch has been executed in accordance with the terms of the subdivision agreement(s) (or condominium agreement(s)) to satisfy all requirements, including financial, servicing, environmental and other requirements to the satisfaction of the Township.

5. For the lands zoned Natural Environment (NE), the provisions of section 12.4 shall apply.

6. Notwithstanding any provisions for Setbacks to the Natural Environment zone as set out in section 4.31 of Zoning By-law No. 023/18, the minimum setback requirements which shall be reduced to 30 m from a wetland and 10 m from the dripline of the woodland/forest.

7. In all other respects, the provisions of Zoning By-law 023/18, as amended shall apply.

READ A FIRST, SECOND A THIRD TIME AND FINALLY PASSED THIS 15th DAY OF JUNE, 2025

_____
James Seeley, Mayor

_____
Courtney Hoytfox, CAO

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER ____

SCHEDULE "A"



THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

EXPLANATION OF BY-LAW NO. ___- 2022

By-law Number _-2022 amends the Township of Puslinch Zoning By-law 23/18 by rezoning a portion of Lots 17, 18 and 19, Concession 8, within the Township of Puslinch, from a site specific AGRICULTURAL (A) ZONE to the RURAL RESIDENTIAL (RUR) ZONE to permit the future development of a residential subdivision.

A HOLDING (H) ZONE provision has been attached to the zone to ensure that Township requirements, financial and otherwise, have been satisfied. The Holding – H zone provisions will be set out as following:

> *Prior to the removal of the holding symbol, draft plan approval for a plan of subdivision on the Subject Lands shall be required to be granted, together with the entering of a subdivision agreement with the Township to satisfy all requirements, including financial, servicing, environmental and other requirements to the satisfaction of the Township.*

The subject application is related to Official Plan Amendment 122 (County of Wellington File No. OP-2021-02), to extend the abutting land use designation to include an area of approximately 11.8 ha (29 acres) in size on the subject lands to facilitate an expansion to an existing rural residential subdivision identified as Audrey Meadows (Phase 1).

AUDREY MEADOWS – PHASE 2 ZONING BY-LAW AMENDMENT

1ST SUBMISSION COMMENTS

Agency/Consultant	**Comment**
County of Wellington	Based on my review of the information submitted, I would request that the following be addressed prior to deeming this application complete: • The submitted EIS be updated with signatures from the author and resubmitted and • The source water protection screening form is to be updated to reflect that an OPA and Zoning By-law amendment application are being considered A pre-consultation meeting was not formally held for this development proposal and although strongly encouraged, they are not required. Planning staff will complete a detail review of the application and prepare subsequent planning reports once the application has been deemed complete. If we have additional comments at the time of this detail review, we will let yourself and the applicant know. Please also be aware that a related OPA has been received, but not yet deemed complete. Once both applications are complete, my intent would be to ensure all public meetings are joint meetings.
Puslinch Fire and Rescue	Puslinch Fire and Rescue Service reviewed the zoning by-law amendment application for lots 17, 18 concession 8 on July 2, 2021. Please be advised that the department has no concerns regarding the application. Please find attached the fire department water supply connection requirements.

Harden Environmental Services Ltd. – Stan Denhoed, Senior Hydrogeologist	See letter attached
Township Ecologist Consultant - NRSI	See attached.
GM BluePlan	See letter attached.
GRCA	See letter attached

Puslinch Fire and Rescue

7404 Wellington Rd 34, Puslinch, ON, N0B 2J0

Fire Chief Luis Gomes

Water Storage Tanks and Hydrants for Fire Protection

Water Storage Tanks

1. Water storage tanks will be sized as per the Ontario Building Code.

2. The top of the tank to be installed below the frost line. Minimum 1.3 M.

3 The bottom of the tank must not be more than 4.6 M below ground level.

4. Access manhole must have lockable heavy metal cover with no holes.

5. Access ladder to be aluminum with rungs to floor of tank.

6. Concrete to be 35 MPA at 30 days with 6% air entrainment.

7. Reinforcement to be per manufacturers specifications.

8. Install a vent pipe with rodent and insect screen.

9. Install automatic float valve system to a water source with back flow preventer.

10. Compliance with the inspection, testing and maintenance provisions of NFPA 25, “Standard for the Inspection, Testing and Maintenance of Water-Based Fire Protection Systems”, for tanks is deemed to satisfy the maintenance requirements

11. The water supply source for the dry hydrant shall provide, on a year-round basis, the required quantity of water, as determined in NFPA 1142, Chapter 4, and Ontario Fire Marshal’s Guidelines on Rural water Supplies for firefighting.

12. The fire department will:

- inspect during installation of tank or tanks
- inspect location of hydrant
- inspect before filling
- perform a pump test with fire pumper before final approval.

Dry Hydrant Design and Location.

1 Puslinch Fire and Rescue Services shall approve all aspects of the dry hydrant design and construction, including the type of materials, pipe size, and system fittings to be used.

2 All dry hydrant systems shall be designed and constructed to provide a minimum flow of 1000 gpm (3800 L)

3. Adequate working space shall be provided around the dry hydrant to provide for a safe working environment.

4. Dry hydrant systems shall be designed and constructed so that slope and piping configurations do not impede drafting operations.

5. Suction hose connection(s) shall be compatible with the fire department's hard suction hose size and shall conform to NFPA 1963, *Standard for Fire Hose Connections*. The connection(s) shall include a protective cap. The cap and adapter shall be of materials that minimize rust and galvanic corrosion at draft.

6. Dry hydrant to be installed a minimum of 30 M from any building and will be approximately 1.8 meters from the edge of driveway using 150 mm (6") pipe. The fire department connection fitting will be 67 cm to 90cm above the ground and facing fire truck location. The Fire Department connection must be NH (National Hose) 150mm (6") thread - female connection with a cap to seal the opening.

7. The dry hydrant system and access to the site shall be developed in a manner that allows the fire department pump to connect to the hydrant using not more than 20 ft (6 m) of hard suction hose

.

8. Dry hydrants shall be located such that they are accessible under all weather conditions. Grass, brush, and other vegetation shall be kept trimmed and neat. Vegetation shall be cleared for a minimum 3 ft (0.9 m) radius from around hydrants

9. Dry hydrants shall be located a minimum of 100 ft (30 m) from any structure

.

10. No parking or other obstacles shall be allowed within 20 ft (6 m) of the access side of the hydrant.

11. Dry hydrants shall be protected from damage by vehicular and other perils, including freezing and damage from ice and other objects.

12. Dry hydrants shall be inspected at least quarterly and maintained as necessary to keep them in good operating condition. The hydrants shall be flow tested at least annually with an approved pump to ensure the minimum design flow is maintained. Compliance with the inspection, testing and maintenance provisions of NFPA 25, "Standard for the Inspection, Testing and Maintenance of Water-Based Fire Protection Systems", for hydrants is deemed to satisfy the maintenance requirements

13. Dry hydrant locations shall be made visible from the main roadway during emergencies by reflective marking and signage approved by Puslinch Fire and Rescue services

Ref: NFPA 1142-2017 Ed., NFPA 25-2017 Ed

General Notes:

NFPA 25;

4.1 **Responsibility of the Owner or Occupant**.

4.1.1* The owner or occupant shall provide ready accessibility to components of waterbased fire protection systems that require inspection, testing, or maintenance.

4.1.2* The responsibility for properly maintaining a waterbased fire protection system shall be that of the owner of the property.

In accordance with the Fire Protection and Prevention Act, Puslinch Fire and Rescue Services requests that all test and inspection documentation be submitted annually to fireprevention@puslinch.ca **,all work must be performed by qualified fire protection technicians.**

Rev 2019.01.21

NATURAL RESOURCE SOLUTIONS INC.
Aquatic, Terrestrial and Wetland Biologists

August 4, 2021 2670

Township of Puslinch
Planning and Development Department
Puslinch, ON
N0B 2J0

Attention: Mr. Jeff Bunn,
Deputy Clerk

RE: Audrey Meadows Development, Part Lots 17, 18 and 19, Concession 8 Township of Puslinch
Peer Review of Zoning Bylaw Amendment Application

As requested, Natural Resource Solutions Inc. (NRSI) has completed a peer review of the Zoning By-Law Amendment (ZBA) Application ("Application") prepared by Stovel and Associates on behalf of Audrey Meadows Ltd. for a proposed development on the above-noted lots, herein referred to as the "subject property", owned by Audrey Meadows Ltd. Our comments are set out below.

Background

The subject property is located southwest of Victoria Road South (Concession 8), Maltby Road East and Old Ruby Lane, in the Township of Puslinch. Multiple reports were included in the Application detailing natural heritage features existing on and adjacent to the subject property, as well as potential direct and indirect impacts the proposed ZBA and associated development may have on these features. The Environmental Impact Study (EIS) prepared by Stovel and Associates during 2021 ("2021 EIS") relies on the findings of a 2004 EIS prepared by Stovel and Associates ("2004 EIS") for the existing Audrey Meadows subdivision, south of the subject property described within this review. The Application was prepared in 2021 and submitted to the Township of Puslinch in June 2021.

Tasks Carried out

In order to complete this review, NRSI carried out the following steps:

- Review of the following reports:
  - Environmental Impact Study (June 2021). Prepared by Stovel and Associates.
  - 2019-2020 Annual Report, Groundwater Monitoring and Surface Water Monitoring Program (April 2021). Prepared by Hydrogeology Consulting Services.
  - Planning Justification Report (June 2021). Prepared by Stovel and Associates
  - Zoning By-Law Amendment Application (June 2021). Prepared by Stovel and Associates on behalf of Audrey Meadows Ltd.
  - Paris-Galt Moraine Policy Area Letter (June 2021). Prepared by Groundwater Science Corp.
  - Zoning By-Law Amendment to By-Law 023/18 for Audrey Meadows Ltd. (June 2021).

Jack Richard and Erin Bannon of NRSI completed a site visit on July 20th, 2021. NRSI staff were accompanied by the landowner, as well as Rob Stovel, of Stovel and Associates. During the site visit, we had the opportunity to investigate the subject property and to examine the natural features present, in addition to the materials reviewed.

Relevant Policy Framework

Our review examined the Application materials and considered the adequacy of the Application and the impacts of the proposed development on natural heritage features identified within the County of Wellington Natural Heritage System, or "Greenlands System", and the Provincial Policy Statement ("PPS"). Both Greenlands and Core Greenlands, as identified by the County of Wellington Official Plan (OP), existing within the subject property. Additionally, our review evaluated the level to which the Application confirms with the *Endangered Species Act* (ESA), *2007*, and the *Township of Puslinch Comprehensive Zoning By-Law, 2018.* This analysis was undertaken to identify whether the Application, particularly the EIS, sufficiently addressed the direct and indirect impacts the proposed Audrey Meadows development may have on the natural heritage features and policies that protect them, as well as avoidance, and mitigation of impacts.

Review Comments

Characterization of Vegetation Communities

The lands that comprise the subject property are predominantly agricultural, although natural features occur throughout a substantial proportion of the northern and western areas of the subject property, as noted in the 2021 EIS and confirmed during NRSI's site visit. A large deciduous woodland overlaps with the proposed development area. This woodland also extends further to the north and west of the proposed development. The woodland is bounded by coniferous plantation to the south and west of the proposed development area. Each of these woodland areas are designated in the County's OP as Greenland (woodland) and Core Greenland (wetland) (County of Wellington 2021). The large deciduous woodland contains Provincially Significant Wetlands (PSWs), and is designated as a Core Greenland feature within the County's Greenlands System. These wetlands form part of the Mill Creek Puslinch Wetland Complex.

South of the PSWs, two smaller unevaluated wetlands occur. These wetlands are each regulated by the Grand River Conservation Authority (GRCA) and are also considered Core Greenlands, as stated within the 2021 EIS. The proposed development area consists primarily of agricultural land. After reviewing the natural areas during our site visit, NRSI agrees with the general vegetation descriptions for the woodland and wetlands areas of the subject property provided in Section 2.4 of the 2021 EIS.

Habitat of Endangered or Threatened Species (Core Greenlands)

Section 5.4.2. of the Wellington County OP mandates that development and site alternation may not impact Species at Risk (SAR), considered endangered or threatened. Specifically, the OP states:

> *"Development and site alteration will not be allowed in significant habitat of endangered or threatened species except in accordance with provincial and federal requirements. Development or site alteration adjacent to significant habitat of endangered or threatened species shall require a satisfactory*

Environmental Impact Assessment that demonstrates there will be no negative impact on the significant habitat of endangered or threatened species or its ecological function."

In order to determine whether or not endangered or threatened species occur within the subject property, as well as demonstrate any proposed development will result in "no negative impacts", it is necessary to conduct fulsome wildlife and habitat surveys. The locations and timing of the field investigations detailed within this 2021 EIS, as well as the overall survey effort completed, are insufficient in our opinion to document the potential presence of some types of SAR species or their habitat within the subject property. Appendix B of the 2021 EIS provides a list of wildlife observed within the subject property, however the report does not provide sufficient information regarding the specific timing and location of the relevant surveys conducted. Currently, it is unclear whether a sufficient number of point count stations for the amphibian call surveys and breeding bird surveys were established in order to adequately assess amphibian and bird habitat.

In order to appropriately assess the potential presence of SAR birds or amphibians within the wooded and wetland habitats of the subject property and immediately adjacent to the subject property, amphibian call surveys and breeding bird survey stations should be established within each habitat type. The standard Marsh Monitoring Protocol requires completing 3 evening amphibian call surveys, and normally recommends the first survey occurs in April, contingent on weather, to document species that typically breed early in the season. Currently, the 2021 EIS does not specify the dates these surveys were completed. Similarly, the timing and location of the breeding bird surveys is unclear. While the 2021 EIS identifies bird species observed on the subject property, no description of the survey method, timing, or location including route or GPS tracks is provided. As such, it is unclear whether any breeding bird surveys were conducted in the woodland areas found on the subject property.

As described by Stovel and Associates during the July 20th, 2021 site visit, wildlife species and habitats on and adjacent to the subject property were evaluated by Stovel and Associates within the 2021 EIS using the findings from the survey effort completed to prepare the 2004 EIS, rather than through the collection of current field data. As 17 years have passed since the submission of the 2004 EIS, the results should not be considered current. While breeding bird surveys and amphibian call surveys were reported to have been completed in 2021, a fulsome series of wildlife and habitat surveys were not described to have been completed to inform the 2021 EIS, specifically.

The potential for SAR and Significant Wildlife Habitat (SWH) has not been fully explored within the 2021 EIS. A review of available background information identifies that Jefferson Salamander (*Ambystoma jeffersonianum*) a species considered endangered in Ontario, have been observed within 10km of the subject property (NHIC 2021). During the July 20th, 2021 field visit, NRSI staff observed a small woodland pond, or vernal pool, in the large deciduous forest community northwest of the proposed development. Given that this pond had open water during July, it could be considered candidate SWH and may provide amphibian breeding habitat based on guidance provided by the Significant Wildlife Habitat Technical Guide (2000). The 2021 EIS reported no woodlands supporting amphibian breeding ponds. Additionally, rock piles and rock crevices were observed during NRSI's field visit, which may provide reptile hibernacula and bat hibernacula, respectively. The 2021 EIS did not consider either of these SWH types.

Recommendations

Based on our review of the 2021 EIS and the Application, it is our opinion that the following steps are required to complete the 2021 EIS for the ZBA and associated proposed development, in order to adequately address aspects related to the natural environment:

- Conduct fulsome vegetation and wildlife surveys, as well as describe the timing, location, and methods applied for the 2021 natural environment surveys, specifically for surveys which do not conform with the referenced standards or those typically conducted under the submission of an EIS;

- Complete fulsome screening and assessments for the variety of SWH types that may occur within and adjacent to the subject property including, but not limited to, woodlands containing amphibian breeding ponds, reptile hibernacula, and bat maternity roosting/hibernacula habitat;

- Complete fulsome screening for SAR that may exist within the subject property or adjacent lands; and

- Demonstrate and confirm that the proposed development will have no negative impact to any significant habitat of endangered or threatened species, or its ecological function.

Woodlands (Greenlands)

Section 5.5.4. of the County of Wellington OP identifies the following with respect to the Greenlands System and Significant Woodlands, which are relevant to this ZBA:

> "*In the Rural System, woodlands over 4 hectares and plantations over 10 hectares are considered to be significant by the County, and are included in the Greenlands system… In the Urban System, woodlands over 1 hectare are considered significant by the County, and are included in the Greenlands system.*
>
> *Detailed studies such as environmental impact assessments may be used to identify, delineate and evaluate the significance of woodlands based on other criteria such as: proximity to watercourses, wetlands, or other woodlands; linkage functions; age of the stand or individual trees; presence of endangered or threatened species; or overall species composition."*

The 2021 EIS correctly identifies Significant Woodlands within the subject property. Currently, the 2021 EIS states that no removal of Significant Woodlands will occur in order to facilitate the proposed Audrey Meadows development associated with the ZBA. Despite this, the limits of proposed development shown within the 2021 EIS overlap with the Significant Woodland boundary, with many lots extending into the existing woodland. The 2021 EIS explains that while some limited backlotting will occur, appropriate restrictions will be established within conditions of draft plan approval in order to ensure the woodland area is not damaged or removed during the construction of the proposed development. The 2021 EIS has proposed a 5m setback from the woodland dripline along the rear of lots #8-19, those directly adjacent to the existing woodland, in which no development or disturbance is permitted, as a means to minimize impacts to the woodland. Neither the woodland dripline or 5m setback has been shown in mapping provided within the Application. Typically, Significant Woodlands are provided a 10m setback, or buffer, to afford this feature sufficient protection from disturbance. In addition to a reduced setback, 2021 EIS identifies that the proposed development will result in partial ownership of the existing woodland to each of the development lots. Should the

proposed development provide partial ownership of the adjacent Significant Woodland for each lot, consideration will need to be given to how this may impact stewardship, and whether this may adversely impact this feature or its ecological function.

Recommendations

- Confirm that the proposed development will not impact the Significant Woodland feature, or its ecological function. A tree inventory and Tree Protection Plan may be required to ensure trees adjacent to the proposed development, and potential impacts to those trees are adequately assessed;
- Illustrate the proposed setback limit in relation to the proposed development lots and Significant Woodland dripline. These features should be delineated with a high level of accuracy, using GPS technology; and
- Specify the restrictions that will be implemented to ensure that development lots included within portions of the Significant Woodland dripline do not negatively impact this feature or its ecological function. Consideration should be given to installing fencing for lots #8-19 along the woodland dripline, to better protect this feature, in addition to the implementation of a rear yard use condition.

Wetlands (Core Greenlands)

With regards to wetlands, Section 5.4.1. of the County of Wellington OP states:

> *"All wetlands in the County of Wellington are included in the Core Greenlands. Development and site alteration will not be permitted in wetlands which are considered provincially significant. Provincially significant wetlands are shown in Appendix 3 of this Plan. All other wetlands will be protected in large measure and development that would seriously impair their future ecological functions will not be permitted. The appropriate Conservation Authority should be contacted when development is proposed in or adjacent to a wetland."*

The 2021 EIS correctly identifies multiple wetlands within the subject property, including PSWs forming part of the Mill Creek Puslinch Wetland Complex, as well as smaller wetlands regulated by the GRCA. As identified within the 2021 EIS and County of Wellington's OP, all wetlands within and adjacent to the subject property are considered Core Greenlands. The 2021 EIS states that the proposed development will not result in any removal of wetland areas. Each of the wetlands within the subject property have been delineated by Stovel and Associates, however during the July 20th, 2021 field visit Rob Stovel reports having had technical GPS issues and expressed the potential for inaccuracies in the recorded wetland boundaries. Stovel stated that this would be revisited during fall 2021 but also stated that the GRCA did not participate in the identification of the wetland boundaries. While the 2021 EIS referenced background information material and mapping provided by the GRCA, the Application does not appear to conform with Section 5.4.1 of the County of Wellington OP, which requires that the relevant Conservation Authority be consulted when a development is proposed within or adjacent to a wetland. A significant portion of the proposed development area falls within GRCA-regulated wetland buffer areas and the GRCA should be consulted on wetland boundaries and appropriate activities within the regulated areas.

Section 4.31 of the Township of Puslinch Comprehensive Zoning By-Law requires that:

"No buildings or structures, including a private sewage treatment system and associated tile weeping bed, shall be constructed closer than 30 metres from the limit of a Natural Environment (NE) Zone.

Notwithstanding the required setback in subsection (A) above or any other provision in this By-law to the contrary:

ii. Where a vacant lot existed on the day of passing of this By-law, a building permit may be issued for permitted buildings or structures, excluding new agricultural buildings and structures, provided that:

i. there is no other suitable location on the lot outside of the 30 metre minimum setback, and

ii. a setback of at least three (3) metres from the NE Zone boundary is maintained."

Notwithstanding the above, the setback from the Natural Environment (NE) Zone may be reduced to a distance that is supported by the Conservation Authority having jurisdiction pursuant to its authority provided under the Conservation Authorities Act, R.S.O. 1990. Where the Conservation Authority provides written approval for a reduced setback from the NE Zone an amendment to this By-law shall not be required. "

Core Greenlands are defined as Natural Environment Zones (NE Zones) under the Township of Puslinch Comprehensive Zoning By-Law and are entitled a minimum 30m setback, notwithstanding the exceptions noted above. The 2021 EIS and Application propose a 15m setback for lots #5, 6, and 7, which are directly adjacent to a wetland area, identified as a Core Greenland feature. The proposed development lots to will extend within the natural feature dripline and within close proximity to the wetland boundary. While the proposed development may limit the building envelope of each lot by a 15m setback, consideration should be given towards how the reduced setback and partial ownership of the adjacent natural feature may impact stewardship, and whether this may adversely impact this feature or its ecological function.

Recommendations

- Consult with the GRCA to confirm delineation of wetland boundaries as identified in 2021 EIS, as well as suitability of proposed development in relation to GRCA-regulated areas, including wetland buffers;
- Confirm that appropriate erosion and sediment controls, referenced within the 2021 EIS, will be implemented to ensure that the adjacent wetlands, and other natural features, are not impacted during the construction of the proposed development;
- Illustrate the proposed setback limit in relation to the proposed development lots and Core Greenlands/Wetland boundary. These features should be delineated with a high level of accuracy, using GPS technology; and
- Specify the restrictions that will be implemented to ensure that development lots within 30m of Core Greenlands/Wetlands do not negatively impact this feature or its ecological function. Consideration should be given to installing fencing along the woodland dripline for lots #5, 6, and 7, to better protect this feature.

Aquatic Resources

The 2021 EIS describes the aquatic features that are found adjacent to the proposed development. Currently, there is no mention of when the field surveys were conducted within the subject property and adjacent lands. Spring 2021 was drier than is typical and it is not currently clear whether or not this has been considered in relation to the assessment of aquatic features on and adjacent to the subject property. Table 1 of the 2021 EIS states that the identified aquatic habitat is considered coldwater. GRCA Regulation mapping confirms this. Despite this, this feature is not described or mentioned within the Aquatic Resources section of the 2021 EIS. A discussion on aquatic species, including sensitive species that may be impacted by the proposed development, is also not provided.

Currently, the Fisheries Habitat section of the 2021 EIS states that "*there is no fish habitat on or within 120 m of the subject property*." However, in the Potential Indirect Impacts section, it is stated that the closest residential lot is approximately 85 m away from the intermittent tributary of Mill Creek. Clarification should be given as to which statement is accurate and the EIS should be updated accordingly.

Without assessing the Functional Servicing Report and Stormwater Management Plan, referenced by the 2021 EIS, it cannot be determined if the Stormwater Management Plan is sufficient to mitigate the impacts to the proposed development (i.e. thermal impacts, and total suspended solids). The Stormwater Management Policy (9.9.9.3) for the Wellington County Official Plan states:

> *c) The objectives of a stormwater management plan are to avoid, minimize and/or mitigate stormwater volume, contaminant loads and impacts to receiving water courses in order to:*
>
> *i. Maintain groundwater quality and flow and stream baseflow;*
>
> *ii. Protect water quality;*
>
> *iii. Minimize the disruption of pre-existing (natural) drainage patterns wherever possible;*
>
> *iv. Prevent increases in stream channel erosion; v. Prevent any increase in flood risk; and*
>
> *v. Protect aquatic species and their habitat.*

With regards to the private sewage treatment on each lot, the section on aquatic habitat states "*in the long run, this could prove to be a significant net improvement to the ecological functions associated with the site.*" No data has been provided within the 2021 EIS to support this statement.

Groundwater Science Corp. (GSC) Paris and Galt Moraine Policy Area letter states that the maintenance or enhancement of groundwater recharge through Low Impact Development measures will be addressed during the Draft Plan stage. GSC also stated that by maintaining the site recharge, the baseflow to the adjacent watercourses would be maintained. This letter states that local surface water drainage patterns to be maintained through detailed design process and associated stormwater management design. GSC anticipates proposed development will meet the requirements of the Paris and Galt Moraine Policy Area.

Recommendations

- Provide a more fulsome description of Aquatic Resources with regards to the thermal regime and fish species present;
- Confirm the distance the proximity of the subject property to fish habitat features, including but not limited to, intermittent streams;
- Specify the mitigation measures that will be in place for the Stormwater Management facility and confirm if these measures will be sufficient for the thermal regime and fish species present; and
- Confirm that the SWM Plan follows the policies within the Wellington County OP.

Conclusion

Based on our review of the 2021 EIS and additional documents supporting the Application, it is NRSI's position that the recommendations described above are required to complete the 2021 EIS for the proposed ZBA and adequately address the policies defined in Section 5 of the County of Wellington's OP.

Please do not hesitate to contact me if you require further clarification on these matters.

Sincerely,
Natural Resource Solutions Inc.

[redacted]

David E. Stephenson, M.SC.
Certified Arborist and Senior Biologist

[redacted]

Erin Bannon
Terrestrial & Wetland Biologist / Certified Arborist

[redacted]

Jack Richard
Registered Professional Forester

Harden Environmental Services Ltd.
4622 Nassagaweya-Puslinch Townline Road
R.R. 1, Moffat, Ontario, L0P 1J0
Phone: (519) 826-0099 Fax: (519) 826-9099

Groundwater Studies
Geochemistry
Phase I / II
Regional Flow Studies
Contaminant Investigations
OMB Hearings
Water Quality Sampling
Monitoring
Groundwater Protection Studies
Groundwater Modelling
Groundwater Mapping

File: 2026 Audrey Meadows Phase II

August 23, 2021

Township of Puslinch
7404 Wellington Rd 34,
Puslinch, ON
N0B 2J0

Attention: Lynne Banks, Project Coordinator

Dear Lynne:

Re: Zoning Bylaw Amendment Application Part Lots 17, 18 Con 8

We have the following preliminary comments on the application.

1) Identification of catchment areas of closed depressions. Similar to the issues we have raised for the Clair Maltby Secondary Plan area, there are numerous closed depressions on this site. Although Figure 3 of the Groundwater Science Corporation June 20, 2021, letter identifies potential locations where infiltration will occur, it appears that a large part of the development presently has runoff to these depressions. In order to maintain a water balance on this Paris moraine property, a detailed accounting of the water capture in these depressions must be made.

2) The predevelopment storm drainage area map presented by Triton is an oversimplification of the existing site conditions and does not recognize infiltration areas as presented by Groundwater Science Corp. As indicated in Comment 1, an improved drainage catchment map will assist in identifying the areas presently with on-site depression focused recharge.

3) A nitrate impact analysis is required. We recommend following MECP Procedure D5-4 to assess density of lots for this development. It must be also shown that wells downgradient of the site will not be impacted by the introduction of septic systems. We require that all private wells between the site and Mill Creek be evaluated for potential impact. The potential connection between the overburden aquifer system and deeper bedrock aquifer should be considered as a potential pathway for effluent.

4) We recommend following MECP Procedure D5-5 as a method of confirming that there will be adequate water supply for the development. We recommend a minimum of three water supply wells be installed to confirm that quantity and quality of the underlying aquifer and the potential for interference with existing wells in the area. It may be beneficial to consider drilling wells into the Goat Island or Gasport Formations to limit the potential for shallow system contamination.

5) The quality of Mill Creek found along the southern edge of the existing Audrey Meadows development should be determined by obtaining water samples during low and high flow. The potential impact of additional stormwater being discharged to Mill Creek should be evaluated with respect to Provincial Water Quality Objectives and Policy 2 of the Water Management Guidelines of the Ministry of the Environment, Conservation and Parks.

6) Water Quality of infiltrated water. Again, similar to comments presented for the Clair Maltby Secondary Plan, the infiltration of stormwater should be evaluated with respect to affecting the water quality of the underlying aquifers.

Sincerely,

Harden Environmental Services Ltd.



Stan Denhoed, M.Sc., P.Eng.
Senior Hydrogeologist

July 23, 2021
Our File: 121006-025

Township of Puslinch
7404 Wellington Road 34
Guelph, ON N0B 2J0

Attention: Ms. Lynne Banks

Re: Application for Zoning By-law Amendment
Part Lots 17 and 18, Concession 8, Township of Puslinch

Dear Ms. Banks:

An application for a Zoning By-law Amendment has been received by the Township for the subject lands on Part Lots 17 and 18, Concession 8, to rezone the lands as Rural Settlement residential Zone, to allow for the development of a future 29-lot residential subdivision, to be connected to the existing Audrey Meadows subdivision to the south. A request from the Township was received by GM BluePlan Engineering on June 28, 2021 to review the Zoning By-Law Amendment Application and supporting documents. This letter has been prepared to document our review of the application.

In support of the Township's review, the following documents and drawings were received and reviewed:

- Functional Servicing and Stormwater Management Report, prepared by Triton Engineering Services Limited, dated June 2021.
- Traffic Impact Brief, prepared by Triton Engineering Services Limited, dated June 2021.
- Groundwater and Surface Water Monitoring Program, prepared by Hydrogeology Consulting Services, dated April 9, 2021.
- Report on Site Characteristics and Proposed Development Objectives as they relate to the Wellington County Official Plan – Section 4.9.7 Paris and Galt Moraine Policy Area, prepared by Groundwater Science Corp., dated June 20, 2021.
- Zoning Bylaw Amendment Application Form, completed by Rob Stovel, dated June 21, 2021.
- Permission to Access Form, dated June 22, 2021.
- Draft Zoning Bylaw Amendment.

The following documents were received and will be reviewed in detail by others:

- Planning Justification Report, prepared by Stovel and Associates Inc., dated June 2021.
- Environmental Impact Study, prepared by Stovel and Associates Inc., dated June 2021.
- Drinking Water Source Protection Screening Form, completed by George R. Good, dated April 20, 2021.

Based on our review, we have no concerns with the zoning bylaw amendment from an engineering perspective.

At the time of detailed design and Draft Plan Approval, GMBP will require the following plans for review:

- ***Legal Survey of the Property***, undertaken by a licenced Ontario Land Surveyor.

- ***General Arrangement Plan***, showing proposed layout of subdivision, including number and size of residential lots, road allowance, stormwater management block(s) and greenspace to remain.

- **Site Grading and Servicing Plans**, developed to illustrate the site topography and drainage under existing and proposed conditions. The plan(s) should also show potable water and wastewater servicing infrastructure. Detailed drawings of proposed stormwater management facilities should be provided.

- **Sediment and Erosion Control Plan**, detailing measures to limit the effect of the proposed construction on the surrounding area and infrastructure.

- ***Landscaping Plan and Tree Preservation/Enhancement Plan,*** adhering to requirements determined by the Township Ecologist and in keeping with the Environmental Impact Study.

- ***Plan and Profile Drawings for all Roads and Services.***

- ***Composite Utility Plan (CUP),*** indicating the location of all underground and aboveground services, utilities driveways, street lighting, traffic and street signs, community mailbox(es) and landscaping to be installed within the municipal right of way. Sign-off of the CUP by each utility company represented by the plan is to be provided with the submission.

- ***Street Lighting and Photometric Plans***, prepared by a professional engineer and including street lighting layout and design, electrical drawings showing the location of poles, load centres and luminaires, standard drawings and specifications for materials and installation, and a photometric distribution diagram indicating the average maintained illumination levels and uniformity rating in comparison to IESNA minimum requirements.

In addition, an updated Functional Servicing and Stormwater Management Report, based on the detailed design, a Geotechnical Report, updated Hydrogeological Report, and updated Traffic Impact Brief, will be required and reviewed at the time of Draft Plan Approval.

Deficiencies/Outstanding Matters

Item No.	Matter / Requirement	Drawing / Document Reference	Date Issue Identified	Comment

Additional Commentary

Item No.	Additional Commentary
1.	The Township Environmental Engineer/Hydrogeologist should confirm that 0.3 hectares is an adequate lot size for the proposed septic systems with tertiary treatment.
2.	The site is partially located within GRCA regulated area, and therefore the GRCA should comment on the proposed setbacks to woodland dripline and wetland.

Completed/Approved

Item No.	Matter / Requirement	Drawing / Document Reference	Date Issue Identified	Date Issue Cleared	Comment

If you have any questions or require additional information, please do not hesitate to contact us.

Yours truly,

GM BLUEPLAN ENGINEERING
Per:



Andrea Reed, P. Eng.
Project Engineer

400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519.621.2761 **Toll free:** 866.900.4722 **Fax:** 519.621.4844 **Online:** www.grandriver.ca

PLAN REVIEW REPORT: Township of Puslinch
Lynne Banks, Development & Legislative Coordinator

DATE: August 3, 2021 **YOUR FILE:**

RE: Application to Amend a Zoning By-Law
Part Lot 17 & 18, Concession 8,Township of Puslinch
Audrey Meadows Ltd.

GRCA COMMENT:*

Grand River Conservation Authority (GRCA) staff have now had the opportunity to review the information circulated with the above noted application. Based on our review of the materials provided, we are not in a position to support this application at this time. The GRCA recommends that wetland areas be delineated and zoned Natural Environment. Please see our detailed comments below.

BACKGROUND:

1. Resource Issues:

Information currently available to this office indicates the subject lands contains a watercourse, wetland, the Provincially Significant Mill Creek Puslinch Wetland Complex, and the regulatory allowances to these features.

2. Legislative/Policy Requirements and Implications:

It is our understanding that the applicant is proposing to change the zoning from Agricultural (A-1) and Natural Environment to Rural Settlement, Open Space, and Natural Environment and have reviewed the following document in support of the zoning application:

- Groundwater Science Corp. 2021. Audrey Meadows Subdivision. Wellington County Official Plan. Section 4.9.7 Paris and Galt Moraine Policy. Technical Memo. Dated June 20, 2021.
- Hydrology Consulting Services. 2021. 2019-2020 Annual Report, Groundwater and Surface Water Monitoring Program. Audrey Meadows Subdivision. Dated April 9, 2021.
- Stovel & Associates Ltd. 2021. Environmental Impact Study, Proposed Rural Settlement Development. Prepared for Audrey Meadows Ltd.
- Triton Engineering Services Ltd. 2021. Functional Servicing and Stormwater Management Report. Audrey Meadows Subdivision. Dated June 2021.

Based on our review of the reports noted above, we provide the following comments:

Natural Heritage

1. The Audrey Meadows Environmental Impact Study (EIS), prepared by Stovel and Associates Inc. (2021), recommends a 15 metre wetland buffer however does not justify this reduced setback. Additional information, including a reference to the Mill Creek

Subwatershed Study and other relevant buffer guidelines, will be required to justify a reduced buffer width in principle. The GRCA recommends that the delineated wetlands be captured in the Natural Environment Zoning to prevent future development impacts. Buffers and appropriate setbacks should be identified and addressed through the EIS.

2. We request that the wetland limits be delineated by a qualified person, surveyed using a high resolution GPS (or total station surveyed), and the two (2) unevaluated wetland units be assessed using the most recent edition of the Ontario Wetland Evaluation System (OMNRF 2014).

Stormwater Management

3. The Functional Servicing and Stormwater Management Report did not clearly demonstrate that groundwater recharge and discharge functions will be maintained on and adjacent to the subject site. Please provide a monthly water balance for pre-development and post-development catchments.

4. Section 2.1.2 (Hydrology and Hydrogeology) of the EIS states that "the water table in the ponds at the southeast of the site are close to the stabilized groundwater level." The wetlands appear to be located within the southwest portion of the site, however the stormwater management block is proposed to be located toward the southeast portion of the site. We would request that the applicant demonstrate post-development infiltration deficit mitigation measures, including proposed infiltration facility location and seasonally high groundwater elevations for the SWM facilities and infiltration facilities.

5. According to the Functional Servicing and Stormwater Management Report, the quantity control objective is to match pre- and post-development peak runoff rates. The peak modelling summary indicates that post-development peak runoff rates toward the wetland (and woodland) area will be below pre-development rates. This suggests there could be an overall reduction in surface flow volumes toward the wetland. A similar assessment of infiltration rates was not provided, despite the proposed reliance on infiltration measures to maintain groundwater recharge and discharge functions on the Galt –Paris Moraine. A more comprehensive assessment of surface runoff and infiltration rates and volumes on this site is required to clearly demonstrate that the proposed development will not result in an adverse impact on the hydrological functions (i.e. recharge, discharge, and storage) of the wetlands on and adjacent to the subject lands.

Due to the presence of the above-noted features, portions of the subject lands are regulated by the GRCA under the Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation (Ontario Regulation 150/06). Any future development or site alteration within the regulated areas will require prior written approval from GRCA in the form of a permit pursuant to Ontario Regulation 150/06.

3. Additional Information/Suggestions provided in an advisory capacity:

It is the opinion of GRCA staff that the EIS did not adequately address the Natural Heritage features as it relates to threatened or endangered species and woodland features and recommend that the Township of Puslinch consider peer review of the of the report.

400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519.621.2761 **Toll free:** 866.900.4722 **Fax:** 519.621.4844 **Online:** www.grandriver.ca

This application is considered a 'Major' Zone Change application, with an applicable fee of $2,335 as per the 2021 fee schedule. With a copy of this correspondence, the applicant will be invoiced in the amount of $2,335.00.

Should you have any questions or require further information, please me, at 519-621-2763 ext. 2230 or by email at jsimons@grandriver.ca.

Yours truly,

[redacted]

Jenn Simons
Resource Planner
Grand River Conservation Authority

c.c. Audrey Meadows Ltd. (via email only)
Robert Stovel c/o Stovel and Associates Inc. (via email only)

Enclosed (1)

**** These comments are respectfully submitted to the Committee and reflect the resource concerns within the scope and mandate of the Grand River Conservation Authority.***



Grand River Conservation Authority

Date: Jul 06, 2021
Author: js

Part Lot 17 & 18, Concession 8, Puslinch

Legend

- Regulation Limit (GRCA)
- Regulated Watercourse (GRCA)
- Regulated Waterbody (GRCA)
- Wetland (GRCA)
- Floodplain (GRCA)
  - Engineered
  - Estimated
  - Approximate
  - Special Policy Area
- Slope Valley (GRCA)
  - Steep
  - Oversteep
  - Steep
- Slope Erosion (GRCA)
  - Oversteep
  - Toe
- Lake Erie Flood (GRCA)
- Lake Erie Shoreline Reach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)

This legend is static and may not fully reflect the layers shown on the map. The text of Ontario Regulation 150/06 supercedes the mapping as represented by these layers.

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Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user.
The source for each data layer is shown in parentheses in the map legend. For a complete listing of sources and citations go to: https://maps.grandriver.ca/Sources-and-Citations.pdf

0 70 140 280 420 Metres

N

Map Centre (UTM NAD83 z17): 568,986.74 4,816,153.70

This map is not to be used for navigation | 2015 Ortho (ON)

NAD 1983 UTM Zone 17N

Scale: 11,892

2nd Submission Comments - March 2022

Administration Centre: 400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6
Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

March 15, 2022
Via email
OP-2021-02 and D14/AUD

Deborah Turchet
Secretary-Treasurer
Planning and Development Department
County of Wellington
74 Woolwich St., Guelph, ON, N1H 3T9

Lynne Banks
Legislative and Development Coordinator
Planning and Development
Township of Puslinch
7404 Wellington Rd 34, Puslinch, ON, N0B 2J0

Dear Ms. Turchet and Ms. Banks,

Re: OP-2021-02 and D14/AUD
Part Lot 17 & 18, Concession 8, Township of Puslinch
Audrey Meadows Ltd.

Recommendation

The Grand River Conservation Authority (GRCA) has no objection to the above applications. The applicant has provided sufficient justification for an Official Plan and Zoning By-law amendment from agricultural to residential land while protecting natural heritage features on and adjacent the property.

Documents Reviewed by Staff

Staff have reviewed the following items previously circulated*:*

- Triton November 18, 2021 response memo to GRCA comments dated November 1, 2021
- Environmental Impact Study Addendum, Audrey Meadows (Stovel and Associaates Inc., with assistance of Lincoln Environmental Consulting Corp., December 27, 2021)
- Audrey Meadows Subdivision Nitrate Impact Analysis and Water Supply Assessment (Groundwater Science Corp., December 20, 2021)
- Triton February 24, 2022 summary memo
- Additional e-mail correspondence and discussions with Triton during December 2021 – January 2022.

The above items address previous GRCA comments dated November 1, 2021 to the satisfaction of the GRCA. As such, the GRCA has no objection to the approval of the Official Plan Amendment and Zoning By-law Amendment.

GRCA Comments

1. GRCA comments identified for Draft Plan Approval / Detailed Design as outlined in email correspondence and subsequent February 24, 2022 Summary Memo will be addressed as part of the detailed design stage during Draft Plan Approval of Subdivision.
2. The EIS addendum does not appear to consider the most recent groundwater assessment by Groundwater Science Corp. (December 20, 2021). We expect that the stormwater management report will delineate existing and proposed stormwater catchment boundaries and provide a more detailed assessment of surface water drainage flow patterns. Pre and post development water balance details will be required to demonstrate that there will be no adverse hydrological impacts within the adjacent wetlands or watercourses.

The GRCA offers the following advisory comments:

3. A minimum 30 m setback from all wetlands is supported. Based on the revised development concept provided by Stovel and Associates, it appears that rear lot lines have been pulled back to the edge of the farm field and minimum rear yard setbacks have been established to protect the forest edge (i.e., 10 m from the dripline) and associated wetlands. We suggest that the rear lot lines can be shifted/refined further to fully avoid the 30 m wetland buffer. A minimum 30 m development setback (including new lot lines) from all wetlands and a 10 m minimum setback from all woodland edges, whichever results in a greater overall buffer, is supported by the GRCA.

Consistent with GRCA's 2022 approved fee schedule, additional fees to those already received will be considered for the detailed submissions in support of a plan of subdivision at the time an application is circulated.

Should you have any questions, please contact me at 519-621-2763 ext. 2229.

Sincerely,



Fred Natolochny MCIP RPP
Supervisor of Resource Planning
Grand River Conservation Authority

cc: Robert Stovel c/o Stovel and Associates Inc. (via email only)
Ray Kirtz, Triton Engineering Services Ltd. (via email only)

CANADA POST
2701 RIVERSIDE DRIVE SUITE N0820
OTTAWA ON K1A 0B1
CANADAPOST.CA

POSTES CANADA
2701 PROM RIVERSIDE BUREAU N0820
OTTAWA ON K1A 0B1
POSTESCANADA.CA

September 20, 2021

Planning
74 Woolwich St
Administration Centre, Third Floor
Guelph, ON N1H 3T9

RE: OP-2021-02 Audrey Meadows Ltd. - circulation for comment

Canada Post has reviewed the proposal for the above noted Development and has determined that the completed project will be serviced by centralized mail delivery provided through Canada Post Community Mailboxes. Our centralized delivery policy will apply for any buildings of 3 or more self-contained units with a common indoor area. For these units the owner/developer will be required to install a mail panel and provide access to Canada Post.

In order to provide mail service to this development, Canada Post requests that the owner/developer comply with the following conditions:

⇒ The owner/developer will consult with Canada Post to determine suitable permanent locations for the placement of Community Mailboxes and to indicate these locations on appropriate servicing plans.

⇒ The Builder/Owner/Developer will confirm to Canada Post that the final secured permanent locations for the Community Mailboxes will not be in conflict with any other utility; including hydro transformers, bell pedestals, cable pedestals, flush to grade communication vaults, landscaping enhancements (tree planting) and bus pads.

⇒ The owner/developer will install concrete pads at each of the Community Mailbox locations as well as any required walkways across the boulevard and any required curb depressions for wheelchair access as per Canada Post's concrete pad specification drawings.

⇒ The owner/developer will agree to prepare and maintain an area of compacted gravel to Canada Post's specifications to serve as a temporary Community Mailbox location. This location will be in a safe area away from construction activity in order that Community Mailboxes may be installed to service addresses that have occupied prior to the pouring of the permanent mailbox pads. This area will be required to be prepared a minimum of 30 days prior to the date of first occupancy.

⇒ The owner/developer will communicate to Canada Post the excavation date for the first foundation (or first phase) as well as the expected date of first occupancy.

⇒ The owner/developer agrees, prior to offering any of the residential units for sale, to place a "Display Map" on the wall of the sales office in a place readily available to the public which indicates the location of all Canada Post Community Mailbox site locations, as approved by Canada Post and the township of Puslinch.

⇒ The owner/developer agrees to include in all offers of purchase and sale a statement, which advises the prospective new home purchaser that mail delivery will be from a designated Community Mailbox, and to

include the exact locations (list of lot #s) of each of these Community Mailbox locations; and further, advise any affected homeowners of any established easements granted to Canada Post.

⇒ The owner/developer will be responsible for officially notifying the purchasers of the exact Community Mailbox locations prior to the closing of any home sales with specific clauses in the Purchase offer, on which the homeowners do a sign off.

Canada Post further requests the owner/developer be notified of the following:

1 The owner/developer of any condominiums will be required to provide signature for a License to Occupy Land agreement and provide winter snow clearance at the Community Mailbox locations

2 Enhanced Community Mailbox Sites with roof structures will require additional documentation as per Canada Post Policy

3 There will be no more than one mail delivery point to each unique address assigned by the Municipality

4 Any existing postal coding may not apply, the owner/developer should contact Canada Post to verify postal codes for the project

5 **The complete guide to Canada Post's Delivery Standards can be found at:**
https://www.canadapost.ca/cpo/mc/assets/pdf/business/standardsmanual_en.pdf

Regards,

Neil Mazey
Delivery Services Officer | Delivery Planning
Huron/Rideau Region
955 Highbury Ave N
London ON N5Y 1A3
(519) 281-2253
neil.mazey@canadapost.ca

February 4, 2022
Our File: 121006-025

Township of Puslinch
7404 Wellington Road 34
Guelph, ON N0B 2J0

Attention: Ms. Lynne Banks

Re: Application for Zoning By-law Amendment
Part Lots 17 and 18, Concession 8, Township of Puslinch

Dear Ms. Banks:

An application for a Zoning By-law Amendment has been received by the Township for the subject lands on Part Lots 17 and 18, Concession 8, to rezone the lands as Rural Settlement residential Zone, to allow for the development of a future 29-lot residential subdivision, to be connected to the existing Audrey Meadows subdivision to the south. The documents submitted also support an Official Plan Amendment application to the County of Wellington. A request from the Township was received by GM BluePlan Engineering to review the Zoning By-Law Amendment Application and supporting documents. This letter has been prepared to document our review of the application.

In support of the zoning bylaw amendment, the following documents and drawings were received and reviewed:

- Functional Servicing and Stormwater Management Report, prepared by Triton Engineering Services Limited, dated June 2021.
- Traffic Impact Brief, prepared by Triton Engineering Services Limited, dated June 2021.
- Groundwater and Surface Water Monitoring Program, prepared by Hydrogeology Consulting Services, dated April 9, 2021.
- Report on Site Characteristics and Proposed Development Objectives as they relate to the Wellington County Official Plan – Section 4.9.7 Paris and Galt Moraine Policy Area, prepared by Groundwater Science Corp., dated June 20, 2021.
- Zoning Bylaw Amendment Application Form, completed by Rob Stovel, dated June 21, 2021.
- Permission to Access Form, dated June 22, 2021.
- Draft Zoning Bylaw Amendment.

The following documents were received and will be reviewed in detail by others:

- Planning Justification Report, prepared by Stovel and Associates Inc., dated June 2021.
- Environmental Impact Study, prepared by Stovel and Associates Inc., dated June 2021.
- Drinking Water Source Protection Screening Form, completed by George R. Good, dated April 20, 2021.

Based on our review, we provide the following engineering comments:

<u>Water Servicing</u>

1. The proposed development is to be serviced by private individual wells.
2. The Functional Servicing Report states that preliminary background information and experience with the adjacent development indicates that there is sufficient quality and quantity of potable water available to service the proposed development. It is stated that the proposed 0.3 hectare lots provide ample room to accommodate the proposed wells and ensure no interference between existing wells in the proximity and proposed wells within the future development. Additional information is required to support this, as described below.
3. Harden Environmental recommends following MECP Procedure D5-5 as a method of confirming that there will be adequate water supply for the development. They recommend that a minimum of three water supply wells be installed to confirm that quantity and quality of the underlying aquifer and the potential for interference with existing wells in the area.

Wastewater Servicing

1. Wastewater servicing is to be provided by private individual septic systems with tertiary (nitrate) treatment to improve effluent quality.
2. The Functional Servicing Report states that the proposed minimum 0.3 hectare lots provide ample room to accommodate the proposed tertiary treatment sanitary systems. Additional information is required to support this, as described below.
3. The preliminary estimation of nitrate loading due to the proposed development, provided in the Groundwater Science Corp. report, is 1.97 mg/L. Initial groundwater nitrate concentrations measured at boreholes on the subject lands are in the range of approximately 6-8 mg/L, reportedly elevated due to agricultural fertilizer use. It is therefore reportedly anticipated that the resulting overall nitrate condition at the site related to the proposed septic systems would be lower than the existing condition, as agricultural loading will be eliminated from the site. These calculations are preliminary in nature, and Harden Environmental have indicated that additional analysis is required.
4. Harden Environmental have indicated that a nitrate impact analysis is required, per MECP Procedure D5-4, to assess the density of lots for the development and determine if a minimum lot size of 0.3 hectares is sufficient. They also require that it be shown that wells downgradient of the site will not be impacted by the introduction of septic systems. All private wells between the site and Mill Creek should be evaluated for potential impact. The potential connection between the overburden aquifer system and deeper bedrock aquifer should be considered as a potential pathway for effluent.

Fire Water

1. While not discussed in the Functional Servicing Report, two fire water storage tanks are indicated on the Proposed Lot Fabric Plan.
2. It is reasonable to defer consideration of fire water supply and fire access to detailed design and draft approval.

Stormwater Management

1. The Stormwater Management Report identifies the following stormwater management (SWM) criteria for the proposed development:
    - Water Quantity Control of post development flows to pre-development flows up to and including the 100-year event.
    - Quality Control: Enhanced treatment (80 percent suspended solids removal) prior to release into the existing municipal outlet.
    - Storm sewers within the development designed to collect/convey the 5-year storm.
      Optimal 2% minimum lot grading slopes.
    - Road Profile design to convey major overland flow toward the SWM pond with maximum depth of low points no greater than 300 mm.
    - Sediment and Erosion control measures to be implemented prior to and during construction until the site is established.
2. We recommend that maintaining post-development water balance to pre-development levels should be added to the above criteria.
3. In general, we have no concerns with the overall approach to stormwater management at this time.
4. It is proposed that stormwater from all roads and all lots east of Old Ruby Lane (10.43 hectares in total) will be conveyed to a dry pond facility with oil-grit-separator (OGS) pre-treatment, which will ultimately discharge to the existing municipal ditch on Victoria Road South. A small area (0.17 hectares) of the rear portions of two lots adjacent to Victoria Road South will discharge directly to the municipal ditch. Under existing conditions 7.51 hectares of the site sheetflows overland to the Victoria Road South ditch. Post-development peak flows to the ditch are to be maintained at or below pre-development peak flows.
5. Stormwater from the rear portions of lots along the western side of the proposed development (2.37 hectares in total) will sheetflow overland to the wetland/woodland area to the west. Under existing conditions 5.46 hectares of the site discharges overland to the woodland area. Post-development peak flows to the woodland area are to be maintained at or below pre-development peak flows. Runoff from roofs and landscaped areas is considered “clean”. As sheetflow overland, or conveyance via grassed swales, allows for

additional polishing, there are no concerns with this approach. Based on the high-level post-development storm drainage area map provided, it appears that the driveways for these western lots are to be graded to drain towards the road, allowing for driveway runoff to be captured by catchbasins and conveyed to the OGS and dry pond for treatment. This should be further considered at the time of detailed design and draft approval.
6. Harden Environmental have indicated that an improved drainage area catchment map is required to identify areas with on-site depression focussed recharge. To demonstrate that the water balance can be maintained, a detailed accounting of the water capture in these depressions should be made.
7. It is proposed that to facilitate infiltration and contribute to groundwater recharge in an effort to maintain water balance, soak-away pits will be connected to roof leaders. Harden Environmental have indicated that the infiltration of stormwater should be evaluated with respect to affecting the water quality of the underlying aquifers.

Roads and Traffic

1. A 20 m urban local road cross section is proposed for the right of ways, with storm sewer and curb and gutter.
2. Access to be the proposed development will be via an extension of Old Ruby Lane to the south, and a connection to Victoria Road South to the East.
3. We note that no engineering drawings have been provided or reviewed at this time.
4. Per the preliminary Traffic Impact Study provided with this submission, existing 2019 traffic volumes were acquired from a County of Wellington counting station located on Victoria Road between Wellington Road 34 and Maltby Road. Intersection counts were not obtained for the purpose of the preliminary assessment, as traffic volumes were impacted by the ongoing Covid-19 pandemic restrictions in 2021. A growth rate of 2% was applied to 2019 traffic counts to determine a theoretical 2021 traffic volume.
5. The Traffic Impact Study does not appear to incorporate forecasting of future traffic volumes on Victoria Road South. The impact of proposed or potential future developments, including within the Clair-Maltby Secondary Plan Area, should be considered.
6. The Traffic Impact Study indicates that the sightlines in both directions at the proposed entrance location on Victoria Road South are greater than the minimum required. The proposed development entrance offset distance of 200m to the existing adjacent residential subdivision to the south is considered to be acceptable.

Utilities

1. Block A has been included on the Proposed Lot Fabric Plan as a hydro corridor easement.
2. Utility servicing to the proposed development is to consist of natural gas, hydro and communications. The Functional Servicing Report indicates that providers of each of these services have plant adjacent to the proposed development. Utilities will be constructed in a joint utility trench that follows the road alignment.

Groundwater and Surface Water Monitoring

1. A ground and surface water monitoring program for the proposed development was commenced in 2019. Analysis of data collected between September 2019 and December 2020 was provided with this submission. This is considered to be baseline data for comparison with future years of data to assess whether trends are occurring. When possible, data and analysis for the 2021 calendar year should be provided for review.
2. Harden Environmental have indicated that the quality of Mill Creek found along the southern edge of the existing Audrey Meadows development should be studied by obtaining water samples during low and high flow. The potential impact of additional stormwater being discharged to Mill Creek should be evaluated with respect to Provincial Water Quality Objectives and Policy 2 of the Water Management Guidelines of the MECP. The surface water monitoring program should be updated accordingly.

Natural Environment

1. The site is partially located within GRCA regulated area, and therefore the GRCA should comment on the proposed setbacks to woodland dripline and wetland.
2. We defer detailed review of the Environmental Impact Study to others.

If you have any questions or require additional information, please do not hesitate to contact us.

Yours truly,

GM BLUEPLAN ENGINEERING
Per:



Andrea Reed, P. Eng.
Project Engineer

May 18, 2022

Sent by email
Attention: Ms. Lynne Banks, Development and Legislative Coordinator

Township of Puslinch
7404 Wellington Rd 34,
Puslinch, ON N0B 2J0

RE: Notice of Public Meeting, File No. OP 2021-02/ D14/AUD

Regarding the proposed 14.5 hectare residential development to be located abutting the existing Audrey Meadows Subdivision, at Part of Lots 17, 18 and 19, Concession 8, Township of Puslinch, County of Wellington, the lands are located within the WHPA-Q for the Arkell Wellfield and therefore, we would have an interest in ensuring that water quantity control is considered and implemented for this development. We are interested in having an opportunity to review and comment on future supporting documents and studies for this development, particularly those related to water quantity control such as site servicing and stormwater management plans and studies.

Sincerely,



Peter G. Rider, P. Geo., RMO, Program Manager
Water Services, **Environmental Services**
City of Guelph

T 519-822-1260 x 2368 | F 519-822-6194 | C 226-820-3608

E peter.rider@guelph.ca

C Melissa Aldunate, Peter Rider, Emily Stahl,
Kyle Davis

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TTY 519-826-9971

guelph.ca

NATURAL RESOURCE SOLUTIONS INC.
Aquatic, Terrestrial and Wetland Biologists

January 28, 2022 2670

Township of Puslinch
Planning and Development Department
Puslinch, ON
N0B 2J0

Attention: Mr. Jeff Bunn,
Deputy Clerk

RE: Audrey Meadows Development, Part Lots 17, 18 and 19, Concession 8
Township of Puslinch
Peer Review of EIS Addendum

As requested, Natural Resource Solutions Inc. (NRSI) has reviewed the Environmental Impact Study Addendum prepared by Stovel and Associates (Stovel) and Lincoln Environmental Consultants Inc. (Lincoln) on behalf of Audrey Meadows Ltd. that has been submitted as part of a Zoning By-Law Amendment (ZBA) Application (Application) for a proposed development on the above-noted lots, herein referred to as the "subject property", owned by Audrey Meadows Ltd. Our comments are set out below.

Background

The subject property is located southwest of Victoria Road South (Concession 8), Maltby Road East and Old Ruby Lane, in the Township of Puslinch (Township). Multiple reports were submitted in the initial Application detailing natural heritage features existing on and adjacent to the subject property, as well as potential direct and indirect impacts the proposed ZBA and associated development may have on these features. In August 2021, NRSI staff provided a peer review letter (2021 Letter) with comments and recommendations related to the proposed development after reviewing the Application materials, at the request of the Township. On December 27, 2021, an EIS Addendum was submitted to the Township detailing additional natural environment surveys that have been completed on the subject property, additional recommendations to mitigate impacts of the proposed development and responses to address comments provided in NRSI's 2021 Letter.

Tasks Carried out

In order to complete this review, NRSI carried out the following steps:

- Review of the following reports:
  - Environmental Impact Study. Prepared by Stovel and Associates. (June 2021),
  - Environmental Impact Study Addendum. Prepared by Stovel and Associates. (December 2021),
  - 2019-2020 Annual Report, Groundwater Monitoring and Surface Water Monitoring Program. Prepared by Hydrogeology Consulting Services. (April 2021),
  - Planning Justification Report. Prepared by Stovel and Associates. (June 2021),
  - Zoning By-Law Amendment Application. Prepared by Stovel and Associates on behalf of Audrey Meadows Ltd. (June 2021),

- Paris-Galt Moraine Policy Area Letter. Prepared by Groundwater Science Corp. (June 2021), and
- Zoning By-Law Amendment to By-Law 023/18 for Audrey Meadows Ltd. (June 2021).

Review Comments

The EIS Addendum submitted by Stovel addressed numerous comments and recommendations made by NRSI regarding the proposed development and potential impacts to natural heritage features found on and adjacent to the subject property. Through our review of the EIS Addendum and initial Application materials, the following comments have been developed:

- A revision to the development concept has been made as of December 27, 2021. The proposed development now contains 22 lots, rather than 29. This revision allows for rear lots lines to be setback from the existing woodland edge along the western portion of the proposed development. While rear lot lines still occur within close proximity to the woodland edge along the northern portion of the proposed development (Lots 9-16), a rear yard setback of 10m has been provided from the woodland dripline, within which no development will occur.

- The use of permanent fencing with no gates along the northern portion (Lots 9-16) of the proposed development has been recommended to limit access and encroachment into the woodland. It is anticipated that this will aid in limiting disturbance to the adjacent woodland edge.

- A “Tree Management Plan” (TMP) identifying any on site trees requiring removal has been recommended as a condition of Draft Plan Approval. It is understood that this TMP will also recommend additional restoration and enhancement measures, as well as tree protection measures to minimize the impacts of construction.

- The EIS Addendum states that “site activities” will be required to occur outside of the breeding bird season (April 1 - August 31) and under suitable (dry) conditions.

- Components of the proposed development requiring site alteration (grading) are now setback by a minimum of 30m from existing wetlands. Wetland boundaries have been flagged and were confirmed with Tony Zammit of the Grand River Conservation Authority (GRCA) on October 14, 2021.

- The use of appropriate Erosion and Sediment Control (ESC) measures have been recommended within the EIS Addendum to protect wetlands on and adjacent to the subject property from construction impacts associated with the proposed development, including the use of silt fencing.

- The EIS Addendum states that fulsome natural feature and wildlife surveys were completed as part of original EIS completed by Stovel in 2004 in support of the existing subdivision south of the proposed development. Within the EIS Addendum the author posits that the original findings of these surveys should be upheld for this Application, though confirms that amphibian and reptile surveys, as deemed necessary, can occur through the recommendation of a condition of Draft Plan Approval.

- The EIS Addendum includes a Significant Wildlife Habitat (SWH) screening exercise that confirms Candidate SWH communities will not be adversely impacted by the proposed development.

- The EIS Addendum has confirmed that potential bat habitat associated with the woodland is not likely to be impacted by the proposed development and that an inventory of trees occurring along the forest edge directly adjacent to the proposed development may be completed as part of the proposed TMP.

- The EIS Addendum has confirmed that the proposed development is not anticipated to have adverse impacts on Aquatic Resources, including potential fish habitat and the overall thermal regime.

Recommendations

It is our opinion that the majority of concerns raised in our initial letter have been appropriately addressed through the proposed development design revisions, additional surveys completed, and recommendations made within the EIS Addendum. Despite this, we believe that the following additional requirements should be incorporated as conditions of Draft Plan Approval.

- Complete a TMP that includes a tree inventory of all trees >10cm Diameter at Breast Height (DBH) that may be impacted by the proposed development. The TMP should include the details discussed in the EIS Addendum, including the identification of necessary tree removals, restoration tree plantings and associated monitoring requirements, invasive species control recommendations, and tree protection measures.

- Include an investigation of potential bat cavities during the tree inventory to determine the presence/absence of trees that may support roosting opportunities for SAR bats. Should SAR bat habitat be identified, consultation with the MECP is recommended and measures to mitigate impacts to this habitat may be required.

- It is understood that Triton Engineering Services Limited (Triton) will provide a detailed analysis of water balance as a condition of Draft Plan Approval. It is our recommendation that updated amphibian call surveys be completed for each wetland directly adjacent (within 120m) to the proposed development, as part of the ecological portion of this assessment. Wetlands existing on lands owned by Audrey Meadows Ltd. should be surveyed, in addition to offsite properties, where access is permitted.

.

Conclusion

Based on our review of the EIS Addendum and additional documents supporting the Application, it is NRSI's position that the recommendations described above be required as conditions of Draft Approval.

Please do not hesitate to contact NRSI should you require further clarification on these matters.

Sincerely,
Natural Resource Solutions Inc.

David E. Stephenson, M.SC.
Certified Arborist and Senior Biologist

Jack Richard
Registered Professional Forester

March 25, 2022

Memorandum

To: Lynne Banks – Development and Legislative Coordinator, Township of Puslinch

Cc: Meagan Ferris – Manager of Planning and Environment, County of Wellington
Deborah Turchet – Coordinator, Administration & Development, Planning and Development Department, County of Wellington

From: Danielle Walker, Source Protection Coordinator, Wellington Source Water Protection

Reviewed By: Kyle Davis – Risk Management Official, Township of Puslinch

RE: Zoning By-law Amendment Application: Audrey Meadows, Township of Puslinch

Please see the below comments in response to the following documents submitted on November 23, 2021:

a. Functional Servicing and Stormwater Management Report dated June 2021;
b. Zoning By-law Amendment Application and Preliminary Concept Plan dated June 22, 2021;
c. Groundwater Monitoring Report dated April 9, 2021;
d. Galt Moraine Policy Area Letter from Groundwater Science Corp. dated June 20, 2021;
e. Planning Justification Report dated June 22, 2021; and
f. Source Protection Screening Form.

Please note the comment numbers refer to Source Water comments made in the Official Plan Amendment process in August 2021 and are provided for reference.

Comment number	Response
1-3	Comments are addressed
2	Please confirm in future submissions if there are transport pathways proposed.
4	According to the Planning Justification Report, private wells and septic systems are proposed for each individual lot. The Functional Servicing Report confirms that each lot will be individually serviced with natural gas. If this information changes, please discuss it in future submissions.

	In relation to consumptive water taking, there is insufficient information provided to estimate daily water usage. The draft water quantity policies which will be in legal effect in the future, recommend that the Township monitor water usage below 50,000 L/day in the WHPA-Q. It is therefore recommended that the applicant provide an estimate of the total proposed water taking as a cumulative total for the proposed development. This could be estimated by considering the proposed size of the individual homes, estimating a typical water usage based on the home size and totaling for the entire development. There was a hydrogeological analysis conducted in 2004 for the existing Audrey Meadows subdivision, however, given that this proposal will increase the water takings, it is recommended that the recent annual report submission plus the 2004 hydrogeological analysis be provided to the Township hydrogeologist for review and comment.
5	The submitted documents do not discuss how to reduce salty water from infiltrating back into the natural environment. Based on the information provided, approximately 85% of runoff from the site will be conveyed to the proposed stormwater management facility via overland swales, sewer and roads. It is noted that roof leaders will connect to soak-a-way pits at each residential site, however, quality control measures specifically targeting salty water run off should be in place. It is recommended that further investigation be given into recharge and infiltration options. Please see original comment and consider the recommended design measures in future submissions.

Please confirm that the site data (lot, building, asphalt, concrete, and landscaped percentages) is included in future submissions. This information is important to review with regards to recharge to the aquifer. As long as the impervious surface percentage after construction is below the 80% threshold value used in the Tier 3 water quantity studies, it will likely be acceptable as the water quantity policies are not legally in effect at this time.

The applicant should please clearly identify all Provincial Instruments, such as Permits to Take Water, Environmental Compliance Approvals, and Environmental Activity and Sector Registrations (EASRs) that will be required for the proposal and provide any necessary technical details or refer to the technical details provided in either the Hydrogeological Study and/or the Stormwater Management Brief/Report. In particular, please indicate whether a Permit to Take Water and / or an Environmental Compliance Approval for the Stormwater Management Facility are required.

If you require further information, please contact one of the undersigned:

Sincerely,

[redacted] Mar 25, 2022

Danielle Walker, Source Protection Coordinator
519-846-9691 ext 236
dwalker@centrewellington.ca

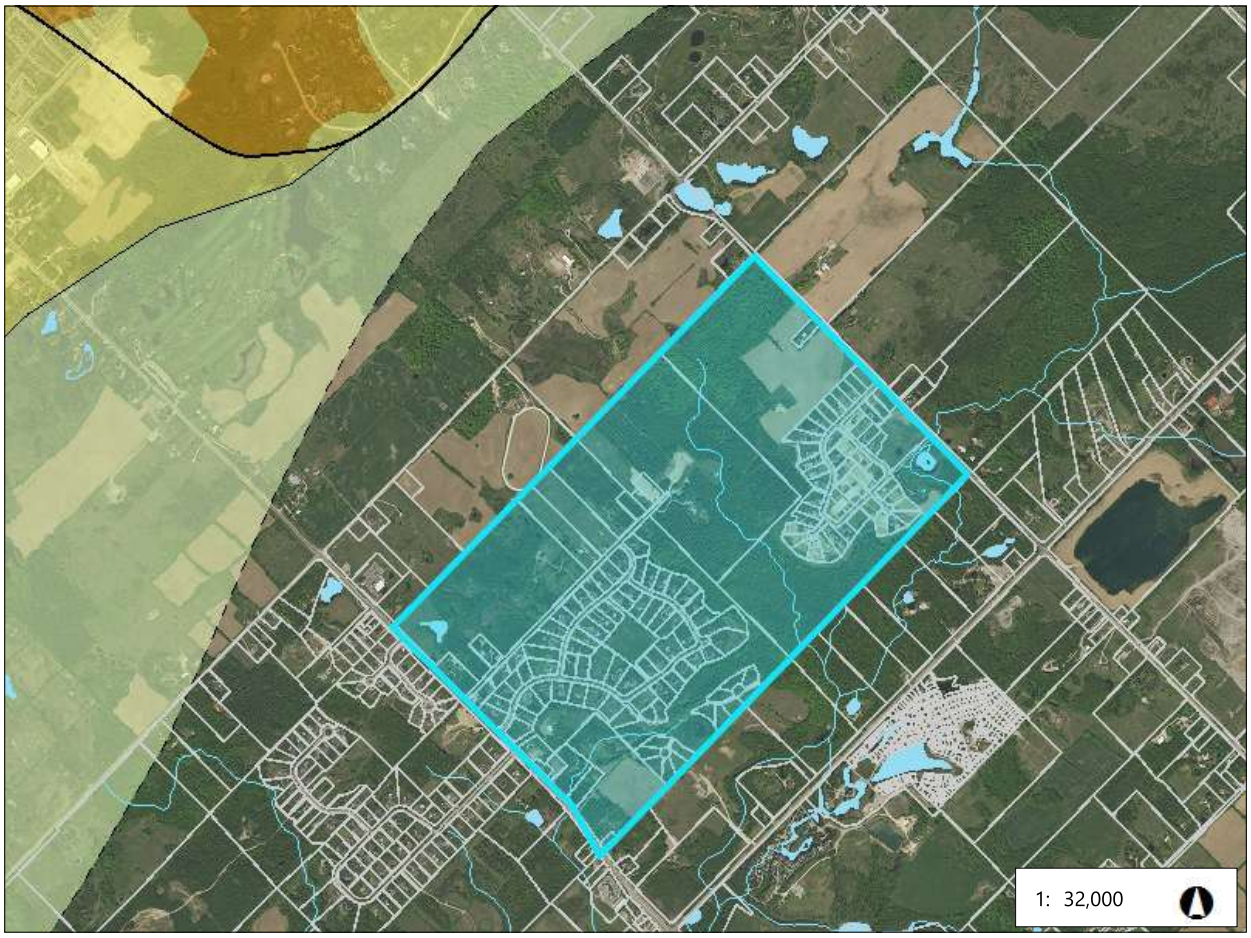
[redacted] Mar 25, 2022

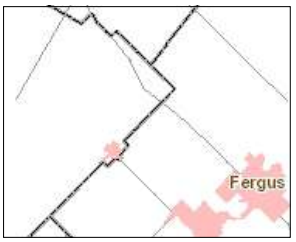
Kyle Davis, Risk Management Official
519-846-9691 ext 362
kdavis@centrewellington.ca

Attachments: WHPA Maps

Explore Wellington

Audrey Meadows





Legend

- Parcels
- Waterbodies
- Watercourses
- Well Locations
- Wellhead Protection Area Boui
  - A
  - B
  - C
  - D
- Issue Contributing Area
  - Chloride
  - Nitrate
  - Sodium
  - TCE
- Vulnerability Score
  - 10
  - 8, D; 8; 8, C
  - 2, 4, 6 (A, B or C)
  - 2,4,6, D; 2,4, D; 2, 4, 6 (D); 4, D; 6,
- HVA
- RoadsLookup

1.6 0 0.81 1.6 Kilometers

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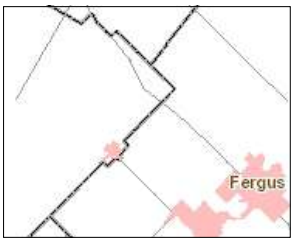
THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2018

Notes

Explore Wellington

Audrey Meadows - Quantity





Legend

- Parcels
- Waterbodies
- Watercourses
- Well Locations
- Q1 and Q2 Boundary
- Q1 and Q2
  - Approved
  - Draft
- RoadsLookup

1.6 0 0.81 1.6 Kilometers

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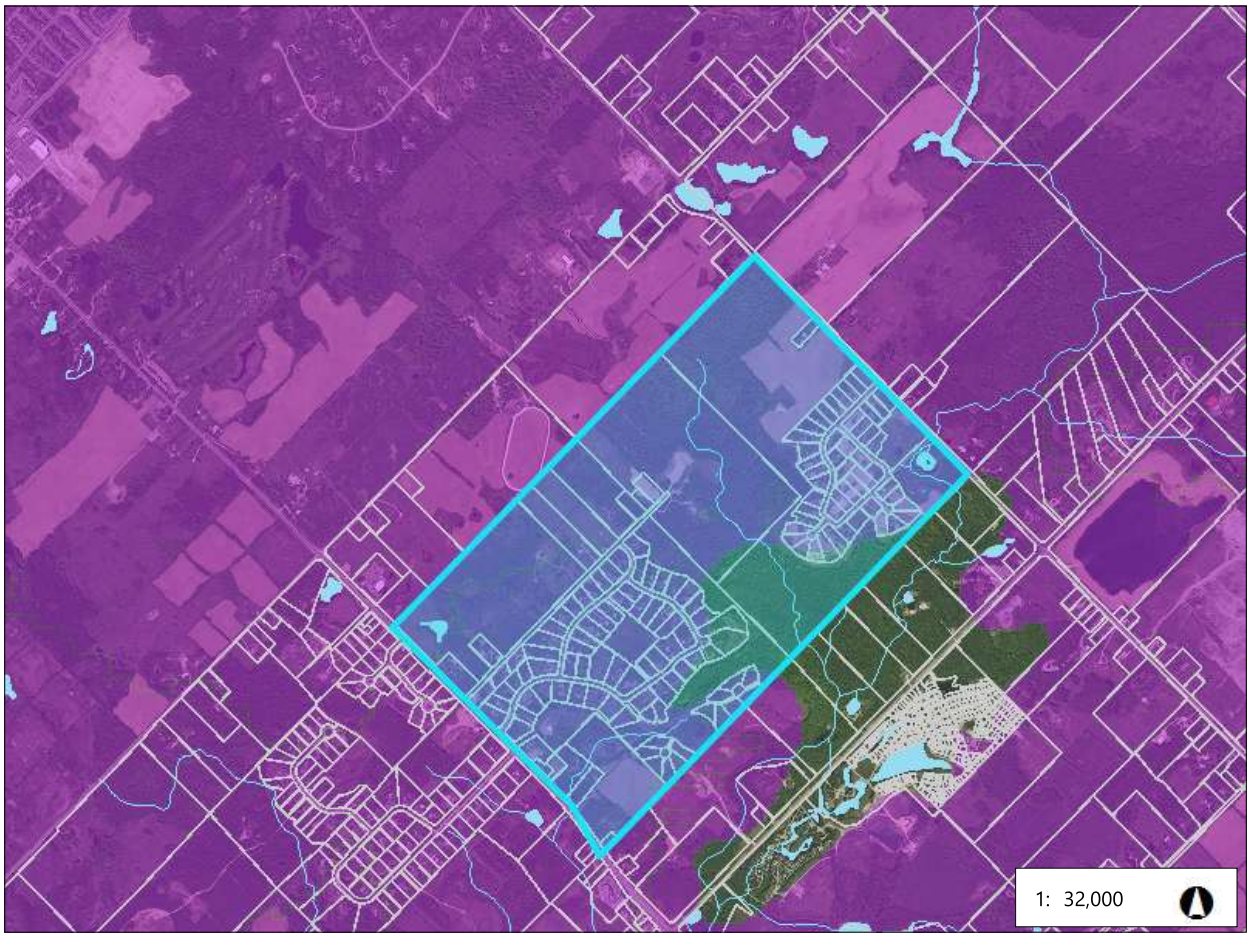
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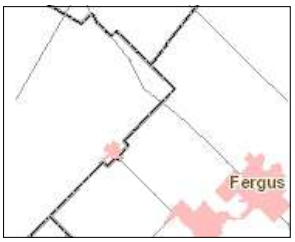
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Notes

Audrey Meadows - SGRA





Legend

- Parcels
- Waterbodies
- Watercourses
- Well Locations
- SGRA
- RoadsLookup

1.6 0 0.81 1.6 Kilometers

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Notes

Source Water_Comments_AudreyMeadows_ZBA_final

Final Audit Report 2022-03-25

Created:	2022-03-25
By:	Danielle Walker (dwalker@centrewellington.ca)
Status:	Signed
Transaction ID:	CBJCHBCAABAAdb2QnVuTBdw5BJKvw8x6RmZFtyJT9ynv

"Source Water_Comments_AudreyMeadows_ZBA_final" History

Document created by Danielle Walker (dwalker@centrewellington.ca)
2022-03-25 - 6:46:23 PM GMT- IP address: 206.132.63.63

Document e-signed by Danielle Walker (dwalker@centrewellington.ca)
Signature Date: 2022-03-25 - 6:51:38 PM GMT - Time Source: server- IP address: 206.132.63.63

Document emailed to Kyle Davis (kdavis@centrewellington.ca) for signature
2022-03-25 - 6:51:40 PM GMT

Email viewed by Kyle Davis (kdavis@centrewellington.ca)
2022-03-25 - 6:59:23 PM GMT- IP address: 167.100.64.156

Document e-signed by Kyle Davis (kdavis@centrewellington.ca)
Signature Date: 2022-03-25 - 6:59:50 PM GMT - Time Source: server- IP address: 167.100.64.156

Agreement completed.
2022-03-25 - 6:59:50 PM GMT

Adobe Sign

Comment Summary – ZBA –- Audrey Meadows Phase 2

Final Review – July 16, 2025 Circulation

Consultant	**Comments**
NPG	See letter attached
GEI	See letter attached
Ecology	See letter attached
Hydrogeology	We are satisfied with the Water Supply and Nitrate Assessment. As stated to the planners on August 19, 2025, the nitrate assessment is only for single family homes and not schools, B&B's, day cares etc...Should the single family homes be converted to other uses in the future, additional nitrate assessment will be required.
GRCA	See letter attached
Sourcewater	See letter attached
County of Wellington Roads	No comments
Township Traffic Consultant	See letter attached
County of Wellington Planning	See letter attached
Township of Puslinch Fire Department	No comments received

Township of Puslinch Building Department	The building department supports the application. No comments at this stage in the process.
Township of Puslinch By-law Enforcement	No comments
Township of Puslinch Public Works	No comments

August 1, 2025

Lynne Banks
7404 Wellington Road 34,
Puslinch, Ontario

Dear Lynne Banks,

RE: **NPG Comments**
Part of Lots 17, 18 and 19 Concession 8
RE: Application for Zoning By-law Amendment

NPG Planning Solutions Inc. (NPG) has been retained to provide comments regarding a Zoning By-law Application to facilitate the development of a residential subdivision consisting of 22 single detached dwelling lots. The Subject Lands legally described as Part of Lots 17, 18 and 19 Concession 8 and are currently vacant. The Subject Lands are approximately 14.5 hectares in size and have 342 meters of frontage along Victoria Road South. Surrounding uses consist of agricultural uses to the north, east and west, and residential uses to the south.

The Subject Lands have been recently subject to an Official Plan Amendment application which was approved by the County of Wellington on April 23, 2025. The Official Plan Amendment changed the designation of a portion of the Subject Lands from Secondary Agricultural to Country Residential to facilitate the proposed development. The Core Greenland and Greenland designation remained as existing on the Subject Lands.

Furthermore, it should be noted that the Zoning By-law Application was deemed complete on November 23, 2021.

This is the Fourth Submission for Zoning By-law Amendment. As part of this submission, NPG has reviewed the following documents:

- Planning Justification Report prepared by Stovel Associates Inc;
- Environmental Impact Assessment prepared by Stovel and Associates Inc;
- Traffic Impact Brief prepared by Triton Engineering Services Limited, dated June 2021;
- Draft Zoning By-law Amendment;

- Zoning By-law Amendment Application;
- Planning Brief prepared by Stovel and Associates Inc., dated October 31, 2024; and
- EIS Addendum Report prepared by Stovel and Associates Inc., dated December 27,2021.

Determination of Completeness

1. NPG acknowledges that the Zoning By-law Amendment application was deemed complete on November 23, 2021

Technical Comments:

2. The County of Wellington indicated that conditions requiring a final Archaeological Assessment can be addressed through the other *Planning Act* applications. We will discuss with the County further on this condition.
3. We review the draft Zoning By-law proposed by the Applicant and offer the following comments:
    a) In addition to the detached dwelling use, permitted uses such as bed and breakfast, home business, private home day care, public school and additional residential unit are also proposed. We require further discussion with the Township's consultant to determine if the 'Nitrate Impact Analysis and Water Supply Assessment' letter prepared by Groundwater Science Corp. and dated December 20, 2021, adequately addresses all proposed uses.
    b) We will discuss the appropriate zones for the wetlands and woodlands as well as their buffers with the Township's Ecologist and the Grand River Conservation Authority (GRCA) to ensure their appropriate protection.
    c) The Applicant should provide the shapefile (*.shp) for the surveyed wetland boundaries that were accepted by the GRCA.
    d) We are not supportive of the broad site-specific provision to permit lot area to be less than the proposed minimum of 0.3 hectares subject to future hydrogeological studies. Any further reduction of lot area in the future should be addressed through future application(s) that are supported by the appropriate studies demonstrating the reduced lot area does not cause any negative impacts.

Sincerely,

[redacted]

Jeremy Tran, MCIP, RPP
Manager, Urban Design and Development Planning
NPG Planning Solutions Inc.
Jtran@npgsolutions.ca

July 17, 2025
GEI Project No. 2402575 – 121006-025

VIA CLOUDPERMIT: Township of Puslinch
Township Application No. D14-AUD

Lynne Banks
Township of Puslinch
4704 Wellington Road 34
Puslinch, ON N0B 2J0

Re: ZBA Application Submission
Part Lots 17, 18 and 19, Concession 8 (Audrey Meadows Phase 2)
Puslinch, ON

Dear Ms. Banks:

GEI Consultants Canada Ltd. (GEI) have reviewed the formal submission for Zoning By-Law Amendment application for the subject lands, located at Part Lots 17, 18 and 19, Concession 8, in the Township of Puslinch. The submission was received from the Township of Puslinch (Township) on July 16, 2025. We are providing comments on the documents submitted in support of the proposed development.

It is our understanding that the proposed development includes a 29-lot residential subdivision with a minimum lot size of 0.3 ha, to be connected to the existing Audrey Meadows subdivision to the south, and with access to Victoria Road South.

The Zoning By-law Amendment application was first received in 2021 and was deemed complete in 2022. An Official Plan Amendment application was submitted to the County of Wellington at the same time and was adopted in April 2025.

1. Documents Received

All plans and studies required from an engineering perspective to support the Zoning Bylaw Amendment application, have been submitted.

The following documents were received and reviewed as part of this submission:

- Functional Servicing and Stormwater Management Report, prepared by Triton Engineering Services Limited, dated June 2021.
- FSR – Follow up Letter, prepared by Triton Engineering Services Limited, dated August 4, 2021.

- FSR – Follow up Letter, prepared by Triton Engineering Services Limited, dated August 16, 2021.
- Traffic Impact Brief, prepared by Triton Engineering Services Limited, dated June 2021.
- Groundwater and Surface Water Monitoring Program, prepared by Hydrogeology Consulting Services, dated April 9, 2021.
- Groundwater Investigation, prepared by Naylor Engineering Associates, dated November 2004.
- Report on Site Characteristics and Proposed Development Objectives as they relate to the Wellington County Official Plan – Section 4.9.7 Paris and Galt Moraine Policy Area, prepared by Groundwater Science Corp., dated June 20, 2021.

We defer detailed review of the following documents to Township staff and other consultants:

- Planning Justification Report, prepared by Stovel and Associates Inc., dated June 2021.
- Environmental Impact Study, prepared by Stovel and Associates Inc., dated June 2021.
- EIS Addendum Report, prepared by Stovel and Associates Inc., dated December 27, 2021.
- Drinking Water Source Protection Screening Form, completed by George R. Good, dated April 20, 2021.

2. Additional Documents Required

All plans and studies required from an engineering perspective have been submitted to support the Zoning Bylaw Amendment application, and additional documents are not required.

3. Technical Comments

Based on the review of documents identified in Section 1, we have no concerns with the zoning bylaw amendment application from an engineering perspective. Further technical review of the subdivision design will be undertaken when a draft plan of subdivision application is made.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.
Project Engineer

NATURAL RESOURCE SOLUTIONS INC.
Aquatic, Terrestrial and Wetland Biologists

August 1, 2025 2670

Township of Puslinch
Planning and Development Department
Puslinch, ON
N0B 2J0

Attention: Ms. Lynne Banks
Development and Legislative Coordinator

RE: Audrey Meadows Development, Part Lots 17, 18 and 19, Concession 8
Township of Puslinch
ZBA Application Review Comments

Natural Resource Solutions Inc. (NRSI) was retained to review an Environmental Impact Study (EIS) and EIS Addendum prepared by Stovel and Associates (Stovel) and Lincoln Environmental Consultants Inc. (Lincoln) on behalf of Audrey Meadows Ltd. that has been submitted as part of a Zoning By-Law Amendment (ZBA) Application (Application) for a proposed development on the above-noted lots, herein referred to as the "subject property", owned by Audrey Meadows Ltd.

It is our understanding the County of Wellington recently approved the Official Plan Amendment Application for this development, and Zoning Bylaw Amendment Application is now again considered active. Provisional comments have been provided in this letter that have been prepared to ensure that the proposed development will effectively avoid negative impacts to natural heritage features within and adjacent to the development lands, consistent with the recommendations provided in our previous peer review letters.

Background

The subject property is located southwest of Victoria Road South (Concession 8), Maltby Road East and Old Ruby Lane, in the Township of Puslinch (Township). Multiple reports were submitted in the initial Application detailing natural heritage features existing on and adjacent to the subject property, as well as potential direct and indirect impacts the proposed ZBA and associated development may have on these features. In August 2021, NRSI staff provided a peer review letter (August 2021) with comments and recommendations related to the proposed development after reviewing the Application materials, at the request of the Township. On December 27, 2021, an EIS Addendum was submitted to the Township detailing additional natural environment surveys that have been completed on the subject property, additional recommendations to mitigate impacts of the proposed development and responses to address comments provided in NRSI's 2021 peer review. A subsequent peer review letter was provided in August 2023.

Provisional Comments

The following comments have been prepared for consideration and are anticipated to be used to support the development of future conditions of Draft Plan Approval for the proposed development. These comments are provisional in nature and anticipated to be refined through ongoing development planning discussions with the Township, County, and applicant or their agent (Mr. Stovel).

- It is noted that the March 2, 2022 Comments Matrix, prepared by Mr. Stovel identifies that the EIS will be updated at the detailed design stage. NRSI staff agree that this should update be completed.

- The revised development concept identifies lot extending into the woodland edge along the northern portion of the proposed development (Lots 9-16). It is noted that a rear yard setback of 10m has been provided from the woodland dripline, within which no development will occur.

- The use of permanent fencing with no gates along the northern portion (Lots 9-16) of the proposed development has been recommended to limit access and encroachment into the woodland. While it is anticipated that this will aid in limiting disturbance to the adjacent woodland edge, the installation of fencing through a portion of the woodland has the potential to impact trees within the woodland and may effectively isolate a section of woodland from the broader feature, enclosing it within the residential lots along the northern boundary of the development.

    - It is recommended this potential impact be assessed within the revised EIS (or Addendum) that is prepared at the detailed design stage. Should impacts be identified, it is recommended that potential offsetting measures be considered, such as the replanting of an equivalent area of woodland contiguous with the existing feature. It is anticipated that such replanting could occur within Block C or elsewhere, subject to discussions between the Town and applicant.

- Should impacts to the existing woodland edge be identified, it is recommended that the revised EIS (or Addendum) include edge management recommendations to ensure the impacts are appropriately mitigated.

- A “Tree Management Plan” (TMP) identifying any on site trees requiring removal is recommended to be prepared as a condition of Draft Plan Approval. This Plan should also consider any potential tree impacts that may occur within the existing woodland edge. The TMP should include the details discussed in the EIS Addendum, including the identification of necessary tree removals >10cm DBH, restoration tree plantings and associated monitoring requirements, invasive species control recommendations, and tree protection measures.

- Include an investigation of potential bat cavities during the tree inventory to determine the presence/absence of trees that may support roosting opportunities for SAR bats. Should SAR bat habitat be identified, consultation with the MECP is recommended and measures to mitigate impacts to this habitat may be required. It should be noted that the Ontario Government recently approved Bill 5 (on June 5, 2025), *Protect Ontario by Unleashing our Economy Act*, 2025. This bill includes a variety of changes including potential alterations to SAR permitting and development processes. At the time this statement was written, the specific implications of Bill 5 to the protection of SAR or their

permitting process remain unknown and it is recommended that SAR continue to be addressed under the existing ESA framework.

- It is understood that Triton Engineering Services Limited (Triton) will provide a detailed analysis of water balance as a condition of Draft Plan Approval. It recommended that the previously proposed updated amphibian call surveys be completed for each wetland directly adjacent (within 120m) to the proposed development, as part of the ecological portion of this assessment. Wetlands existing on lands owned by Audrey Meadows Ltd. should be surveyed, in addition to offsite properties, where access is permitted.

- The revised EIS should incorporate details of the water balance analysis to be completed by Triton, in order to demonstrate that no negative ecological impacts to the wetlands will occur.

- The EIS Addendum states that “site activities” will be required to occur outside of the breeding bird season (April 1 - August 31) and under suitable (dry) conditions. It is recommended that all vegetation removal activities occur outside of both the breeding bird season and bat active season.

Conclusion

Based on our review of the EIS Addendum and additional documents supporting the Application, it is NRSI’s position that the ZBA Application can be considered complete from an ecological perspective, however the provisional recommendations described above should be required as conditions of Draft Approval. NRSI staff are available to meet with the Town, County and applicant to further discuss these comments, as requested.

Please do not hesitate to contact NRSI should you require further clarification on these matters.

Sincerely,
Natural Resource Solutions Inc.



Jack Richard, R.P.R.
Terrestrial Biologist and Registered Professional Forester

Administration Centre: 400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

August 11, 2025

Via email

GRCA File: D14/AUD – Audrey Meadows

Lynne Banks, Associate Planner
Township of Puslinch
404 County Road 34
Puslinch, Ontario, N0B 2J0

Dear Lynne Banks,

Re: D14/AUD – Zoning By-Law Amendment
Part Lot 17 & 18, Concession 8, Township of Puslinch
Audrey Meadows Ltd.

Grand River Conservation Authority (GRCA) staff have reviewed the above-noted Zoning By-Law Amendment application to rezone the lands from agricultural(A) to rural residential holding (RUR - "H") to permit the future development of a residential subdivision.

Recommendation

The GRCA has no objection to the zoning by-law amendment application.

Documents Reviewed by Staff

Staff have reviewed the following documents submitted with this application:

- Planning Justification Report, dated June, 2021
- Revised Draft Zoning By-Law Amendment dated June 3, 2025
- Triton February 24, 2022 summary memo

GRCA Comments

The GRCA has reviewed the proposed Zoning By-law Amendment application. We understand that the zoning change aims to rezone the lands from agricultural(A) to rural residential holding (RUR - "H") to permit the future development of a residential subdivision. We also understand that the proposal involves a revision of the term from 'Rural Settlement Residential (RUSR)' to

Member of Conservation Ontario, representing Ontario's 36 Conservation Authorities | The Grand – A Canadian Heritage River

‘Rural Residential (RUR)’. Consistent with our previous comments dated March 15,2022, the GRCA has no objection to the approval of the Zoning By-law Amendment. Please find our comments letter attached and be advised that we have outstanding comments to be addressed as part of the detailed design stage.

We trust this information is of assistance. Should you have any questions, please contact me at 519-621-2763 ext. 2231 or iezorlu@grandriver.ca.

Sincerely,



Ismet Esgin Zorlu
Resource Planner
Grand River Conservation Authority

Enclosed: GRCA Comments March 15, 2022

Copy: Robert Stovel c/o Stovel and Associates Inc. (via email)
Ray Kirtz, Triton Engineering Services Ltd. (via email)

Administration Centre: 400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6
Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

March 15, 2022
Via email
OP-2021-02 and D14/AUD

Deborah Turchet
Secretary-Treasurer
Planning and Development Department
County of Wellington
74 Woolwich St., Guelph, ON, N1H 3T9

Lynne Banks
Legislative and Development Coordinator
Planning and Development
Township of Puslinch
7404 Wellington Rd 34, Puslinch, ON, N0B 2J0

Dear Ms. Turchet and Ms. Banks,

Re: OP-2021-02 and D14/AUD
Part Lot 17 & 18, Concession 8, Township of Puslinch
Audrey Meadows Ltd.

Recommendation

The Grand River Conservation Authority (GRCA) has no objection to the above applications. The applicant has provided sufficient justification for an Official Plan and Zoning By-law amendment from agricultural to residential land while protecting natural heritage features on and adjacent the property.

Documents Reviewed by Staff

Staff have reviewed the following items previously circulated*:*

- Triton November 18, 2021 response memo to GRCA comments dated November 1, 2021
- Environmental Impact Study Addendum, Audrey Meadows (Stovel and Associaates Inc., with assistance of Lincoln Environmental Consulting Corp., December 27, 2021)
- Audrey Meadows Subdivision Nitrate Impact Analysis and Water Supply Assessment (Groundwater Science Corp., December 20, 2021)
- Triton February 24, 2022 summary memo
- Additional e-mail correspondence and discussions with Triton during December 2021 – January 2022.

The above items address previous GRCA comments dated November 1, 2021 to the satisfaction of the GRCA. As such, the GRCA has no objection to the approval of the Official Plan Amendment and Zoning By-law Amendment.

GRCA Comments

1. GRCA comments identified for Draft Plan Approval / Detailed Design as outlined in email correspondence and subsequent February 24, 2022 Summary Memo will be addressed as part of the detailed design stage during Draft Plan Approval of Subdivision.
2. The EIS addendum does not appear to consider the most recent groundwater assessment by Groundwater Science Corp. (December 20, 2021). We expect that the stormwater management report will delineate existing and proposed stormwater catchment boundaries and provide a more detailed assessment of surface water drainage flow patterns. Pre and post development water balance details will be required to demonstrate that there will be no adverse hydrological impacts within the adjacent wetlands or watercourses.

The GRCA offers the following advisory comments:

3. A minimum 30 m setback from all wetlands is supported. Based on the revised development concept provided by Stovel and Associates, it appears that rear lot lines have been pulled back to the edge of the farm field and minimum rear yard setbacks have been established to protect the forest edge (i.e., 10 m from the dripline) and associated wetlands. We suggest that the rear lot lines can be shifted/refined further to fully avoid the 30 m wetland buffer. A minimum 30 m development setback (including new lot lines) from all wetlands and a 10 m minimum setback from all woodland edges, whichever results in a greater overall buffer, is supported by the GRCA.

Consistent with GRCA's 2022 approved fee schedule, additional fees to those already received will be considered for the detailed submissions in support of a plan of subdivision at the time an application is circulated.

Should you have any questions, please contact me at 519-621-2763 ext. 2229.

Sincerely,



Fred Natolochny MCIP RPP
Supervisor of Resource Planning
Grand River Conservation Authority

cc: Robert Stovel c/o Stovel and Associates Inc. (via email only)
Ray Kirtz, Triton Engineering Services Ltd. (via email only)

07/30/2025

Memorandum

To: Lynne Banks – Development and Legislative Coordinator, Township of Puslinch
Monika Farncombe – Planning and Corporate Services Coordinator, Township of Puslinch

Cc: Jesse Auspitz – Principal Planner, NPG Planning Solutions
Mehul Safiwala – Junior Planner, Township of Puslinch
Meagan Ferris – Manager of Planning and Environment – County of Wellington

From: Danielle Fisher – Risk Management Inspector, Wellington Source Water Protection

RE: Audrey Meadows, Township of Puslinch
Zoning By-law Amendment Application

Wellington Source Water Protection (WSWP) staff have had the opportunity to review the submitted documents in support of the above noted application. This property is located within a vulnerable area and our review was completed to ensure the activities at this property meet the requirements of relevant Source Protection Plan and County of Wellington Official Plan policies.

As requested, please see our comments below:

1. **Application Support - If the application can be deemed complete, then are you in support of the application?**

In order to be in support of this application, we require the information that we had requested in March 2022. Please see the attached comment memorandum dated March 25, 2022.

2. **If you support the application – Are there any conditions that need to be addressed through the Zoning?**

The conditions to be addressed through the zoning are outlined in the memorandum dated March 25, 2022, and are provided here for reference. Please refer to original memo for more detail.

1. That the applicant provide an estimate of the total proposed water taking as a cumulative total for the proposed development;
2. That the recent annual report submission plus the 2004 hydrogeological analysis be provided to the Township hydrogeologist for review and comment;
3. That best management practices, such as LID measures, with the goal to maintain pre-development recharge and reduce salt-laden water infiltration, be implemented;
4. Documentation, to the satisfaction of the Township Hydrogeologist, that each drinking water well was installed in a manner that does not connect multiple aquifers and in accordance with Ontario Regulation 903.

5. Documentation that any unused wells are decommissioned as per *Ontario Regulation 903*. If no unused wells are present on the property, please confirm this in a future submission;
6. Documentation of all provincial approvals required for this property, including Environmental Compliance Approval and Permits to Take Water. If no provincial approvals are required, please confirm this in a future submission.

3. If you cannot support the application - why?

N/A

4. Are there any technical items required to support the application?

See above conditions

For more information, please contact sourcewater@centrewellington.ca.

Sincerely,

[redacted]

Danielle Fisher
Risk Management Inspector
519-846-9691 ext 236
dfisher@centrewellington.ca

Attachments: Source Water Protection comments dated March 25, 2022

SALVINI CONSULTING
Transportation Engineering and Planning

Salvini Consulting Inc.
185 Deer Ridge Drive
Kitchener, ON · N2P 2K5
519-591-0426
julia@salviniconsulting.com

July 31, 2025

Lynne Banks
Development and Legislative Coordinator
Township of Puslinch
7404 Wellington Road 34
Puslinch, ON · N0B 2J0

Re: Audrey Meadows Ltd., Final Review for Zoning By-law Amendment
Traffic Impact Brief, June 2021
Township Peer Review Comments

Dear Lynne,

I've reviewed the June 2021 Traffic Impact Brief that was submitted in support of the planning applications for the Audrey Meadows site on Victoria Road. Comments had been previously provided by GM BluePlan Engineering in February of 2022, so my comments in this letter compliment those comments. In addition, it is my understanding that a holding provision has been proposed as part of the draft Zoning By-law that would require draft plan approval for a plan of subdivision together with a subdivision agreement with the Township before the holding provision could be lifted. The draft plan of subdivision process will give the opportunity to update and confirm the transportation considerations for the site.

Generally, I have no concerns with the proposal from a transportation perspective. The proposal is a relatively low traffic generator and can be accommodated on the road network. The current proposal has even fewer units than were assessed in the Triton study (22 units now versus 30 units in the study). I agree that road improvements will not be required at the proposed connection to Victoria Road and that the traffic can be accommodated. The proposed road connection to Victoria Road is appropriately located about 200 metres from the intersection at Cathrine Court to the south and provides for adequate sight distance along Victoria Road. The Triton study confirms that the new road connection location provides for stopping sight distance along Victoria Road in both directions. Given the sight distances that they have indicated in the study, this location also meets the TAC requirements for intersection sight distance in both directions.

When the draft plan of subdivision process is initiated, I would like to review the proposed draft plan to confirm it is not significantly different than the current proposal from a transportation point of view. If it is similar, there may not even be the need to update the Traffic Impact Brief.

To address the Township's review process, I provide the following:

1. Application Support – I am in support of allowing the application from a transportation perspective.
2. There are no transportation conditions that need to be addressed through the Zoning beyond any standard conditions from the Township.
3. n/a
4. I do not require any additional technical items to support the application.

Please let me know if you have any further questions about my review of the subject application.

Sincerely,

[redacted]

Julia Salvini, MEng, PEng, FITE
President

Cc: Mike Fowler, Township of Puslinch
Justine Brotherston, Township of Puslinch
Pasquale Costanzo, Wellington County
Andrea Reed, GEI Consultants

COUNTY OF WELLINGTON

PLANNING AND DEVELOPMENT DEPARTMENT
Aldo Salis, BES, M. Sc., MCIP, RPP, DIRECTOR
TEL: (519) 837-2600
FAX: (519) 823-1694
1-800-663-0750

ADMINISTRATION CENTRE
74 WOOLWICH STREET
GUELPH, ONTARIO
N1H 3T9

August 12th, 2025

BY E-MAIL

Ms. Justine Brotherston
Township of Puslinch
7404 Wellington Rd 34
Puslinch, Ontario N0B 2J0

Dear Ms. Brotherston,

Re: Zoning By-law Amendment D14/AUD
Audrey Meadows (Phase 2)
Township of Puslinch

Thank you for circulating the above-noted application and allowing the County to provide preliminary comments. It is understood that the subject Zoning By-law Amendment was previously deemed complete by the Township in 2021 and that the subject proposal is related to a County Official Plan Amendment (OP-2021-02 Audrey Meadows Ltd.). The related Official Plan amendment (OPA 122) was adopted by County Council on March 27th 2025 and now is in force and effect.

At the Planning Committee meeting for OPA 122, discussions surrounding protecting the natural features on-site, including the woodlands, took place. These natural features are currently identified in the Official Plan as forming part of the Greenland System (Core Greenlands and Greenlands) with a majority of the features being significant woodlands (Greenlands). It is requested that the above noted features be placed within the Natural Environment (NE) Zone to preserve and protect the feature which also functions as a distinct buffer between the subject development and the urban boundary of the City of Guelph. This would align with the existing land use designation (Part 5 The Greenlands System) and also ensure consistency with the urban-rural boundary policies (Section 4.7 Urban Area Protection).

The Township, the Township's ecological consultants and the Grand River Conservation Authority (GRCA) will need to be satisfied with the proposed setbacks from natural features (woodlands dripline and wetlands) and County planning staff supports clearly delineate setback requirements within the proposed amending by-law.

If Council approves this amendment, we would appreciate a copy of the notice of passing, amending by-law and affidavit documents for our files.

Yours truly,

[redacted]

Meagan Ferris, RPP MCIP
Manager of Planning and Environment
County of Wellington

REPORT COR-2025-037

TO:	Mayor and Members of Council
PREPARED BY:	Justine Brotherston, Director of Corporate Services/Municipal Clerk
PRESENTED BY:	Justine Brotherston, Director of Corporate Services/Municipal Clerk
MEETING DATE:	September 17, 2025
SUBJECT:	Major Site Alteration Application Recommendation P11-MAR - Gino Martinello 4670 Sideroad 10 North

RECOMMENDATION

That Report COR-2025-037 entitled Major Site Alteration Application Recommendation P11-MAR – Gino Martinello, 4670 Sideroad 10 North be received for information; and,

Whereas the Township and its expert consultants are satisfied with the application for a Major Site Alteration through their comprehensive review of the submission materials;

Therefore be it resolved,

That Council approves the Major Site Alteration Permit for 4670 Sideroad 10 North; and,

That Council approve the Conditions of the Site Alteration Permit as [presented/amended] in Schedule "B" of this report; and,

That Council give three readings to By-law No. 2025-071 being a by-law to authorize the Mayor and Clerk to sign the required contract documents.

Purpose

The purpose of this report is to provide Council with a recommendation relating to the Major Site Alteration Permit for 4670 Sideroad 10 North and the proposed conditions for approval as outlined in the report.

Background

The purpose of the Major Site Alteration Application, as outlined by the applicant, is to permit a total of 145,000 cubic meters of fill to be imported to the subject site for the purpose of improving arability and drainage in support of ongoing efforts to convert a former gravel pit into productive farmland. Specifically, the fill will include topsoil intended to enhance soil quality, thereby improving crop production and yield.

The Township deemed the application complete on March 25, 2025 subject to receipt of the application fee which was received on April 3, 2025.

The following public engagement have been completed to date:

- Circulate the Public Information and Written Feedback Notice to properties within a 120 metre buffer or May 15, 2025;
- Public Information Meeting May 28, 2025;
- Written Feedback deadline June 16, 2025.

Comments

In support of Application, the following items were submitted:

First Submission

- March 5, 2025 Major Site Alteration Application Form
- March 5, 2025 Justification for Importing Fill Letter
- March 5, 2025 No Adverse Effect Letter
- January 9, 2025 Extension of Operating Hours
- March 5, 2025 Ownership Confirmation for Qualified Professional
- January 9, 2025 Control Plan
- January 17, 2025 Haul Route Permit
- January 27, 2025 Excess Soil Management Plan – Beneficial Reuse Site
- March 14, 2025 QP Declaration – Excess Soils Management Letter
- August 31, 2022 Grand River Conservation Authority Sign Off
- Township Site Alteration Checklist
- January 9, 2025 Site Alteration Permit Owner Authorization
- November 14, 2024 Soil Characterization Report Proposed Parking Lot Addition 565 Arvin Avenue, Stoney Creek, Ontario
- October 28, 2024 Topsoil Sampling and Chemical Analysis Southeast Quadrant of Parkside Drive and Clappison Avenue, Waterdown, ON

Second Submission

- April 25, 2025 Response to Matrix
- May 2, 2025 Excess Soil Management Plan – Beneficial Reuse Site
- May 6, 2025 Stormwater Management Letter
- April 29, 2025 Control Plan

Third Submission

- August 7, 2024 Soil Characterization Report ESA - 210 Mohawk Road E, Hamilton, Ontario

Fourth Submission

- June 20, 2025 Response to 3rd Site Alteration Application Submission
- August 7, 2025 Social Characterization Report ESA – 4670 Sideroad 10 North, Puslinch, Ontario

Fifth Submission

- August 8, 2025 Response to 4th Site Alteration Application Submission

Project Details

Importation of Fill

The applicant is proposing to import 145,000 cubic metres of soil between January 1, 2025 and December 31, 2028 which equates to approximately 14,500 truckloads of fill.

Due to the volume of fill, it is anticipated that the applicant will need to add source sites to their permit over the course of the three (3) year permit. The applicant will be required to provide the appropriate documentation, such as the analysis of samples of the fill, source site confirmation, etc., to be reviewed by the Township's Engineering Consultant. The Township is committed to providing its peer review within two business days of receipt from the applicant.

Haul Route

As noted above, due to the volume of fill, it is anticipated that the applicant will need to add source sites over the course of the permit which may require updates to the haul route(s) for the site. It is a condition of the Haul Route Permit that the Township be notified if the Haul Route is altered due to changes in the approved source site location(s).

Hours of Operation

The applicant is requesting the following hours of operation:

- Monday to Friday – 7:00 a.m. to 6:00 p.m.
- Saturday – 7:30 a.m. to 4:30 p.m.
- Sundays and Statutory Holidays – None

This would require approval from Council to vary from the provisions of the By-law, as the Township's Site Alteration By-law does not permit site alteration activities during the following:

- Between the hours of 5:00 p.m. and 8:30 a.m. Monday to Friday;
- Anytime on a Saturday, Sunday or Statutory Holiday;
- During any period in which a wind warning has been issued by Environment Canada;
- During any weather conditions where the ability to mitigate Site Alteration activity impacts is severely compromised (e.g., heavy rain, etc.); and
- During any situation where Site Alteration activities can unduly impact adjacent landowners (e.g., brush fires, floods, unsuitable road conditions, etc.).

The applicant has provided a breakdown of how the project duration would be impacted based on the following scenarios: the extended hours be denied; approval for extended weekdays only; and if the request is fully granted (extended weekdays and Saturdays):

Estimated Impact on Project Duration		
	Extended hours cases	
Standards Hours	**Weekday Hours Only**	**Weekday and Saturdays**
20 Months	18 months	16 months

Staff recommend that no extended hours be approved for this project as the extension results in limited reduction in the project time, and the impacts to the residents during morning, evenings and weekends are not deemed to be acceptable. Staff recommend that the applicant be given three years to complete the project based on the work being completed over 20 months with 6-8 months of construction season each year.

Operational Procedures

In accordance with the applicant's Excess Soil Management Plan – Beneficial Reuse Site 4670 Sideroad 10 North, the following is a summary of the proposed operational procedures to be

undertaken by the applicant. The Excess Soil Management Plan can be viewed in the 2nd Submission at Puslinch.ca/ActiveSiteAlteration.

- Site will be fenced and gated to prevent unauthorized access.
- Each load will have a bill of lading signed by the authorized source site representative indicating the name of the source site, hauler, driver, and the date and time of shipment.
- A gatekeeper will be present to receive each load and will compare the bill of lading to the approved source sites and complete a visual inspection of each load prior to permitting access to the site.
- Receiving Site QP is to ensure each load is coming from an approved Source Site.
- Fill that is observed to contain unacceptable materials, odors, staining or elevated headspace vapors as determined using a PID or FID, must be returned to the Source Site. Should the Source Site refuses to take back the unacceptable load(s), the Owner is responsible for ensuring such loads are removed and brought to a facility approved to accept such loads.

Applicable Legislation and Requirements

Township of Puslinch Site Alteration By-law 2023-057

Attachments

Schedule "A" – Key Map – 4670 Sideroad 10 North
Schedule "B" – Draft Conditions of Approval
Schedule "C" – 1st Submission Township Staff and Consultants Comments
Schedule "D" – 2nd Submission Township Staff and Consultants Comments
Schedule "E" – 3rd Submission Township Staff and Consultants Comments
Schedule "F" – 4th Submission Township Staff and Consultants Comments
Schedule "G" – 5th Submission Township Staff and Consultants Comments

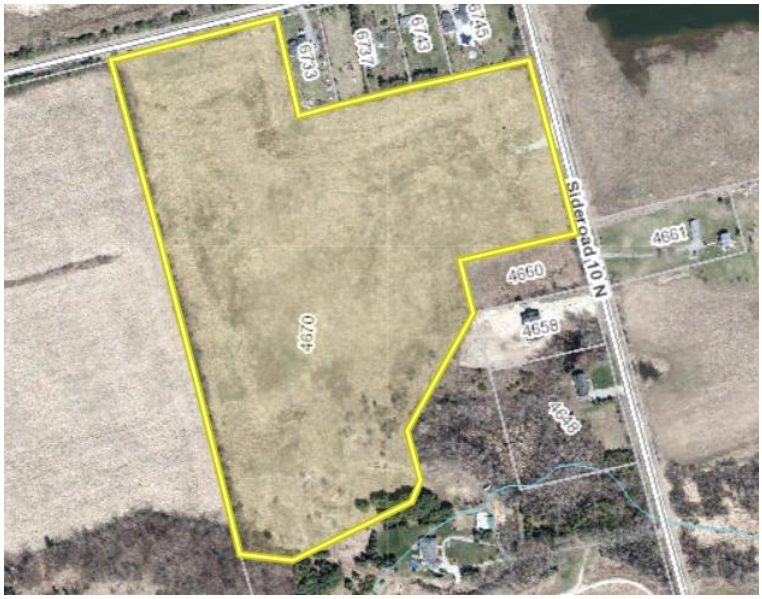
Respectfully submitted,

Justine Brotherston,
Director of Corporate Services/Municipal Clerk

Reviewed by:

Courtenay Hoytfox,
CAO

Schedule "A" – Key Map



Schedule "B" – Draft Conditions of Approval

1. That the owner shall finance the installation of a 4 way stop at Forestell Road and Sideroad 10 North with an upset limit of $5,000.
2. That the owner shall submit bills of lading at intervals of 3,600 cubic metres for review by Township staff.
3. That the owner shall contact Township staff within 24 hours of any protocol breach.
4. That the owner be required to clean any debris on the road as a result of the site alteration works at the end of each day.
5. That the no work shall be completed in the areas directly adjacent to the residential properties in the months of July and August.
6. That upon receiving evidence from a qualified professional demonstrating that the construction activity is the direct cause of changes to the respective owner's well water, the owner will undertake necessary work to rectify the issues.
7. Dust Control Measures are to include the following:
    a. Wind Conditions - all activities must be terminated if the wind speed is greater than 30km/h. A windsock will be erected and located near the work area to provide indication of wind intensity and direction.
    b. Dust Discharge from Site – Dust discharge from site to adjacent residential areas is to be monitored as a trigger for halting or modifying work activities, truck traffic speeds or implementing dust suppression measures.
    c. Water for Dust Suppression – A water truck will be present and applied consistently for dust control. At the end of each workday, water trucks may treat all exposed areas to create a stabilizing crust on the soil.
8. Traffic Management measures are to include the following:
    a. During construction, vehicle and equipment travel speeds within the site should be kept to a minimum. The maximum speed of vehicles at a construction site/roadway will be limited to 30 km/h. Should wind conditions dictate, traffic speeds must be reduced, or halted if required. The hard surfaces on the site must be cleaned either at the end of the workday or within a day of the construction activity. If possible, restrict vehicle access to the site to essential vehicles only.
9. That Site Alteration Permit shall expire three years from the date of issuance.

April 25, 2025 – 4670 Sideroad 10 North

	Drawing/Document	Comment
CONVERSATION AUTHORITY – Grand River Conservation	• Municipal Development Standards (MDS), Township of Puslinch, dated September 2019. • Township of Puslinch Comprehensive Zoning By-Law No. 023-18, dated May 2021. • By-Law Number 2023-057, The Corporation of the Township of Puslinch. • Major Site Alteration Permit Requirement Checklist and Process. • 4670 Sideroad 10 N Application Form, dated 2025-03-05 • Letter: Extension of Operating Hours, prepared by Meritech Engineering, dated 2025-01-09 • Letter: Justification for Importing Fill, prepared by Meritech Engineering, dated 2025-03-05 • Letter: No Adverse Effect, prepared by Meritech Engineering, dated 2025-03-05 • Communication: Site alteration Permit – Retaining of QP, signed by Gino Martinello, dated 2025-03-05 • Haul Route Permit for 4670 Sideroad 10N, signed by Mike Fowler, dated 2025-01-17 • GRCA Approval, granted by Chris Lorenz M. Sc., dated 2022-08-31 • Site Alteration Permit Owner Authorization, signed by Gino Martinello 2025-01-09	GRCA's comments are outstanding and will be provided as soon as received.
Grit Engineering Inc.		See Attached.
Trace Associates Inc /XCG– Thomas Kolodziej, P. Eng.		See Attached.
Township of Puslinch – Andrew Hartholt, Chief Building Official		The applicant needs to show the existing & proposed septic systems on the site plan/Control plan. The building department has issued a new septic permit for the existing house, and the existing septic serving that house will need to be decommissioned. Any site alteration in the area of the existing septic will need to be put on hold until the new system is installed/operational, and the existing system has been decommissioned.
Township of Puslinch – Mike Fowler, Director of Public Works, Parks and Facilities		Public works has no concerns or comments at this time.

April 25, 2025 – 4670 Sideroad 10 North

	• Drawing Set: 4670 Sideroad 10 North, Prepared by Meritech Engineering, dated 2025-01-xx • Figure: Land Use, prepared by Meritech Engineering, dated 2022-08-23 • Excess Soil Management Plan (ESMP) Beneficial Reuse Site, prepared by Fortis Environmental, dated 2025-02-14 • Letter: QP Declaration – Excess Soils Management, prepared by Fortis Environmental, dated 2025-03-14 • Soil Characterization Report, prepared by Soil-Mat Engineers & Consultants Ltd., dated 2024-11-15 • Topsoil Sampling and Chemical Analysis, prepared by DS Consultants Ltd., dated 2024-10-28	
Township of Puslinch – Justine Brotherston, Designated Official		If the applicant does not intend to identify all of their source sites in advance of the project, we request that they develop a protocol outlining how source sites will be presented to the Township for review prior to the importation of fill to the site.

GRIT ENGINEERING INC

133 REGENT STREET
STRATFORD, ON N5A 3W2
519.305.5727
gritengineering.ca

April 22, 2025

Olive Zhang
Building Services Technician
Township Of Puslinch
7404 Wellington Road 34
Puslinch, ON N0B 2J0

Major Site Alteration Permit Application Review
4670 Sideroad 10 North, Puslinch, ON N0B 2J0

GRIT Engineering Inc. (GRIT) was retained by the Township of Puslinch Building Department to complete a technical review of the Major Site Alteration Permit Application for 4670 Sideroad 10 North in Puslinch, Ontario. The practitioner of record is Brian Enter (briane@meritech.ca). GRIT attempted via email to contact the practitioner on the application to inform them of a Technical Review on April 17, 2025, per Section 6.1.1 Technical Reviews of the Professional Engineers Reviewing Work Prepared by Another Professional Engineer Guideline (PEO, October 2011). It is understood that a letter was submitted to the Township of Puslinch in support of a Site Alteration Permit Application at 4670 Sideroad 10 North, Puslinch, Ontario. It is understood that this is an ongoing project, and GRIT has not been on site to date.

GRIT has been provided with the following updated documents submitted for the application for our review:

- Municipal Development Standards (MDS), Township of Puslinch, dated September 2019.
- Township of Puslinch Comprehensive Zoning By-Law No. 023-18, dated May 2021.
- By-Law Number 2023-057, The Corporation of the Township of Puslinch.
- Major Site Alteration Permit Requirement Checklist and Process.
- 4670 Sideroad 10 N Application Form, dated 2025-03-05
- Letter: Extension of Operating Hours, prepared by Meritech Engineering, dated 2025-01-09
- Letter: Justification for Importing Fill, prepared by Meritech Engineering, dated 2025-03-05
- Letter: No Adverse Effect, prepared by Meritech Engineering, dated 2025-03-05
- Communication: Site alteration Permit – Retaining of QP, signed by Gino Martinello, dated 2025-03-05
- Haul Route Permit for 4670 Sideroad 10N, signed by Mike Fowler, dated 2025-01-17
- GRCA Approval, granted by Chris Lorenz M. Sc., dated 2022-08-31
- Site Alteration Permit Owner Authorization, signed by Gino Martinello 2025-01-09
- Drawing Set: 4670 Sideroad 10 North, Prepared by Meritech Engineering, dated 2025-01-xx
- Figure: Land Use, prepared by Meritech Engineering, dated 2022-08-23
- Excess Soil Management Plan (ESMP) Beneficial Reuse Site, prepared by Fortis Environmental, dated 2025-02-14
- Letter: QP Declaration – Excess Soils Management, prepared by Fortis Environmental, dated 2025-03-14
- Soil Characterization Report, prepared by Soil-Mat Engineers & Consultants Ltd., dated 2024-11-15

133 REGENT STREET
STRATFORD, ON N5A 3W2
519.305.5727
gritengineering.ca

- Topsoil Sampling and Chemical Analysis, prepared by DS Consultants Ltd., dated 2024-10-28

Review Comments – Civil

1. Consideration should be made with regard to stormwater quantity and quality control, and erosion control to lessen the impact of the increased surface runoff volume and time of concentration (due to the removal of depression storage), for runoff tributary towards the GRCA-regulated wetland area.
2. The location size, species, and condition of all trees as defined in the Town of Puslinch By-law, including their dripline, and the composite dripline of all other vegetation; should be included on the existing conditions or grading plan.

Kind regards,

GRIT Engineering Inc.



Kieran Wintle, E.I.T.
Civil Designer
kieran@gritengineering.ca



Luke Jesson, P. Eng
Civil Engineer
luke@gritengineering.ca

820 Trillium Drive
Kitchener, Ontario, Canada
N2R 1K4

traceassociates.ca
info@traceassociates.ca
1.877.418.7223

April 23, 2025
Trace Project No. 900-0476-01

Submitted via email: ozhang@puslinch.ca

Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario N0B 2J0

Attention: Olive Zhang, Municipal Building Official

Dear Olive:

Re: Review of Site Alteration Permit Application
4670 Sideroad 10, North, Township of Puslinch, Ontario

1.0 INTRODUCTION, PURPOSE, AND USE

As requested by the Corporation of the Township of Puslinch (the Township), Trace Associates Inc. (Trace), has reviewed the information and data provided to the Township in support of the Site Alteration Permit Application (the Application) for the property located at 4670 Sideroad 10, North, Township of Puslinch, Ontario (subject property or site). This document was prepared under Trace's Professional Report Conditions (provided as Attachment A).

The documents provided by the Township that were reviewed by Trace included:

1. "QP Declaration – Excess Soils Management, 4670 Sideroad 10 North, Puslinch, Ontario," dated March 14, 2025, prepared by Fortis Environmental.

2. "Site Alteration Permit- Retaining of QP, 4670 Sideroad 10 N, Township of Puslinch," letter dated March 5, 2025, signed by Gino Martinello.

3. "No Adverse Effect, 4670 Sideroad 10 N, Puslinch, Site Alteration Permit Application," letter dated March 5, 2025, prepared by Meritech Engineering.

4. "Justification for Importing Fill, 4670 Sideroad 10 N, Puslinch, Site Alteration Permit Application," letter dated March 5, 2025, prepared by Meritech Engineering.

5. Copy of the Application online submission form, dated March 5, 2025.

6. "Excess Soils Management Plan (ESMP) – Beneficial Reuse Site, 4670 Sideroad 10 North, Puslinch, Ontario," dated February 14, 2025, prepared by Fortis Environmental.

7. "Haul Route Permit for 4670 Sideroad 10 N (Roll # 2301000001015000000)," dated January 17, 2025, issued by the Township of Puslinch.

8. “Extension of Operating Hours, 4670 Sideroad 10 N, Puslinch,” letter dated January 9, 2025, prepared by Meritech Engineering.

9. “Site Alteration Permit Owner Authorization,” dated January 9, 2025, signed by Gino Martinello.

10. “Topsoil Sampling and Chemical Analysis, Southeast Quadrant of Parkside Drive and Clappison Avenue, Waterdown, ON,” dated October 28, 2024, prepared by DS Consultants Ltd.

11. “Soil Characterization Report, Proposed Parking Lot Addition, 565 Arvin Avenue, Stoney Creek, Ontario,” dated November 15, 2024, prepared by Soil-Mat Engineers & Consultants Ltd.

12. “4670 Sideroad 10 N – Site Alteration Application Submission – JQ4076,” email correspondence dated August 31, 2022, between Meritech Engineering, Township of Puslinch, and the Grand River Conservation Authority,

13. “Figure 1: Land Use,” drawing dated August 23, 2022, prepared by Meritech Engineering.

14. “Legend, Details & Project Notes,” drawing dated August 23, 2022, issued for permit application in January 2025, prepared by Meritech Engineering.

15. “Original Conditions and ESC Plan,” drawing dated August 23, 2022, issued for permit application in January 2025, prepared by Meritech Engineering.

16. “Predominant Soil Type,” drawing dated August 23, 2022, issued for permit application in January 2025, prepared by Meritech Engineering.

17. “Grading Plan,” drawing dated August 23, 2022, issued for permit application on January 9, 2025, prepared by Meritech Engineering.

18. “Section View,” drawing dated August 23, 2022, issued for permit application in January 2025, prepared by Meritech Engineering.

19. “Proposed Haul Road,” drawing dated August 23, 2022, issued for permit application in January 2025, prepared by Meritech Engineering.

20. “General Cut/Fill Plan,” drawing dated August 23, 2022, issued for permit application in January 2025, prepared by Meritech Engineering.

21. “Major Site Alteration Permit Requirement Checklist and Process”, undated, issued by The Township of Puslinch.

Based on the reviewed information and data provided in support of the Application, Trace understands that up to 145,000 m^3 of excess soil, including topsoil, will be imported to the subject property to regrade approximately 9.9 ha of the subject to improve its drainage and arability. Given the proposed volume of soil and the area of the site to be affected by the grading activities, on average, approximately 1,5 m of excess soil/fill and topsoil will be placed on-site. It is noted that, according to the Application, the site alteration works will result in changes to the existing grades of up to 5 m.

According to the Application, some excess soil/fill has already been brought to the site and is currently stockpiled in the east portion of the site; however, the source(s), the quantity, and/or the quality of this

stockpiled excess soil/fill are not known. Trace understands that the rest of the excess soil/fill and/or topsoil needed to complete the site alteration works will be brought to the site over the next two to three years.

The source site(s) of the excess soil/fill already brought to the site and/or still to be brought to the site have not been identified in the reviewed documents; however, two soil characterization reports were included in the documents provided by the Township. The two reports, listed as Items 10 and 11 above, provided soil characterization results for the properties located at the southeast quadrant of Parkside Drive and Clappison Avenue, Waterdown (Hamilton) and 565 Arvin Avenue in Stoney Creek, respectively. As such, some excess soil/fill already brought to the site and/or still to be brought to the site may have originated from these two properties.

No information regarding the quality of the granular material already brought to the subject site was included in the Application. Based on the reviewed information, Trace understands that the quality of the imported excess soil/fill and topsoil will meet the Ministry of the Environment, Conservation and Parks (MECP or the Ministry) Table 2.1, generic excess soil quality standards (ESQS) provided in the document titled "Rules for Soil Management and Excess Soil Quality Standards," dated February 2024 (Soil Rules). According to the Application, the excess soil/fill and topsoil to be used in the areas intended for growing crops will meet Table 2.1 generic ESQS for agricultural property use, while the excess soil/fill and topsoil to be used in the other areas of the site (i.e., the areas not used for growing crops) will meet Table 2.1 generic ESQS for residential/parkland/institutional property use.

As instructed by the Township, the purpose of the review completed by Trace was to determine the following:

- Does the Application include all the required information and data listed in the By-law Number 2023-057 (Site Alteration By-law)?

- Does the soil imported to the subject property meet the applicable soil use and/or property use quality standards?

As instructed by the Township, the purpose of the review completed by Trace was to determine the following:

- Does the Application include all the required information and data listed in By-law Number 2023-057 (Site Alteration By-law)?

- Does the soil imported to the subject property meet the applicable soil use and/or property use quality standards?

The scope of this document is limited to the matters expressly covered. This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace Associates Inc. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

2.0 TRACE'S REVIEW COMMENTS

2.1 Does the Application include all the required information and data listed in By-law Number 2023-057 (Site Alteration By-law)?

This section summarizes the methods used to carry out and complete the scope of work.

Based on Trace's review of the documents provided in support of the Application, there are some deficiencies, including missing, incomplete, and/or contradicting information or data. The specific deficiencies are listed in the attached Schedule B Control Plans review checklist (provided as Attachment B); however, the most significant issues are discussed below.

Quality of Imported Granular Material

The documentation submitted to support the Application does not include laboratory analyses confirming the quality of the excess soil/fill already brought to the site. As discussed in Section 1, above, the two reports, listed as Items 10 and 11 above, provided soil characterization results for the properties located at the southeast quadrant of Parkside Drive and Clappison Avenue, Waterdown (Hamilton) and 565 Arvin Avenue in Stoney Creek, respectively.

The report for the 565 Arvin Avenue in Stoney Creek states that the soil samples had the concentrations of the analyzed parameters at or below Table 1 generic ESQS for agricultural property use. The report for the southeast quadrant of Parkside Drive and Clappison Avenue, Waterdown (Hamilton), states that the soil samples had the concentrations of the analyzed parameters at or below Table 2.1 generic ESQS for residential/parkland/institutional property use. However, it is not clear from the reviewed documentation how much, if any, of the soil from these properties was imported to the subject property.

Applicable Generic ESQS

According to the Application, the excess soil/fill already brought to the site and/or still to be brought to the site will meet either Table 2.1 generic ESQS for agricultural use, (in the areas to be used for growing crops), or Table 2.1 generic ESQS residential/parkland/institutional property (in the areas not to be used for growing crops).

Based on the site location, the reported final placement of imported fill is more than 30 m from a water body, as well as the site setting (in an area where groundwater is used as a source of potable groundwater), and site uses (for growing crops and residential), the imported excess soil/fill and topsoil already brought or still to be brough to the subject property must meet Table 1 generic ESQS for agricultural property use (in the areas to be used for growing crops) and Table 2.1 generic ESQS for residential/parkland/institutional property (in the areas not to be used for growing crops), or the site-specific standards derived using the Beneficial Reuse Assessment Tool (BRAT) or a risk assessment completed following the requirements of Ontario Regulation 153/04, as amended.

2.2 Does the soil imported to the subject property meet the applicable soil use and/or property use quality standards?

No laboratory analytical results, documenting the quality of the granular material brought or to be brought to the subject property, have been included in the Application, therefore, the quality of the imported granular material is currently not known.

Furthermore, according to the Application, the excess soil/fill already brought to the site and/or still to be brought to the site will meet either Table 2.1 generic ESQS. **Under the Soil Rules, the top 1.5 metres of excess soil placed on-site in the area(s) to be used for growing crops must meet Table 1 generic ESQS for agricultural property use.**

3.0 CONCLUSIONS

Based on the review of the above-listed documents, Trace has concluded the following:

1. The Application does not include all the required information or data that is specified in Section 5.2 (b) of the Site Alteration By-law.

2. The quality of the imported granular material used or to be used in the site alteration works has not been documented and is currently not known.

3. The selected (proposed) soil quality standard for assessing excess soil to be placed in the area(s) of the site to be used for growing crops, (i.e., Table 2.1 generic ESQS for agricultural property use), does not meet the excess soil quality standards provided in the Soil Rules. **In accordance with the Soil Rules, the top 1.5 m of excess soil/fill and topsoil placed on-site in the area(s) to be used to grow crops must meet Table 1 generic ESQS for agricultural property use.**

4.0 RECOMENDATIONS

Based on the review of the above-listed documents, Trace provides the following recommendations:

1. As stated in the Site Alteration By-law, the quality of soil used for site alteration activities must meet the applicable Ministry ESQS. As such, the proposed Excess Soil Management Plan should be reviewed and revised to include the correct generic ESQS for excess soil/fill and topsoil to be placed in the area(s) of the site to be used for growing crops.

5.0 LIMITATIONS

The scope of this document is limited to the matters expressly covered. The Corporation of the Township of Puslinch and any other party using this document with the express written consent of the Corporation of the Township of Puslinch and Trace also acknowledge that the conclusions and recommendations set out in this document are based on information and data provided by others. The reviewed information and data were assumed to be accurate unless otherwise stated and were not independently verified by Trace. As such, Trace Associates Inc. cannot be held responsible for environmental conditions at the subject site that were not apparent from the reviewed information and data or due to errors and/or omissions in the information and data reviewed.

This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

6.0 CLOSURE AND QUALITY MANAGEMENT

We trust this meets your requirements. Should you have any questions or comments, please contact the undersigned.

Respectfully submitted,
Trace Associates Inc.



Prepared by:
Thomas J. Kolodziej, B.A.Sc., P.Eng., QP
Senior Project Manager/Technical Advisor
519.741.5774
tkolodziej@traceassociates.ca

TK/kj

APPENDICES

Appendix A.....Trace Associates Inc. Professional Report Conditions
Appendix B.....Schedule B Control Plans Review Checklist

DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
0	Issued for client use	Thomas Kolodziej	K:(Drive) Projects	April 23, 2025

Note: This draft report is valid for eight weeks from the issuance date or until a final report is issued, whichever occurs first.



Appendix A

Trace Associates Inc.
Professional Report
Conditions

1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.

4.0 LIMITATION OF LIABILITY

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.

2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

5.0 DISCLOSURE OF INFORMATION BY CLIENT

The Client acknowledges that in conducting the scope of work (the “Scope”) and preparing the Report, Trace has relied on information provided by the Client. Trace, in conducting the Scope and preparing the Report, has assumed the accuracy, and has not attempted to verify the completeness of all such information. The Client acknowledges that Trace cannot be held liable for any damages to the Client resulting from any inaccuracies or incompleteness in the information provided by the Client to Trace.

6.0 STANDARD OF CARE

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

7.0 NOTIFICATION OF AUTHORITIES

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace’s reasonably exercised discretion.

8.0 OWNERSHIP OF INSTRUMENTS OF SERVICE

The Client acknowledges that all reports, plans, and data generated by Trace during the performance of the work and preparation of the Report and other documents prepared by Trace in the course of performing the scope are considered its professional work product and shall remain the copyright property of Trace. Any patents, methods, ideas, concepts, know-how, copyrights, trademarks, trade secrets, or other intellectual property rights developed by Trace prior to, during, and in the course of performing the Services

("IP") will be the exclusive property of Trace. The only exception to this is where Trace has prepared an Emergency Response Plan and associated training materials for a Client; in these cases, the Client owns these documents and is solely responsible for their implementation in an emergency.

9.0 ALTERNATE REPORT FORMAT

Where Trace submits both electronic file and hard copy versions of the Report, drawings, and other documents and deliverables (collectively termed "Trace's instruments of professional service"), the Client agrees that only the signed and stamped versions shall be considered final and legally binding. Trace shall keep the original electronic documents for record and working purposes, and, in the event of a dispute or discrepancies, Trace's electronic copy shall govern.

The Client agrees that both electronic file and hard copy versions of Trace's instruments of professional service shall not, under any circumstances, no matter who owns or uses them, be altered by any party, except Trace. The Client warrants that Trace's instruments of professional service will be used only and exactly as submitted by Trace and for the purpose for which such instruments of professional service were intended.

The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

10.0 RECORDS RETENTION

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

11.0 GOVERNING LAW

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.



Appendix B

Schedule B Control Plans Review Checklist

BY-LAW NUMBER 2023-057 – SCHEDULE B

SCHEDULE "B" CONTROL PLANS

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	**April 24, 2025**		
SITE ADDRESS:	**4670 Sideroad 10 North, Township of Puslinch, Ontario**		
Item	**Included**	**Not included**	**Comments**
1. A control plan(s) required to be submitted as part of any Application for a Permit pursuant to this By-law shall include, among other things, the following:			
a. a key map showing the location of the Site;	✓	☐	
b. the Global Positioning System (GPS) coordinates of the centroid of the Site in terms of easting and northing;	✓	☐	
c. the Site boundaries and number of hectares of the Site;	✓	☐	
d. the use of the Site and the location and use of the buildings and other structures adjacent to the Site;	✓	☐	
e. the location, dimensions and use of existing and proposed buildings and other structures existing or proposed to be erected on the Site;	✓	☐	
f. the location of lakes, streams, wetlands, channels, ditches, other watercourses, and other bodies of water on the Site and within thirty (30) metres beyond the Site boundary;	✓	☐	
g. the location of the predominant Soil types;	✓	☐	
h. the location size, species, and condition of all Trees as defined in this By-law, including their dripline, and the composite dripline of all other Vegetation;	☐	☐	N/A (no trees on the subject property)
i. the location of driveways on the lands and all easements and rights-of-way over, under, across or through the Site;	✓	☐	
j. the location and dimensions of any existing and proposed stormwater Drainage systems and natural Drainage patterns on the Site and within thirty (30) metres of the Site boundaries;	✓	☐	
k. the location and dimensions of utilities, structures, roads, rights-of-way, easements, highways, and paving;	✓	☐	

BY-LAW NUMBER 2023-057 – SCHEDULE B

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	**April 24, 2025**		
SITE ADDRESS:	**4670 Sideroad 10 North, Township of Puslinch, Ontario**		
Item	**Included**	**Not included**	**Comments**
l. the existing Site topography at a contour interval not to exceed 0.5 metres and to extend a minimum of thirty (30) metres beyond the Site boundaries;	✓	☐	
m. the Proposed Grade(s) and Drainage system(s) to be used upon completion of the work, which is the subject of the Permit;	✓	☐	
n. the location and dimensions of all proposed work which is the subject of the Application for a Permit;	✓	☐	
o. the location and dimensions of all proposed temporary Topsoil or Fill stockpiles;	✓	☐	
p. the location, dimensions, design details and specifications of all work which is the subject of the Application, including all Site Erosion and Dust Control measures or Retaining Walls necessary to meet the requirements of this By-law and the estimated cost of the same;	☐	☐	
q. a schedule of the anticipated starting and completion dates of all proposed work which is the subject of the Application for a Permit;	✓	☐	
r. a list of the type of equipment and machinery that will be used during the Site Alteration process, including the expected days and times of operation in accordance with this By- law;	☐	☒	A list of the types of equipment and machinery that will be used during the Site Alteration process is not provided
s. provisions for the maintenance of construction Site Erosion and Dust Control measures during construction and after, as required;	✓	☐	
t. typical notes on the final rehabilitation plan to indicate the final ground cover materials, type and size of Vegetation to be planted, depth of Topsoil, Tree removals or Tree protection measures;	✓	☐	

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	April 24, 2025		
SITE ADDRESS:	4670 Sideroad 10 North, Township of Puslinch, Ontario		
Item	**Included**	**Not included**	**Comments**
u. proposed Site access location(s) and haul route(s) to and within the Site;	✓	☐	
v. a description of the quality and source of the proposed Fill with confirmation that the Fill meets the applicable Excess Soil Quality Standards (ESQS) for the Site;	☐	☒	The source(s) of excess soil/fill and topsoil already brought or still to be brought to the site are not identified. The proposed Table 2.1 ESQS (for the excess soil/fill and topsoil to be placed in the areas of the site to be used for growing crops) does not meet the minimum ESQS, i.e., the top 1.5 metres of soil in the areas to be used for growing crops must meet Table 1 ESQS for agricultural use.
i. if Site-specific standards for Soil quality acceptance have been developed using the MECP's Excess Soil Beneficial Reuse Assessment Tool (BRAT), a copy of the BRAT model input and output and a signed statement by the Qualified Person preparing the BRAT model;	☐	☐	NA
ii. If Site-specific standards for Soil quality acceptance have been developed using a risk assessment pursuant to the requirements in the Rules for Soil Management and Excess Soil Quality Standards, a copy of the risk assessment and a signed statement by the Qualified Person who prepared the risk assessment model must be submitted;	✓	☐	NA
w. a Sampling and Analysis Plan (SAP) for the source of the proposed Fill;	✓	☒	The SAP for source sites has been developed; however, there is no indication that the SAP was implemented for the excess soil/fill that has already been brought to the site.

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	April 24, 2025		
SITE ADDRESS:	4670 Sideroad 10 North, Township of Puslinch, Ontario		
Item	**Included**	**Not included**	**Comments**
x. a Quality Assurance/Quality Control (QA/QC) Program;	✓	☒	The QA/QC program for source sites has been developed; however, there is no indication that this QA/QC program was implemented for the excess soil/fill that has already been brought to the site.
y. the scale of drawings, either 1:500 or 1:1000;	☐	☐	
z. operational procedures manual;	✓	☐	Operational Procedures are described in the Excess Soil Management Plan
aa. for Site to receive greater than 10,000 m^3, and where required by the provisions of Ontario Regulation 406/19, as amended, file a notice on the Excess Soil Registry operated by RPRA; and	☐	☐	
bb. all other information as deemed necessary or required by the Designated Official.	☐	☐	
2. Where a permit from the County of Wellington or the Township is required to use any portion of the proposed haul route, the issuance of, and conformity with such permit(s) shall be deemed to be a condition of the issuance of the Permit under this By-law.	☐	☐	NA
3. It shall be the responsibility of the Owner to ensure that all Fill which is Placed or Dumped under this By-law shall conform with, and meet, the requirements of this By-law and all conditions of the Permit. At any time during the term of the Permit, an Inspector or the Designated Official may require evidence of such conformity, including, without limiting the generality of the foregoing, a requirement that the Permit Holder provide evidence to the satisfaction of the Designated Official that each Truckload complies with the requirements of this By-law.	☐	☐	NA
4. Every control plan accompanying an Application for a Permit under this By-law must be stamped by a Qualified Person approved by the Designated Official.	✓	☐	

BY-LAW NUMBER 2023-057 – SCHEDULE B

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	**April 24, 2025**		
SITE ADDRESS:	**4670 Sideroad 10 North, Township of Puslinch, Ontario**		
Item	**Included**	**Not included**	**Comments**
5. Notwithstanding any other provisions of this By-law, the Designated Official may waive the requirement for a Control Plan or any part thereof, after taking into consideration the proposed works and the anticipated impact on the Site and the surrounding environment.	☐	☐	NA

May 15, 2025 – 4670 Sideroad 10 North

	Drawing/Document	Comment
CONVERSATION AUTHORITY – Grand River Conservation	• "Stormwater management, 4670 Sideroad 10 North, Puslinch, Ontario," dated May 6, 2025, prepared by Meritech Engineering (Meritech, May 6, 2025). • "Comment Summary, 4670 Sideroad 10 N, Puslinch, Site Alteration Permit Application," table dated April 25, 2025, updated May 5, 2025, prepared by Meritech Engineering (Meritech, May 5, 2025). • "Excess Soils Management Plan (ESMP) – Beneficial Reuse Site, 4670 Sideroad 10 North, Puslinch, Ontario," dated February 14, 2025, updated May 2, 2025, prepared by Fortis Environmental (Meritech, May 2, 2025). • "Legend, Details & Project Notes," drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025a). • "Original Conditions and ESC Plan," drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025b). • "Predominant Soil Type," drawing dated August 23, 2022, updated on April 29, 2025, prepared by	See Attached.
Grit Engineering Inc.		See Attached.
Trace Associates Inc /XCG– Thomas Kolodziej, P. Eng.		See Attached.
Township of Puslinch – Andrew Hartholt, Chief Building Official		No further comments.
Township of Puslinch – Mike Fowler, Director of Public Works, Parks and Facilities		Public works has no concerns or comments at this time.

May 15, 2025 – 4670 Sideroad 10 North

	Meritech Engineering (Meritech, April 29, 2025c). • "Grading Plan," drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025d). • "Section View," drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025e). • "Proposed Haul Road," drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025f). • "General Cut/Fill Plan," drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025g).	
Township of Puslinch – Justine Brotherston, Designated Official		No further comments at this time.

Administration Centre: 400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

May 2, 2025
via email

Olive Zhang
Building Services Technician
Township of Puslinch
7404 Wellington Road 34
Puslinch, ON, N0B 2J0

Dear Olive Zhang,

Re: Site Alteration Permit Application
4670 Sideroad 10 North, Township of Puslinch.
Gino Martinello

Grand River Conservation Authority (GRCA) staff have reviewed the above-noted Site Alteration Permit Application to facilitate improved agricultural use (crop growth and a proposed pole barn) and residential dwelling at 4670 Sideroad 10 North in the Township of Puslinch.

Recommendation

The proposed development activity is located outside of GRCAs regulated area. Therefore, the GRCA has no objection to the proposed site alteration permit application. Please see below for our comments.

Documents Reviewed by Staff

Staff have reviewed the following documents submitted with this application:

- Site Drawings, prepared by Meritech Engineering, dated January 9, 2025.

GRCA Comments

GRCA has reviewed this application under the Mandatory Programs and Services Regulation (Ontario Regulation 686/21), including acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a regulatory authority under Ontario Regulation 41/24 and as a public body under the *Planning Act* as per our CA Board approved policies.

Information currently available at our office indicates that the subject property contains a wetland, valley slopes, and the regulated allowances associated with these features. A copy of our resource mapping is attached for reference. Due to the presence of these features, a small portion of the subject property is regulated by the GRCA under Regulation 41/24 (Prohibited Activities, Exemptions, and Permits Regulation). Any development or site alteration within the regulated area requires prior written approval from the GRCA.

Based on the site drawings, we understand that the proposed site alteration works including importing topsoil to increase the yield of the land. Based on the site plan provided, the proposed development area is outside of the GRCAs regulated area. Therefore, we have no objection to the site alteration permit and a GRCA permit is not required.

Consistent with GRCA's 2023-2025 approved fee schedule, this application is considered a minor site plan application, and the applicant will be invoiced in the amount of $465.00 for the GRCA's review of the application.

Should you have any questions, please contact Ismet Esgin Zorlu (Resource Planner) at iezorlu@grandriver.ca or (519) 621-2761 extension 2231.

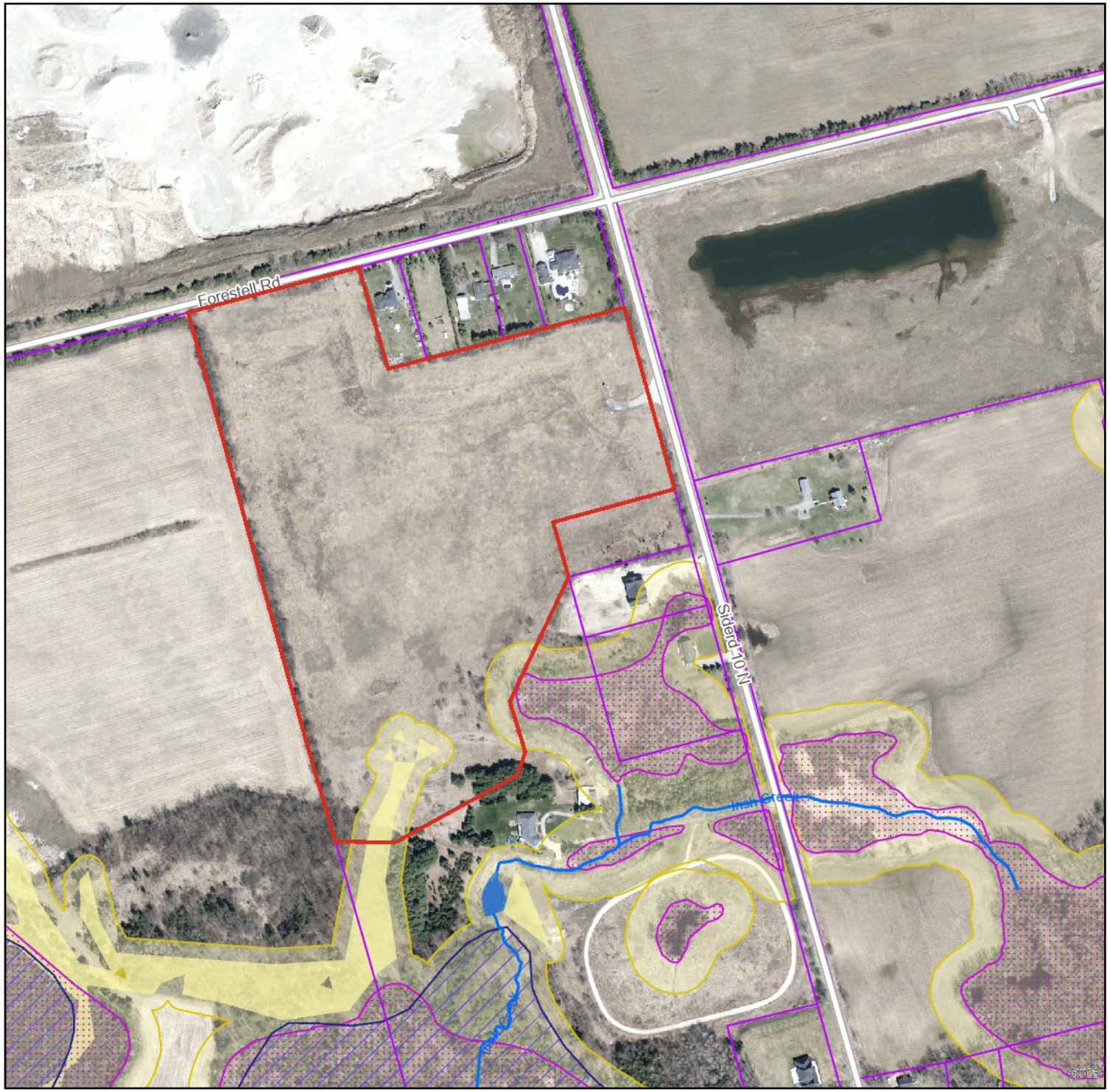
Sincerely,

[redacted]

Chris Foster-Pengelly, M.Sc.
Supervisor of Planning and Regulations, Planning and Regulation Services

Enclosed: GRCA map of property.

Copy: Gino Martinello, Owner (via email)



Grand River Conservation Authority

Date: Apr 23, 2025

4670 Sideroad 10 North

Legend

- RegulationLimit(GRCA)
- Floodplain(GRCA)
  - Engineered
  - Estimated
  - Approximate
- Floodplain- Special Policy Area (GRCA)
- Slope Erosion (GRCA)
  - Steep
  - Oversteep
  - Toe
- Slope Valley (GRCA)
  - Steep
  - Oversteep
- RegulatedWatercourse(GRCA)
- RegulatedWaterbody(GRCA)
- Wetland(GRCA)
- Lake Erie Flood (GRCA)
- Lake Erie ShorelineReach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)
- ConservationArea Boundary (GRCA)

Copyright Grand River Conservation Authority, 2025.

Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user.
The source for each data layer is shown in parentheses in the map legend. See Sources and Citations for details.

Scale 1:5,405

NAD83 UTM zone 17 (EPSG:26917)

Map Centre (X,Y): 560474.59, 4813397.00 | Map Link

This map is not to be used for navigation | 2020 Ortho (ON)

133 REGENT STREET
STRATFORD, ON N5A 3W2
519.305.5727
gritengineering.ca

May 9, 2025

Olive Zhang
Building Services Technician
Township Of Puslinch
7404 Wellington Road 34
Puslinch, ON N0B 2J0

Major Site Alteration Permit Application Review
4670 Sideroad 10 North, Puslinch, ON N0B 2J0

GRIT Engineering Inc. (GRIT) was retained by the Township of Puslinch Building Department to complete a technical review of the Major Site Alteration Permit Application for 4670 Sideroad 10 North in Puslinch, Ontario. The practitioner of record is Brian Enter (briane@meritech.ca). GRIT attempted via email to contact the practitioner on the application to inform them of a Technical Review on April 17, 2025, per Section 6.1.1 Technical Reviews of the Professional Engineers Reviewing Work Prepared by Another Professional Engineer Guideline (PEO, October 2011). It is understood that a letter was submitted to the Township of Puslinch in support of a Site Alteration Permit Application at 4670 Sideroad 10 North, Puslinch, Ontario. It is understood that this is an ongoing project, and GRIT has not been on site to date.

GRIT provided a review letter dated April 22, 2025. It is understood the application has now been revised and the following documents added to the original submission for our review:

- Stormwater Management Letter, prepared by Meritech Engineering, dated 2025-05-06
- Comment Summary dated with responses from Meritech Engineering 2025-05-05

Review Comments – Civil

1. No further comment on stormwater management. GRIT agrees with the approach.
2. It is understood the town has exempted the tree inventory requirements. The dripline has been added and GRIT agrees with this approach.

Kind regards,

GRIT Engineering Inc.

Montana Wilson, EMBA, M.Eng, P.Eng.
CEO
montana@gritengineering.ca

820 Trillium Drive
Kitchener, Ontario, Canada
N2R 1K4

traceassociates.ca
info@traceassociates.ca
1.877.418.7223

May 12, 2025
Trace Project No. 900-0476-01

Submitted via email: ozhang@puslinch.ca

Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario N0B 2J0

Attention: Olive Zhang, Municipal Building Official

Dear Olive:

Re: Review of Additional and Updated Support Documents Site Alteration Permit Application
4670 Sideroad 10, North, Township of Puslinch, Ontario

1.0 INTRODUCTION, PURPOSE, AND USE

In April 2025, Trace Associates Inc. (Trace), was retained by the Corporation of the Township of Puslinch (the Township), to conduct a review of the information and data initially submitted in support of the of the Site Alteration Permit Application (the Application) for the property located at 4670 Sideroad 10, North, Township of Puslinch, Ontario (subject property or site). The list of the support documents initially submitted in support of the Application and reviewed by Trace, and Trace's review comments on the initial Application were provided to the Township in a document titled "Review of Support Documents, Site Alteration Permit Application, 4670 Sideroad 10, North, Township of Puslinch, Ontario," dated April 23, 2025 (Trace, April 23, 2025).

Trace understands, that in May 2025, new and updated support documentation pertinent to the Application were submitted to the Township. As requested by the Township, Trace has reviewed the following additional and updated information and data provided to the Township in support of the Application for the subject property:

The additional/new and updated documents (the original versions of these documents were previously reviewed by Trace in April 2025), provided by the Township that were reviewed by Trace included:

1. "Stormwater management, 4670 Sideroad 10 North, Puslinch, Ontario," dated May 6, 2025, prepared by Meritech Engineering (Meritech, May 6, 2025).

2. "Comment Summary, 4670 Sideroad 10 N, Puslinch, Site Alteration Permit Application," table dated April 25, 2025, updated May 5, 2025, prepared by Meritech Engineering (Meritech, May 5, 2025).

3. "Excess Soils Management Plan (ESMP) – Beneficial Reuse Site, 4670 Sideroad 10 North, Puslinch, Ontario," dated February 14, 2025, updated May 2, 2025, prepared by Fortis Environmental (Meritech, May 2, 2025).

4. "Legend, Details & Project Notes," drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025a).

5. “Original Conditions and ESC Plan,” drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025b).

6. “Predominant Soil Type,” drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025c).

7. “Grading Plan,” drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025d).

8. “Section View,” drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025e).

9. “Proposed Haul Road,” drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025f).

10. “General Cut/Fill Plan,” drawing dated August 23, 2022, updated on April 29, 2025, prepared by Meritech Engineering (Meritech, April 29, 2025g).

Based on the review of the new and updated information and data provided in support of the Application, Trace understands that over the next two to three years, up to 145,000 m^3 of excess soil, including topsoil, will be imported to the subject property to regrade approximately 9.9 ha of the subject to improve its drainage and arability.

According to the Application (Meritech, May 5, 2025), the matter of the quality of the fill, historically brought to the site, which was the subject of Traces comments included in the April 24, 2025, letter, has been resolved through a recent legal resolution with the Township. Trace also understands that in lieu of identifying the actual source(s) of the soil/fill to be brought to the site, the Application includes an updated Excess Soil Management Plan (ESMP), which Includes, amongst other things, a protocol for obtaining Township’s approval of source material prior to importation to the subject site.

Trace also understands that six truckloads of fill were brought to the site in the area of the pole barn as part of an approved building permit application. Reportedly, the fill quality results were provided to the Township; however, these results were not included in the information provided to Trace for review.

As instructed by the Township, the purpose of the review completed by Trace was to determine the following:

- Does the Application include all the required information and data listed in the By-law Number 2023-057 (Site Alteration By-law)?

- Does the soil imported to the subject property meet the applicable soil use and/or property use quality standards?

As instructed by the Township, the purpose of the review completed by Trace was to determine the following:

- Does the Application include all the required information and data listed in By-law Number 2023-057 (Site Alteration By-law)?

- Does the soil imported to the subject property meet the applicable soil use and/or property use quality standards?

This document was prepared under Trace's Professional Report Conditions (provided as Attachment A). The scope of this document is limited to the matters expressly covered. This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace Associates Inc. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

2.0 TRACE REVIEW COMMENTS

2.1 Does the Application include all the required information and data listed in By-law Number 2023-057 (Site Alteration By-law)?

Based on Trace's review of the original, updated, and new documents provided in support of the Application, there are some minor deficiencies, including missing information or data. The specific deficiencies are listed in the attached Schedule B Control Plans review checklist (provided as Attachment B).

2.2 Does the soil imported to the subject property meet the applicable soil use and/or property use quality standards?

As discussed in Section 1, the matter of the quality of the fill historically brought to the site, which was the subject of Traces comments included in the April 24, 2025, letter, has reportedly been resolved through a recent legal resolution with the Township.

Trace also understands that soil quality data for the six truckloads of fill that were brought to the site as part of an approved building permit application was provided to the Township. However, this data was not included in the information provided to Trace for review.

The updated ESMP identifies the appropriate applicable excess soil quality standards (ESQS) for the soil still to be brought to the site.

3.0 CONCLUSIONS

Based on the review of the above-listed documents, Trace has concluded the following:

1. The Application does include most of the required information or data that is specified in Section 5.2 (b) of the Site Alteration By-law. The missing information is considered minor.

2. The issue of the quality of the historically imported granular material, which was previously discussed by Trace (Trace, April 23, 2025), has reportedly been resolved through a recent legal resolution.

3. Soil quality data, for the six truckloads of fill that were brought to the site as part of an approved building permit application, was reportedly provided to the Township. However, this data was not included in the information provided to Trace for review.

4. The selected (proposed) soil quality standard for assessing excess soil to be placed in the area(s) of the site described in the updated ESMP are appropriate for the intended site on-site uses.

4.0 RECOMMENDATIONS

Based on the review of the above-listed documents, Trace provides the following recommendations:

1. The missing information or data should be provided to the Township and Trace for review.

5.0 LIMITATIONS

The scope of this document is limited to the matters expressly covered. The Corporation of the Township of Puslinch and any other party using this document with the express written consent of the Corporation of the Township of Puslinch and Trace also acknowledge that the conclusions and recommendations set out in this document are based on information and data provided by others. The reviewed information and data were assumed to be accurate unless otherwise stated and were not independently verified by Trace. As such, Trace Associates Inc. cannot be held responsible for environmental conditions at the subject site that were not apparent from the reviewed information and data or due to errors and/or omissions in the information and data reviewed.

This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

6.0 CLOSURE AND QUALITY MANAGEMENT

We trust this meets your requirements. Should you have any questions or comments, please contact the undersigned.

Respectfully submitted,
Trace Associates Inc.



Prepared by:
Thomas J. Kolodziej, B.A.Sc., P.Eng., QP
Senior Project Manager/Technical Advisor
519.741.5774
tkolodziej@traceassociates.ca

TK/kp, jp

APPENDICES

Appendix A .....Trace Associates Inc. Professional Report Conditions
Appendix B .....Schedule B Control Plans Review Checklist

DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
0	Issued for client use	Thomas Kolodziej	K:(Drive) Projects	May 12, 2025



Appendix A

Trace Associates Inc.
Professional Report
Conditions

1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.

4.0 LIMITATION OF LIABILITY

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.

2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

5.0 DISCLOSURE OF INFORMATION BY CLIENT

The Client acknowledges that in conducting the scope of work (the “Scope”) and preparing the Report, Trace has relied on information provided by the Client. Trace, in conducting the Scope and preparing the Report, has assumed the accuracy, and has not attempted to verify the completeness of all such information. The Client acknowledges that Trace cannot be held liable for any damages to the Client resulting from any inaccuracies or incompleteness in the information provided by the Client to Trace.

6.0 STANDARD OF CARE

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

7.0 NOTIFICATION OF AUTHORITIES

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace’s reasonably exercised discretion.

8.0 OWNERSHIP OF INSTRUMENTS OF SERVICE

The Client acknowledges that all reports, plans, and data generated by Trace during the performance of the work and preparation of the Report and other documents prepared by Trace in the course of performing the scope are considered its professional work product and shall remain the copyright property of Trace. Any patents, methods, ideas, concepts, know-how, copyrights, trademarks, trade secrets, or other intellectual property rights developed by Trace prior to, during, and in the course of performing the Services

("IP") will be the exclusive property of Trace. The only exception to this is where Trace has prepared an Emergency Response Plan and associated training materials for a Client; in these cases, the Client owns these documents and is solely responsible for their implementation in an emergency.

9.0 ALTERNATE REPORT FORMAT

Where Trace submits both electronic file and hard copy versions of the Report, drawings, and other documents and deliverables (collectively termed "Trace's instruments of professional service"), the Client agrees that only the signed and stamped versions shall be considered final and legally binding. Trace shall keep the original electronic documents for record and working purposes, and, in the event of a dispute or discrepancies, Trace's electronic copy shall govern.

The Client agrees that both electronic file and hard copy versions of Trace's instruments of professional service shall not, under any circumstances, no matter who owns or uses them, be altered by any party, except Trace. The Client warrants that Trace's instruments of professional service will be used only and exactly as submitted by Trace and for the purpose for which such instruments of professional service were intended.

The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

10.0 RECORDS RETENTION

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

11.0 GOVERNING LAW

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.



Appendix B

Schedule B Control Plans Review Checklist

BY-LAW NUMBER 2023-057 – SCHEDULE B

SCHEDULE "B" CONTROL PLANS

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	**May 12, 2025**		
SITE ADDRESS:	**4670 Sideroad 10 North, Township of Puslinch, Ontario**		
Item	**Included**	**Not included**	**Comments**
1. A control plan(s) required to be submitted as part of any Application for a Permit pursuant to this By-law shall include, among other things, the following:			
a. a key map showing the location of the Site;	✓	☐	
b. the Global Positioning System (GPS) coordinates of the centroid of the Site in terms of easting and northing;	✓	☐	
c. the Site boundaries and number of hectares of the Site;	✓	☐	
d. the use of the Site and the location and use of the buildings and other structures adjacent to the Site;	✓	☐	
e. the location, dimensions and use of existing and proposed buildings and other structures existing or proposed to be erected on the Site;	✓	☐	
f. the location of lakes, streams, wetlands, channels, ditches, other watercourses, and other bodies of water on the Site and within thirty (30) metres beyond the Site boundary;	✓	☐	
g. the location of the predominant Soil types;	✓	☐	
h. the location size, species, and condition of all Trees as defined in this By-law, including their dripline, and the composite dripline of all other Vegetation;	☐	☐	N/A (no trees on the subject property)
i. the location of driveways on the lands and all easements and rights-of-way over, under, across or through the Site;	✓	☐	
j. the location and dimensions of any existing and proposed stormwater Drainage systems and natural Drainage patterns on the Site and within thirty (30) metres of the Site boundaries;	✓	☐	
k. the location and dimensions of utilities, structures, roads, rights-of-way, easements, highways, and paving;	✓	☐	

BY-LAW NUMBER 2023-057 – SCHEDULE B

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	May 12, 2025		
SITE ADDRESS:	**4670 Sideroad 10 North, Township of Puslinch, Ontario**		
Item	**Included**	**Not included**	**Comments**
l. the existing Site topography at a contour interval not to exceed 0.5 metres and to extend a minimum of thirty (30) metres beyond the Site boundaries;	✓	☐	
m. the Proposed Grade(s) and Drainage system(s) to be used upon completion of the work, which is the subject of the Permit;	✓	☐	
n. the location and dimensions of all proposed work which is the subject of the Application for a Permit;	✓	☐	
o. the location and dimensions of all proposed temporary Topsoil or Fill stockpiles;	✓	☐	
p. the location, dimensions, design details and specifications of all work which is the subject of the Application, including all Site Erosion and Dust Control measures or Retaining Walls necessary to meet the requirements of this By-law and the estimated cost of the same;	✓	☐	
q. a schedule of the anticipated starting and completion dates of all proposed work which is the subject of the Application for a Permit;	✓	☐	
r. a list of the type of equipment and machinery that will be used during the Site Alteration process, including the expected days and times of operation in accordance with this By- law;	☐	☒	A list of the types of equipment and machinery that will be used during the Site Alteration process is not provided
s. provisions for the maintenance of construction Site Erosion and Dust Control measures during construction and after, as required;	✓	☐	
t. typical notes on the final rehabilitation plan to indicate the final ground cover materials, type and size of Vegetation to be planted, depth of Topsoil, Tree removals or Tree protection measures;	✓	☐	

BY-LAW NUMBER 2023-057 – SCHEDULE B

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	May 12, 2025		
SITE ADDRESS:	**4670 Sideroad 10 North, Township of Puslinch, Ontario**		
Item	**Included**	**Not included**	**Comments**
u. proposed Site access location(s) and haul route(s) to and within the Site;	✓	☐	
v. a description of the quality and source of the proposed Fill with confirmation that the Fill meets the applicable Excess Soil Quality Standards (ESQS) for the Site;	☐	☒	Six truckloads of fill were reportedly brought to the site in the area of the pole barn as part of an approved building permit application. Reportedly, the fill quality results were provided to the Township; however, these results were not included in the information provided to Trace for review. The source(s) and the quality of this fill is currently not known
i. if Site-specific standards for Soil quality acceptance have been developed using the MECP's Excess Soil Beneficial Reuse Assessment Tool (BRAT), a copy of the BRAT model input and output and a signed statement by the Qualified Person preparing the BRAT model;	☐	☐	NA (Using generic ESQS)
ii. If Site-specific standards for Soil quality acceptance have been developed using a risk assessment pursuant to the requirements in the Rules for Soil Management and Excess Soil Quality Standards, a copy of the risk assessment and a signed statement by the Qualified Person who prepared the risk assessment model must be submitted;	☐	☐	NA (Using generic ESQS)
w. a Sampling and Analysis Plan (SAP) for the source of the proposed Fill;	✓	☐	
x. a Quality Assurance/Quality Control (QA/QC) Program;	✓	☐	
y. the scale of drawings, either 1:500 or 1:1000;	✓	☐	
z. operational procedures manual;	✓	☐	

BY-LAW NUMBER 2023-057 – SCHEDULE B

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	**May 12, 2025**		
SITE ADDRESS:	**4670 Sideroad 10 North, Township of Puslinch, Ontario**		
Item	**Included**	**Not included**	**Comments**
aa. for Site to receive greater than 10,000 m^3, and where required by the provisions of Ontario Regulation 406/19, as amended, file a notice on the Excess Soil Registry operated by RPRA; and	✓	☐	
bb. all other information as deemed necessary or required by the Designated Official.	☐	☐	NA
2. Where a permit from the County of Wellington or the Township is required to use any portion of the proposed haul route, the issuance of, and conformity with such permit(s) shall be deemed to be a condition of the issuance of the Permit under this By-law.	☐	☐	NA (TBD by the Township)
3. It shall be the responsibility of the Owner to ensure that all Fill which is Placed or Dumped under this By-law shall conform with, and meet, the requirements of this By-law and all conditions of the Permit. At any time during the term of the Permit, an Inspector or the Designated Official may require evidence of such conformity, including, without limiting the generality of the foregoing, a requirement that the Permit Holder provide evidence to the satisfaction of the Designated Official that each Truckload complies with the requirements of this By-law.	☐	☐	NA (TBD by the Township)
4. Every control plan accompanying an Application for a Permit under this By-law must be stamped by a Qualified Person approved by the Designated Official.	✓	☐	
5. Notwithstanding any other provisions of this By-law, the Designated Official may waive the requirement for a Control Plan or any part thereof, after taking into consideration the proposed works and the anticipated impact on the Site and the surrounding environment.	☐	☐	NA

June 10, 2025 – 4670 Sideroad 10 North

	Drawing/Document	Comment
Trace Associates Inc /XCG– Thomas Kolodziej, P. Eng.	• Soil Report- May 16th	See Attached.
Township of Puslinch – Andrew Hartholt, Chief Building Official		No further comments.
Township of Puslinch – Mike Fowler, Director of Public Works, Parks and Facilities		No comments.
Township of Puslinch – Justine Brotherston, Designated Official		1) Provide the farm business registration number of the agricultural operation as well as the name and contact information for the farmer? 2) Can you please provide the Township with the anticipated improvement in yields as a result of the project? 3) Provide a statement of the nature of the agricultural operation (e.g. types of crops to be grown, anticipated rotation of crops if any, etc.) 4) Provide a workplan or documentation demonstrating that work near the adjacent properties is to be completed near the beginning or end of the construction season/project to minimize impacts. 5) Update the complaint protocol to include well interference. 6) Provide additional information on dust control measures such utilizing a windsock to determine dust patterns and mitigation measures such as regulating truck speed on site, or adjustments to work area based on wind patterns. 7) Provide information regarding the location of wells on adjacent neighbouring properties to the area of site alteration.

		8) Provide the impact to the amount of time required to complete the project based on the following: a. If the Township were to approve the request for extended site alteration activity hours as presented. b. If the Township were to approve the request for extended site alteration hours for weekdays only. c. If the Township were to deny the request for extended site alteration hours.

820 Trillium Drive
Kitchener, Ontario, Canada
N2R 1K4

traceassociates.ca
info@traceassociates.ca
1.877.418.7223

June 5, 2025
Trace Project No. 900-0476-01

Submitted via email: ozhang@puslinch.ca

Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario N0B 2J0

Attention: Olive Zhang, Municipal Building Official

Dear Olive:

Re: Review of Soil Characterization Report for 210 Mohawk Road, East Hamilton, Ontario Site Alteration Permit Application

1.0 INTRODUCTION, PURPOSE, AND USE

As requested by the Corporation of the Township of Puslinch (the Township), Trace Associates Inc. (Trace), has reviewed a report titled "Soil Characterization Report for 210 Mohawk Road, East, Hamilton, Ontario," dated August 7, 2024, (SCR), prepared by Fortis Environmental Inc. (Fortis). The SCR was submitted in support of the Site Alteration Permit Application (the Application) for the property located at 4670 Sideroad 10 North, Township of Puslinch, Ontario (the Site).

Trace understands that six truckloads of imported fill have been brought to the Site and placed in the area to be used for the future construction of the pole barn. Trace also understands that the SCR documents, amongst other things, the past uses of the source site for the fill brought to the Site, i.e., 210 Mohawk Road, East in Hamilton, Ontario, and the quality of the fill brought to the Site.

As instructed by the Township, the purpose of the review completed by Trace was to determine if the information and data included in the SCR meets the requirements of By-law Number 2023-057 (Site Alteration By-law), and if the quality of the fill imported to the Site meets the applicable soil use and/or property use quality standards.

This document was prepared under Trace's Professional Report Conditions (provided as Appendix A). The scope of this document is limited to the matters expressly covered. This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace Associates Inc. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

2.0 TRACE REVIEW COMMENTS

Based on Trace's review of the SCR, a total of five confirmatory in-situ samples were collected from approximately 1,925 cubic metres (m^3) of excess soil generated at the source site (210 Mohawk Road, East, Hamilton). In accordance with the document titled "Rules for Soil Management and Excess Soil Quality Standards," dated February 2024 (Soil Rules), made uunder Ontario Regulation (O. Reg.) 406/19, at least one in-situ soil sample must be collected for every 200 m^3 of excess soil generated. Given the approximate volume of excess soil generated at the source site was 1,925 m^3, a minimum of 10 confirmatory samples should have been collected from the excess soil. The SCR did not include a rationale for not collecting the minimum number of in situ confirmatory samples prescribed in the Soil Rules.

Based on Trace's review of the SCR, the excess soil was analyzed for the appropriate parameters. Furthermore, the analytical results indicate that the concentrations of the analyzed parameters met the applicable Table 2.1, full-depth excess soil quality standards (ESQS) for use in a potable groundwater condition with the exception of salt-related parameters, i.e., the sodium adsorption ratio (SAR), and the electrical conductivity (EC). As such, the imported fill is suitable (from the environmental standpoint) for on site use underneath the pole barn, as long as this fill is **not** placed within 30 metres of a water body, and/or within 100 metres of a potable water well.

3.0 CONCLUSIONS

Based on the review of the above-listed documents, Trace has concluded the following:

1. The number of confirmatory samples collected from the excess soil generated at source site (five) does not meet the minimum number (10) of in situ confirmatory samples prescribed in the Soil Rules. As such, the SCR does not meet the requirements of the Site Alteration By-law.

2. The quality of the imported fill to be used underneath the pole barn meets applicable Table 2.1 ESQS.

4.0 RECOMMENDATIONS

Based on the review of the above-listed documents, Trace provides the following recommendations:

1. The fill brought to the site for use under the pole barn should be resampled to properly document its suitability for the intended on-site use. The analytical parameters and the minimum number of confirmatory samples should be determined in accordance with the Soil Rules and the quantity of the fill brought to the Site.

5.0 LIMITATIONS

The scope of this document is limited to the matters expressly covered. The Corporation of the Township of Puslinch and any other party using this document with the express written consent of the Corporation of the Township of Puslinch and Trace also acknowledge that the conclusions and recommendations set out in this document are based on information and data provided by others. The reviewed information and data were assumed to be accurate unless otherwise stated and were not independently verified by Trace. As such, Trace Associates Inc. cannot be held responsible for environmental conditions at the subject site that were not apparent from the reviewed information and data or due to errors and/or omissions in the information and data reviewed.

This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

6.0 CLOSURE AND QUALITY MANAGEMENT

We trust this meets your requirements. Should you have any questions or comments, please contact the undersigned.

Respectfully submitted,
Trace Associates Inc.



Prepared by:
Thomas Kolodziej, B.A.Sc., P.Eng., QP
Senior Project Manager/Technical Advisor
519.741.5774
tkolodziej@traceassociates.ca



Reviewed by:
Pamela Cameron, B.A.Sc., P.Eng., QP
Senior Project Manager/Technical Advisor
519.741.5774
pcameron@traceassociates.ca

TK/kp, jp

APPENDICES

Appendix A .....Trace Associates Inc. Professional Report Conditions

DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
0	Issued for client use	Thomas Kolodziej	K:(Drive) Projects	June 5, 2025

Appendix A

Trace Associates Inc. Professional Report Conditions

1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.

4.0 LIMITATION OF LIABILITY

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.

2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

5.0 DISCLOSURE OF INFORMATION BY CLIENT

The Client acknowledges that in conducting the scope of work (the “Scope”) and preparing the Report, Trace has relied on information provided by the Client. Trace, in conducting the Scope and preparing the Report, has assumed the accuracy, and has not attempted to verify the completeness of all such information. The Client acknowledges that Trace cannot be held liable for any damages to the Client resulting from any inaccuracies or incompleteness in the information provided by the Client to Trace.

6.0 STANDARD OF CARE

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

7.0 NOTIFICATION OF AUTHORITIES

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace’s reasonably exercised discretion.

8.0 OWNERSHIP OF INSTRUMENTS OF SERVICE

The Client acknowledges that all reports, plans, and data generated by Trace during the performance of the work and preparation of the Report and other documents prepared by Trace in the course of performing the scope are considered its professional work product and shall remain the copyright property of Trace. Any patents, methods, ideas, concepts, know-how, copyrights, trademarks, trade secrets, or other intellectual property rights developed by Trace prior to, during, and in the course of performing the Services

("IP") will be the exclusive property of Trace. The only exception to this is where Trace has prepared an Emergency Response Plan and associated training materials for a Client; in these cases, the Client owns these documents and is solely responsible for their implementation in an emergency.

9.0 ALTERNATE REPORT FORMAT

Where Trace submits both electronic file and hard copy versions of the Report, drawings, and other documents and deliverables (collectively termed "Trace's instruments of professional service"), the Client agrees that only the signed and stamped versions shall be considered final and legally binding. Trace shall keep the original electronic documents for record and working purposes, and, in the event of a dispute or discrepancies, Trace's electronic copy shall govern.

The Client agrees that both electronic file and hard copy versions of Trace's instruments of professional service shall not, under any circumstances, no matter who owns or uses them, be altered by any party, except Trace. The Client warrants that Trace's instruments of professional service will be used only and exactly as submitted by Trace and for the purpose for which such instruments of professional service were intended.

The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

10.0 RECORDS RETENTION

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

11.0 GOVERNING LAW

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.

820 Trillium Drive
Kitchener, Ontario
N2R 1K4

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info@traceassociates.ca
1.877.418.7223

August 21, 2025
Trace Project No. 900-0476-01

Submitted via email: ozhang@puslinch.ca

Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario N0B 2J0

Attention: Olive Zhang - Municipal Building Official

Dear Olive:

Re: Review of Fortis Environmental Soil Characterization Report, dated August 7, 2025, and Meritech Engineering Letter, dated August 8, 2025
4670 Sideroad 10 North, Township of Puslinch, Ontario

1.0 INTRODUCTION, PURPOSE, AND USE

As requested by the Corporation of the Township of Puslinch (the Township), Trace Associates Inc. (Trace) has reviewed the following documents, which were submitted in support of the Site Alteration Permit Application for the property located at 4670 Sideroad 10 North, Township of Puslinch, Ontario (the Site):

- *Soil Characterization Report - ESA, 4670 Sideroad 10 North, Puslinch*, *Ontario,* dated August 7, 2025 prepared by Fortis Environmental Inc. (Fortis, 2025)

- *Response to 4th Site Alteration Permit Application Submission, 4670 Sideroad 10 North, Township of Puslinch,* prepared by Meritech Engineering (Meritech, 2025)

Trace understands that the above-listed documents were submitted to the Township in response to Trace's comments dated June 5 and 26, 2025, respectively.

This document was prepared under Trace's Professional Report Conditions (provided as Appendix A). The scope of this document is limited to the matters expressly covered. This document was prepared for the sole benefit of the Township and may not be relied upon by any other person or entity without the express written consent of the Township and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

2.0 TRACE ASSOCIATES INC. REVIEW COMMENTS

The additional information and data provided in the above-listed documents address Trace's comments dated June 5 and 26, 2025.

3.0 LIMITATIONS

The scope of this document is limited to the matters expressly covered. The Township and any other party using this document with the express written consent of the Township and Trace also acknowledge that the conclusions and recommendations set out in this document are based on information and data provided by others. The reviewed information and data were assumed to be accurate unless otherwise stated and were not independently verified by Trace. As such, Trace cannot be held responsible for environmental conditions at the Site that were not apparent from the reviewed information and data or due to errors and/or omissions in the information and data reviewed.

This document was prepared for the sole benefit of the Township and may not be relied upon by any other person or entity without the express written consent of the Township and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

4.0 CLOSURE AND QUALITY MANAGEMENT

We trust this meets your requirements. Should you have any questions or comments, please contact the undersigned.

Respectfully submitted,
Trace Associates Inc.

[redacted]

Prepared by:
Thomas Kolodziej, B.A.Sc., P.Eng., QP
Senior Project Manager / Technical Advisor
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Reviewed by:
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TK/sc

APPENDICES

Appendix A .....Trace Associates Inc. Professional Report Conditions

DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
0	Issued for client use	Thomas Kolodziej	P: Drive (Secretary)	August 21, 2025

5.0 REFERENCES

Fortis (Fortis Environmental Inc.). (2025). *Soil characterization report - ESA, 4670 Sideroad 10 North, Puslinch, Ontario*.

Meritech (Meritech Engineering). (2025). *Response to 4th site alteration permit application submission, 4670 Sideroad 10 North, Township of Puslinch*.

Appendix A

Trace Associates Inc.
Professional Report
Conditions

1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.

4.0 LIMITATION OF LIABILITY

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.

2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

5.0 DISCLOSURE OF INFORMATION BY CLIENT

The Client acknowledges that in conducting the scope of work (the “Scope”) and preparing the Report, Trace has relied on information provided by the Client. Trace, in conducting the Scope and preparing the Report, has assumed the accuracy, and has not attempted to verify the completeness of all such information. The Client acknowledges that Trace cannot be held liable for any damages to the Client resulting from any inaccuracies or incompleteness in the information provided by the Client to Trace.

6.0 STANDARD OF CARE

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

7.0 NOTIFICATION OF AUTHORITIES

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace’s reasonably exercised discretion.

8.0 OWNERSHIP OF INSTRUMENTS OF SERVICE

The Client acknowledges that all reports, plans, and data generated by Trace during the performance of the work and preparation of the Report and other documents prepared by Trace in the course of performing the scope are considered its professional work product and shall remain the copyright property of Trace. Any patents, methods, ideas, concepts, know-how, copyrights, trademarks, trade secrets, or other intellectual property rights developed by Trace prior to, during, and in the course of performing the Services

("IP") will be the exclusive property of Trace. The only exception to this is where Trace has prepared an Emergency Response Plan and associated training materials for a Client; in these cases, the Client owns these documents and is solely responsible for their implementation in an emergency.

9.0 ALTERNATE REPORT FORMAT

Where Trace submits both electronic file and hard copy versions of the Report, drawings, and other documents and deliverables (collectively termed "Trace's instruments of professional service"), the Client agrees that only the signed and stamped versions shall be considered final and legally binding. Trace shall keep the original electronic documents for record and working purposes, and, in the event of a dispute or discrepancies, Trace's electronic copy shall govern.

The Client agrees that both electronic file and hard copy versions of Trace's instruments of professional service shall not, under any circumstances, no matter who owns or uses them, be altered by any party, except Trace. The Client warrants that Trace's instruments of professional service will be used only and exactly as submitted by Trace and for the purpose for which such instruments of professional service were intended.

The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

10.0 RECORDS RETENTION

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

11.0 GOVERNING LAW

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.

820 Trillium Drive
Kitchener, Ontario
N2R 1K4

traceassociates.ca
info@traceassociates.ca
1.877.418.7223

June 26, 2025
Trace Project No. 900-0476-01

Submitted via email: ozhang@puslinch.ca

Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario N0B 2J0

Attention: Olive Zhang, Municipal Building Official

Dear Olive:

Re: Review of Meritech Engineering Letter Dated June 20, 2025,
4670 Sideroad 10 North, Township of Puslinch, Ontario

1.0 INTRODUCTION, PURPOSE, AND USE

As requested by the Corporation of the Township of Puslinch (the Township), Trace Associates Inc. (Trace), has reviewed a letter titled *Response to 3rd Site Alteration Permit Application Submission, 4670 Sideroad 10 North, Township of Puslinch*, dated June 20, 2025 (Meritech, 2025) (Response Letter), prepared by Meritech Engineering (Meritech) (Meritech, 2025). This document was prepared under Trace's Professional Report Conditions (provided as Appendix A).

The Response Letter was submitted to address the Township's questions and concerns following May 28, 2025, Public Information Meeting that was held as part of the Site Alteration Permit Application (the Application) process for the property located at 4670 Sideroad 10 North, Township of Puslinch, Ontario (the Site). Based on the Township's instructions provide in the email dated June 26, 2025, Trace reviewed the Meritech's responses provided under Items 5 and 6 of the Response Letter. For reference, a copy of the Response Letter is included as Appendix B.

The scope of this document is limited to the matters expressly covered. This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

2.0 TRACE REVIEW COMMENTS

2.1 Response Letter Item 5

Township Comment:

Update the complaint protocol to include well interference.

Meritech's Response:

We recommend the complaint procedure or applicable document to contain the following:

"Upon receiving evidence from a qualified professional demonstrating that the construction activity is the direct cause of changes to the respective owner's water well, the applicant will undertake necessary work to rectify the changes."

Notwithstanding the above, we note that the Township's engineer stressed during the public information meeting that complying with the Government's regulations and procedures is deemed to be adequate to address this matter with regards to water quality. In addition, this application was screened by the Township's engineer to determine required engineering review components. Nothing regarding this matter was required.

Trace Comment:

Based on Trace's review of the information and data provided in the Response Letter, as well as in the documents submitted in support of the Application that were previously reviewed by Trace (please refer to Trace letters dated April 23, May 12, and June 5, 2025), the amendment to the compliant procedure proposed by Meritech is appropriate.

2.2 Response Letter Item 6

Township Comment:

Provide additional information on dust control measures such utilizing a windsock to determine dust patterns and mitigation measures such as regulating truck speed on site, or adjustments to work area based on wind patterns.

Meritech's Response:

Dust Control Measures are to include the following:

1. Wind Conditions - all activities must be terminated if the wind speed is greater than 30km/h. A windsock will be erected and located near the work area to provide indication of wind intensity and direction.

2. Water for Dust Suppression – A water truck will be present and applied consistently for dust control. At the end of each workday, water trucks may treat all exposed areas to create a stabilizing crust on the soil.

3. Traffic Management - During construction, vehicle and equipment travel speeds within the site should be kept to a minimum. The maximum speed of vehicles at a construction site/roadway should be limited to 30 km/h. The hard surfaces on the site must be cleaned either at the end of the workday or within a day of the construction activity. If possible, restrict vehicle access to the site to essential vehicles only.

Trace Comment:

Item 1. Wind Conditions:

Trace recommends adding evidence of visible dust discharging from the Site and onto the adjacent properties, particularly those located to the north, east and south of the Site that include residential dwellings, as another trigger for adjusting or halting on-site activities that are the source of dust discharging from the Site.

Item 3. Traffic Management:

The maximum speed should be based on the evidence of visible dust discharging from the Site onto the adjacent properties. As such, Trace recommends amending the wording regarding the maximum speed to include the wind conditions (i.e., the speed and the direction) and the evidence of visible dust discharging from the Site onto the adjacent properties.

3.0 LIMITATIONS

The scope of this document is limited to the matters expressly covered. The Corporation of the Township of Puslinch and any other party using this document with the express written consent of the Corporation of the Township of Puslinch and Trace also acknowledge that the conclusions and recommendations set out in this document are based on information and data provided by others. The reviewed information and data were assumed to be accurate unless otherwise stated and were not independently verified by Trace. As such, Trace Associates Inc. cannot be held responsible for environmental conditions at the subject site that were not apparent from the reviewed information and data or due to errors and/or omissions in the information and data reviewed.

This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

4.0 CLOSURE AND QUALITY MANAGEMENT

We trust this meets your requirements. Should you have any questions or comments, please contact the undersigned.

Respectfully submitted,
Trace Associates Inc.

[redacted]

Prepared by:
Thomas Kolodziej, B.A.Sc., P.Eng., QP
Senior Project Manager/Technical Advisor
519.741.5774
tkolodziej@traceassociates.ca

Reviewed by:
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TK/so

APPENDICES

Appendix A .....Trace Associates Inc. Professional Report Conditions
Appendix B .....Meritech Engineering, Letter Dated June 20, 2025

DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
0	Issued for client use	Thomas Kolodziej	K: Projects (Final)	June 26, 2025

5.0 REFERENCES

Meritech (Meritech Engineering). (2025). *Response to 3rd site alteration permit application submission, 4670 Sideroad 10 North, Township of Puslinch*.



Appendix A

Trace Associates Inc.
Professional Report
Conditions

1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.

4.0 LIMITATION OF LIABILITY

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.

2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

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6.0 STANDARD OF CARE

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

7.0 NOTIFICATION OF AUTHORITIES

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace’s reasonably exercised discretion.

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The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

10.0 RECORDS RETENTION

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

11.0 GOVERNING LAW

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.

Appendix B

Meritech Engineering
Letter Dated June 20, 2025

REPORT COR-2025-038

TO:	Mayor and Members of Council
PREPARED BY:	Mehul Safiwala, Junior Planner
PRESENTED BY:	Justine Brotherston, Director of Corporate Services/Municipal Clerk
MEETING DATE:	September 17, 2025
SUBJECT:	Zoning By-law Amendment Application (D14/DAN) 4631 Sideroad 20 North Request for Council to deem the application complete

RECOMMENDATION

That Report COR-2025-038 entitled Zoning By-law Amendment Application (D14/DAN) Request for Council to deem the application to be complete be received; and

That Council deem the zoning amendment application to be complete; and,

That staff be directed to proceed with notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the *Planning Act, 1990*.

Purpose

The purpose of this report is to:

1. Advise Council of the application for a Site Specific Zoning By-law Amendment for the property described as Lots 21 & 22 Concession 4, PART 1 61R22477; Township of Puslinch, (the "Subject Lands"). The proposed Zoning By-law Amendment is to amend the Township of Puslinch Zoning By-law 23-2018, as amended, to rezone the lands from an Agriculture (A), Future Development 3 (FD3), and Natural Environment (NE) Zone to an Industrial (IND) Zone and add a site-specific use to permit a large scale prestige employment campus with additional uses being daycare and wholesale uses.

2. Obtain confirmation from Council that the application can be deemed to be complete and provide notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the *Planning Act, 1990*.

Background

Application

The proposed Zoning By-law Amendment Application is to amend the Township of Puslinch Zoning By-law 23-2018, as amended, to rezoning the lands municipally referred to as 4631 Sideroad 20 North from an Agriculture (A), Future Development 3 (FD3), and Natural Environment (NE) Zone to an Industrial (IND) Zone to permit a large-scale prestige employment development comprised of office, manufacturing, warehousing and associated uses, and add a site-specific use to permit the proposed daycare centre.

The application required two submissions in order determine that all required documents and studies to support the application have been received.

Township staff and consultants will begin a fulsome review of the application based on the application merits once the application has been deemed complete by Council.

Consultation:

1. Pre-Consultation

A pre-submission consultation for the proposed rezoning was submitted on July 14, 2022 and the applicant was provided with preliminary comments from Township Staff and its consultants representing the Township, County of Wellington, and external agencies.

The following reports and plans have been submitted with the pre-consultation application on July 14, 2022:

- Conceptual Site Plan with aerial image
- Estill Innovation Community – Danby Products – March 16, 2022

2. Process to Deem Application Complete

Comments

The Zoning By-law Amendment Application was submitted to the Township on February 12, 2025 and the prescribed fee was paid on March 5, 2025. There were two submissions in order to determine that all required documents and studies to support the application had been received.

There is a thirty (30) day timeline to review applications for completeness in accordance with the Act.

The following reports and plans were submitted with the Zoning By-law Amendment application:

1st Submission – February 2, 2025:

- Cover Letter – MHBC Planning – February 12, 2025
- Planning Justification Report – MHBC Planning - February, 2025
- Urban Design Brief – MHBC Planning – February, 2025
- Environmental Impact Study – GHD Limited - February 7, 2025
- Functional Servicing Report – GHD Limited - February 7, 2025
- Preliminary Geotechnical Investigation Report – GHD Limited - February 7, 2025
- Water Resources Impact Assessment – GHD Limited - January 31, 2025
- Stormwater Management Report – GHD Limited - February 7, 2025
- Traffic Impact Study – GHD Limited - February 7, 2025
- Water Supply Analysis – GHD Limited - January 29, 2025
- Site Servicing Plan #1 – GHD Limited – February 7, 2025
- Site Servicing Plan #2 – GHD Limited - February 7, 2025
- Site Grading Plan #1 – GHD Limited – February 7, 2025
- Site Grading Plan #2 – GHD Limited – February 7, 2025
- Existing Storm Drainage Area Plan – GHD Limited – February 7, 2025
- Storm Drainage Area Plan #1 – GHD Limited – February 7, 2025
- Storm Drainage Area Plan #2 – GHD Limited – February 7, 2025
- Parcel Register from Ontario Land Registry Office – February 6, 2025
- Public Consultation Strategy Form prepared by Wellington County – February 9, 2025
- Source Water Protection Screening From
- Site Plan, Contect Plan, Area Statistics – Sweeny&Co Architects – January 30, 2025
- Site Plan Renderings – Sweeny&Co Architects – January 27, 2025

2nd Submission – June 9, 2025

- Draft Zoning By-law
- Zoning Compliance Matrix
- Comment Response Matrix of the 1st Submission comments – June, 2025
- Cover Letter – MHBC Planning – June 9, 2025
- Urban Design Brief – MHBC Planning – June, 2025

- Land Use Compatibility Study – GHD Limited – May 30, 2025
- Memo - MDS I Type A Analysis – MHBC Planning – March 20, 2025
- Environmental Impact Study – GHD Limited – June 2, 2025
- Functional Servicing Report – GHD Limited – May 28, 2025
- Site Servicing Plan #1 – GHD Limited – May 28, 2025
- Site Servicing Plan #2 – GHD Limited - May 28, 2025
- Site Grading Plan #1 – GHD Limited – May 28, 2025
- Site Grading Plan #2 – GHD Limited – May 28, 2025
- Existing Storm Drainage Area Plan – GHD Limited – May 28, 2025
- Storm Drainage Area Plan #1 – GHD Limited – May 28, 2025
- Storm Drainage Area Plan #2 – GHD Limited – May 28, 2025
- Stormwater Management Report – GHD Limited - May 28, 2025
- Traffic Impact Study – GHD Limited - May 28, 2025
- Archaeological Assessment – Detritus Consulting - March 26, 2025
- Site Plan, Contect Plan, Area Statistics – Sweeny&Co Architects – June 6, 2025
- Site Plan Renderings – Sweeny&Co Architects – February 7, 2025

Recommendation

Staff recommend that Council deem the application to be complete at this time as the Township's staff and consultants have determined that all the required documents and studies have been provided for the application. The applicant has paid the required fee to the Township and is responsible for paying all third-party costs should the application require more than two submissions.

Should Council deem the application to be complete, the timelines in the *Planning Act* stipulate 90 days to process the application. The Township continues to process applications as close to the stipulated timelines as practical. The legislation sets out the following process to be completed:

- Circulate the statutory notice to properties within a 120 metre buffer, in addition to all required agencies;
- Peer review all submitted materials to the satisfaction of the Township;
- Present the application to the Township Planning and Development Advisory Committee for comments (November 12, 2025);
- Schedule and conduct at least one public meeting (November 19, 2025);

- Advertise the complete application and public meeting in the Wellington Advertiser in accordance with statutory notice requirements and installing physical signage on the property; and
- Provide Council with a planning recommendation report and proposed by-law (Date to be determined).

Financial Implications

As outlined throughout the report.

Applicable Legislation and Requirements

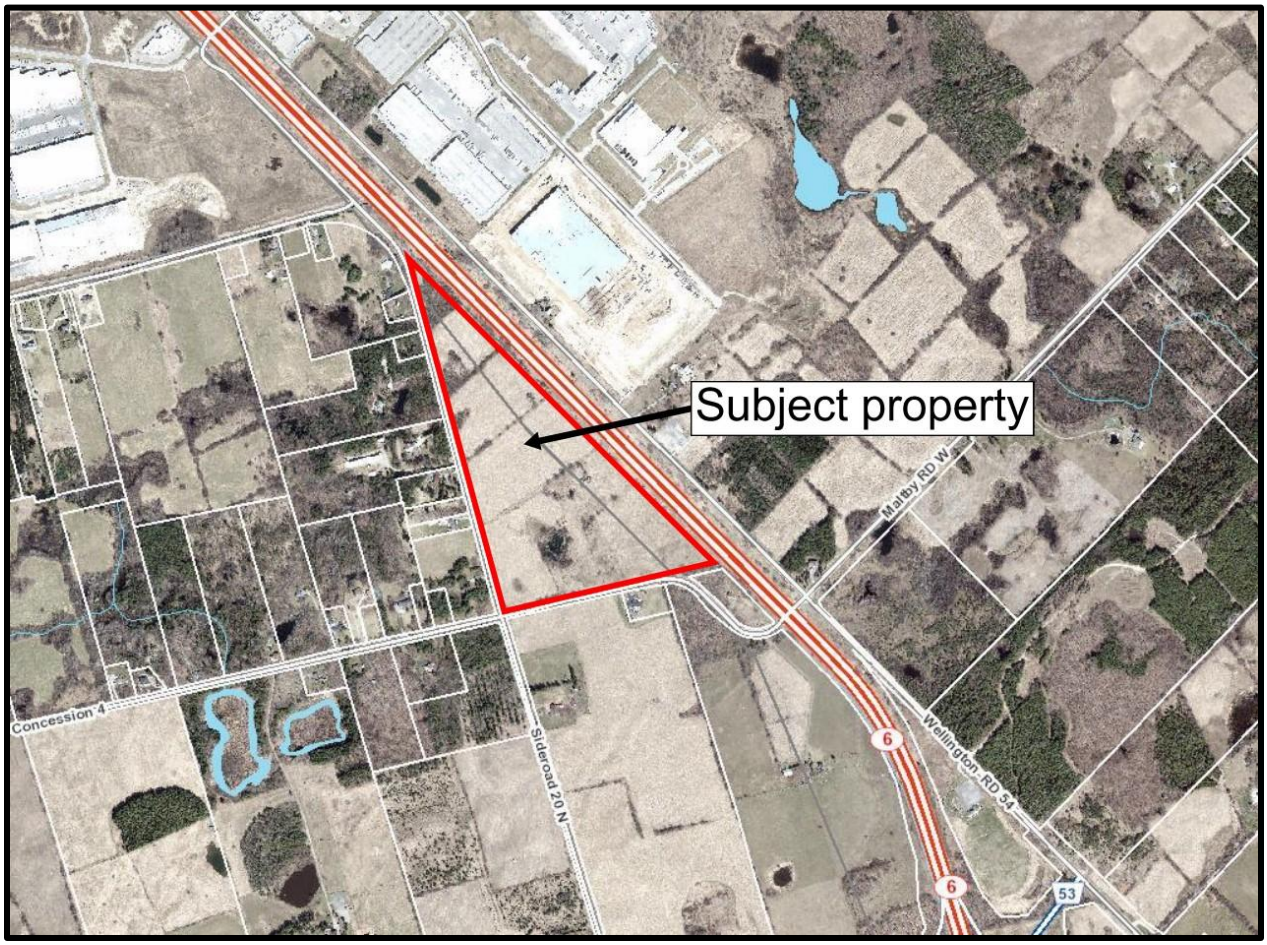
County of Wellington Official Plan
Township of Puslinch Zoning By-law 2018-023
Planning Act, R.S.O. 1990, as amended

Attachments
Schedule "A" – Key Map

Respectfully submitted,	**Reviewed by:**
Mehul Safiwala **Junior Planner**	**Justine Brotherston** **Director of Corporate Services/** **Municipal Clerk**

Schedule "A"

KEY MAP



REPORT COR-2025-039

TO:	Mayor and Members of Council
PREPARED BY:	Justine Brotherston, Director of Corporate Services/Municipal Clerk
PRESENTED BY:	Justine Brotherston, Director of Corporate Services/Municipal Clerk
MEETING DATE:	September 17, 2025
SUBJECT:	Request for Municipal Support Confirmation – IESO LT2(e-1) RFP – 3972 Sideroad 10 S – Solar Farm

RECOMMENDATION

That report COR-2025-039 entitled Request for Municipal Support Confirmation – IESO LT2(e-1) RFP – 3972 Sideroad 10 S – Solar Farm be received for information; and,

Whereas issuance of a Municipal Support Resolution prior to a decision being made on applicable *Planning Act* approvals may prejudice the Township in its decision on such *Planning Act* matters;

And Whereas the Township does not wish to contribute to any loses the proponent or landowner may experience, whether real or perceived, in advancing a project where *Planning Act* and other subsequent approvals are not guaranteed;

Now therefore be it resolved that Council declines issuance of a Municipal Support Resolution for LT2 (e-1) RFP, where a 'solar farm' is not permitted on the subject lands in accordance with the County of Wellington's Official Plan and the Township's Zoning By-law 023-18, as amended.

Purpose

The purpose of the report is to provide information on the LT2(e-1) RFP and to seek Council's direction on issuing a Municipal Support Resolution in advance of a decision being made on required *Planning Act* approvals.

Background

The Independent Electricity System Operator (IESO) works to ensure there is sufficient power available to service Ontario's electricity grid now and in the long-term and is responsible to ensure the reliability of the system. The IESO has recently released a request for proposals (RFP) for its long-term procurement strategy to acquire approximately 14,000 GWh of annual energy supply to meet system energy needs from new build electricity generating facilities.

The LT2(e-1) RFP Process Schedule below is an excerpt from Schedule "A" of the report the IESO Long-term 2 Energy Supply (Window 1) Request for Proposals.

Milestone	Date
IESO's release of the final LT2(e-1) RFP and LT2(e-1) Contract	June 27, 2025 (the "RFP Effective Date")
Proponent's deadline for submitting questions and comments, if any	July 24, 2025 (the "Question and Comment Deadline")
IESO's deadline for issuing Addenda to the LT2(e-1) RFP and LT2(e-1) Contract, if any	August 14, 2025
Proponent's deadline for registration	September 4, 2025
Proposal submission deadline	October 16, 2025 at 3:00 P.M. (EPT) (the "Proposal Submission Deadline")
Target date for notification to Selected Proponents	April 14, 2026

The IESO has identified in their RFP that LT2(e) will have multiple procurement windows and that LT2(e-1) is the first procurement window.

For any proposal that is located in whole or in part of lands are subject to land use authority of a municipality must receive a municipal resolution in support of the proposal's submission.

Comments

The proponent is seeking a Municipal Support Resolution from the Council for the purposes of participating in the LT2(e-1) RFP process as this is a mandatory requirement of the proposal. This Municipal Support Resolution must be received prior to the proposal submissions deadline of October 16, 2025 at 3:00 P.M. The proponent has provided a draft resolution of support for Council's consideration in Schedule 'B' of this report.

As stated in Schedule "B" a pre-consultation meeting was held with the proponent on October 17, 2024. Through the pre-consultation process it was anticipated that a number of *Planning Act* applications would be required for the proposed development including an Official Plan Amendment, Zoning By-law Amendment and Site Plan Application.

Without submission of a *Planning Act* application with relevant supporting documents, the Township cannot attest to the appropriateness of the development. Further, in the absence of public consultation lead by the Township the public interest for this development is difficult to gauge. Staff is not aware of an Official Plan Amendment Application being made to the County of Wellington, nor has staff received any Planning Applications following the Pre-consultation in October of 2024.

Given no further consultation has taken place with the Township since the October 2024 Pre-consultation, and subsequent Planning Applications have not been received to date, staff recommend that Council decline the issuance of a Municipal Support Resolution until such time the appropriate planning processes have been completed.

Financial Implications

As noted throughout the report.

Applicable Legislation and Requirements

None

Engagement Opportunities

None

Attachments

Schedule "A" – LT2(e-1) Request for Proposal
Schedule "B" - Proponent Request for Municipal Support Confirmation

Respectfully submitted,	**Reviewed by,**
Justine Brotherston, **Director of Corporate Services/** **Municipal Clerk**	**Courtenay Hoytfox,** **CAO**

IESO LONG-TERM 2 ENERGY SUPPLY (WINDOW 1) REQUEST FOR PROPOSALS

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SECTION 1 – INTRODUCTION

1.1 Independent Electricity System Operator

(a) The Independent Electricity System Operator (the "**IESO**") works at the heart of Ontario's power system as the system operator, directing the flow of electricity across the grid and administering the wholesale electricity market. It sets the hourly Ontario electricity price and ensures there is enough power to meet the province's energy needs in real time. The IESO works with stakeholders and communities across the province to plan and secure energy for the future, as well as to guide conservation efforts in Ontario. The IESO has a role in planning for and competitively procuring resources that meet Ontario's needs today and into the future. These may be met through diverse resources such as wind, solar, hydro, biomass, nuclear, natural gas, demand response, conservation, storage or other innovative technologies.

(b) The IESO is governed by an independent board of directors that is appointed by the Government of Ontario. Its fees and license are set by the Ontario Energy Board (the "**OEB**") and it operates independently of all other participants in the electricity market.

(c) Credit ratings for the IESO have been issued by Moody's and DBRS Morningstar. Additional information about the IESO can be obtained from www.ieso.ca.

1.2 Purpose and Background of the LT2(e-1) RFP

(a) After more than a decade of strong supply, Ontario is entering a period of emerging electricity system needs, driven by increasing demand, the refurbishment of nuclear generating units, as well as expiring contracts for existing facilities. Recognizing the necessity to address these needs in a timely, cost-effective and flexible manner, the IESO has engaged with stakeholders in the development of a resource adequacy framework. As Ontario's electricity system evolves to become more diverse and dynamic, procurement processes must evolve along with it. The resource adequacy framework published on the IESO's website targets robust competitive processes that focus on cost-effective reliability, while more effectively balancing ratepayer and supplier risk in this changing environment.

(b) As described in the Annual Planning Outlook published on the IESO's website in March 2024 some of the mechanisms intended to support the IESO's resource adequacy initiatives are:

(i) the Long-Term 2 Energy Supply Request for Proposals (the "**LT2(e) RFP**"), which is intended to acquire approximately 14,000 GWh of

annual energy supply to meet system energy needs from New Build Electricity generating facilities; and

(ii) the Long-Term 2 Capacity Services Request for Proposals (the "**LT2(c) RFP**"), which is intended to acquire capacity services to meet system reliability needs from New Build resources representing up to a total of 1.6 GW of targeted contracted capacity

As set out in the directive of the Ontario Minister of Energy and Mines issued to the IESO pursuant to subsection 25.32 of the Electricity Act dated November 28, 2024, as amended (the "**Ministerial Directive**"), the LT2(e) RFP is to be comprised of multiple procurement windows, each set out in distinct requests for proposals. This Long-Term 2 Energy Supply (Window 1) Request for Proposals (the "**LT2(e-1) RFP**") is the first such procurement of the LT2(e) RFP. Similarly, pursuant to the Ministerial Directive, the LT2(c) RFP is to be comprised of multiple procurement windows and the Long-Term 2 Capacity Services (Window 1) Request for Proposals (the "**LT2(c-1) RFP**") is the first such procurement by the IESO. This LT2(e-1) RFP, the LT2(c-1) RFP and any other procurement window of the LT2(e) RFP or the LT2(c) RFP are each distinct and independent procurement processes.

(c) Through the Expedited Long-Term Request for Proposals published on December 6, 2022, as amended (the "**E-LT1 RFP**") the IESO competitively procured more than 1.1 GW of year-round capacity services from new build Electricity resources and approximately 285 MW of year-round capacity services from eligible expansion Electricity resources, on a maximum contract capacity basis.

(d) Through the Long-Term Request for Proposals published on September 29, 2023, as amended (the "**LT1 RFP**") for new build and eligible expansion Electricity resources able to commit to commercial operation as early as 2028, the IESO competitively procured 2,194 MW of year-round capacity services on a maximum contract capacity basis.

(e) The LT2(e-1) RFP is intended to competitively procure year-round energy generation services from New Build Electricity generating facilities equal to or larger than one (1) MW, able to become registered in the *IESO-administered markets*, with an aggregate Expected Annual Imputed Production of 3,000 GWh (the "**Total Target Annual Energy**").

(f) The Selected Proponents of the LT2(e-1) RFP are required to enter into a Long-Term 2 Energy Supply (Window 1) Contract in the form set out in APPENDIX B (the "**LT2(e-1) Contract**") with the IESO for a commitment period commencing on the Commercial Operation Date of the Long-Term Energy Project as set out in the LT2(e-1) Contract and expiring on April 30, 2050 (the "**Commitment Period**").

1.3 Defined Terms

(a) Capitalized terms used in this LT2(e-1) RFP have the respective meanings ascribed to them in APPENDIX A. Terms and acronyms used in this document that are italicized have the meanings ascribed in *Chapter* 11 of the Market Rules available on the IESO's website.

(b) Capitalized terms used in Section 2.2 but not otherwise defined in the LT2(e-1) RFP have the meanings given to them in the LT2(e-1) Contract.

SECTION 2 – ELIGIBILITY AND CONTRACTUAL REQUIREMENTS

2.1 Eligibility Requirements

(a) *Team Member Experience*

(i) The Proponent shall meet the Team Member Experience set out in this Section 2.1(a).

(ii) The Proponent must have at least two (2) Designated Team Members who have experience in the Planning, Developing, Financing, Constructing and Operating of at least one (1) Qualifying Project, where such individuals had managerial authority in respect of such functions (the "**Team Member Experience**"). The Proponent may have more than two (2) Designated Team Members on its Proponent Team to satisfy the aggregate Team Member Experience requirements relating to each of the Planning, Developing, Financing, Constructing and Operating requirements (for instance, if a Designated Team Member does not have experience in all of the five categories). For greater certainty, the experience of the Designated Team Members does not need to have been earned with the same Proponent or Control Group Member.

(iii) The Team Member Experience claimed for each Designated Team Member submitted as a part of the Prescribed Form: Proponent Information, Declarations and Workbook (Energy) pursuant to Section 2.1(a)(ii) must be supported by an accompanying statutory declaration of an officer of the Proponent in respect of the information submitted in respect of Team Member Experience.

(b) *Single Person*

Each Proponent shall be a single Person and may not be an unincorporated joint venture of multiple Persons.

(c) *Long-Term Energy Project*

(i) Each Proponent shall make the necessary investments to successfully develop, own, operate and maintain a New Build Electricity generating facility with a Nameplate Capacity equal to or larger than one (1) MW and, where the facility uses natural gas to generate Electricity, with a Nameplate Capacity no larger than forty-five (45) MW, which delivers Electricity through its own meter (for clarity, "its own meter" means a meter not used by any other facility) in accordance with all Laws and Regulations to the *IESO-controlled grid*, and can participate directly in the *IESO-administered markets* and supply energy during the Commitment Period (a "**Long-Term Energy Project**"), should they be offered an LT2(e-1) Contract. Each Proposal must be specific to a single Long-Term Energy Project. Where a Long-Term Energy Project is the subject of a Proposal under this LT2(e-1) RFP, such Long-Term Energy Project may not be the subject of a proposal submitted under the LT2(c-1) RFP.

(ii) Proponents are reminded of the necessity to comply with Laws and Regulations, including for greater certainty the Distribution System Code, the Transmission System Code, the Market Rules and requirements of any applicable Municipalities, local service boards, conservation authorities, Indigenous Communities or other applicable authorities, as each may be applicable to their Long-Term Energy Project. Proponents should be aware of required approvals, including environmental and municipal approvals, which may be required prior to construction of their resources, if applicable.

(iii) Proponents are reminded of the important role that effective engagement with Indigenous and local communities, including Municipalities, play in the successful planning, development and operation of their Electricity resources and must be prepared to undertake their appropriate role in such engagement and address the interests or concerns of such communities in good faith and in compliance with Laws and Regulations. Proponents are encouraged to conduct early engagement with all Municipalities and Indigenous Communities that may be impacted by their proposed Long-Term Energy Project and to inform such communities of the proposed location of the Project Site as early as possible. Proponents are also reminded that certain permits and approvals for the proposed Long-Term Energy Project may trigger consultation requirements with Indigenous Communities. Proponents are encouraged to refer to the Indigenous Consultation Information Package for additional resources related to Indigenous Consultation and engagement. All Proposals where the Project Site is proposed to be located, in whole or in part on Municipal Project Lands or Indigenous Lands must

include evidence of the delivery of a Pre-Engagement Confirmation Notice to the applicable Local Body Administrator dated no later than sixty (60) days prior to the Proposal Submission Deadline.

(iv) For any Proposal where the Project Site is proposed to be located in whole or in part on Indigenous Lands, the Proposal must include an Indigenous Support Confirmation as a part of the Prescribed Form: Evidence of Indigenous Support (Energy).

(v) For any Proposal where the Project Site is proposed to be located in whole or in part on Municipal Project Lands, the Proposal must include a Municipal Support Confirmation as a part of the Prescribed Form: Evidence of Municipal Support (Energy).

(vi) For any Proposal in respect of a Crown Land Project, the Proponent must submit a letter from the Ontario Ministry of Natural Resources substantially in accordance with the form set out in Exhibit C of the Prescribed Form: Access Rights Declaration (Energy) confirming that a completed Crown Land Site Report Form has been submitted by the Proponent and has the "endorsement" by the Ontario Ministry of Natural Resources in respect of the applicable lands as required by section 5(e) of the Ministerial Directive (an "**MNR Confirmation Letter**"). Additionally, any Proposal in respect of a Crown Land Project must include one or more Crown Land Shapefiles mapping the boundary of the Project Site (and separately, that of any included Proposal PQ Alternates) that is consistent with Project Site information included in the Crown Land Site Report Form as part of the Prescribed Form: Access Rights Declaration (Energy).

(vii) For any Proposal where the Project Site is proposed to be located, in whole or in part on Unincorporated Territory, the Proponent must submit a letter from a Land Use Planner addressed to the Proponent and the IESO, that includes the seal or certificate of such Land Use Planner issued by the Ontario Professional Planners Institute, confirming that the Project Site (or applicable portion of the Project Site, with reference to a scale map) is located on Unincorporated Territory and confirming whether the Project Site (or applicable portion of the Project Site) has been designated as a Prime Agricultural Area or Specialty Crop Area (a "**Confirmation of Unincorporated Territory**") as part of the Prescribed Form: Confirmation of Unincorporated Territory (Energy).

(d) *Agricultural Lands*

(i) The Project Site in respect of a Long-Term Energy Project may not include any lands located in areas designated as Specialty Crop Areas as of the Proposal Submission Deadline.

(ii) Where a Long-Term Energy Project is a Non-Rooftop Solar Project, the Project Site may not include any lands located in areas designated as Prime Agricultural Areas as of the Proposal Submission Deadline.

(iii) Where the Project Site in respect of a Long-Term Energy Project (other than a Non-Rooftop Solar Project) includes any lands located in areas designated as Prime Agricultural Areas as of the Proposal Submission Deadline, the Proponent shall:

(A) as a part of the Prescribed Form: Evidence of Municipal Support (Energy) provide confirmation from the Local Municipality that the AIA Component One Requirement has been completed to the satisfaction of the Local Municipality; and

(B) if selected as a Selected Proponent, pursuant to the LT2(e-1) Contract complete an AIA Components Two and Three Requirement and provide confirmation from the Local Municipality that such AIA Components Two and Three Requirement has been completed to the satisfaction of the Local Municipality as described in further detail below.

(e) *No Connection Impact Assessment Prior to Contract Award*

For any Proposal in respect of a Long-Term Energy Project seeking to connect to a Distribution System, the Long-Term Energy Project may not be the subject of a Connection Impact Assessment (whether issued or pending) submitted by or on behalf of the Proponent or any of its Affiliates as of the Proposal Submission Deadline and the Proponent must refrain from submitting a Connection Impact Assessment in respect of such Long-Term Energy Project until such time as it has either been notified that its Proposal has not been selected pursuant to Section 5.4(a) or entered into the LT2(e-1) Contract in respect of such Long-Term Energy Project. Where any Connection Impact Assessment in respect of a Proponent's Long-Term Energy Project has previously been submitted to an LDC, such Connection Impact Assessment must be rescinded and permanently revoked prior to the submission of a Proposal in respect of such Long-Term Energy Project.

(f) *Connection Point Requirements*

(i) In submitting its Connection Point as a part of the Proposal in the Proposal Workbook, a Proponent may provide a single Circuit or

Feeder, as applicable, or, where multiple connections to Common Corridor Circuits or Common LDC Feeders may be applicable, the Proposal may specify a Connection Point comprised of:

(A) for connections to a Transmission System, up to four (4) Circuits that are Common Corridor Circuits; or

(B) for connections to a Distribution System, up to four (4) Feeders that are Common LDC Feeders.

For clarity, if a Connection Point is comprised of multiple physical connections to Common Corridor Circuits or Common LDC Feeders, all such connections must be either to a Transmission System (using only Common Corridor Circuits) or to a Distribution System (using only Common LDC Feeders) and no eligible Connection Point may be comprised of a combination of Circuits and Feeders.

(ii) Subject to Section 2.1(f)(i), if the Long-Term Energy Project is proposed to have multiple connections to Common Corridor Circuits or Common LDC Feeders, as applicable, the Proponent shall propose the portion of the proposed Contract Capacity (in MW) to be allocated to each Circuit or Feeder, as applicable, in the Proposal Workbook, subject to a minimum allocation of one (1) MW to each such Circuit or Feeder, and may designate one alternative allocation of the proposed Contract Capacity to any other Circuits or Feeders that are all Common Corridor Circuits or Common LDC Feeders, as applicable. Additionally, if the Long-Term Energy Project is proposed to have a single electrical point of connection to a Circuit or Feeder for which there are Common Corridor Circuits or Common LDC Feeders, as applicable, the Proponent may designate in the Proposal Workbook one alternative allocation of the proposed Contract Capacity to any one or more of such Common Corridor Circuits or Common LDC Feeders, subject to a minimum allocation of one (1) MW to each such Circuit or Feeder.

(iii) For any Proposal PQ Alternate proposing a Connection Point comprised of multiple connections to Common Corridor Circuits or Common LDC Feeders, as applicable, in the Proposal Workbook the Proponent shall propose the allocation of the alternative portion of the smaller proposed Contract Capacity of the Proposal PQ Alternate to all or any combination of the Circuits or Feeders, as applicable, submitted pursuant to Section 2.1(f)(i) in respect of the Primary Proposal PQ. Each such Proposal PQ Alternate may also designate one alternative allocation of the smaller proposed Contract Capacity of the Proposal PQ Alternate to all or any combination of

the alternative Circuits or Feeders (if any) designated pursuant to Section 2.1(f)(ii).

(iv) For any Proposal that has provided an alternate allocation of proposed Contract Capacity across such Common Corridor Circuits or Common LDC Feeders as described in Section 2.1(f)(ii) or Section 2.1(f)(iii), as applicable, the IESO may, in its Discretion, select either of the proposed allocations, which selection will be communicated to the Selected Proponent(s) as a part of the preparation of the execution copy of the LT2(e-1) Contract provided pursuant to Section 3.8(a)(ii). For clarity, the Selected Proponent shall execute and deliver the LT2(e-1) Contract in accordance with Section 3.8(a).

2.2 Overview of the LT2(e-1) Contract

(a) This Section 2.2 provides an overview of certain sections of the LT2(e-1) Contract and is for descriptive purposes only. For greater certainty, to the extent that there is any inconsistency between the descriptions in this Section 2.2 and the LT2(e-1) Contract, the terms of the LT2(e-1) Contract shall prevail.

(b) The Proponents whose Proposals are selected must enter into the LT2(e-1) Contract as Suppliers under their own names.

(c) *Monthly Payment*

The LT2(e-1) Contract is structured as a financial guarantee of a Supplier's calculated monthly revenue requirement, utilizing an imputed revenue model for the Facility that deems revenues to be earned by the Supplier in the IESO's wholesale energy market based on the Contract Capacity and the Monthly Imputed Production Factor. Where imputed market revenues for a Settlement Month are less than the Supplier's monthly revenue requirement under the LT2(e-1) Contract, the IESO will make a payment of such difference to the Supplier. Where imputed market revenues for a Settlement Month are greater than the Supplier's monthly revenue requirement under the LT2(e-1) Contract, the Supplier must pay such excess imputed revenue to the IESO.

(i) The Monthly Payment under the LT2(e-1) Contract is set out in Exhibit J of the LT2(e-1) Contract and is calculated by subtracting the Facility's imputed market revenues and any Non-Performance Charge from the Facility's monthly revenue requirement and then adding any applicable Day-Ahead-to-Real-Time Adjustment.

(A) The Supplier's monthly revenue requirement is the product of the Indexed Fixed Price (in $/MWh), the Annual Average

Imputed Production Factor (expressed in decimal), the Contract Capacity (each of which is a bid parameter by the Proponent taken from its Proposal), the Force Majeure Capacity Reduction Factor and the number of hours in an applicable month.

(B) Imputed market revenues under the LT2(e-1) Contract are calculated as the product of the Imputed Production Price, the Monthly Imputed Production Factor (expressed in decimal), the Contract Capacity, any Force Majeure Capacity Reduction Factor and the number of hours in the applicable month.

(C) The Day-Ahead-to-Real-Time Adjustment for each hour will be zero for any Facility that is not a Wind Facility or a Solar Facility and for any Wind Facility or Solar Facility will be calculated as set out in Exhibit J of the LT2(e-1) Contract.

(ii) For the first Contract Year, the Indexed Fixed Price will be equal to the Fixed Price adjusted for inflation based on the change in the Consumer Price Index from the month immediately preceding the Contract Date to the month immediately preceding the earlier of the Commercial Operation Date and the Milestone Date for Commercial Operation. For the second and each succeeding Contract Year, twenty percent (20%) of the Indexed Fixed Price will be adjusted for inflation based on year-over-year change in the Consumer Price Index.

(iii) All Suppliers under the LT2(e-1) Contract will be required to operate and maintain the Facility in accordance with Good Engineering and Operating Practices. All market revenues attributable to Environmental Attributes, Capacity Products or Ancillary Services products generated from the physical operation of the Facility, will be for the benefit of the Supplier in accordance with the LT2(e-1) Contract and do not contribute to the determination of imputed market revenue of the Supplier under the LT2(e-1) Contract.

(d) *Performance Obligations*

(i) Starting after the end of the third Contract Year, if the Facility achieves an Actual Performance Factor that is less than eighty percent (80%) of the Facility's Annual Average Imputed Production Factor under the LT2(e-1) Contract on an annual basis, the Supplier will be assessed a Non-Performance Charge calculated in accordance with Exhibit F of the LT2(e-1) Contract.

(ii) The Non-Performance Charge is equal to the average Indexed Fixed Price for the most recent three (3) completed Contract Years multiplied by the portion of the Performance Factor Shortfall for the year that is in excess of twenty percent (20%).

(iii) Starting after the end of the third Contract Year, where the Performance Factor Shortfall is greater than thirty-five percent (35%) for the year it shall constitute a Supplier Event of Default.

(e) *Commercial Operation*

(i) If Commercial Operation of the Facility is not achieved by the Milestone Date for Commercial Operation, the Supplier shall pay to the IESO, as liquidated damages and not as a penalty, a sum of money equal to the amount of (1) the Liquidated Damages Rate multiplied by (2) the Contract Capacity for each Business Day after the Milestone Date for Commercial Operation, until Commercial Operation has been achieved. The "Liquidated Damages Rate" under the LT2(e-1) Contract is $150/MW-Business Day of Contract Capacity.

(ii) If Commercial Operation is not achieved on or before the Longstop Date, it shall constitute a Supplier Event of Default. The "Longstop Date" under the LT2(e-1) Contract is the date that is eighteen (18) months after the Milestone Date for Commercial Operation.

(iii) The LT2(e-1) Contract will seek to incentivize early operation. If Commercial Operation of the Facility is achieved before the COD Bonus End Date, the Supplier shall be entitled to apply a fixed payment multiplier to the Fixed Price, which will be determined based on the time period in which the COD was achieved (set out below in Section 2.2(e)(iv)) and which Early COD Payment Multiplier shall apply for the period starting on the COD until the COD Bonus End Date. The COD Bonus End Date shall be fixed and not subject to change for any reason, including an event of Force Majeure.

(iv) Early COD Payment Multiplier

Commercial Operation Date	**Early COD Payment Multiplier**
Prior to and until April 30, 2029	1.5
From May 1, 2029 to December 31, 2029	1.4
From January 1, 2030 to April 30, 2030	1.2

(f) *Force Majeure*

Any Force Majeure that is claimed by the Supplier and accepted by the IESO during the Commitment Period shall be excluded from the calculation of the Monthly Payment under Exhibit J of the LT2(e-1) Contract for the portion of the total hours in the month and the portion of the Contract Capacity for the Facility that is subject to an Outage arising from such confirmed Force Majeure event (the "**Force Majeure Capacity Reduction Factor**", or "**FMCRF**"). The FMCRF will be applied to the calculation of both the monthly revenue requirement in Exhibit J and will also be applied to reduce the imputed market revenues calculated in accordance with Exhibit J of the LT2(e-1) Contract. Additionally, the total number of Force Majeure Outage Hours will be excluded from the total hours in the period used to calculate the Actual Performance Factor for the purpose of the performance requirements specified in Section 2.2(d).

(g) *Completion and Performance Security*

(i) The Supplier must, as of the Contract Date, provide to the IESO, Completion and Performance Security in an amount equal to the applicable Proposal Security (as set out in Section 3.7(d)(ii)) in accordance with and within the period specified in Section 3.8(a)(iii)(A) of this LT2(e-1) RFP. The amount of the Completion and Performance Security as of the Contract Date is equal to the amount required for Proposal Security and a Selected Proponent must authorize the IESO to convert and maintain the Proposal Security to be held as Completion and Performance Security, rather than replacing the Proposal Security with separate Completion and Performance Security at the time of entering into the LT2(e-1) Contract.

(ii) From and after the Contract Date and until the end of the Term, the Supplier must maintain the Completion and Performance Security in the amount per MW of the Contract Capacity and for the period specified below:

Period	**Amount of Completion and Performance Security (in $ / MW)**
From the Contract Date until COD	Amount of the Proposal Security as set out in Section 3.7(d)(ii)
From COD until the end of the Term	$20,000/MW

(iii) The Completion and Performance Security must be in the form of a letter of credit in the form provided in the LT2(e-1) Contract (consistent with the form in Appendix D hereto), for the full amount of the Completion and Performance Security.

(h) *Indigenous Community Participation*

(i) If the Supplier is awarded Rated Criteria Points in its Proposal as a result of a Proponent Indigenous Participation Level pursuant to Section 4.3(a) then the Supplier shall, within twenty (20) Business Days of a request by the IESO, provide written evidence documenting the Economic Interest in the Supplier that is held by the applicable Indigenous Community(ies) or Indigenous Holding Vehicle that is to the satisfaction of the IESO, acting reasonably.

(ii) Until the fifth (5th) anniversary of the COD, if the Indigenous Participation Level is reduced, the Supplier shall provide written notice thereof to the IESO of such decrease, which notice shall include the revised Indigenous Participation Level and the effective date thereof.

(iii) If the Indigenous Participation Level is not restored to a level of at least the level as at the Contract Date within six (6) months after such written notice pursuant to Section 2.2(h)(ii), then such failure to maintain an Indigenous Participation Level of at least such level until at least the fifth (5th) anniversary of the COD shall constitute a Supplier Event of Default.

(iv) Notwithstanding the foregoing, where an individual Indigenous Community that held more than ten percent (10%) of the Economic Interest in the Supplier as of the Contract Date (including through an Indigenous Holding Vehicle, if applicable) provides a written notice to the IESO, signed by one or more individuals with authority to bind the applicable Indigenous Community, requesting a reduction in the Indigenous Participation Level prior to the fifth (5th) anniversary of the Commercial Operation Date, to a level that may not be less than the Minimum Reduced IPL, such reduced Indigenous Participation Level shall be deemed to re-set the Indigenous Participation Level for purposes of this obligation. Such reduction may be exercised only once prior to the fifth (5th) anniversary of the Commercial Operation Date.

(i) *AIA Components Two and Three Requirement for Project Sites on Prime Agricultural Areas*

(i) Where the Project Site in respect of a Facility includes lands that are located within a Prime Agricultural Area as of the Proposal Submission Deadline (other than a Facility that is a Non-Rooftop Solar Project, which is not eligible to be located within Prime Agricultural Areas), the Supplier shall, by no later than the eighteen (18) month anniversary of the Contract Date, provide the IESO with a written notice containing confirmation from an authorized representative of any Local Municipality that has jurisdiction over land use planning in respect of all or any portion of the Project Site confirming that the Supplier has completed an AIA Components Two and Three Requirement with respect to the Facility and stating that such AIA Components Two and Three Requirement is satisfactory to the Local Municipality.

(ii) If the Supplier fails to meet the requirements described above such failure shall constitute a Supplier Event of Default under the LT2(e-1) Contract. If the IESO elects to terminate the LT2(e-1) Contract as a result of such Supplier Event of Default, such termination shall be without any costs or payments of any kind to either Party and all Completion and Performance Security shall be returned to the Supplier.

(j) *Adjustment for Post-Proposal Applicable Tariffs*

If the Supplier's Capital Cost increases by more than ten percent (10%) as a direct result of the Supplier or its direct or indirect contractor or subcontractor being required to pay any Post-Proposal Applicable Tariffs, the Supplier will have the opportunity, on no more than two (2) occasions, to deliver to the IESO a notice with a proposed revised Fixed Price, which the IESO may accept or reject in its sole and absolute discretion. Where the IESO rejects such proposed revised Fixed Price, the LT2(e-1) Contract will be automatically terminated, and the Completion and Performance Security shall be returned to the Supplier.

(k) *Gas Turbine Delivery Delay*

Where the Facility utilizes natural gas or biogas as its energy source and, despite its use of Commercially Reasonable Efforts, the Supplier is unable to cause the delivery of one or more combustion turbines that are to be incorporated into the Facility to the Project Site by the date that is eighteen (18) months prior to the Milestone Date for Commercial Operation (the Gas Turbine Delay Date), and provided the Supplier provides evidence of a binding third-party equipment purchase and that it has paid a deposit for such turbine(s), the definition of the term "Expiry Date" set out in Section 1.1 of the LT2(e-1) Contract shall be automatically amended to extend the date of April 30, 2050 set out therein by that number of days by which the

scheduled delivery of the gas turbine(s) to the Project Site exceeds the Gas Turbine Delay Date.

2.3 No Exclusivity of Contract

(a) The LT2(e-1) Contract, if any, executed with a Supplier will not be an exclusive contract for the provision of energy supply to meet system energy needs. The IESO may contract with others for the same or similar products or services from other resources or may otherwise obtain the same or similar products or services by other means.

SECTION 3 – LT2(e-1) RFP PROCESS OVERVIEW

3.1 Schedule

(a) Below is the schedule relating to this LT2(e-1) RFP process (the "**Schedule**"):

Milestone	**Date**
IESO's release of the final LT2(e-1) RFP and LT2(e-1) Contract	**June 27, 2025** (the "**RFP Effective Date**")
Proponent's deadline for submitting questions and comments, if any	**July 24, 2025** (the "**Question and Comment Deadline**")
IESO's deadline for issuing Addenda to the LT2(e-1) RFP and LT2(e-1) Contract, if any	**August 14, 2025**
Proponent's deadline for registration	**September 4, 2025**
Proposal submission deadline	**October 16, 2025** at 3:00 P.M. (EPT) (the "**Proposal Submission Deadline**")
Target date for notification to Selected Proponents	**April 14, 2026**

(b) The IESO reserves the right to accelerate or postpone any of the dates set out above and to add to, eliminate, or re-order any of the steps set out in the

Schedule. The IESO may amend the Schedule from time to time by Addendum, which will be posted on the Website.

3.2 Questions and Comments

(a) This LT2(e-1) RFP and the LT2(e-1) Contract, as applicable, will be public and accessible via the Website. Interested parties are encouraged to promptly examine all such documentation and: (i) report to the IESO any errors, omissions or ambiguities; and (ii) send to the IESO any questions they may have regarding the LT2(e-1) RFP and the LT2(e-1) Contract by submitting a question or a comment by e-mail to LT2.RFP@ieso.ca on or before the Question and Comment Deadline specified in the Schedule. The IESO will not be responsible for, nor be obliged to respond to, questions or comments submitted from another location of the IESO's website or to any other e-mail address.

(b) Questions marked as confidential will not be accepted by the IESO. Questions and comments received in the manner prescribed above that request clarification of the LT2(e-1) RFP and the LT2(e-1) Contract will be posted on the Website with the IESO's response, but the identity of any party asking any question or making any comment will not be revealed.

(c) The IESO is under no obligation to provide additional information or answers but may do so at its sole Discretion. When posting questions to the Website, the IESO may make conforming changes to the question to remove identifying or Proponent-specific information.

(d) It is the responsibility of an interested party to seek clarification by submitting questions or comments in the manner provided above on any matter that it considers to be unclear. The IESO shall not be responsible for any misunderstanding on the part of an interested party concerning any aspect of this LT2(e-1) RFP.

3.3 Addenda

(a) This LT2(e-1) RFP and the LT2(e-1) Contract may be amended only by Addendum in accordance with this Section 3.3. If the IESO, for any reason, determines that it is necessary or appropriate to amend or provide additional information relating to the LT2(e-1) RFP and the LT2(e-1) Contract such information will be communicated by posting such Addendum on the Website on or prior to the deadline for issuing Addenda set out in the Schedule. Each Addendum will be deemed to form an integral part of this LT2(e-1) RFP and the LT2(e-1) Contract, as the case may be.

(b) Each Addendum may contain important information, including significant changes to this LT2(e-1) RFP, the LT2(e-1) Contract and their respective Prescribed Forms, and interested parties are responsible for visiting the

Website as often as is necessary to ensure that they obtain all Addenda and other communications issued by the IESO from time to time.

(c) The IESO may issue an Addendum or Addenda after the deadline for issuing Addenda specified in the Schedule. If any Addendum is issued after the deadline for issuing Addenda set out in the Schedule, the IESO may, in its Discretion, extend the Proposal Submission Deadline for a reasonable amount of time having regard to the circumstances.

3.4 Registration

(a) As the first step of participating in this LT2(e-1) RFP, interested Proponents must submit a Prescribed Form: Registration Form (Energy) to the IESO, specific to an individual proposed Long-Term Energy Project, in accordance with the specific details set out in the Prescribed Form: Registration Form (Energy), together with a registration fee of five hundred Dollars ($500) (the "**Registration Fee**"). The Prescribed Form: Registration Form (Energy) shall require the Proponent to: (i) identify the Proponent; (ii) specify the proposed Long-Term Energy Project's energy source type; (iii) identify the maximum Contract Capacity for the proposed Long-Term Energy Project; and (iv) provide certain information relating to the proposed Connection Point in respect of the proposed Long-Term Energy Project. For greater certainty, registration pursuant to this Section 3.4 does not obligate a prospective Proponent to submit a Proposal

(b) Payment for the Registration Fee must be sent to the following bank account:

Beneficiary:	Independent Electricity System Operator
Beneficiary Address:	1600-120 Adelaide St West, Toronto ON M5H 1T1
Bank:	The Toronto-Dominion Bank
Bank Address:	55 King St West, Toronto ON M5K 1A2
Bank ID:	004
Transit No.:	10202
Account No.:	0690-5618464
Swift Code:	TDOMCATTTOR

In order to ensure that the Registration Fee deposited by the Proponent is identified and correctly applied, the electronic funds transfer or wire should include a deposit reference identifier ("**Registrant ID**") in the form of: LT2-Proponent Name-Project Name-Year (Example: LT2(e-1)-CompanyA-Project A-2025). After making the payment, an email must be sent to LT2.RFP@ieso.ca with a copy to ieso.treasury@ieso.ca with the following information: (a) Proponent name (and if different from depositor, depositor name); (b) Project Name; (c) expected deposit date; and (d) amount of Registration Fee deposited.

(c) If an interested Proponent would otherwise fail to meet the registration requirements set out in this Section 3.4 as a result of a manifest error or deficiency in the Prescribed Form: Registration Form (Energy) or in the delivery Registration Fee, such as a missing date, name, signature or a typographical error, the IESO may, in its Discretion, issue a rectification notice identifying a perceived deficiency and in such case will provide the Proponent a single opportunity to rectify the perceived deficiency and submit the applicable corrected or completed materials within the time period specified by the IESO in such notice.

(d) The IESO will respond to the Proponent confirming the Proponent's registration and providing a Unique Project ID for the identified Long-Term Energy Project for purposes of this LT2(e-1) RFP in advance of the Proposal Submission Deadline.

3.5 Communications

(a) The IESO does not wish to impair essential or appropriate communications by interested parties for the purposes of project planning, development, operations, regulatory compliance, participation in the *IESO-administered markets*, compliance with the requirements of this LT2(e-1) RFP, structuring or assembling a Proponent, participating in stakeholder engagement events administered by the IESO in respect of this LT2(e-1) RFP, or responding to stakeholder solicitations or requests for comments from the IESO in respect of this LT2(e-1) RFP (collectively, the "**Permitted Purposes**"). Therefore, the following communications rules apply with respect to this LT2(e-1) RFP:

(i) Communications in respect of this LT2(e-1) RFP must be only for the Permitted Purposes and for no other purposes; and

(ii) Permitted communications include communications with MPPs, mayors, municipal officials, municipal administrative staff, the media, members of the public, the IESO, the OEB, transmitters and distributors, for the Permitted Purposes and for no other purposes.

(iii) Communications in respect of this LT2(e-1) RFP shall not be for the purposes (the "**Excluded Purposes**") of:

(A) obtaining (or attempting to obtain or lobbying to obtain) an unfair advantage in respect of the LT2(e-1) RFP;

(B) influencing (or attempting to influence) the terms or outcome of the LT2(e-1) RFP other than via participating in stakeholder engagement events administered by the IESO in respect of this LT2(e-1) RFP or the LT2(e-1) Contract, or responding to stakeholder solicitations or requests for

comments from the IESO in respect of this LT2(e-1) RFP or the LT2(e-1) Contract;

(C) influencing (or attempting to influence) government officials, regulatory officials or the management or staff of the IESO, OEB or transmitters or distributors, with respect to this LT2(e-1) RFP;

(D) denying (or attempting to deny) any other potential Proponent's fair, open and impartial consideration; or

(E) impairing (or attempting to impair) public confidence in the process or outcome of the LT2(e-1) RFP.

(iv) The onus shall be on a Proponent to demonstrate that any communications in relation to this LT2(e-1) RFP were not communications for Excluded Purposes.

(v) Communication for any Excluded Purposes shall be and is hereby expressly excluded from the Permitted Purposes.

(vi) Communications with respect to this LT2(e-1) RFP between Proponents or prospective Proponents and any member of the IESO's management or board of directors, the Evaluation Team or its advisors, other than as expressly provided in this LT2(e-1) RFP, shall be considered to be communications for Excluded Purposes. Communications with IESO staff and the Ministry staff are permissible only for Permitted Purposes. Opportunities for communication with IESO or the Ministry staff or any other Person for Permitted Purposes shall not be used to carry out communications for Excluded Purposes.

(b) If a Proponent or prospective Proponent has any questions regarding the appropriateness of specific communications, they are advised to seek clarification from the IESO via the e-mail address: LT2.RFP@ieso.ca.

(c) The IESO shall have the right to request and obtain from a Proponent, and the Proponent shall, if so requested, promptly provide to the IESO, information or clarification regarding the appropriateness of any communications by such Proponent that may be prohibited by this LT2(e-1) RFP. The Proponent shall provide all information reasonably necessary or appropriate to allow the IESO to assess whether such communications are or were for Permitted Purposes.

(d) In cases of breach of the foregoing communications rules, the IESO may, in its Discretion, disqualify a Proponent or revoke the status of a Proponent, as the case may be. No Proponent shall engage or have engaged in any communications that would constitute a Conflict of Interest or that would

breach the Non-Collusion Requirements, failing which, the IESO may, in its Discretion, disqualify the Proponent.

3.6 Proposal Requirements

(a) Proponents are responsible for ensuring that the Proposals are complete in every respect and in compliance with this LT2(e-1) RFP. Proponents should structure their Proposals in accordance with the instructions in this LT2(e-1) RFP. Where information is requested in this LT2(e-1) RFP, any response made in a Proposal should reference the applicable section numbers of this LT2(e-1) RFP where such request is made.

(b) The Proposals shall be unconditional. Any Proposal that is submitted subject to any condition will be rejected and such Proposal will no longer be considered in this LT2(e-1) RFP process. Except as provided in Section 3.7(e)(iii), the Proposal Fee will be non-refundable.

(c) Apart from the completion of any blanks, bullets or similar uncompleted information in the Prescribed Forms, no amendments may be made to the pre-printed wording of the Prescribed Forms, but copies, including multiple copies, may be made of the appropriate pages of the Prescribed Forms. The Prescribed Forms will be made available on the Website in a writable PDF, Word or Excel format. Any amendments made to the Prescribed Forms, whether on the face of such forms or contained elsewhere in the Proposal, may result in the disqualification of the Proposal. All Prescribed Forms populated with relevant information from the Proponent must be signed by a director, officer or other person who has the authority to bind the Proponent.

(d) Certain Prescribed Forms are, or contain, statutory declarations. The onus is solely on Proponents to conduct all investigations and verifications necessary or appropriate, including any investigations required of any member(s) of the Proponent's team, to confirm that each of the statements set out in the declarations can be made accurately and truthfully. If the IESO determines in its Discretion that any matter declared is not materially true and correct, then the Proposal may be rejected. Additionally, misrepresentations in the Proposal will constitute a breach of the representations and warranties in the LT2(e-1) Contract.

(e) The Proposal must be written in English only and must be submitted in electronic format, typed in black ink, printable on an 8.5 × 11-inch paper, and all pages in applicable documents should be numbered sequentially. Proposals should be collated and organized in a user-friendly manner, including an index, cross-referencing of the various supporting documentation and their respective page numbering systems, and should provide detailed responses.

3.7 Proposal Submission

(a) *Limit*

(i) Only one Proposal may be submitted in respect of an individual Long-Term Energy Project.

(ii) A Proponent must submit separate Proposals for each individual Long-Term Energy Project. A Proponent may submit multiple Proposals, provided that no more than twenty (20) Proposals in total may be submitted by: (A) the Proponent; (B) any Control Group Member of the Proponent; or (C) the Proponent together with any Control Group Member of the Proponent (the "**Proponent Group Limit**").

(b) To be considered, a Proponent must submit all of the materials in Section 3.7(c)(i) (collectively, a "**Proposal**"). It is the Proponent's responsibility to submit the Proposal to the IESO as prescribed by the requirements in Section 3.7(c) in all material respects. Any Proposal submission that is not received by the IESO per the requirements set out in Section 3.7(c) in all material respects will be rejected and the Proposal will no longer be considered in this LT2(e-1) RFP process. Except as provided in Section 3.7(e)(iii), the Proposal Fee will be non-refundable.

(c) *Electronic Submission Requirements*

(i) To constitute a complete Proposal, Proponents must submit all of the following documents that are applicable to the Proposal as a part of the Proposal, electronically to LT2.RFP@ieso.ca, prior to the Proposal Submission Deadline:

	ELECTRONIC PROPOSAL REQUIREMENTS	
Item #	**Proposal Document**	**Delivery and Format**
1.	Proposal Fee	An electronic funds transfer or wire payable to the "Independent Electricity System Operator" in the amount of **$11,300** per Proposal (the "**Proposal Fee**"), which fee is inclusive of HST. A Proponent submitting multiple Proposals must submit the Proposal Fee separately for each Proposal.

2.	LT2(e-1)PF-EB100 - Prescribed Form: Economic Bid Statement (Energy)	The proposed Fixed Price (in $ per MWh) shall be submitted by the Proponent in its Proposal and will be the subject of the price evaluation under the LT2(e-1) RFP. In its Economic Bid Statement, the Proponent may, but is not obligated to, indicate up to two (2) Proposal PQ Alternates for purposes of the Deliverability Test assessment set out in Section 4.5. All Proponents must submit their proposed Fixed Price (and details of any Proposal PQ Alternates) in the Prescribed Form: Economic Bid Statement (Energy). Proponents are strongly encouraged to use a filename that follows the naming convention: **Unique Project ID [●] LT2(e-1)PF-EB100**.
3.	LT2(e-1)PF-PI100 - Prescribed Form: Proponent Information, Declarations and Workbook (Energy)	All Proponents must submit an electronic copy of the completed Prescribed Form: Proponent Information, Declarations and Workbook (Energy). As a part of this Prescribed Form, Proponents must submit the Proposal Workbook. Proponents are strongly encouraged to use a filename for the Prescribed Form: Proponent Information, Declarations and Workbook that follows the naming convention: **Unique Project ID [●] LT2(e-1)PF-PI100**. Proponents are strongly encouraged to use a filename for the Proposal Workbook that follows the naming: **Unique Project ID [●] LT2(e-1)PF-PW100**
4.	LT2(e-1)PF-AR100 - Prescribed Form: Access Rights Declaration (Energy)	All Proponents must submit an electronic copy of the completed Prescribed Form: Access Rights Declaration (Energy). Except where the Project Site is entirely located on Crown land, as a part of or attached to this Prescribed Form, Proponents must submit electronic copies of a single scale map of the

		Project Site showing the outer boundary of the Project Site. Except where the Project Site is entirely located on Crown land, Proponents must provide evidence of access rights to the Properties included in the Project Site. Proponents must submit one or more parcel registers (or equivalent for lands not registered on the Ontario land titles system) in respect of the Project Site evidencing the registered owner of the Properties included in the Project Site. Except where the Project Site is entirely located on Crown land, where title to one or more Properties included in the Project Site is not in the name of the Proponent (including where title is held by an Affiliate of the Proponent), the Proponent must submit a letter addressed to the IESO signed by the documented title holder of such Properties (or the applicable Governmental Authority, where access to such Properties are controlled by such Governmental Authority) stating that the Proponent has: (i) the contractual right to acquire such Properties; or (ii) contractual rights to build, operate and maintain the Long-Term Energy Project on such Properties, if it is selected as a Selected Proponent. Such title holder's statement shall not otherwise be qualified or conditional. Where the Proposal is in respect of a Crown Land Project, as a part of or attached to this Prescribed Form, the Proponent must submit an MNR Confirmation Letter, a Crown Land Shapefile and an attestation that the Project Site information contained in the Crown Land Shapefile is consistent in all material respects with the Project Site information included in the Proponent's Crown Land Site Report Form. Proponents are strongly encouraged to use a filename that follows the naming convention: **Unique Project ID [●] LT2(e-1)PF-AR100**.
5.	LT2(e-1)PF-CUT100 - Prescribed Form:	If the Project is proposed to be located in whole or in part on Unincorporated Territory, the

	Confirmation of Unincorporated Territory (Energy)	Proponent must submit an electronic copy of the completed Prescribed Form: Confirmation of Unincorporated Territory (Energy). As part of or attached to this form, Proponents must submit a Confirmation of Unincorporated Territory, which must show the seal or certificate of the issuing Land Use Planner from the Ontario Professional Planners Institute. Proponents are strongly encouraged to use a filename that follows the naming convention: **Unique Project ID [●] LT2(e-1)PF-CUT100**.
6.	LT2(e-1)PF-IS100 - Prescribed Form: Evidence of Indigenous Support (Energy)	If the Project Site is proposed to be located in whole or in part on Indigenous Lands, the Proponent must submit an electronic copy of the completed Prescribed Form: Evidence of Indigenous Support (Energy). As a part of this form, Proponents must submit electronic copies of Indigenous Support Confirmation(s) dated no earlier than seven (7) months prior to the RFP Effective Date. Proponents are strongly encouraged to use a filename that follows the naming convention: **Unique Project ID [●] LT2(e-1)PF-IS100**.
7.	LT2(e-1)PF-MS100 - Prescribed Form: Evidence of Municipal Support (Energy)	If the Project Site is proposed to be located in whole or in part on Municipal Project Lands, the Proponent must submit an electronic copy of the completed Prescribed Form: Evidence of Municipal Support (Energy). As a part of or attached to this form, Proponents must submit electronic copies of Municipal Support Confirmation(s). Where the Municipal Support Confirmation is in the form of a Municipal Resolution in Support of Proposal Submission, the Municipal Resolution in Support of Proposal Submission must be dated no earlier than seven (7) months prior to the RFP Effective Date.

		Where the Municipal Support Confirmation is in the form of a Blanket Municipal Support Resolution, together with a Blanket MS Confirmation Letter, such Blanket MS Confirmation Letter must be dated no earlier than seven (7) months prior to the RFP Effective Date. Proponents are strongly encouraged to use a filename that follows the naming convention: **Unique Project ID [●] LT2(e-1)PF-MS100**.
8.	LT2(e-1)PF-IP100 - Prescribed Form: Evidence of Indigenous Community Participation (Energy)	If the Proponent is seeking to attain the Rated Criteria Points in Section 4.3(a) and (if applicable) Section 4.3(b), in order to attain such Rated Criteria Points, the Proponent must submit an electronic copy of the completed Prescribed Form: Evidence of Indigenous Community Participation (Energy). As a part of or attached to this Prescribed Form, Proponents must submit electronic copies of one or more organizational charts and securities registers documenting the Economic Interest in the Proponent held by one or more Indigenous Communities. Additionally, where Rated Criteria Points are sought under Section 4.3(b) and the Project Site is not located on Indigenous Lands, this Prescribed Form requires an attestation from an Individual with authority to bind an Indigenous Community whose Economic Interest in the Proponent is included in the Proponent Indigenous Participation Level, that the Project Site includes lands that are within the Indigenous Community's established or asserted traditional territory or homeland or are the subject of a treaty signed with the Indigenous Community. Proponents are strongly encouraged to use a filename that follows the naming convention: **Unique Project ID [●] LT2(e-1)PF-IP100**.

(ii) The email submission made to LT2.RFP@ieso.ca must contain all Proposal documents identified in Section 3.7(c)(i) and should utilize the following naming convention in its email subject line: "**LT2(e-1) Unique Project ID [●] Submission**".

(iii) The Proposal documents that are required to be submitted to the IESO in electronic format in accordance with Section 3.7(c)(i) must be received by the IESO in the LT2.RFP@ieso.ca inbox by no later than the Proposal Submission Deadline. Proponents are solely responsible for their technology and the transmission of the Proposal submission (including the full amount of the Proposal Fee). The IESO shall utilize the time stamp generated at the time of receipt into the LT2.RFP@ieso.ca inbox.

Any delays due to firewalls, technical faults, file size, unreadable or partial scans of compiled documents, forms or attachments, electronic funds transfers, or a high volume of Proposals will not be taken into account. This time stamp (being the time that the email is received by the IESO) will be the sole determinant of whether electronic Proposal documents were received prior to the Proposal Submission Deadline. For clarity, the IESO will not be responsible for late deliveries, deliveries to the incorrect email address or location or other electronic delivery failures. Proposal documents submitted after the Proposal Submission Deadline will not be accepted. Due to limitations on the size of electronic delivery of emails to the LT2.RFP@ieso.ca email of twenty (20) megabytes, Proponents may submit their Proposal documents through multiple emails. Proponents are advised that the IESO's firewall may reject emails containing attachments when originating from certain public email platforms such as gmail.com; yahoo.com; hotmail.com; msn.com; sympatico.ca; rogers.com and similar public email systems. Proponents are strongly encouraged to utilize email systems operating on private servers for the electronic submission of Proposal materials.

For further clarity, if any email containing Proposal documents is shown to have been received in the LT2.RFP@ieso.ca inbox or payment of Proposal Fees are received in IESO's bank account at anytime after the Proposal Submission Deadline, the entire Proposal will be rejected and the Proposal will no longer be considered in this LT2(e-1) RFP process. Except as provided in Section 3.7(e)(iii), the Proposal Fee will be non-refundable. **Proponents are strongly encouraged to submit their Proposals and payments sufficiently in advance of the Proposal Submission Deadline to avoid any unforeseen delays in electronic delivery or processing of payments.**

(iv) Payment for the Proposal Fee must be sent to the following bank account:

Beneficiary:	Independent Electricity System Operator
Beneficiary Address:	1600-120 Adelaide St West, Toronto ON M5H 1T1
Bank:	The Toronto-Dominion Bank
Bank Address:	55 King St West, Toronto ON M5K 1A2
Bank ID:	004
Transit No.:	10202
Account No.:	0690-5618464
Swift Code:	TDOMCATTTOR

In order to ensure that Proposal Fee deposited by the Proponent is identified and correctly applied, the electronic funds transfer or wire should include a deposit reference identifier in the form of the Unique Project ID. After making the payment, an email must be sent to LT2.RFP@ieso.ca with a copy to ieso.treasury@ieso.ca with the following information: (a) Proponent name; (b) the Unique Project ID; (c) expected deposit date; and (d) amount of Proposal Fee deposited. Proponents are reminded that any bank wiring or electronic funds transfer fees (or equivalent) must be taken into account and Proponents are responsible to ensure that the full amount of the Proposal Fee is received by the IESO (net of any banking or transfer fees) by the Proposal Submission Deadline.

Any electronic funds transfers in the manner other than that described in this Section 3.7(c)(iv) will not be taken into account, except at the IESO's Discretion.

(d) *Hard Copy Submission Requirements*

(i) In addition to the electronically submitted documents identified in Section 3.7(c)(i), a Proponent must provide the following Proposal documents in hard copy submission to the IESO's address provided in Section 3.7(d)(iii) prior to the Proposal Submission Deadline:

HARD COPY PROPOSAL REQUIREMENTS	
Proposal Document	**Delivery and Format**
Proposal Security	One original hard copy of the Proponent's Proposal Security in the amount specified in Section 3.7(d)(ii), which should be contained in a separate, opaque and

	sealed envelope marked "**Proposal Security**" and with the Unique Project ID.

(ii) The amount of Proposal Security (which shall be converted into Completion and Performance Security upon execution of the LT2(e-1) Contract) shall be thirty-five thousand Dollars ($35,000) per MW of Contract Capacity (with MW rounded to two decimal places in the event of partial MW), subject to a minimum total amount of five hundred thousand Dollars ($500,000) and a maximum of fifteen million Dollars ($15,000,000).

(iii) Proposal documents required to be submitted to the IESO in hard copy format shall be delivered to the address below:

Independent Electricity System Operator
120 Adelaide Street West, Suite 1600
Toronto, ON M5H 1T1
Attention: LT2(e-1) RFP

(iv) The Proposal documents that are required to be submitted to the IESO in hard copy format in accordance with Section 3.7(d)(i) must be received by the IESO in a single envelope, specific to each individual Proposal, prior to the Proposal Submission Deadline. The IESO shall create a time stamp upon receipt of the hard copy materials and provide the Proponent a record of such time stamp. This time stamp will be the sole determinant of whether hard copy Proposal documents were received prior to the Proposal Submission Deadline.

(v) Proponents are encouraged to submit a cover letter with each hard copy of the Proposal Security that clearly identifies the Proponent's name, Unique Project ID and Long-Term Energy Project's name to which the enclosed Proposal Security relates. Proponents are encouraged to affix a label to the outside of any hard copy submission package, specific to each individual Proposal, that clearly indicates the Proponent's name and address along with the IESO's mailing address (the "**Proposal Submission Label**"). The form of the Proposal Submission Label has been provided in APPENDIX C to this LT2(e-1) RFP.

(e) *Amendment, Withdrawal or Non-Submission of Proposals*

(i) Proposals cannot be amended once submitted.

(ii) At any time prior to the Proposal Submission Deadline, a Proponent may withdraw a submitted Proposal by emailing notice of such withdrawal in the Prescribed Form: Notice of Proposal Withdrawal (Energy) to the IESO at LT2.RFP@ieso.ca and, provided that such Prescribed Form: Notice of Proposal Withdrawal (Energy) is received by the IESO prior to the Proposal Submission Deadline, the entire Proposal described therein shall be deemed to have been withdrawn.

(iii) If a Proponent withdraws a Proposal prior to the Proposal Submission Deadline, the IESO will not process such Proposal and will return such Proposal, including the Proposal Fee to the Proponent.

(iv) Subject to Section 3.7(a), the IESO will not process more than one Proposal with the identical Proponent name unless it is in relation to separate Long-Term Energy Projects. If the IESO receives multiple Proposals from the same Proponent and in respect of the same Long-Term Energy Project and no corresponding Prescribed Form: Notice of Proposal Withdrawal (Energy) indicating whether any one of such Proposals has been withdrawn, the IESO will not process either Proposal and will return each Proposal, including the Proposal Fee and Proposal Security, to the Proponent.

(v) If a Proponent makes payment of the Proposal Fee but does not submit a Proposal prior to the Proposal Submission Deadline, the IESO will return such Proposal Fee to the prospective Proponent.

(f) *Irrevocability*

(i) Proposals shall be irrevocable in the form submitted by the Proponent from the Proposal Submission Deadline until 3:00 P.M. (EPT) on the one hundred and eightieth (180th) day after the Proposal Submission Deadline or for such longer period as agreed to from time to time pursuant to the provisions of this Section 3.7(f) (the "**Period of Irrevocability**").

(ii) If the IESO wishes to extend the Period of Irrevocability, the IESO shall submit a request prior to the expiry of the Period of Irrevocability to those Proponents whose Proposals are, at the time of the request, still being considered in the evaluation process. A Proponent may, in its discretion, consent to extend its Period of Irrevocability and, in such case, must notify the IESO of such intent within five (5) Business Days after such request was made.

(iii) If a Proponent does not respond to the request within five (5) Business Days or refuses to extend the Period of Irrevocability, the

Proponent's Proposal shall continue to be irrevocable in accordance with its original Period of Irrevocability.

(iv) If the IESO determines in its Discretion that it will be unable to award contracts prior to the expiration of the applicable Period of Irrevocability, it will, after the expiration of the Period of Irrevocability, cease to consider the Proposal(s) of a Proponent who has refused the IESO's request to extend its Period of Irrevocability. The IESO will continue to evaluate Proposals of those Proponents who have consented to an extension to their Period of Irrevocability and award contracts, if at all, only to such remaining Proponents.

3.8 Notification of Selected Proponents and Other Proponents

(a) *Selected Proponents*

(i) Once Selected Proposals are chosen by the IESO, the IESO will notify the Selected Proponents in writing of the selection, and will notify the other Proponents that were not chosen by the IESO in accordance with Section 3.8(b).

(ii) The IESO may, prior to the financial market opening in Toronto, Ontario, in accordance with the Schedule, make a public announcement of such selection, noting that such selection is subject to the successful completion and execution of the LT2(e-1) Contract and related closing documents. The IESO will forward to the Selected Proponent(s) a copy of the LT2(e-1) Contract and those related closing documents prepared by the IESO for completion and execution by the Selected Proponents, and the date that the LT2(e-1) Contract and such closing documents are sent by the IESO to the Selected Proponents is referred to as the "**LT2(e-1) Contract Receipt Date**".

(iii) The Selected Proponents must, within twenty (20) Business Days after the LT2(e-1) Contract Receipt Date,

(A) authorize the IESO to convert and maintain the Proposal Security to be held as Completion and Performance Security, and

(B) execute and deliver the LT2(e-1) Contract together with all related closing documents required by the IESO (including certificates of status or equivalent).

For greater certainty, it is the Selected Proponent who must execute and deliver the LT2(e-1) Contract, and the Selected Proponent may not substitute or propose to substitute another party in its place.

(iv) Should any Selected Proponent fail to execute and deliver the LT2(e-1) Contract and all related closing documents required by the IESO within the required timeframes in respect of any Selected Proposals, such Selected Proponents will be in breach of this LT2(e-1) RFP with respect to such Proposals and the IESO may, in its Discretion, disqualify such Selected Proposals, draw upon the Proposal Security, and/or disqualify any or all other Selected Proposals submitted by the same Selected Proponent, which remedies shall be the sole and exclusive remedies of the IESO as a result of such Selected Proponent's breach of this LT2(e-1) RFP.

(v) Once the required Completion and Performance Security and the executed LT2(e-1) Contract and all related closing documents have been delivered to the IESO by the Selected Proponents, the IESO will coordinate, in consultation with the applicable Selected Proponents, further public announcements concerning the Long-Term Energy Project.

(b) *Other Proponents*

(i) The IESO will notify a Proponent whose Proposal did not become a Selected Proposal, either:

(A) after the evaluation for Stage 1 has concluded for all Proponents, that a Proponent's Proposal has failed to satisfy the Stage 1 completeness requirements set out in Section 4.1; or

(B) after Selected Proponents are notified pursuant to Section 3.8(a), that successful Proponents have been selected by the IESO as Selected Proponents and that the LT2(e-1) RFP process has concluded,

and that, in either case, they were not selected by the IESO under this LT2(e-1) RFP and such decision is final and binding.

3.9 Debriefing

(i) Any Proponent whose Proposal did not become a Selected Proposal may request a debriefing after being notified of their status.

(ii) The IESO will hold a single debriefing meeting for each Proponent in which they can discuss their rejected Proposal. Requests must be made in writing through LT2.RFP@ieso.ca email address and must be made within thirty (30) days of such notification. The intent of the debriefing session is to assist the Proponent in presenting a better proposal in subsequent procurement opportunities.

(iii) Any debriefing provided is not offered for the purpose of providing an opportunity to challenge this LT2(e-1) RFP procurement process.

3.10 Confidentiality

(a) Information provided by a Proponent is subject to, and may be released in accordance with, the provisions of the *Freedom of Information and Protection of Privacy Act* (Ontario), as amended from time to time. A Proponent is required to clearly identify any portion of any Proposal that contains proprietary or confidential information by marking it as "Proprietary and Confidential". Only those portions of a Proposal that are marked as "Proprietary and Confidential" will be accorded confidential treatment by the IESO in accordance with this Section 3.10.

(b) The confidentiality of any such information identified by the Proponent will be maintained by the IESO, except where Laws and Regulations, a request by the Information and Privacy Commissioner, a court, legislative committee or a tribunal requires the IESO to do otherwise. Notwithstanding the foregoing, the IESO shall not be required to maintain the confidentiality of any such information that:

(i) is or becomes generally available to the public without fault or breach on the part of the IESO of any duty of confidentiality owed by the IESO to the Proponent or to any third party;

(ii) the IESO can demonstrate that it had been rightfully obtained by the IESO, without any obligation of confidence, from a third party that had the right to transfer or disclose it to the IESO free of any obligation of confidence;

(iii) the IESO can demonstrate that it had been rightfully known by, or in the possession of, the IESO at the time of disclosure, free of any obligation of confidence when disclosed; or

(iv) has been independently developed by the IESO.

(c) Information contained in Proposals will, as deemed necessary by the IESO, be disclosed on a confidential basis, to the Evaluation Team, the IESO, the Government of Ontario, the Fairness Advisor, the IESO's counsel and other advisors retained in connection with the LT2(e-1) RFP and in the evaluation of the Proposals.

(d) All information provided by or obtained from the IESO in any form in connection with this LT2(e-1) RFP is the sole property of the IESO and must be treated as confidential, and:

(i) is not to be used for any purpose other than replying to this LT2(e-1) RFP;

(ii) must not be disclosed without the prior written authorization of the IESO; and

(iii) shall be returned by the Proponent to the IESO immediately upon the request of the IESO.

3.11 Disclosure of Proponents

Notwithstanding Section 3.10, the IESO may choose to publish or otherwise disclose all or any part of the following information regarding the Proposals subsequent to notifying all successful and unsuccessful Proponents or following the completion of this LT2(e-1) RFP:

(a) Proponent Name;

(b) applicable Long-Term Energy Project and its Contract Capacity;

(c) average or individual Fixed Prices or other aggregate pricing information;

(d) the location of proposed Project Sites; and

(e) the Indigenous Communities that hold Economic Interest in a Proponent (including through an Indigenous Holding Vehicle).

The IESO may make such disclosure on an individual basis, or as aggregated with information provided by other Proponents.

SECTION 4 – PROPOSAL EVALUATION

The evaluation of Proposals will be conducted by the IESO in five distinct stages as follows:

4.1 Stage 1 – Completeness Requirements

In Stage 1, each Proposal will pass or fail depending on whether the Proposal is complete and contains all documents, forms and declarations required by Section 3.7 of this LT2(e-1) RFP.

All Proposals must be complete in all respects at the time of submission. If a Proposal would otherwise fail the Stage 1 completeness review as a result of a manifest error or deficiency on a submitted Prescribed Form, such as a missing date, name, signature or a typographical error (and not, for certainty, a failure to pay the Proposal Fee, a failure to deliver the Proposal Security as required by Section 3.7 or a failure to submit a Prescribed Form in its entirety that is required by Section 3.7), the IESO may, in its Discretion, issue a rectification notice identifying a perceived deficiency and in such case will provide the Proponent a single opportunity to rectify the perceived deficiency and submit the applicable corrected or completed materials within the time period specified by the IESO in such notice.

For greater certainty, a failure by a Proponent to complete a Prescribed Form for the purposes of having their Rated Criteria evaluated shall not fail the Stage 1 completeness review as a result of such failure, and such failure will only result in a failure to be awarded the applicable Rated Criteria Points.

4.2 Stage 2 – Mandatory Requirements

In Stage 2, each Proposal will pass or fail depending on whether, based on the information provided in the Proposal, the Proposal meets the following mandatory requirements (the "**Mandatory Requirements**"):

(a) the Proponent satisfies the Team Member Experience requirements specified in Section 2.1(a);

(b) the Proponent is a single Person in accordance with Section 2.1(b);

(c) the Long-Term Energy Project meets the eligibility requirements specified in Section 2.1, including:

(i) if the Project Site is proposed to be located in whole or in part on Municipal Project Lands or on Indigenous Lands, a Pre-Engagement Confirmation Notice has been delivered in accordance with Section 2.1(c)(iii);

(ii) if the Project Site is proposed to be located in whole or in part on Indigenous Lands, the Proposal includes an Indigenous Support Confirmation in accordance with Section 2.1(c)(iv);

(iii) if the Project Site is proposed to be located in whole or in part on Municipal Project Lands, the Proposal includes Municipal Support Confirmation in accordance with Section 2.1(c)(v);

(iv) if the Project Site is proposed to be located in whole or in part on Crown land, the Proposal includes an MNR Confirmation Letter and a Crown Land Shapefile in accordance with Section 2.1(c)(vi);

(v) if the Project Site is proposed to be located in whole or in part on Unincorporated Territory, the Proposal includes a Confirmation of Unincorporated Territory in accordance with Section 2.1(c)(vii);

(vi) that the Project Site is not located on Specialty Crop Areas in accordance with Section 2.1(d)(i);

(vii) where the Long-Term Energy Project is a Non-Rooftop Solar Project, the Project Site does not include any lands located in areas designated as Prime Agricultural Area in accordance with Section 2.1(d)(ii);

(viii) that it may not be the subject of a Connection Impact Assessment (whether issued or pending) that has not been rescinded and permanently revoked as of the time of Proposal submission in accordance with the requirements of Section 2.1(e); and

(ix) the Long-Term Energy Project satisfies the Connection Point Requirements.

(d) the Proposal is for a Long-Term Energy Project with a Nameplate Capacity equal to or larger than one (1) MW and, where the Long-Term Energy Project utilizes natural gas to generate electricity, with a Nameplate Capacity that does not exceed forty-five (45) MW, which can be registered as a *registered facility* under the Market Rules;

(e) the Proposal is within the Proponent Group Limit set out in Section 3.7(a);

(f) the Proponent is either the registered owner of the Project Site or has submitted the requisite confirmation letter(s) from the registered owner(s) of the Properties included in the Project Site or, if applicable, an MNR Confirmation Letter in accordance with the requirements of Section 3.7(c)(i); and

(g) where the Proposal is for a Crown Land Project, the Project Site (and the Project Site of any associated Proposal PQ Alternate(s)), as reflected in the Crown Land Shapefile(s) submitted in accordance with Section 2.1(c)(vi) does not overlap with or use any of the same Crown lands as any AOR Held Lands for which the Proponent is not the Applicant of Record.

For greater certainty, the determination of whether such Mandatory Requirements are met will be based on the Proposal materials contained solely in the submission documents as set out in Section 3.7(c)(i) and, in the case of Crown Land Projects, review of mapping tools and reference materials in respect of AOR Held Lands from the Ontario Ministry of Natural Resources. Proposals that do not demonstrate that the Proponent satisfies the Mandatory Requirements set out in this Section 4.2 will not be evaluated further and will be rejected. Notwithstanding the foregoing, if a Proposal is for a Crown Land Project and the proposed Project Site (or the Project Site of any associated Proposal PQ Alternate) is determined, from review by IESO or its consultant of the Crown Land Shapefile(s), to overlap with or use any of the same Crown lands as any AOR Held Lands for which the Proponent is not the Applicant of Record, but an associated Proposal PQ Alternate does not overlap with or use any such same Crown lands, the Proposal will continue through the subsequent stages of evaluation only in respect of such Proposal PQ Alternate(s).

4.3 Stage 3 – Rated Criteria

All Proposals that have passed Stage 1 and Stage 2 shall have their Rated Criteria evaluated by the IESO. The IESO will assign "**Rated Criteria Points**" to such Proposals as set out

in this Section. There shall be a maximum of twelve (12) possible Rated Criteria Points awarded to any Proposal. The Rated Criteria to be used by the IESO are as follows:

(a) *Proponent Indigenous Participation Level*

Rated Criteria Points available	**Indigenous Community Participation**
3	If the Proponent Indigenous Participation Level is equal to or more than fifty percent (50%).
2	If the Proponent Indigenous Participation Level is equal to or more than twenty-five percent (25%) but less than fifty percent (50%).
1	If the Proponent Indigenous Participation Level is equal to or more than ten percent (10%) but less than twenty-five percent (25%).
0	If the Proponent Indigenous Participation Level is less than ten percent (10%).

(b) *Local Indigenous Community Participation*

If Rated Criteria Points were awarded pursuant to Section 4.3(a) and the Project Site is located in whole or in part on:

(i) Indigenous Lands; or

(ii) lands within the treaty area, or the established or asserted traditional territory or homeland of an Indigenous Community that holds an Economic Interest in the Proponent of at least ten percent (10%) and is included in the Proponent Indigenous Participation Level (including through an Indigenous Holding Vehicle, if applicable), as evidenced by an attestation from an Individual with authority to bind that Indigenous Community,

the following additional Rated Criteria Points shall be awarded to such Proposal:

Rated Criteria Points available	**Local Indigenous Community Participation**

3	If the Proponent Indigenous Participation Level is equal to or more than fifty percent (50%).
2	If the Proponent Indigenous Participation Level is equal to or more than twenty-five percent (25%) but less than fifty percent (50%).
1	If the Proponent Indigenous Participation Level is equal to or more than ten percent (10%) but less than twenty-five percent (25%).
0	If the Proponent Indigenous Participation Level is less than ten percent (10%).

(c) Project Site Located in the Northern Zone

Rated Criteria Points available	**Location in Northern Zone**
3	If the Project Site is located within the Northern Zone.
0	If the Project Site is not located within the Northern Zone.

(d) Project Site Not Located in Prime Agricultural Area

Rated Criteria Points available	**Project Site Not Located in Prime Agricultural Area**
3	If the Project Site does not include lands that are located in a Prime Agricultural Area.
0	If the Project Site includes lands that are located in a Prime Agricultural Area.

4.4 Stage 4 – Review of Economic Bid Statement

(a) All of the Proposals that have passed Stage 2 and have had their Rated Criteria evaluated by the IESO in Stage 3, will have their Economic Bid Statement reviewed.

(b) *Proposal Weighted Average Price and Proposal Average Capacity*

(i) Where a Proposal includes one or more Proposal PQ Alternates, a weighted average of the proposed Fixed Price for a Proposal (the "**Proposal Average Price**") shall be calculated as the weighted average, based on Expected Annual Imputed Production, of the Fixed Price submitted for the Primary Proposal PQ and all Proposal PQ Alternates in respect thereof and an average Contract Capacity among the Primary Proposal PQ and any Proposal PQ Alternates in respect thereof (the "**Proposal Average Capacity**") shall be calculated.

(ii) If the Proposal does not include a Proposal PQ Alternate, the Proposal Average Price for such Proposal shall be equal to the Fixed Price submitted for the Primary Proposal PQ and the Proposal Average Capacity shall be equal to the single proposed Contract Capacity.

(c) Subject to Section 5.10(m), all Primary Proposal PQs and Proposal PQ Alternates whose proposed Fixed Price exceeds the weighted average, based on Expected Annual Imputed Production, calculated using the Proposal Average Capacity in respect of the proposed Contract Capacity for each Proposal, of the Proposal Average Price of all Proposals by more than forty percent (40%) will not be evaluated further and will be rejected.

(d) *Evaluated Proposal Price and Ranking*

(i) All Proposals and any associated Proposal PQ Alternates other than those rejected under Section 4.4(c), shall have their proposed Fixed Price evaluated using the Rated Criteria Points to calculate the "**Evaluated Proposal Price**".

(ii) The Evaluated Proposal Price shall only be used by the IESO to rank the Proposal (and any associated Proposal PQ Alternates). Such Evaluated Proposal Price shall not impact the pricing under the LT2(e-1) Contract, which shall be based on the proposed Fixed Price.

(iii) The Evaluated Proposal Price will be calculated using the following formula:

EPP = SP × (1 - (ECW × (S / MS)) – (CSP × 0.02))	
where:	
EPP	is the Evaluated Proposal Price (in $ per MWh).

SP	is the Submitted Price which shall be equal to the proposed Fixed Price set out in the Prescribed Form: Economic Bid Statement (Energy).
ECW	is the evaluation criteria weighting, which set at 0.20.
S	is equal to the total Rated Criteria Points awarded to the Proposal under Stage 3.
MS	is the maximum possible Rated Criteria Points available under Stage 3, which shall be twelve (12) points.
CSP	is the value of 1.0 if the Proponent constitutes, and has optionally self-identified as, a Canadian-Status Proponent in its Proposal, and in all other cases is equal to 0.

(iv) Proposals (including any associated Proposal PQ Alternates) will be ranked in order of their Evaluated Proposal Price, with the lowest Evaluated Proposal Price receiving the highest priority, the second lowest Evaluated Proposal Price receiving the second highest priority, and so on until all of the Proposals (and Proposal PQ Alternates) have been ranked according to their Evaluated Proposal Price. The outcome of this ranking will create a preliminary list (the "**Preliminary List**").

(v) In the event of an equivalent Evaluated Proposal Price between two or more Proposals (or Proposal PQ Alternates), the order ranking within the Preliminary List shall be determined by giving the higher ranking to the Proposal (or Proposal PQ Alternate) with the higher Annual Average Imputed Production Factor and a lower ranking to the Proposal (or Proposal PQ Alternate) with a lower Annual Average Imputed Production Factor.

(vi) In the event that multiple Proposals or Proposal PQ Alternates within the Preliminary List have the same Evaluated Proposal Price and the same Annual Average Imputed Production Factor, the order ranking between such Proposals will be randomly generated, which will be witnessed and documented by the Fairness Advisor.

4.5 Stage 5 – Deliverability Assessment

(a) The deliverability in respect of the Long-Term Energy Project, for Proposals that are included in the Preliminary List, will be assessed by the IESO in accordance with the IESO's methodology for determining the deliverability status as outlined in the latest version of the deliverability test guidance document published on the Website (the "**Deliverability Test**"), based on their ranking within the Preliminary List.

(b) Each Proponent acknowledges and agrees that the Deliverability Test results are distinct from, and in addition to, any Connection Impact Assessment, System Impact Assessment or Customer Impact Assessment required pursuant to Laws and Regulations. Neither the Deliverability Test results, nor any exercise of IESO's Discretion as described in Section 2.1(f)(iv), as applicable, ensure the ability to connect a Long-Term Energy Project or at any assumed cost.

(c) If the Deliverability Test result for a Proposal on the Preliminary List is "Deliverable", subject to Section 4.5(f), such Proposal will be processed and added to the "**Offer List**" and all alternate Proposal PQ Alternates for such Proposal will be removed from the Preliminary List.

(d) If the Deliverability Test result for a Proposal on the Preliminary List is "Not Deliverable", such Proposal will not be processed further and will be removed from the Preliminary List. Notwithstanding the foregoing, any Proposal PQ Alternates in respect of such Proposal will remain on the Preliminary List and will be evaluated in their ranked order. If a Proposal PQ Alternate is subsequently added to the Offer List any further Proposal PQ Alternate in respect of such Proposal will be removed from the Preliminary List.

(e) Proposals will only be added to the Offer List until such point where, subject to Section 4.5(f) and Section 5.10(l), the addition of a Proposal from the Preliminary List causes the aggregate Expected Annual Imputed Production of the Proposals on the Offer List to meet or exceed the Total Target Annual Energy, following which no further Proposals from the Preliminary List shall be added to the Offer List.

(f) In the event that multiple Proposals (or Proposal PQ Alternates) on the Preliminary List are Crown Land Projects, before adding any such Proposal (or Proposal PQ Alternate) to the Offer List, the IESO will (or will cause its consultant to) utilize the Crown Land Shapefile for each such Crown Land Project to identify any instances in which the proposed Project Site for such Proposal (or that of any of its Proposal PQ Alternates) overlaps with or uses the same lands as the proposed Project Site of any other Crown Land Projects (or that of any Proposal PQ Alternates) on the Preliminary List (any such Proposals, "**Conflicting Crown Land Proposals**"). In the event of any Conflicting Crown Land Proposals on the Preliminary List, where any such Conflicting Crown Land Proposal (or any associated Proposal PQ Alternate) is to be added to the Offer List pursuant to Section 4.5(c), any Proposal that is a Conflicting Crown Land Proposal with such Proposal that is ranked lower on the Preliminary List will not be evaluated further and will be rejected, provided that in the event any Proposal PQ Alternate in respect of such rejected Conflicting Crown Land Proposal does not overlap with the Project Site of the Proposal (or Proposal PQ Alternate) being added to the Offer List, such Proposal PQ Alternate of the rejected Conflicting

Crown Land Proposal will remain on the Preliminary List and will be evaluated in its ranked order.

4.6 Selected Proponent

Any Proponent whose Proposal is included on the Offer List shall be a "**Selected Proponent**" and shall be required to enter into an LT2(e-1) Contract as described in Section 2.2 in respect of the applicable Proposal(s), and to carry out the provisions of the LT2(e-1) Contract.

SECTION 5 – ADDITIONAL TERMS AND CONDITIONS

5.1 General Terms and Conditions

(a) For the purpose of determining time of receipt of any submission, the clock at the prescribed location for submission shall govern.

(b) The onus remains solely with the Proponent to deliver submissions as specified in this LT2(e-1) RFP by the relevant deadline.

5.2 LT2(e-1) RFP Documents

(a) The following materials form part of, and are incorporated into, this LT2(e-1) RFP:

(i) the body of this LT2(e-1) RFP and all Appendices;

(ii) any Addenda; and

(iii) all Prescribed Forms.

(b) Any conflict or inconsistency between this LT2(e-1) RFP, the Prescribed Forms, the Appendices, or Addenda, if any, shall be resolved by interpreting the documents and information in the following order from highest priority to lowest priority:

(i) Addenda;

(ii) the body of this LT2(e-1) RFP and APPENDIX A;

(iii) other Appendices to this LT2(e-1) RFP; and

(iv) Prescribed Forms.

(c) All other information and materials are provided for information purposes only, do not form part of this LT2(e-1) RFP and are not binding on the IESO.

(d) In the event of any conflict or inconsistency between the terms of this LT2(e-1) RFP and the Proposal, this LT2(e-1) RFP shall govern over the Proposal to the extent of any conflict or inconsistency.

(e) Once the LT2(e-1) Contract is executed, the LT2(e-1) Contract will govern over this LT2(e-1) RFP.

5.3 Compliance

If, in the Discretion of the IESO, a Proposal does not comply with the requirements set out in this LT2(e-1) RFP, the IESO may, without liability, cost or penalty, disqualify the Proposal and the Proposal shall not be given any further consideration. For purposes of this LT2(e-1) RFP, "comply" means that the Proposal conforms to the requirements of this LT2(e-1) RFP without Material Deviation.

For the purpose of clarity, each Proponent acknowledges and agrees that the IESO's evaluation of compliance with this LT2(e-1) RFP is not an evaluation of absolute compliance and that the IESO may waive failures to comply that, in the IESO's Discretion, do not constitute a Material Deviation.

5.4 Return of Proposal Security

(a) For each Proponent whose Proposal does not pass any of the stages set out in Section 4 of this LT2(e-1) RFP, the applicable Proposal Security will be returned to the address provided on the Proposal Submission Label within ten (10) Business Days of the Proponent being notified by the IESO that their Proposal did not pass any of the stages set out in Section 4 of this LT2(e-1) RFP or that their Proposal was otherwise rejected.

(b) For the Selected Proposal(s), the Selected Proponent is required to authorize the IESO to convert the Proposal Security into Completion and Performance Security, which will be retained by the IESO for purposes of the LT2(e-1) Contract.

5.5 Participation Costs

(a) Each Proponent will bear all costs and expenses in connection with its participation in this LT2(e-1) RFP, including any costs incurred in the review of this LT2(e-1) RFP and any expert advice required in responding to this LT2(e-1) RFP.

(b) The IESO and its advisors shall not be liable to pay any Proponents costs under any circumstances. In particular, the IESO will not reimburse the Proponents in any manner whatsoever in the event of rejection or disqualification of any or all Proposals or in the event of the cancellation of this LT2(e-1) RFP for any reason.

(c) Subject to Section 5.6, by submitting any submission in response to this LT2(e-1) RFP, the Proponent irrevocably and unconditionally waives any claims against the IESO and its advisors relating to the Proponent's costs and expenses.

5.6 Material Breach of this LT2(e-1) RFP

Each Proponent agrees that, if the IESO commits a material breach of this LT2(e-1) RFP, the IESO's liability to the Proponent, and the aggregate amount of damages recoverable against the IESO for any matter relating to or arising from that material breach, whether based upon an action or claim in contract, warranty, equity, negligence, intended conduct or otherwise, including any action or claim arising from the acts or omissions, negligent or otherwise, of the IESO, shall be no greater than the submission preparation costs that the Proponent seeking damages from the IESO can demonstrate and shall in any event not include any lost profits or indirect, punitive or consequential damages.

5.7 Verification

All statements, information and documentation submitted as part of any Proposal are subject to verification and enforcement in accordance with the terms of this LT2(e-1) RFP. If such statements, information or documentation are determined by the IESO to be incorrect or misleading, the IESO reserves the right to re-evaluate the Proposal and the Proponent's status.

5.8 Other Procurement Processes

(a) Participation in this LT2(e-1) RFP shall not preclude participation in any other present or future IESO procurements (provided that all requirements and criteria set out under each such procurement are satisfied).

(b) This LT2(e-1) RFP is not in any way intended to preclude, restrict or otherwise discourage any Proponent from proceeding with the development of facilities or resources outside the scope of the IESO's procurement processes.

5.9 Governing Law

This LT2(e-1) RFP shall be governed by and construed in accordance with the laws of the Province of Ontario and the federal laws of Canada applicable therein. Each Proponent submits to the exclusive jurisdiction of the courts of the Province of Ontario situated in Toronto.

5.10 Reserved Rights

Notwithstanding any other provision of this LT2(e-1) RFP, the IESO reserves the right to:

(a) request written clarification or the submission of supplementary written information from any Proponent and incorporate the response to that request for clarification into the that party's submission;

(b) meet with some or all Proponents to discuss aspects of their submissions;

(c) verify with any Proponent, or with a third party, any information set out in a submission;

(d) contact any party providing financing, including obtaining information on such party whether directly from the party or a third party;

(e) disqualify any Proponent whose submission contains misrepresentations or any other inaccurate or misleading information;

(f) waive any informality or irregularity at the IESO's Discretion;

(g) disqualify any Proponent or the submission of any such party who has engaged in conduct prohibited by this LT2(e-1) RFP;

(h) make changes, including substantial changes, to this LT2(e-1) RFP in the manner set out in this LT2(e-1) RFP;

(i) cancel this LT2(e-1) RFP process at any stage;

(j) cancel this LT2(e-1) RFP process at any stage and issue a new process for the same or similar deliverables;

(k) reject any or all Proposals at the IESO's Discretion;

(l) accept Proposals in excess of the Total Target Annual Energy;

(m) accept any Proposals for which the Fixed Price is in excess of the threshold set out in Section 4.4(c); or

(n) if only one Proposal is received, elect to accept or reject it.

and these reserved rights are in addition to any other express rights or any other rights which may be implied in the circumstances, and the IESO shall not be liable for any expenses, costs, losses or any direct or indirect damages incurred or suffered by any Proponent, or any third party resulting from the IESO exercising any of its express or implied rights under this LT2(e-1) RFP.

By submitting a Proposal, the Proponents authorizes the collection by the IESO of the information set out under Sections 5.10(c), 5.10(d), and 5.10(e) above.

APPENDIX A – GLOSSARY OF TERMS

Addenda	means the documents expressly identified as addenda and issued by the IESO to Proponents in accordance with this LT2(e-1) RFP and "**Addendum**" means any one of such documents.
Affiliate	has the meaning given to it in the LT2(e-1) Contract.
AIA Component One Requirement	means a written notice by way of e-mail delivered by the Proponent to the chief administrative officer or equivalent of an applicable Local Municipality which: (A) acknowledges that the Project Site in respect of a proposed Long-Term Energy Project (other than a Non-Rooftop Solar Project) includes any lands located in areas designated as Prime Agricultural Area as of the delivery of the Pre-Engagement Confirmation Notice; and (B) includes documentation that the Proponent has evaluated alternative locations for its proposed Project Site, as informed by OMAFA Guidance.
AIA Components Two and Three Requirement	has the meaning given to it in the LT2(e-1) Contract.
Annual Average Imputed Production Factor	has the meaning given to it in the LT2(e-1) Contract.
AOR Held Lands	means Crown lands that are the subject of an Applicant of Record Status with the Ontario Ministry of Natural Resources as reflected in mapping tools published or made publicly available by the Ontario Ministry of Natural Resources as of the Proposal Submission Deadline with metadata labeling the Crown lands corresponding to a specific Applicant of Record Status and associated Applicant of Record.
Appendix or Appendices	means the Appendix or Appendices that form part of this LT2(e-1) RFP.
Applicant of Record	means a Person that is the named holder of an Applicant of Record Status in respect of AOR Held Lands by the Ontario Ministry of Natural Resources.

Applicant of Record ID #	Means the reference serial number issued by the Ontario Ministry of Natural Resources identifying Applicant of Record Status (e.g. in the format of "XP-XXXX").
Applicant of Record Status	means a status designated by the Ontario Ministry of Natural Resources via a unique application of record serial number providing for the exclusive opportunity to the status holder thereof to pursue approvals for renewable energy projects on specified Crown lands.
Blanket MS Confirmation Letter	means a letter addressed to the IESO from the chief administrative officer (or equivalent) of each Local Municipality with land use authority over any of Municipal Project Lands that: (A) identifies: (i) the Proponent; (ii) the name, technology and maximum potential Contract Capacity of the Long-Term Energy Project; and (iii) the Municipal Project Lands; (B) states that the Local Municipality supports the submission of the Proposal; (C) confirms that the Proponent has undertaken community and Indigenous engagement activities in respect of the Long-Term Energy Project to the satisfaction of the Local Municipality; (D) confirms whether the Municipal Project Lands are within any Prime Agricultural Areas or Specialty Crop Areas; and (E) confirms, if the Municipal Project Lands are within any Prime Agricultural Areas, that the Proponent has completed the AIA Component One Requirement to the satisfaction of the Local Municipality.
Blanket Municipal Support Resolution	means a resolution or other equivalent instrument signed by or on behalf of the council of the Local Municipality in which the Long-Term Energy Project is proposed to be located that expresses the support of the Local Municipality for the development, construction and operation of: (a) the Long-Term Energy Project; or (b) multiple Long-Term Energy Projects,

	which support for such Long-Term Energy Project(s) must be for purposes of the requirements of: (i) this LT2(e-1) RFP; or (ii) other long-term procurement initiatives of the IESO that are subsequent to the LT2(e-1) RFP, and may be subject to all Laws and Regulations.
Business Day	means a day, other than a Saturday or Sunday or statutory holiday in the Province of Ontario that is listed on the "*Physical and Financial Market Holiday Schedule*" (or any substantially equivalent future schedule) published by the IESO for purposes of the Market Rules, from time to time, but excluding from such statutory holidays Easter Monday, Remembrance Day and National Day for Truth and Reconciliation.
Canadian-Status Proponent	means a Proponent whose registered office and main or head office (if different than its registered office) are located in Canada and, where the Proponent is Controlled by any other Person, the registered office and main or head office (if different than its registered office) or permanent residence (as applicable) of any of the Proponent's Ultimate Controlling Parent(s) are located in Canada.
Capacity Product	has the meaning given to it in the LT2(e-1) Contract.
Circuit	means a designated electrical line that is a part of a Transmission System and that is designated by a number that is recognized in common among the Transmitter and the System Operator.
Commercial Operation Date	has the meaning given to it in the LT2(e-1) Contract.
Commitment Period	has the meaning given to that term in Section 1.2.
Common Corridor Circuits	means Circuits that are parallel to one another and utilize the same, or proximate parallel land-based rights of way, or otherwise start and end at common transmission stations.
Common LDC Feeders	means Feeders that are owned by a common LDC.
Completion and Performance Security	has the meaning given to it in the LT2(e-1) Contract.

Confirmation of Unincorporated Territory	has the meaning given to that term in Section 2.1(c)(vii).
Conflict of Interest	means, without limitation, any situation or circumstance where, in relation to this LT2(e-1) RFP process, the Proponent obtains an unfair advantage or engages in conduct, directly or indirectly, that may allow it to obtain an unfair advantage, including: (i) having or having access to information in the preparation of its Proposal that is confidential to the IESO or the Government of Ontario and that is not available to other Proponents; (ii) communicating with any official or representative of the IESO or the Government of Ontario or members of the Evaluation Team with a view to influencing preferred treatment in this LT2(e-1) RFP process; or (iii) engaging in conduct (including breach of Non-Collusion Requirements) that compromises or could be seen to compromise the integrity of the open and fair LT2(e-1) RFP process and tend to render that process non-competitive and unfair.
Conflicting Crown Land Proposals	has the meaning given to such term in Section 4.5(f).
Connection Impact Assessment	means an assessment conducted by an LDC to determine the impact on the Distribution System of connecting the Long-Term Energy Project to its Distribution System pursuant to the Distribution System Code.
Connection Line	means the electrical connection line (or lines) connecting the Long-Term Energy Project to the Connection Point, including ancillary equipment such as transformers and switchgear.
Connection Point	means, (i) where the Long-Term Energy Project is connected to a Transmission System, the electrical point or points of connection, as defined in the Market Rules, between the Long-Term Energy Project and the *IESO-controlled grid*; and

	(ii) where the Long-Term Energy Project is connected to a Distribution System, the embedded connection point(s), as defined in the Market Rules, between the Long-Term Energy Project and the Distribution System.
Connection Point Requirements	means the requirements set out in Section 2.1(f) of the LT2(e-1) RFP.
Constructing	means prior demonstrable experience in undertaking or overseeing the building, erecting, constructing, installing, testing, start-up and commissioning of an Electricity resource.
Contract Capacity	has the meaning given to it in the LT2(e-1) Contract.
Control	means, with respect to any Person at any time: (a) holding, whether directly or indirectly, as owner or other beneficiary, (other than solely as the beneficiary of an unrealized security interest) securities or ownership interests of that Person carrying votes or ownership interests sufficient to elect or appoint fifty percent (50%) or more of individuals who are responsible for the supervision or management of that Person; or (b) the exercise of de facto control of that Person whether direct or indirect and whether through the ownership of securities or ownership interests, by contract or trust or otherwise, and "**Controls**" or "**Controlled**" has a corresponding meaning.
Control Group Member	means, in respect of any Proponent, an entity that: (a) Controls the Proponent, or (b) is Controlled by the Proponent, or (c) is Controlled by the same entity that Controls the Proponent.
Crown	means His Majesty the King in Right of the Province of Ontario or His Majesty the King in Right of Canada.
Crown Land Project	means a Long-Term Energy Project in respect of which the Project Site is located in whole or in part on provincial Crown land.
Crown Land Shapefile	means a geographic information system shapefile with data in each of .shp, .shx, .dbf and .prj file formats that produces

	a single polygon shape outline of the boundary of the Project Site and, if applicable, a separate single polygon shape outline of the boundary of the Project Site for any Proposal PQ Alternate, displayed on the NAD 83 Ontario MNR Lambert Conical projected coordinate system: EPSG:3161 (NAD83/Ontario MNR Lambert), that is substantially consistent with the content and format of the template crown land shapefile published on the Website.
Crown Land Site Report Form	means a "Crown Land Site Report Form" in the format and as defined by the Ontario Ministry of Natural Resources at https://www.ontario.ca/page/renewable-energy-crown-land.
Customer Impact Assessment	means a study conducted by a Transmitter to assess the impact of the connection of a Long-Term Energy Project on other users of the *IESO-controlled grid*.
Deliverability Test	has the meaning given to it in Section 4.5(a).
Designated Team Member	means an individual who is either a director, officer or an employee of the Proponent or a Control Group Member of the Proponent.
Developing	means prior demonstrable experience in engaging in community and municipal consultations, obtaining site access, obtaining regulatory and environmental approvals and other permits necessary for construction of an Electricity resource, and where the Crown had a duty to consult obligation in the jurisdiction where the prior experience was obtained, undertaking the procedural aspects of consultation with Indigenous communities that are required to support the Crown's duty to consult obligations.
Distribution System	means a system connected to the *IESO-controlled grid* for distributing Electricity at voltages of 50 kilovolts or less, and includes any structures, equipment or other things used for that purpose, provided that a Distribution System shall be deemed not to include any equipment controlled by the IESO pursuant to the Distribution System Code.
Distribution System Code	means the "Distribution System Code" established and approved by the OEB, which, among other things, establishes the obligations of a local distribution company with respect to the services and terms of service to be

	offered to customers and retailers and provides minimum technical operating standards for Distribution Systems.
Discretion	means the sole and absolute discretion of the IESO.
Dollars	means Canadian dollars and cents.
E-LT1 RFP	has the meaning given to that term in Section 1.2(c).
Economic Bid Statement	means the Prescribed Form containing the proposed Fixed Price.
Economic Interest	has the meaning given to it in the LT2(e-1) Contract.
Electrical Safety Authority	means the organization created and described pursuant to O.Reg 89/99 under the Electricity Act.
Electricity	means electric energy.
Electricity Act	means Ontario's *Electricity Act, 1998*, SO 1998, c 15, Sched. A, as amended from time to time.
EPT	means Eastern Prevailing Time.
Evaluated Proposal Price	has the meaning given to that term in Section 4.4(c)(i).
Evaluation Team	means, collectively, the IESO's personnel and advisors (legal or otherwise) who are involved in evaluating Proposals.
Excluded Purposes	has the meaning given to that term in Section 3.5(a)(iii).
Existing Building	means a building or structure that has been designed to be used for the purpose of providing enclosure, shelter or protection to people or property, provided that it is occupied and used in accordance with all Laws and Regulations as of the Proposal Submission Deadline.
Expected Annual Imputed Production	means, for any Facility, the product of multiplying the Annual Average Imputed Production Factor, the Contract Capacity and 8,760 hours.
Facility	has the meaning given to it in the LT2(e-1) Contract.
Fairness Advisor	means the Person who is retained by the IESO to provide (i) independent assurance to Proponents and other stakeholders that the selection and contracting processes are fair and transparent, and (ii) a written statement that attests that the

	procurement process was conducted in an objective and fair manner.
Feeder	means a designated electrical line that is a part of a Distribution System and that is designated by a number that is recognized in common among the LDC and the System Operator.
Financing	means prior demonstrable experience arranging non-recourse project financing, bank financing or on-balance sheet financing sufficient to commence construction.
Fixed Price	has the meaning given to that term in the LT2(e-1) Contract.
Fixed Price Tool (Energy)	means the non-binding illustrative spreadsheet tool published on the Website to assist Proponents in understanding the settlement implications of a proposed Fixed Price, in conjunction with proposed Monthly Imputed Production Factors for purposes of this LT2(e-1) RFP.
First Nation Community	means, for the purposes of this LT2(e-1) RFP, (a) a First Nation located in whole or in part in Ontario that is a "band" as defined in the *Indian Act*, RSC 1985, c I-5, as amended from time to time; or (b) a Person, other than a natural Person, that has been determined by the Government of Ontario (for purposes of this LT2(e-1) RFP) to represent the collective interests of a community that is composed of First Nation natural Persons in Ontario.
Force Majeure Capacity Reduction Factor or FMCRF	has the meaning given to that term in Section 2.2(f).
Governmental Authority	means the Crown, any federal, provincial, or municipal government, parliament or legislature, or any regulatory authority, agency, tribunal, commission, board or department of any such government, parliament or legislature, or any court or other law, regulation or rule-making entity, having jurisdiction in the relevant circumstances, including the IESO, the OEB, the Electrical Safety Authority, and any Person acting under the authority of any Governmental Authority.
GW	means gigawatt.

GWh	means gigawatt hour.
IESO	means the Independent Electricity System Operator.
Indigenous Consultation Information Package	means the document titled "Indigenous Consultation Information Package" issued by the Ministry and published on the Website.
Indigenous Community	means, for the purposes of this LT2(e-1) RFP, a First Nation Community or a Métis Community.
Indigenous Holding Vehicle	means a Person, other than a natural Person, where the Economic Interest in such Person is held, directly or indirectly, solely by one or more Indigenous Communities.
Indigenous Participation Level	has the meaning given to that term in LT2(e-1) Contract.
Indigenous Lands	means: (a) "reserve" land as set out in the *Indian Act*, RSC 1985, c I-5, as amended from time to time; (b) "designated lands" as set out in the *Indian Act*, RSC 1985, c I-5, as amended from time to time; (c) "special reserves" as set out in s. 36.1 of the *Indian Act*, RSC 1985, c I-5, as amended from time to time; (d) fee simple lands that are held in trust for the benefit of a First Nation in Ontario that is a "band" as defined in the *Indian Act*, RSC 1985, c I-5, as amended from time to time, provided that those lands are the subject of an application or proposal by such First Nation to have Canada set the lands apart as reserve lands pursuant to Canada's "Additions to Reserve /Reserve Creation Policy Directive" (2016) or the *Addition of Lands to Reserves and Reserve Creation Act*, SC 2018, c 27, as amended from time to time; (e) Crown land or other lands that Canada has agreed to recommend be set apart as reserve for a First Nation in Ontario that is a "band" as defined in the *Indian Act*, RSC 1985, c I-5, as amended from time to time, in settlement of such First Nation's land claim; or (f) "settlement lands" transferred to the Algonquins of Ontario or its Institutions pursuant to the Algonquins of Ontario Treaty with Canada and Ontario ("**Treaty**"), or otherwise held by the Algonquins of Ontario or its

	institutions pursuant to the Treaty, for the benefit of one or more of the Algonquins of Ontario communities or Treaty beneficiaries.
Indigenous Resolution in Support of Proposal Submission	means a band council resolution (or equivalent) from the Indigenous Community with authority over the applicable Indigenous Lands substantially in accordance with Exhibit A of the Prescribed Form: Evidence of Indigenous Support (Energy) which, among other things, indicates that the Indigenous Community supports the submission of the Proposal and confirms that the Proponent has undertaken community and Indigenous engagement activities in respect of the Long-Term Energy Project to the satisfaction of the Indigenous Community.
Indigenous Support Confirmation	means any of an Indigenous Resolution in Support of Proposal Submission or an Indigenous Support Confirmation Letter.
Indigenous Support Confirmation Letter	means a letter or an instrument addressed to the IESO by one or more individuals authorized by an executed band council resolution of such Indigenous Community which: (A) identifies: (i) the Proponent; (ii) the name, technology and maximum potential Contract Capacity of the Long-Term Energy Project; and (iii) the Indigenous Lands; (B) states that the Indigenous Community supports the submission of the Proposal; and (C) confirms that the Proponent has undertaken community and Indigenous engagement activities in respect of the Long-Term Energy Project to the satisfaction of the Indigenous Community.
Land Use Planner	means an individual who is a member in good standing of the Canadian Institute of Planners and is a registered professional planner in Ontario with the Ontario Professional Planners Institute.
Laws and Regulations	means: (a) applicable Canadian federal, provincial or municipal laws, orders-in-council, by-laws, codes, rules, policies, regulations and statutes; (b) applicable orders, decisions, codes, judgments, injunctions, decrees, awards and writs of any court, tribunal,

	arbitrator, Governmental Authority or other Person having jurisdiction; (c) applicable rulings and conditions of any licence, permit, certificate, registration, authorization, consent and approval issued by a Governmental Authority; (d) any requirements under or prescribed by applicable common law; and (e) the Market Rules, as well as any manuals or interpretation bulletins issued by the IESO from time to time in relation thereto.
LDC	means the owner or operator of a Distribution System who is licensed by the OEB as an "electricity distributor".
Liquidated Damages Rate	has the meaning given to it in the LT2(e-1) Contract.
Local Body Administrator	means (i) in respect of a Local Municipality, the chief administrative officer, or equivalent; or (ii) in respect of Indigenous Lands, one or more individuals with authority to bind the applicable Indigenous Community with authority over the Indigenous Lands.
Local Municipality	means any corporation that is a "local municipality" as defined in and for the purposes of the *Municipal Act, 2001,* SO 2001, c 25 or the *City of Toronto Act, 2006*, SO 2006, c 11, Sched A, both as amended from time to time.
Longstop Date	has the meaning given to it in the LT2(e-1) Contract.
Long-Term Energy Project	has the meaning given to that term in Section 2.1(c)(i).
LT1 RFP	has the meaning given to that term in Section 1.2.
LT2(e-1) Contract	has the meaning given to that term in Section 1.2.
LT2(e-1) Contract Receipt Date	has the meaning given to that term in Section 3.8(a)(ii).
LT2(c) RFP	has the meaning given to that term in Section 1.2.
LT2(e) RFP	has the meaning given to that term in Section 1.2.
LT2(c-1) RFP	has the meaning given to that term in Section 1.2.
LT2(e-1) RFP	has the meaning given to that term in Section 1.2.

Mandatory Requirements	has the meaning given to that term in Section 4.2.
Market Rules	means the rules made under section 32 of the Electricity Act.
Material Deviation	means a deviation from the Proponent's obligations contained in this LT2(e-1) RFP that, in the Discretion of the IESO: (a) affects such party's or the IESO's obligations or rights in any material way; (b) affects the obligations or rights of other Proponents under this LT2(e-1) RFP; or (c) results in a failure to satisfy a material component of any requirement set out in this LT2(e-1) RFP.
Métis Community	means, for the purposes of this LT2(e-1) RFP: (a) the Métis Nation of Ontario or any of its regions or active Chartered Community Councils; or (b) a Person, other than a natural Person, that has been determined by the Government of Ontario (for purposes of this LT2(e-1) RFP) to represent the collective interests of a community that is composed of Métis natural Persons in Ontario.
Ministry	means the Ontario Ministry of Energy and Mines, or any future replacement thereof.
Ministerial Directive	has the meaning given to that term in Section 1.2.
MNR Confirmation Letter	has the meaning given to that term in Section 2.1(c)(vi).
Monthly Imputed Production Factor	has the meaning given to it in the LT2(e-1) Contract.
Municipality	means any corporation that is a "local municipality" or an "upper-tier municipality" as defined in and for the purposes of the *Municipal Act, 2001,* SO 2001, c 25 or the *City of Toronto Act, 2006*, SO 2006, c 11, Sched A, both as amended from time to time.
Municipal Project Lands	means any Properties that are subject to the land use authority of an applicable Local Municipality.

Municipal Resolution in Support of Proposal Submission	means a resolution or other instrument signed by or on behalf of the Local Municipality in which the Long-Term Energy Project is proposed to be located substantially in accordance with the form set out in Exhibit A of the Prescribed Form: Evidence of Municipal Support (Energy) which, among other things, indicates that the Local Municipality supports the submission of the Proposal.
Municipal Support Confirmation	means either: (i) a Municipal Resolution in Support of Proposal Submission; or (ii) a Blanket Municipal Support Resolution provided together with a Blanket MS Confirmation Letter.
MW	means megawatt.
MWh	means megawatt hour.
Nameplate Capacity	has the meaning given to that term in LT2(e-1) Contract.
New Build	means the development and construction of a new Electricity generating or storage facility that is not an Upgrade or Redevelopment.
Non-Collusion Requirements	means requirements that a Proponent under the LT2(e-1) RFP: (a) not coordinate its Proposal with any other Proponent; (b) keep and will continue to keep its Proposal confidential until the conclusion of the LT2(e-1) RFP and selection of the Selected Proposal(s), if any; (c) ensure that no member of the Proponent has entered into any agreement or arrangement with any member of another Proponent which may affect the Proposal submitted by the Proponent or the other Proponent; and (d) not engage in any activity or communication that results in a Conflict of Interest, collusion or a violation of any of the civil or criminal provisions of the *Competition Act*, RSC, 1985, c C-34, as amended from time to time.
Non-Rooftop Solar Project	means a Solar Project that is not a Rooftop Solar Project.

Northern Zone	means the collective Ontario territorial Districts of Kenora, Rainy River, Thunder Bay, Cochrane, Algoma, Sudbury, Timiskaming, Nipissing, Manitoulin and Parry Sound.
OEB	has the meaning given to that term in Section 1.1(b).
Offer List	has the meaning given to that term in Section 4.5(c).
OMAFA	means the Ontario Ministry of Agriculture, Food and Agribusiness, or any future replacement thereof.
OMAFA Guidance	means the documents and materials issued by OMAFA on the Website in respect of agricultural impact assessments or any future equivalent or replacement thereof.
Operating	means prior demonstrable experience operating, monitoring, maintaining, inspecting and repairing an Electricity resource.
Official Plan	means the current official plan of a Local Municipality approved under Section 17 of the Planning Act or that of a planning board established pursuant to Section 10 of the Planning Act.
Period of Irrevocability	has the meaning given to that term in Section 3.7(f)(i).
Permitted Purposes	has the meaning given to that term in Section 3.5(a).
Person	means a natural person, firm, trust, partnership, limited partnership, company or corporation (with or without share capital), sole proprietorship, Governmental Authority or other entity of any kind.
Planning	means prior demonstrable experience preparing, designing, scheduling, engineering and procurement of materials and equipment for an Electricity resource.
Planning Act	means the *Planning Act*, RSO 1990, c P.13, as amended from time to time.
Pre-Engagement Confirmation Notice	means a written notice by way of e-mail or certified mail delivered to an applicable Local Body Administrator as described in the Prescribed Form: Evidence of Municipal Support (Energy) or Prescribed Form: Evidence of Indigenous Support (Energy), as applicable, which, among other things, indicates that the Proponent intends to submit a Proposal under the LT2(e-1) RFP and seeks to confirm

	applicable land-use details in relation to the proposed Project Site (or portion thereof).
Preliminary List	has the meaning given to that term in Section 4.4(c)(iv).
Prescribed Form	means, in relation to a form, the latest version available on the Website of the corresponding form referred to and incorporated in this LT2(e-1) RFP, as may be amended or replaced by the IESO from time to time and without notice to the Proponent.
Primary Proposal PQ	means, for any Proposal that includes a Proposal PQ Alternate or two (2) Proposal PQ Alternates, the portions of the Proposal describing the Long-Term Energy Project with the largest Contract Capacity and the Project Site with the largest area and the corresponding Fixed Price attributable to such largest, primary Long-Term Energy Project (as set out in section 2 of the Prescribed Form: Economic Bid Statement (Energy)).
Prime Agricultural Area	has the meaning given to that term in any Official Plan and includes any substantially similar designation in any Official Plan, or in any substantially similar instrument issued pursuant to the *Northern Services Boards Act*, RSO 1990, c L.28, for agricultural land use designation purposes based on the definition of "Prime Agricultural Area" in the Provincial Planning Statement, 2024.
Project Site	means all Properties on which the proposed Long-Term Energy Project is to be located, excluding any Connection Line.
Property	means a parcel or lot of real property as identified by a Property Identification Number or, in the absence thereof, by another legal description by lot and/or parcel number or similar legal description or by other appropriate description using metes and bounds or GPS coordinates. In the case of provincial Crown land, Property means real property identified by GPS co-ordinates of the Property.
Property Identification Number or PIN	means the property identifier assigned to a property in accordance with the *Registry Act*, RSO 1990, c R.20, s 21(2) or in accordance with the *Land Titles Act*, RSO 1990, c L.5, s 141(2).
Proponent	means the Person that has submitted a Proposal.

Proponent Group Limit	has the meaning given to that term in Section 3.7(a).
Proponent Indigenous Participation Level	means the percentage of the total Economic Interest in the Proponent as of the Proposal Submission Deadline that is held by one or more Indigenous Communities or Indigenous Holding Vehicles that each hold at least ten percent (10%) of the Proponent's total Economic Interest as of the Proposal Submission Deadline, provided that: (i) where the Project Site is proposed to be located in whole or in part on Indigenous Lands and the Proposal includes an Indigenous Support Confirmation as required under Section 2.1(c)(iii), only the Economic Interest of the Indigenous Community that provided such Indigenous Support Confirmation will be included in the Proponent Indigenous Participation Level, including where such Indigenous Community holds its Economic Interest in the Proponent through an Indigenous Holding Vehicle; and (ii) where a Proponent is itself an Indigenous Community, the Proponent Indigenous Participation Level shall be 100%.
Proposal	has the meaning given to that term in Section 3.7(b).
Proposal Average Capacity	has the meaning given to it in Section 4.4(b)(i).
Proposal Average Price	has the meaning given to it in Section 4.4(b)(i).
Proposal Fee	has the meaning given to that term in Section 3.7(c)(i).
Proposal PQ Alternate	means, in respect of a Proposal, a ranked alternative smaller size for the Contract Capacity of the proposed Long-Term Energy Project that: (i) is located within the boundaries of the same identified Project Site as the Primary Proposal PQ; (ii) uses the same Monthly Imputed Production Factors as the Primary Proposal PQ; and (iii) subject to the Connection Point Requirements, uses the same Connection Point (or portion thereof) as the Primary Proposal PQ, with a corresponding proposed alternate Fixed Price.

Proposal Security	means one or more irrevocable and unconditional standby letters of credit issued by a financial institution listed in either Schedule I or II of the *Bank* Act, SC 1991, c 46, as amended from time to time, or such other financial institution having a minimum credit rating of (i) A- with S&P, (ii) A3 with Moody's, (iii) A (low) with DBRS Morningstar, or (iv) A- with Fitch IBCA, in substantially the form attached as Appendix D of the LT2(e-1) RFP or in a form acceptable to the IESO, acting reasonably.
Proposal Submission Deadline	means the Proposal Submission Deadline date and time as set out in the Schedule.
Proposal Submission Label	has the meaning given to that term in Section 3.7(d)(v).
Proposal Workbook	means an electronic copy of, in Microsoft excel format, the provided Proposal workbook forming a part of the Prescribed Form: Proponent Information, Declarations and Workbook (Energy) and containing information regarding the Long-Term Energy Project and the Proponent, including the technology type, fuel source, Project Site, Connection Point, Monthly Imputed Production Factors and the mandatory and rated criteria-related information.
Provincial Planning Statement, 2024	means the 2024 policy statement issued by the Minister of Municipal Affairs and Housing under section 3 of the Planning Act and approved by the Lieutenant Governor in Council via Order in Council No. 1099/2024.
Qualifying Project	means an Electricity generation or storage facility: (A) with a nameplate capacity of at least 1 MW (measured in alternating current in the case of solar powered generation); and (B) that has achieved commercial operation in any jurisdiction in Canada or the United States of America no more than fifteen (15) years prior to the Proposal Submission Deadline.
Question and Comment Deadline	means the Question and Comment Deadline date as set out in the Schedule.
Rated Criteria Points	means the criteria set out in Section 4.3.
Redevelopment	means the substantial replacement of physical infrastructure constituting an existing Electricity resource.

Registrant ID	has the meaning given to that term in Section 3.4(b).
Registration Fee	has the meaning given to that term in Section 3.4(a).
RFP Effective Date	means the RFP Effective Date as set out in the Schedule.
Rooftop Solar Project	means a Solar Project that uses solar photovoltaic generating equipment, the photovoltaic modules of which are (or will be) all integrated into or form part of the wall facing, roof, cover, or other architectural element that forms part of a permanent, Existing Building.
Schedule	has the meaning given to that term in Section 3.1(a).
Selected Proponent	has the meaning given to that term in Section 4.6.
Selected Proposal	means any Proposal which is included on the Offer List.
Specialty Crop Area	has the meaning given to that term in the Provincial Planning Statement, 2024.
Solar Project	means a Long-Term Energy Project that utilizes solar photovoltaic generating technology to generate Electricity that is delivered to the *IESO-controlled grid*.
Supplier	has the meaning given to it in the LT2(e-1) Contract.
System Impact Assessment	means a study conducted by the IESO pursuant to the Market Rules, to assess the impact of a new connection of a generation facility or of the modification of an existing connection of a generation facility on the performance of the *IESO-controlled grid* and the reliability of the integrated power system.
Team Member Experience	has the meaning given to that term in Section 2.1(a)(ii).
Total Target Annual Energy	has the meaning given to that term in Section 1.2.
Transmission System	means a system for conveying Electricity at voltages of more than 50 kilovolts and includes any structures, equipment or other things used for that purpose.
Transmission System Code	means the "Transmission System Code" approved by the OEB and in effect from time to time, which, among other things, sets the standards for a Transmitter's existing Transmission System and for expanding the Transmitter's transmission facilities in order to connect new customers to

	it or accommodate increase in capacity or load of existing customers.
Transmitter	means a Person licensed as a "transmitter" by the OEB in connection with a Transmission System.
Ultimate Controlling Parent	means, in respect of any reference Person other than a natural person, a Person that controls such reference Person and that is not itself Controlled by any other Person.
Unique Project ID	means the unique project reference number assigned to a Long-Term Energy Project by the IESO pursuant to the registration process set out in Section 3.4.
Upgrade	means the refurbishment, replacement or addition of equipment or technology in respect of an existing Electricity resource.
Unincorporated Territory	means any Properties that: (i) are located in areas of the Province of Ontario without municipal organization; (ii) are not Indigenous Lands; and (iii) are not provincial or federal Crown land.
Website	means that section of the IESO's website referenced as "Long-Term 2 RFP" that is dedicated to the LT2(e-1) RFP process and is at https://www.ieso.ca/Sector-Participants/Resource-Acquisition-and-Contracts/Long-Term-2-RFP.

APPENDIX B – LT2(E-1) CONTRACT

The LT2(e-1) Contract available on the Website is incorporated in this APPENDIX B by reference.

APPENDIX C – PROPOSAL SUBMISSION LABEL

RFP No.: LT2(e-1) RFP

Full Legal Name and Address of the Proponent

NAME:

LONG-TERM ENERGY PROJECT'S NAME:

REGISTRANT ID:

UNIQUE PROJECT ID:

ADDRESS:

CONTACT:

PHONE NO.:

E-MAIL:

Independent Electricity System Operator
120 Adelaide Street West, Suite 1600
Toronto, ON M5H 1T1
Attention: LT2(e-1) RFP

The Postal Code is to aid in identifying the building only. The onus remains solely with interested parties to instruct courier/ delivery personnel to deliver the Proposal documents to the exact floor location specified above by the Proposal Submission Deadline. Proponents assume sole responsibility for late deliveries if these instructions are

APPENDIX D – FORM OF IRREVOCABLE AND UNCONDITIONAL STANDBY LETTER OF CREDIT

DATE OF ISSUE:	[●]
APPLICANT:	[●]
BENEFICIARY:	Independent Electricity System Operator and its permitted assigns (the "**Beneficiary**") 120 Adelaide Street West, Suite 1600 Toronto, ON M5H 1T1
AMOUNT:	[●]
EXPIRY DATE:	[●]
EXPIRY PLACE:	Counters of the issuing financial institution in Toronto, Ontario
CREDIT RATING:	**[Insert credit rating only if the issuer is not a financial institution listed in either Schedule I or II of the *Bank Act*]**
TYPE:	Irrevocable and Unconditional Standby Letter of Credit Number: [●] (the "**Credit**")

(Note: Replace all bold terms and [●] symbols as appropriate.)

The Credit is issued in connection with the Beneficiary's Request for Proposals dated **[<*insert RFP Effective Date*>]**, as amended, to solicit energy supply to meet system energy needs from new-build facilities in Ontario (the "**LT2(e-1) RFP**") and the Proposal dated [●] for the Long-Term Energy Project bearing Unique Project ID [●] submitted by the Applicant in response thereto (the "**Proposal**").

Additionally, if the Proposal is selected under the LT2(e-1) RFP, the Credit may serve as the "**Completion and Performance Security**" (as such term is defined in the LT2(e-1) RFP) in respect of the "**LT2(e-1) Contract**" (as such term is defined in the LT2(e-1) RFP) as amended from time to time, between the Beneficiary and the "**Supplier**", as such term is defined under the LT2(e-1) Contract.

We hereby authorize the Beneficiary to draw on **[Issuing Bank Name/Address]**, in respect of the Credit, for the account of the Applicant, up to an aggregate amount of $● (● Canadian Dollars) available by the Beneficiary's draft at sight accompanied by the Beneficiary's signed certificate contained either of the following statements:

(i) "The Proponent, whose Proposal has been selected and accepted by the Beneficiary, **[has made a material misrepresentation in the Proposal]** or **[has failed, within (20) Business Days of the date on which the Proponent was given the LT2(e-1) Contract to sign, to**

execute and deliver the LT2(e-1) Contract or to deliver a new Completion and Performance Security to the Beneficiary or otherwise confirm that the Proposal Security be converted into and held by the Beneficiary as the Completion and Performance Security] and therefore the Beneficiary is entitled to draw upon the Credit in the amount of the draft attached hereto.";

or

(ii) "The Supplier is in breach of, or default under, the LT2(e-1) Contract, and therefore the Beneficiary is entitled to draw upon the Credit in the amount of the draft attached hereto."

Drafts drawn hereunder must bear the clause "Drawn under irrevocable and unconditional Standby Letter of Credit No. [●] issued by [**Issuing Bank Name**] dated [**Issue Date**]."

Partial drawings are permitted.

This Letter of Credit will automatically extend for additional, successive terms of one year each (each an "**Additional Term**"), unless the undersigned provides the Beneficiary with written notice, at least 60 days prior to the expiration date of the then current term, that it does not wish to extend this Letter of Credit for an Additional Term.

We engage with you that all drafts drawn under and in compliance with the terms of the Credit will be duly honoured, if presented at the counters of [**Issuing Bank Name/Address**] at or before [**Expiry Time**] (EST) on or before [**Expiry Date**], as extended.

The Credit is subject to the International Standby Practices ISP 98, International Chamber of Commerce Publication No. 590, and as to matters not addressed by ISP 98, shall be governed by the laws of the Province of Ontario and applicable Canadian federal law, and the parties hereby irrevocably agree to attorn to the non-exclusive jurisdiction of the courts of the Province of Ontario.

This Credit is transferable at the written request of the Beneficiary, without the consent of the Applicant, but subject to consent of the issuing financial institution, acting reasonably. All fees incurred by the issuing financial institution in relation to such transfer shall be at the Applicant's expense, but failure of the Applicant to pay such fees shall not restrict the ability of the Beneficiary to transfer the Credit.

In the event of a transfer of this Credit as provided for above, the above name of the Beneficiary will be amended to another entity by way of an amendment hereto, without the consent of the Applicant, and upon receipt by **[Issuing Bank Name]** of the Beneficiary's dated and signed letter addressed to **[Issuing Bank Name]** and completed as follows:

"We, the undersigned Beneficiary to [**Issuing Bank Name**] Letter of Credit No. [●], hereby waive all our rights under the Letter of Credit and request that the current name and address of the Beneficiary thereunder be amended to read [**insert name and address of new Beneficiary**]. We have enclosed the original Letter of Credit and all amendments (if any) thereto. Please forward the original Letter of Credit and all amendments (if any), including the current amendment to the [**new Beneficiary**], care of the Applicant."

[**Issuing Bank Name**]

By: _____

By: _____

ADDENDUM NO. 1
Dated August 14, 2025, to the
IESO LT2(e-1) RFP

In accordance with Section 3.3 of the LT2(e-1) RFP, this Addendum No. 1 contains amendments to the LT2(e-1) RFP posted on the Website and amendments to the LT2(e-1) Contract incorporated by reference in Appendix B to the LT2(e-1) RFP.

Capitalized terms used in this document have the meaning given to such terms in the LT2(e-1) RFP or the LT2(e-1) Contract, as applicable.

1. Add the following new Section 2.2(l) to the LT2(e-1) RFP:

> "(l) *Transmission Connection Cost Exceedance*
>
> Where the Facility's proposed Connection Point is located on a Transmission System, if the Supplier's cost of electrical interconnection of the Facility to the Connection Point that is reflected in a written estimate of such costs provided by the applicable Transmitter for purposes of a connection and cost recovery agreement or similar binding agreement for the cost recovery of electrical interconnection to the Connection Point, despite the Supplier's use of Commercially Reasonable Efforts and Good Engineering and Operating Practices to minimize such costs, is more than thirty percent (30%) higher than the costs reflected in the IESO Generalized Tx Connection Cost Reference, the Supplier may provide a Tx Connection Cost Exceedance Notice to the Buyer in which the Supplier must provide supporting details of such anticipated Tx Connection Cost Exceedance and request the termination of the LT2(e-1) Contract. No later than thirty (30) Business Days after its receipt of a Tx Connection Cost Exceedance Notice, the Buyer shall provide a Buyer Tx Connection Cost Exceedance Confirmation to the Supplier confirming whether or not it agrees, acting reasonably, that the Transmitter's estimated costs would constitute a Tx Connection Cost Exceedance. Where the Buyer Tx Connection Cost Exceedance Confirmation confirms the Supplier's substantiation of the anticipated Tx Connection Cost Exceedance, the Buyer shall elect in such notice that either (i) the Buyer shall reimburse the Supplier following COD for seventy-five percent (75%) of the amount by which the Paid Connection Costs exceed one hundred and thirty percent (130%) of the costs reflected in the IESO Generalized Tx Connection Cost Reference as of the Proposal Submission Deadline, or (ii) the LT2(e-1) Contract shall be automatically terminated and all Completion and Performance Security shall be returned to the Supplier within twenty (20) Business Days of the Buyer's Tx Connection Cost Exceedance Confirmation."

2. In Section 3.1(a) of the LT2(e-1) RFP, the date of "July 24, 2025" appearing in the second row of the table setting out the definition of the Question and Comment Deadline is deleted and replaced with "August 21, 2025".

3. Add the following definitions in Appendix A of the LT2(e-1) RFP in the alphabetical order:

"

IESO Generalized Tx Connection Cost Reference	means the document identified as such issued by the IESO and published on the Website prior to the Proposal Submission Deadline.

"

4. Add the following definitions in Section 1.1 of the LT2(e-1) Contract in the alphabetical order:

"**Buyer Tx Connection Cost Exceedance Confirmation**" has the meaning given to it in Section 2.2(f).

"**IESO Generalized Tx Connection Cost Reference**" has the meaning given to such term in the LT2(e-1) RFP.

"**Paid Connection Costs**" has the meaning given to it in Section 2.2(g).

"**Paid Connection Costs Notice**" has the meaning given to it in Section 2.2(g).

"**Paid Connection Cost Exceedance**" means the amount by which the Paid Connection Costs exceed one hundred and thirty percent (130%) of the costs reflected in the IESO Generalized Tx Connection Cost Reference as of the Proposal Submission Deadline.

"**Tx Connection Cost Exceedance**" has the meaning given to it in Section 2.2(e).

"**Tx Connection Cost Exceedance Notice**" has the meaning given to it in Section 2.2(e).

5. Add the following new Section 2.2(e), (f) and (g) in the LT2(e-1) Contract:

"

(e) Notwithstanding the foregoing, where the Connection Point is located on a Transmission System, if the Supplier's cost of electrical interconnection of the Facility to the Connection Point that is reflected in a written estimate of such costs provided by the applicable Transmitter for purposes of a connection and cost recovery agreement or similar binding agreement for the cost recovery of electrical interconnection to the Connection Point, despite the Supplier's use of Commercially Reasonable Efforts and Good Engineering and Operating Practices to minimize such costs, is more than thirty percent (30%) higher than the reference cost set out in the IESO Generalized Tx Connection Cost Reference (such circumstance, a "**Tx Connection Cost Exceedance**"), the Supplier may, no later than eighteen

(18) months after the Contract Date, provide a notice to the Buyer in which the Supplier provides supporting details of such anticipated Tx Connection Cost Exceedance and request the termination of this Agreement (such notice, a "**Tx Connection Cost Exceedance Notice**").

(f) No later than thirty (30) Business Days after its receipt of a Tx Connection Cost Exceedance Notice, the Buyer shall provide a notice to the Supplier confirming whether or not it agrees, acting reasonably, that the Tx Connection Cost Exceedance Notice substantiates a Tx Connection Cost Exceedance (such notice, a "**Buyer Tx Connection Cost Exceedance Confirmation**"). Where the Buyer Tx Connection Cost Exceedance Confirmation confirms the Supplier's substantiation of a Tx Connection Cost Exceedance, the Buyer shall elect in such notice either (i) that it agrees to reimburse the Supplier following COD for seventy-five percent (75%) of the Paid Connection Costs Exceedance or (ii) that this Agreement shall be automatically terminated without any costs or payments of any kind to either Party and all Completion and Performance Security shall be returned to the Supplier within twenty (20) Business Days of the Supplier's receipt of the Buyer Tx Connection Cost Exceedance Confirmation. Where there is any dispute as to whether the Supplier has substantiated a Tx Connection Cost Exceedance, such dispute shall be submitted to mandatory and binding arbitration in accordance with Section 16.2 without first having to comply with Section 16.1.

(g) Where the Buyer has elected in a Buyer Tx Connection Cost Exceedance Confirmation to reimburse the Supplier for seventy-five percent (75%) of the Paid Connection Cost Exceedance, the Supplier shall provide a notice to the Buyer no later than thirty (30) days following the COD containing all evidence reasonably required to confirm the amount paid by the Supplier to the Transmitter in respect of the interconnection of the Facility to the Connection Point (such amount, the "**Paid Connection Costs**" and such notice, a "**Paid Connection Cost Notice**"). No later than twenty (20) Business Days after its receipt of a Paid Connection Cost Notice, the Buyer shall provide notice to the Supplier, confirming the amount of the Paid Connection Cost Exceedance evidenced in the Paid Connection Cost Notice to the satisfaction of the Buyer, acting reasonably. Following delivery of such notice from the Buyer confirming the Paid Connection Cost Exceedance, the Buyer shall pay to the Supplier seventy-five percent (75%) of the Paid Connection Cost Exceedance in the next Monthly Payment, provided that, where the amount of such Buyer payment is greater than $10,000,000, the Buyer may divide such payment into twelve equal monthly installments, which shall be included with the twelve subsequent Monthly Payments. Where there is any dispute as to the Buyer's calculation of any Paid Connection Cost Exceedance, such dispute shall be submitted to mandatory and binding arbitration in accordance with Section 16.2 without first having to comply with Section 16.1.

6. In Section 16.6(c) of the LT2(e-1) Contract add the words ", other than as a result of a *bona fide* enforcement of a Secured Lender Security Agreement under Article 12 of this Agreement," after the words "Commercial Operation Date" appearing in the 5th line of such clause.

7. In the last sentence of Section 16.7(b) of the LT2(e-1) Contract, replace the words "new contract" with "New Agreement".

Justine Brotherston

To: Michael HRYSCHENKO; Lynne Banks
Cc: Zachary Rypalowski; Raymond Chokelal; Nikolai Kotikov; Mike Hryschenko; [redacted]
Subject: RE: Request for Municipal Support Confirmation — IESO LT2(e-1) RFP (Sideroad Solar Farm)

From: Michael HRYSCHENKO <hryschenko@integrativeprojectsolutions.com>
Sent: Friday, August 08, 2025 12:00 PM
To: Lynne Banks <lbanks@puslinch.ca>; Justine Brotherston <jbrotherston@puslinch.ca>
Cc: Zachary Rypalowski <rypalowski@integrativeprojectsolutions.com>; Raymond Chokelal <chokelal@integrativeprojectsolutions.com>; Nikolai Kotikov <kotikov@integrativeprojectsolutions.com>; Mike Hryschenko <salesandsupport@integrativeprojectsolutions.com>; [redacted]
Subject: Request for Municipal Support Confirmation — IESO LT2(e-1) RFP (Sideroad Solar Farm)

Caution! This message was sent from outside your organization. Allow sender | Block sender | Report

Justine Brotherston
Interim Municipal Clerk / Deputy Clerk
Township of Puslinch
7404 Wellington Rd 34
Puslinch, ON N0B 2J0
T: 519-763-1226 ext. 208 • F: 519-736-5846
www.puslinch.ca

Dear Lynne and Justine, and to Whom It May Concern,

Integrative Project Solutions Ltd. (IPS) intends to submit a proposal to the IESO's **Long-Term 2 Energy Supply (Window 1) RFP — LT2(e-1)** on October 16, 2025, and requests the Township's **Municipal Support Confirmation (council resolution)** for the **Sideroad Solar Farm**, so our submission satisfies the IESO's mandatory requirement.

As you'll recall, we **presented the Sideroad Solar Farm to the Council on November 20, 2024, and had a preconsultation discussion on October 17, 2024**. This letter follows up on the presentation and formalizes our support request using the IESO template.

Project at a glance

- **Proponent:** Integrative Project Solutions Ltd. (IPS)
- **Project: Sideroad Solar Farm** — ground-mounted, non-emitting solar PV
- **Location: 3972 Sideroad 20 S, Puslinch, ON N0B 2J0** (approx. **43.408793, −80.173534**)
- **Land use:** The project lands are **not located within a Prime Agricultural Area or** a **Specialty Crop Area**. The Township can verify this through its online mapping system, Official Plan schedules, or the provincial agricultural system mapping.

- **Indicative size: ~6,156 kW DC / 5,000 kW AC** (see attached site plan)
- **Tentative point of connection: Puslinch DS — Feeder F1 (27.6 kV)**
- **Hydro One status:** We have **run the tentative capacity check**; the **Station Capacity Calculator shows "PASSED" at 5,000 kW AC (exporting, inverter-based)** for **Puslinch DS – F1**.
  Our **Hydro One PCIR (Consultation ID 21,477)** reflects the same station/feeder and site coordinates.

Community benefits

- **Local jobs & procurement.** Construction employment across civil, electrical, and commissioning, and **ongoing local O&M** (vegetation management, seasonal access/snow, periodic electrical inspections). We will prioritize **local contractors and suppliers** where possible. We anticipate hundreds of jobs during construction and dozens of jobs during the O&M period of a minimum of 25 years.
- **Clean, non-emitting energy.** New **non-emitting electricity** is produced in Puslinch, supporting Ontario's reliability without air emissions or water use.
- **Stable local revenues.** Long-term **property-tax** contributions and local purchasing throughout construction and operations.
- **Thoughtful siting.** Buffers/vegetative screening, as well as coordinated construction logistics (including traffic and seasonal road protection), will be implemented in collaboration with Township staff.

Timing & status

- **Council presentation: November 20, 2024** (delegation received; continued coordination with staff). Preconsultation meeting on October 16, 2024.
- **Pre-Engagement Confirmation Notice: [Delivered on: insert date]** (≥60 days before the IESO proposal deadline).
- **Context:** Many Ontario municipalities have already issued and are issuing LT2(e-1) support resolutions, allowing proponents to submit on time.

What we're asking the Council to pass

Using the IESO **Prescribed Form: Evidence of Municipal Support (Energy) — LT2(e-1)PF-MS100** template, a resolution that:

1. **Supports the submission** of our LT2(e-1) proposal for Sideroad Solar Farm on the lands above;
2. Clarifies that the support is **solely to satisfy the IESO submission requirement** and **not** any other approval; and
3. Acknowledges our **Indigenous and community engagement** commitments; and
4. **Confirms** the lands are **not within a Prime Agricultural Area** and are **not** a **Specialty Crop Area**.

We're ready to provide more details if necessary, in addition to those already provided.

Attachments

1. **Hydro One — Station Capacity Calculator:** Puslinch DS – F1, 5,000 kW, **PASSED**
2. **Hydro One PCIR — Consultation ID 21,477** (3972 Sideroad 20 S; Puslinch DS F1)
3. **Site Plan — 3972 Sideroad 20 S** (6,156 kW DC / 5,000 kW AC)
4. **IESO Prescribed Form: Evidence of Municipal Support (Energy) — LT2(e-1)PF-MS100** (template resolution)

Please see below the suggested text for the letter of support for your convenience, review, and adjustment, which is based on the IESO proposal:

Title: Municipal Support — IESO LT2(e-1) RFP — **Sideroad Solar Farm** (Integrative Project Solutions Ltd.)

WHEREAS Integrative Project Solutions Ltd. ("IPS") proposes the **Sideroad Solar Farm**, a ground-mounted, non-emitting solar PV facility located at **3972 Sideroad 20 S, Puslinch, ON N0B 2J0** (approx. **43.408793, −80.173534**) with an indicative size of **~6,156 kW DC / 5,000 kW AC**; and

WHEREAS the **IESO Long-Term 2 Energy Supply (Window 1) RFP — LT2(e-1)** requires a **Municipal Support Confirmation** where projects are on Municipal Project Lands; and

WHEREAS on **November 20, 2024,** the Proponent presented Sideroad Solar Farm to Council; and

WHEREAS the Proponent has provided a **Hydro One Station Capacity Calculator** result showing **PASSED** for **Puslinch DS — Feeder F1 (27.6 kV), 5,000 kW exporting (inverter-based)**, and has filed a **Preliminary Consultation Information Request (PCIR) – Consultation ID 21,477**; and

WHEREAS the project lands are **not within a Prime Agricultural Area** and are **not** a **Specialty Crop Area**; and

WHEREAS the Proponent has undertaken, and will continue to undertake, **Indigenous and community engagement** to the Township's satisfaction; and

WHEREAS the Proponent has **[delivered / will deliver]** the required **Pre-Engagement Confirmation Notice** to the Township's Local Body Administrator on **[insert date]** (at least 60 days before the IESO proposal deadline);

NOW THEREFORE BE IT RESOLVED THAT:

1. **Council supports the submission** of the **Sideroad Solar Farm** proposal by Integrative Project Solutions Ltd. to the IESO under the **LT2(e-1) RFP**, **solely to meet the IESO's submission requirement** and **not** as any other approval, endorsement, or authorization under the Planning Act, any municipal by-law, or any other statute or regulation.
2. **Council confirms** that the project lands described herein are **not within a Prime Agricultural Area** and **not** a **Specialty Crop Area**, and **acknowledges** the Proponent's commitment to ongoing Indigenous and community engagement.
3. **The Clerk is authorized** to issue a **Municipal Support Confirmation** letter reflecting this resolution and to complete the IESO **Prescribed Form: Evidence of Municipal Support (Energy) — LT2(e-1)PF-MS100** for inclusion with the Proponent's submission.

Passed this ___ day of _____, 2025.

We would greatly appreciate your support on this matter.

--
Best regards,

Michael Hryschenko, EMBA, B.Sc.E.E.
CEO, IPS & Solar Wind Renewables Ltd.
453 Wyecroft Rd, Oakville, ON L9K2H2
www.integrativeprojectsolutions.com
hryschenko@integrativeprojectsolutions.com

Station Capacity Calculator

Fill out the fields below to check capacity.

Station / Feeder

PUSLINCH DS - F1

Project Size (kW)

5,000 kW

Project Type

Exporting (e.g. Net Metering)

Project Technology

Solar or Battery (inverter based)

Check Capacity →

Passed

In order for Hydro One to confirm capacity availability and allocate capacity to your project, you will have to apply to Hydro One for connection using **Connection Impact Assessment (CIA) Form B**.

Go to Form B

For projects over 10kW, you may request a **Preliminary Consultation Information Request (PCIR) Form A** which contains pertinent information, including a GIS map that will be helpful when completing your Form B application submission.

Go to Form A

Reference ID: c49f4ded-3373-f011-bec2-6045bd61fd9d

Distributed Energy Resource (DER) Connection

General Information

Report Date:	22-Jun-2023
Consultation ID #:	21,477
Requested Project Capacity:	5000 kW
Fuel / Energy Type:	Solar - Inverter Based
Transformer ID #:	
Hydro One 12-Digit Account # (if applicable):	

Project Site Information

Project Site:	Address:	3972 Sideroad 20 S
	City/Town:	Puslinch
	Postal Code:	N0B 2J0
Project Site GPS Coordinates: (Per Google Earth)	Latitude (decimal format):	43.408793
	Longitude (decimal format):	-80.173534
	Link (if available):	https://goo.gl/maps/GGtErVni2SrhZanF6

Disclaimer

Hydro One Networks Inc. provides this information in response to your Preliminary Consultation Information Request. This information will assist you in completing your Connection Impact Assessment application (CIA), should you decide to proceed. Please note that the information provided is based on information and records available to us at the time that this report was issued and is subject to change and verification. Capacity is not being reserved for your project at this time. Capacity is only reserved upon completion of a successful CIA.

☐ **A.** The requested connection capacity is not available at that location at this time due to restrictions within the distribution system.

☐ **B.** The requested connection capacity is not available at that location at this time due to restrictions within the transmission system.

☑ **C.** Conditional pass - There may be connection capacity at that location at this time. We recommend that you check transmission capacity based on the information below.

Hydro One Station Capacity Calculator: https://www.hydroone.com/business-services/generators/station-capacity-calculator

Connection Information

Connection Station (Municipal / Distribution Station)	Connection Station Name	Puslinch DS
	Connecting Feeder Name	F1
	Utility Transformer Size (kVA)	
	Connection Voltage	27.6 kV
Host Distributor (if applicable)	Connection Station Name	
	Connecting Feeder Name	
	Utility Transformer Size (kVA)	
	Connection Voltage	
Upstream Station (Transmission Station)	Upstream Station Name	
	Upstream Feeder Name	

Notes

Information including any conditions on capacity or configuration, and likely requirements for transfer trip.

Customer transformer required. Transfer Trip is required.
Station and/or feeder upgrade information wont be known until a CIA has been completed.

Process & Requirements For Connection Impact Assessment (CIA)

If you proceed to apply for a CIA study, the following characteristics will likely apply. This information is provided for your guidance only and does not assume the outcome of the CIA.

	Impact Assessment Studies Required	Payments owing for Impact Assessments on submission of CIA Form
☐	No CIA	No study payments required
✔	LDC CIA	Please see our website below for the costs of CIAs and SIAs and the payee for cheques. https://www.hydroone.com/business-services/generators/connection-impact-assessment
☐	Host LDC CIA	
☐	Transmitter CIA	
☐	IESO System Impact Assessment (SIA)	



3972 Sideroad 20 S, Puslinch, ON

SYSTEM SIZE: 6,156 KW DC / 5,000 KW AC

DATE: OCTOBER 12, 2021

GPS: 43.408793,-80.173534

THIS DRAWING IS AN INSTRUMENT OF SERVICE, IS PROVIDED BY AND IS THE PROPERTY OF SPARK GREEN POWER INC.
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This page sets out the instructions for completing the Prescribed Form: Evidence of Municipal Support (Energy).

All capitalized terms used in these instructions and the Prescribed Form: Evidence of Municipal Support (Energy), unless otherwise stated, have the meanings ascribed to them in the LT2(e-1) RFP.

INSTRUCTIONS APPLICABLE TO ALL PRESCRIBED FORMS:

a. The first page of a Prescribed Form should be marked with the name of the Long-Term Energy Project that is the subject of the Proposal. The Proponent should use the name given to the Long-Term Energy Project in the Prescribed Form: Proponent Information, Declarations and Workbook (Energy).

b. This instruction page is not required to be submitted as part of the completed Prescribed Form.

c. The Prescribed Form is required to be submitted electronically via email to the IESO at LT2.RFP@ieso.ca.

d. Information provided in each Prescribed Form should be consistent with the information provided in the Proposal.

e. Where the Prescribed Form has multiple pages, the pages of the Prescribed Form should be kept together in the Proposal in sequential order.

f. Where a blank field for a section/page reference is provided in a Prescribed Form, enter the section/page reference of the Proposal where the substantiating evidence for that particular item can be found.

g. Apart from the completion of any blanks, drop down lists, check boxes or similar uncompleted information in a Prescribed Form, no amendments may be made to the wording of a Prescribed Form.

h. Each Prescribed Form must be completed in its entirety. Fields marked <if applicable> must be completed if applicable to the Proposal. If not applicable, they should be marked "Not Applicable".

i. If a signature is required for a Prescribed Form, the Prescribed Form must be signed by a person with authority to bind the Proponent. The Prescribed Form may be printed, signed and scanned, or may be signed digitally through Adobe (Digital ID, or Fill and Sign), Apple Preview or DocuSign.

j. With the exception of this instruction page, instructions within a Prescribed Form will be enclosed in brackets.

INSTRUCTIONS SPECIFIC TO THIS PRESCRIBED FORM: EVIDENCE OF MUNICIPAL SUPPORT (ENERGY)

k. To meet the mandatory requirements of Section 4.2(c) of the LT2(e-1) RFP, where the Project Site is proposed to be located in whole or in part on Municipal Project Lands, a Proponent is to complete and submit in the Proposal a) the main body of this Prescribed Form and b) a copy of the applicable Municipal Support Confirmation, as indicated in Section 3, from each Local Municipality with authority over the Municipal Project Lands.

l. Where the Municipal Support Confirmation is in the form of a Municipal Resolution in Support of Proposal Submission, such resolution must be dated no earlier than seven (7) months prior to the RFP Effective Date.

m. Where the Municipal Support Confirmation is in the form of a Blanket Municipal Support Resolution together with a Blanket MS Confirmation Letter, such Blanket MS Confirmation Letter must be dated no earlier than seven (7) months prior to the RFP Effective Date.

n. A copy of the Municipal Support Confirmation must be provided in Exhibit B.

o. Councils of Local Municipalities have the option of using the form of Municipal Resolution in Support of Proposal Submission provided Exhibit A, should they so choose. An alternative to the Municipal Resolution in Support of Proposal Submission is a Blanket Municipal Support Resolution provided together with a Blanket MS Confirmation Letter.

p. A Municipal Support Confirmation is not required if the Project Site of the Long-Term Energy Project is located wholly on Indigenous Lands, Crown lands managed by the Ministry of Natural Resources and located outside of Municipal Project Lands, Unincorporated Territory, or any combination thereof.

GUIDANCE FOR MUNICIPALITIES:

The IESO is undertaking the LT2(e-1) RFP to competitively procure year-round energy generation services, on a Contract Capacity basis from New Build Electricity generating facilities equal to or larger than one (1) MW registered or able to become registered in the *IESO-administered markets*.

Should a Local Municipality wish to support the submission of a Proposal for a particular Long-Term Energy Project, a group of Long-Term Energy Projects, or one or more particular technology types, they must either pass a Municipal Resolution in Support of Proposal Submission (project-specific) or a Blanket Municipal Support Resolution. In the case of a Blanket Municipal Support Resolution, a Blanket MS Confirmation Letter (project-specific), containing the same project-specific information and statements as set out in template Municipal Resolution in Support of Proposal Submission, must be provided together with the Blanket Municipal Support Resolution.

Local Municipalities are encouraged to use the template Municipal Resolution in Support of Proposal Submission in Exhibit A. Should a Local Municipality wish to develop its own resolution, the resolution must:

(A) identify:

(i) the Unique Project ID of the Long-Term Energy Project (if applicable / known)
(ii) the name of the Long-Term Energy Project
(iii) the name of the Proponent
(iv) the generation technology type of the Long-Term Energy Project
(v) the maximum potential Contract Capacity of the Long-Term Energy Project (which may not exceed the largest Contract Capacity ultimately provided in the Prescribed Form: Proponent Information, Declarations and Workbook (Energy) in respect of the Long-Term Energy Project); and
(vi) the Property Identification Number (PIN), municipal address, legal description or GPS coordinates of the Municipal Project Lands; and

(B) confirm that the Proponent has, no later than sixty (60) days prior to the Proposal Submission Deadline, delivered a Pre-Engagement Confirmation Notice to an applicable Local Body Administrator in respect of the Local Municipality that includes the information above, except for the Unique Project ID which should only be required as part of the Pre-Engagement Confirmation Notice if available, and a sample of a Pre-Engagement Confirmation Notice has been provided in Exhibit C for your convenience; and

(C) state:

(i) that the Local Municipality supports the submission of a Proposal for the Long-Term Energy Project located on the applicable Municipal Project Lands. The statement in such resolution may be qualified as being solely for the purposes of satisfying the mandatory requirements under Section 4.2(c) of the LT2(e-1) RFP, and does not supersede any applicable permits or approvals under applicable Laws and Regulations that may be required for a particular Long-Term Energy Project;

(ii) that that the Proponent has undertaken, or has committed to undertake, Indigenous and community engagement activities in respect of the Long-Term Energy Project to the satisfaction of the Municipality;

(iii) whether or not the Municipal Project Lands are designated as Prime Agricultural Areas as set out in the Local Municipality's Official Plan as of the date of the resolution; and

(iv) if the Municipal Project Lands are designated as Prime Agricultural Areas:
(a) the Municipal Project Lands are not designated as Specialty Crop Areas;
(b) the Long-Term Energy Project is not a Non-Rooftop Solar Project;
(c) the Proponent has satisfied the AIA Component One Requirement to the satisfaction of the Local Municipality; and
(d) if the Proponent is selected as a Selected Proponent under the LT2(e-1) RFP, the Local Municipality will engage in good faith with the Selected Proponent to enable the Selected Proponent to complete the AIA Components Two and Three Requirement.

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Suite 1600
Toronto, Ontario M5H 1T1
T 416-967-7474
F 416-967-1947
www.ieso.ca

Capitalized terms not defined herein have the meanings ascribed to them in the LT2(e-1) RFP.

Section 1 – Information of the Proponent and the Long-Term Energy Project

a.	Unique Project ID of the Long-Term Energy Project: *<input Unique Project ID>*	
b.	Name of the Long-Term Energy Project: *<input name of the Long-Term Energy Project>*	
c.	Legal name of the Proponent: *<input legal name of the Proponent>*	
d.	Property Identification Number (PIN), or if PIN is not available, municipal address or legal description of Properties included in the Municipal Project Lands: *<input PIN(s) (if a PIN is not available, use Municipal Address or legal description) or GPS coordinates, if applicable>*	
e.	Name(s) of all Local Municipalities with authority over the Municipal Project Lands: *<input name of the Local Municipality(ies)>*	Local Municipality 1: Local Municipality 2 (if applicable):

Section 2 – Pre-Engagement Confirmation Notice

a.	A Pre-Engagement Confirmation Notice has been delivered to all Local Municipalities with authority over the Municipal Project Lands in accordance with Section 2.1(c)(iii) of the LT2(e-1) RFP:	☐ Yes, a Pre-Engagement Confirmation Notice was delivered to Local Municipality 1 named above in Section 1(e) no later than sixty (60) days prior to the Proposal Submission Deadline AND (if applicable) ☐ Yes, a Pre-Engagement Confirmation Notice was delivered to Local Municipality 2 named above in Section 1(e) no later than sixty (60) days prior to the Proposal Submission Deadline

Section 3 – Municipal Support Confirmation

a.	The form of Municipal Support Confirmation used for Local Municipality 1 named above in Section 1(e), attached in Exhibit B, which has not been revoked, amended or supplemented in any material respect as of the date hereof, is:	○ A Municipal Resolution in Support of Proposal Submission dated no earlier than seven (7) months prior to the RFP Effective Date OR ○ A Blanket Municipal Support Resolution with a Blanket MS Confirmation Letter dated no earlier than seven (7) months prior to the RFP Effective Date
b.	The form of Municipal Support Confirmation used for Local Municipality 2 (if applicable) named above in Section 1(e), attached in Exhibit B, which has not been revoked, amended or supplemented in any material respect as of the date hereof, is:	◉ A Municipal Resolution in Support of Proposal Submission dated no earlier than seven (7) months prior to the RFP Effective Date OR ◉ A Blanket Municipal Support Resolution with a Blanket MS Confirmation Letter dated no earlier than seven (7) months prior to the RFP Effective Date

I hereby confirm that I am an individual with the authority to bind the Proponent and that, if applicable, by signing this form using electronic signature, I agree to the content, terms and conditions set out in the document on behalf of the Proponent.

PROPONENT NAME: _____

Per: _____

Print Name:

Print Title:

(I have authority to bind the Proponent)

Date Signed

120 Adelaide Street West
Suite 1600
Toronto, Ontario M5H 1T1
T 416-967-7474
F 416-967-1947
www.ieso.ca

EXHIBIT A
FORM OF MUNICIPAL RESOLUTION IN SUPPORT OF PROPOSAL SUBMISSION

Resolution NO: _____ Date: _____

[Note: The Municipal Resolution in Support of Proposal Submission must not be dated earlier than seven (7) months prior to the RFP Effective Date.]

WHEREAS:

1. The Proponent is proposing to construct and operate a Long-Term Energy Project located on Municipal Project Lands, as defined and with the characteristics outlined in the table below, under the Long-Term 2 Energy Supply (Window 1) Request for Proposals ("**LT2(e-1) RFP**") issued by the Independent Electricity System Operator ("**IESO**").

2. Capitalized terms not defined herein have the meanings ascribed to them in the LT2(e-1) RFP.

3. The Proponent has, no later than sixty (60) days prior to the Proposal Submission Deadline, delivered a Pre-Engagement Confirmation Notice to an applicable Local Body Administrator in respect of the Municipal Project Lands that includes the details outlined in the table below, except for the Unique Project ID which should only be required as part of the Pre-Engagement Confirmation Notice if available.

Unique Project ID of the Long-Term Energy Project (if available): *<input Unique Project ID>*	
Legal name of the Proponent: *<input legal name of the Proponent>*	
Name of the Long-Term Energy Project: *<input name of the Long-Term Energy Project>*	
Technology of the Long-Term Energy Project: *<input technology of the Long-Term Energy Project>*	
Maximum potential Contract Capacity of the Long-Term Energy Project (in MW): *<input the maximum potential Contract Capacity of the Long-Term Energy Project (in MW)>*	

Property Identification Number (PIN), or if PIN is not available, municipal address or legal description of the Municipal Project Lands: *<input the applicable description>* (the "**Municipal Project Lands**")	

4. Pursuant to the LT2(e-1) RFP, if the Long-Term Energy Project is proposed to be located in whole or in part on Municipal Project Lands, the Proposal must include Municipal Support Confirmation which may be in the form of a Municipal Resolution in Support of Proposal Submission;

NOW THEREFORE BE IT RESOLVED THAT:

5. The council of *<insert name of Municipality>* _____ supports the submission of a Proposal for the Long-Term Energy Project located on the Municipal Project Lands.

6. This resolution's sole purpose is to satisfy the mandatory requirements of Section 4.2(c)(iii) of the LT2(e-1) RFP and may not be used for the purpose of any other form of approval in relation to the Proposal or Long-Term Energy Project or for any other purpose.

7. The Proponent has undertaken, or has committed to undertake, Indigenous and community engagement activities in respect of the Long-Term Energy Project to the satisfaction of the Municipality.

8. The Municipal Project Lands *<does/does not>* _____ include lands designated as Prime Agricultural Areas in the *<insert name of Municipality>* _____'s Official Plan.

9. Where the Municipal Project Lands does include lands designated as Prime Agricultural Areas in the *<insert name of Municipality>* _____'s Official Plan as of the date of this resolution:
    a. The Municipal Project Lands are not designated as Specialty Crop Areas;
    b. The Long-Term Energy Project is not a Non-Rooftop Solar Project;
    c. The Proponent has satisfied the AIA Component One Requirement to the satisfaction of the Local Municipality; and
    d. If the Proponent is selected as a Selected Proponent under the LT2(e-1) RFP, the council of *<insert name of Municipality>* _____ will engage in good faith with the Selected Proponent to enable the Selected Proponent to complete the AIA Components Two and Three Requirement.

DULY RESOLVED BY THE LOCAL MUNICIPALITY

on the ____ day of _____, 20____

<Signature lines for elected representatives*. At least one signature is required.>*

EXHIBIT B
MUNICIPAL SUPPORT CONFIRMATION

Note: Attach the Municipal Support Confirmation (i.e., Municipal Resolution in Support of Proposal Submission or a Blanket Municipal Support Resolution with a Blanket MS Confirmation Letter).

120 Adelaide Street West
Suite 1600
Toronto, Ontario M5H 1T1
T 416-967-7474
F 416-967-1947
www.ieso.ca

EXHIBIT C
SAMPLE OF PRE-ENGAGEMENT CONFIRMATION NOTICE

Date: _____

Re: Pre-Engagement Confirmation Notice under the LT2(e-1) RFP

Dear *<insert name of the Local Body Administrator>* _____,

The Proponent (defined below) is proposing to construct and operate a Long-Term Energy Project located on Municipal Project Lands, as defined and with the characteristics outlined in the table below, under the Long-Term 2 Energy Supply (Window 1) Request for Proposals ("**LT2(e-1) RFP**") issued by the Independent Electricity System Operator ("**IESO**").

We, the Proponent intend to submit a Proposal under the LT2(e-1) RFP and seek to confirm applicable land-use details in relation to the Municipal Project Lands identified below.

Unique Project ID of the Long-Term Energy Project (if available): *<input Unique Project ID>*	
Legal name of the Proponent: *<input legal name of the Proponent>*	
Name of the Long-Term Energy Project: *<input name of the Long-Term Energy Project>*	
Technology of the Long-Term Energy Project: *<input technology of the Long-Term Energy Project>*	
Maximum potential Contract Capacity of the Long-Term Energy Project (in MW): *<input the maximum potential Contract Capacity of the Long-Term Energy Project (in MW)>*	
Property Identification Number (PIN), or if PIN is not available, municipal address or legal description of the Municipal Project Lands: *<input the applicable description>* (the "**Municipal Project Lands**")	

We intend to undertake community engagement in respect of the Long-Term Energy Project and appreciate your confirming the applicable land-use details in relation to the Municipal Project Lands. *[Note: Consider detailing planned engagement events, if known.]*

We will be happy to coordinate with you and receive your feedback in respect of our planned engagements.

PROPONENT NAME: _____

Per: _____

Print Name:

Print Title:

(I have authority to bind the Proponent)

Date Signed:

REPORT COR-2025-041

TO:	Mayor and Members of Council
PREPARED BY:	Mehul Safiwala, Junior Planner
PRESENTED BY:	Justine Brotherston, Director of Corporate Services/Municipal Clerk
MEETING DATE:	September 17, 2025
SUBJECT:	Zoning By-law Amendment Application (D14/DAA) 7456 Mclean Road West & 197 Brock Road South Request for Council to deem the application complete/incomplete

RECOMMENDATION

That Report COR-2025-041 entitled Zoning By-law Amendment Application (D14/DAA) Request for Council to deem the application to be complete be received; and

That Council deem the zoning amendment application to be complete; and,

That staff be directed to proceed with notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the *Planning Act, 1990*.

Purpose

The purpose of this report is to:

1. Advise Council of the application for a Site Specific Zoning By-law Amendment for the property described as Rear Part Lot 25, Concession 7 RP 61R7239 PARTS 1 & 2; and RP 61R4472 PART 2; Township of Puslinch, (the "Subject Lands"). The proposed Zoning By-law Amendment is to amend the Township of Puslinch Zoning By-law 23-2018, as amended, to rezone the lands from a Special Provision Industrial (IND(sp54)) ZONE and Holding Industrial (IND(h5)) ZONE to a site-specific Highway Commercial (HC(spXXX)) ZONE.

2. Obtain confirmation from Council that the application can be deemed to be complete and provide notice in accordance with Section 3 and Section 5 of O. Reg. 545/06 of the *Planning Act, 1990*.

Background

Application

The proposed Zoning By-law Amendment Application is to amend the Township of Puslinch Zoning By-law 23-2018, as amended, to rezoning the lands municipally referred to as 7456 Mclean Road West and 197 Brock Road South from a Special Provision Industrial (IND(sp54)) ZONE and a Holding Industrial (IND(h5)) ZONE to a Special Provision Highway Commercial (HC(spXXX)) ZONE to permit a gas bar, associated retail/convenience store, and drive through restaurant.

The application required one submission in order determine that all required documents and studies to support the application have been received.

Township staff and consultants will begin a fulsome review of the application based on the application merits once the application has been deemed complete by Council.

Consultation:

1. Pre-Consultation

A pre-submission consultation for the proposed rezoning was submitted on November 14, 2022 and the applicant was provided with preliminary comments from Township Staff and its consultants representing the Township, County of Wellington, and external agencies.

The following reports and plans have been submitted with the pre-consultation application on December 16, 2022:

- 7456 McLean Road W + 197 Brock Road S / Proposal Summary – SiV-iK Planning/Design — November 14, 2022;
- Concept Plan– SiV-iK Planning/Design – November 3, 2022

2. Process to Deem Application Complete

Comments

The Zoning By-law Amendment Application was submitted on October 20, 2023 with no further submissions made. The application was reactivated August 8, 2025 which required one submission in order to determine that all required documents and studies to support the application had been received.

Township staff and consultants will begin a fulsome review of the application based on it's merits once the application has been deemed complete by Council.

There is a thirty (30) day timeline to review applications for completeness in accordance with the Act.

The following reports and plans were submitted with the Zoning By-law Amendment application:

1st Submission – October 20, 2023:

- Zoning By-law Amendment Application Form – October 3, 2023
- Draft Zoning By-law
- Site plan & Key Plan – ATA Architects – October 4, 2023
- Planning Justification Report – SiV-iK Planning/Design – September 20, 2023
- Hydrogeological Assessment Report – C.F. Crozier & Associates – October, 2023
- Transportation Impact Study – C.F. Crozier & Associates – October, 2023
- Functional Servicing & Stormwater Management Report – C.F. Crozier & Associates – October, 2023
- Preliminary Erosion, Sediment Control and Removals Plan – Crozier Consulting Engineers – October 20, 2023
- Preliminary Site Grading Plan – Crozier Consulting Engineers – October 20, 2023
- Preliminary Site Servicing Plan – Crozier Consulting Engineers – October 20, 2023
- Preliminary Pre-Development Drainage Plan – Crozier Consulting Engineers – October 20, 2023
- Preliminary Post-Development Drainage Plan – Crozier Consulting Engineers – October 20, 2023
- Requirement for an Environmental Impact Study Memo prepared by Aboud & Associates Inc. - May 31, 2023
- Environmental Impact Study requirement email correspondence - June 5, 2023
- Source Water Protection Screening From
- Comment Summary for 7456 McLean Rd. W. & 192 Brock Rd. S. of Pre-consultation

prepared Township of Puslinch.

2nd Submission – August 8, 2025

- Zoning By-law Amendment Application Form – October 3, 2023
- Draft Zoning By-law
- Planning Justification Report – SiV-iK Planning/Design – September 20, 2023
- Site Plan – Richard Ziegler Architect – August 5, 2025
- Elevations - Building – Richard Ziegler Architect – August 5, 2025
- Elevations - Car Gas Bar – Richard Ziegler Architect – August 5, 2025
- Elevations - Truck Gas Bar – Richard Ziegler Architect – August 5, 2025
- Floor Plan - Main Building – Richard Ziegler Architect – August 5, 2025
- Roof Plan - Main Building – Richard Ziegler Architect – August 5, 2025
- Preliminary Erosion, Sediment Control and Removals Plan – Crozier Consulting Engineers – August 1, 2025
- Preliminary Site Grading Plan – Crozier Consulting Engineers – August 1, 2025
- Preliminary Site Servicing Plan – Crozier Consulting Engineers – August 1, 2025
- Preliminary Pre-Development Drainage Plan – Crozier Consulting Engineers – August 1, 2025
- Preliminary Post-Development Drainage Plan – Crozier Consulting Engineers – August 1, 2025
- Functional Servicing & Stormwater Management Report – C.F. Crozier & Associates – August, 2025
- Hydrogeological Investigation Report – C.F. Crozier & Associates – July, 2025
- Comment Response Matrix of the 1st Submission comments
- Tree Inventory and Preservation Plan – Kuntz Forestry Consulting – July 25, 2025
- Tree inventory and Preservation Plan Figure 1 – Kuntz Forestry Consulting – July 25, 2025
- Woodland Designation Assessment Figure 2 – Kuntz Forestry Consulting – July 25, 2025
- Plan of Survey with Topography – Tarasick McMillan Kubicki – November 3, 2022
- Transportation Impact Study – C.F. Crozier & Associates – August, 2025

Staff recommend that Council deem the application to be complete at this time as the Township's staff and consultants have determined that all of the required documents and studies have been provided for the application. The applicant has paid the required fee to the Township and is responsible for paying all third-party costs should the application require more than two submissions.

Should Council deem the application to be complete, the timelines in the *Planning Act* stipulate 90 days to process the application. The Township continues to process applications as close to the stipulated timelines as practical. The legislation sets out the following process to be completed:

- Circulate the statutory notice to properties within a 120 metre buffer, in addition to all required agencies;
- Peer review all submitted materials to the satisfaction of the Township;
- Present the application to the Township Planning and Development Advisory Committee for comments (November 12, 2025);
- Schedule and conduct at least one public meeting (November 20, 2025);
- Advertise the complete application and public meeting in the Wellington Advertiser in accordance with statutory notice requirements and installing physical signage on the property; and
- Provide Council with a planning recommendation report and proposed by-law (Date to be determined).

Financial Implications

As outlined throughout the report.

Applicable Legislation and Requirements

County of Wellington Official Plan
Township of Puslinch Zoning By-law 2018-023
Planning Act, R.S.O. 1990, as amended

Attachments
Schedule "A" – Key Map

Respectfully submitted,

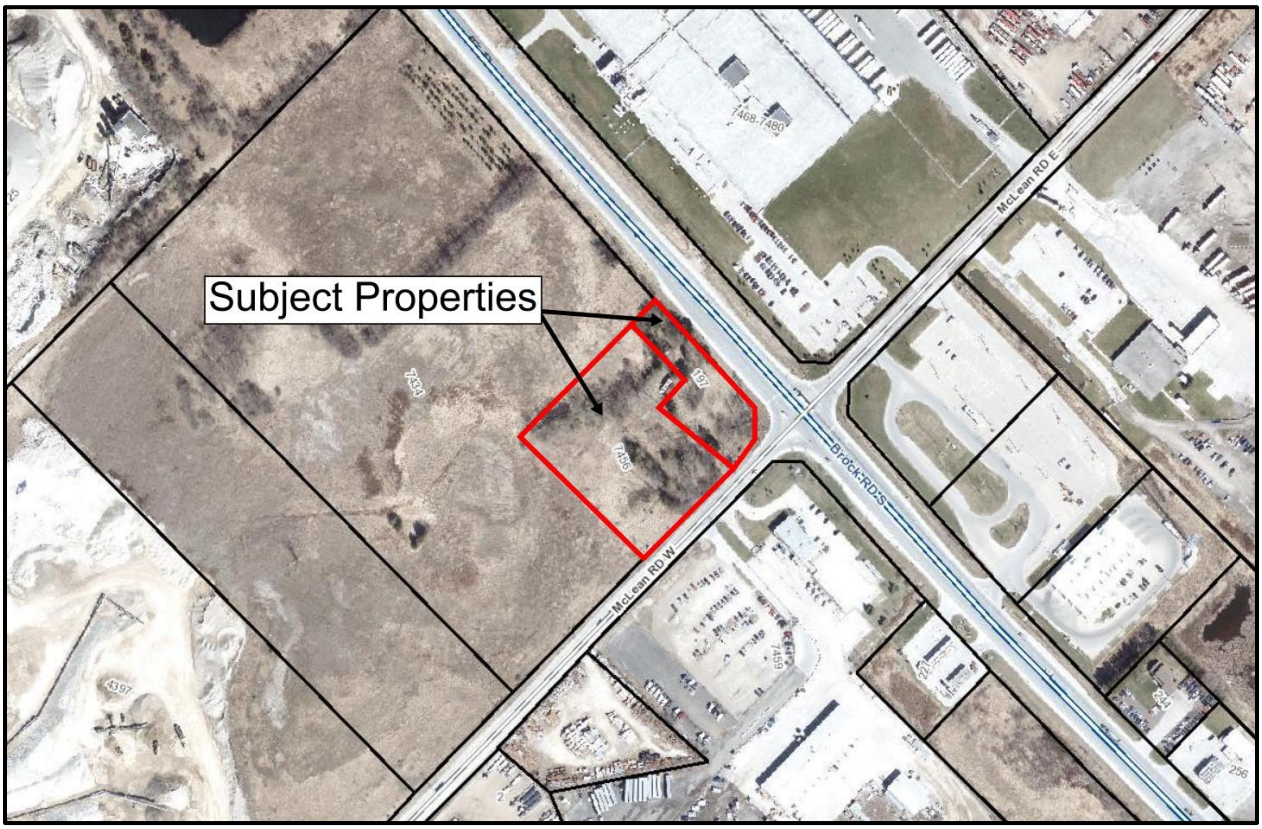
Mehul Safiwala
Junior Planner

Reviewed by:

Justine Brotherston
Director of Corporate Services/
Municipal Clerk

Schedule "A"

KEY MAP



REPORT BLD-2025-003

TO: Mayor and Members of Council

PREPARED BY: Olive Zhang, Municipal Building Official I

PRESENTED BY: Andrew Hartholt, Chief Building Official

MEETING DATE: September 17th, 2025

SUBJECT: Building Department Second Quarter Update – April to June 2025

RECOMMENDATION

That Report BLD-2025-003 entitled Building Department Second Quarter Update – April to June 2025 be received for information.

Purpose

The purpose of this report is to provide Council with an update of the activities in the Building Department for the Second Quarter of 2025 (April, May and June).

Background

Council receives a summary of the Township building permits on a quarterly basis.

Financial Implications

The Building Code Act requires that the total amount of building permit fees meets the total costs for the municipality to administer and enforce the Building Code Act and Regulations. Building permit fees were established to fully recover the Township's cost of providing building permit services, including an allocation of administrative overhead/indirect costs. Any surplus revenue from building permit fees is transferred to a restricted reserve, to be drawn upon in years of declining building activity.

Applicable Legislation and Requirements

Building Code Act, 1992, S.O. 1992, c. 23

Attachments

Schedule A - Second Quarter 2025 report and Comparison Charts

Respectfully submitted,

Olive Zhang
Municipal Building Official I

Reviewed by:

Andrew Hartholt
Chief Building Official

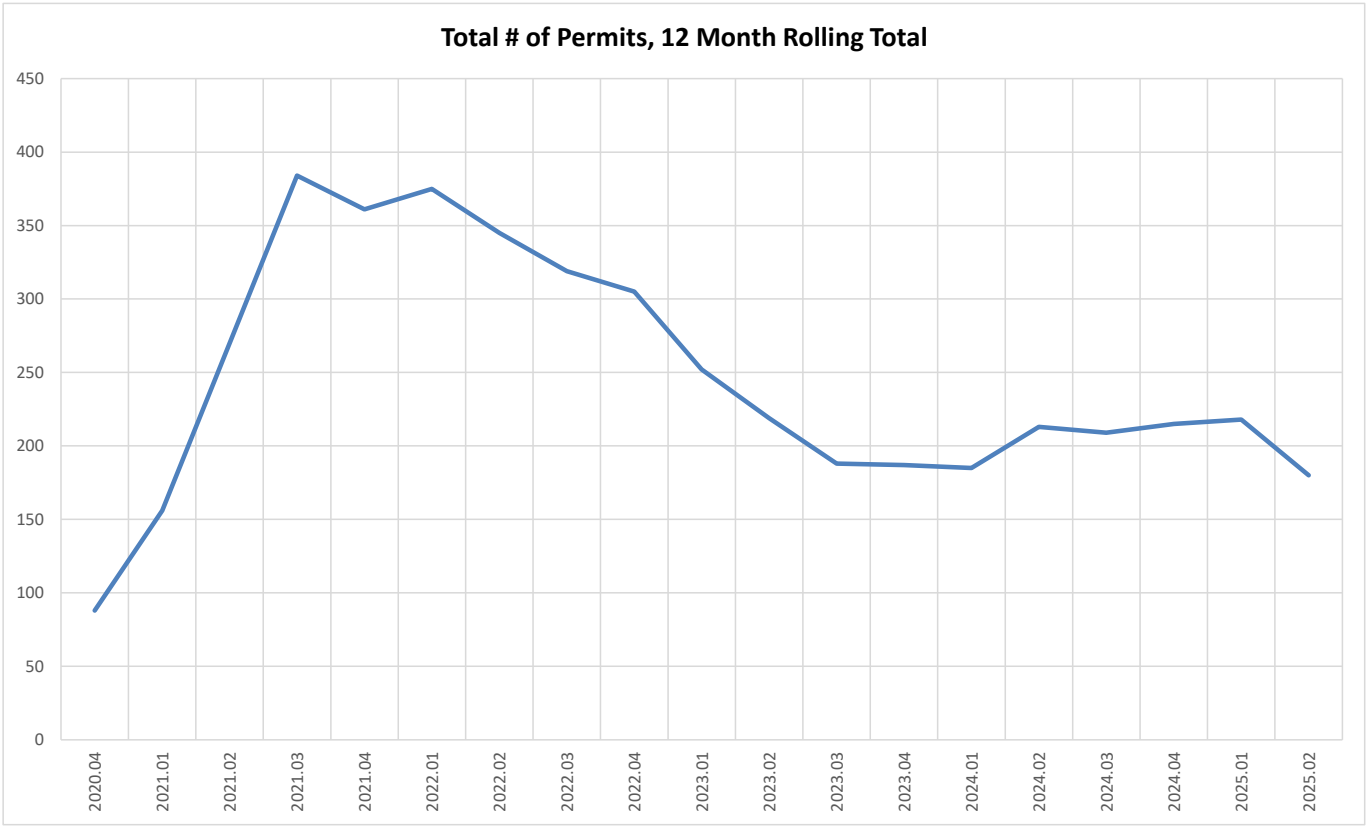
Building Permit Comparison Summary - Schedule A

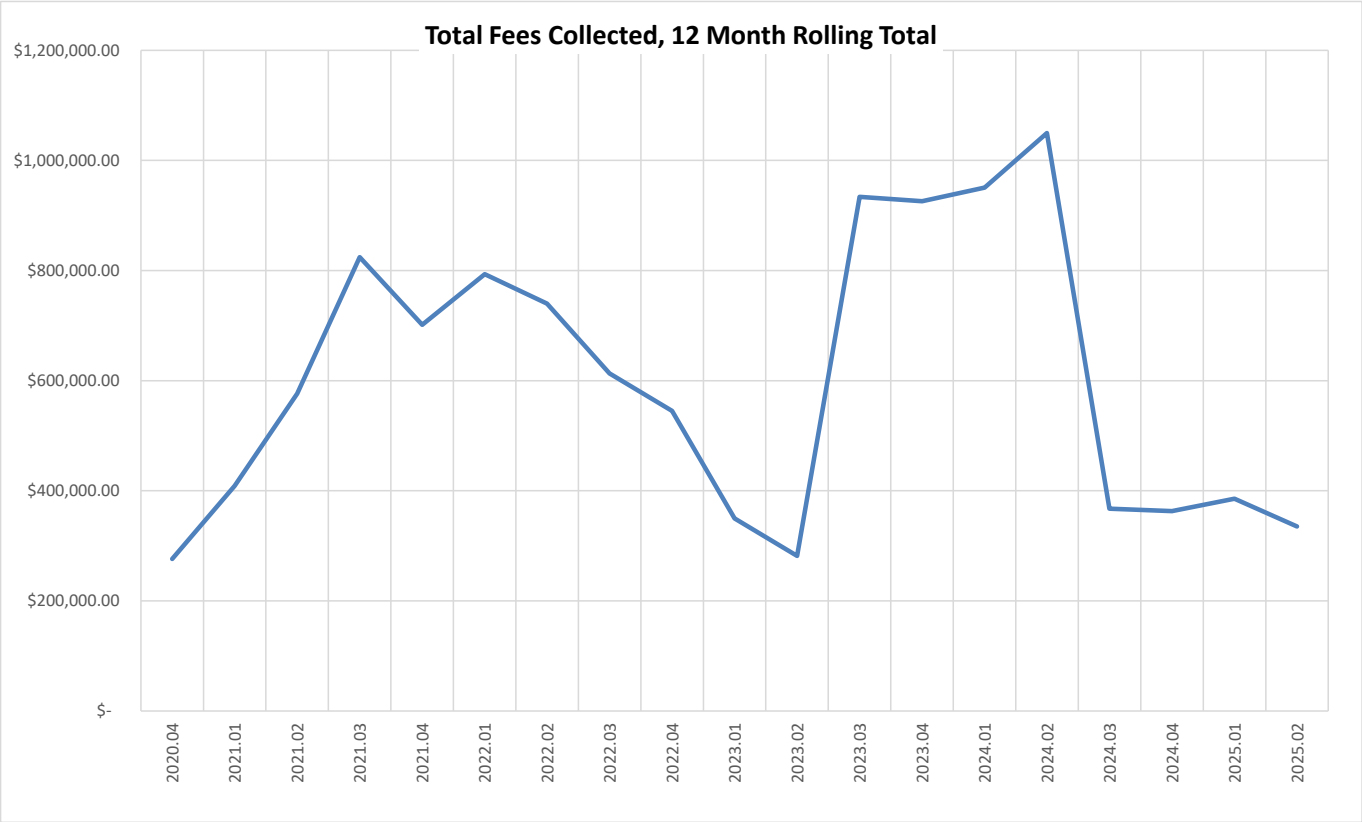
Report BLD-2025-003

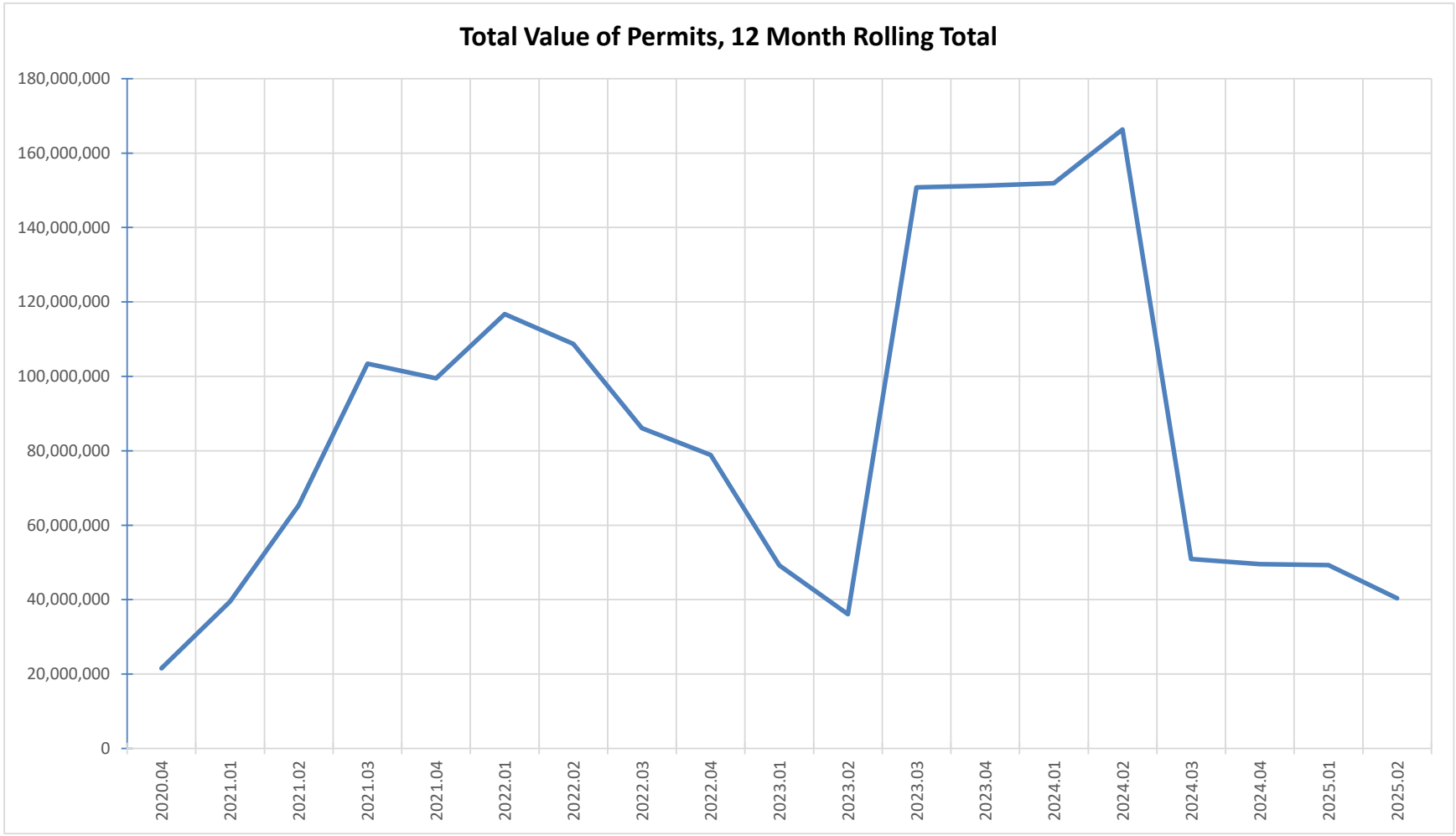
Second Quarter - April to June 2025

Category	Permit Count		Total Permit Fees		Cost of Construction	
	2025	2024	2025	2024	2025	2024
Accessory Structures	6	17	$4,616.65	$19,316	$336,500	$1,830,916
Agricultural Structures	0	1	$0.00	$1,595	$0	$200,000
Commercial/Industrial	0	0	$0.00	$0	$0	$0
Demolition	3	6	$548.00	$1,086	$25,001	$2,565,000
Institutional	0	1	$0.00	$2,325	$0	$650,000
Miscellaneous Permits	2	4	$752.00	$1,462	$14,000	$765,000
Plans Resubmission	2	0	$752.00	$0	$0	$0
Plumbing	2	0	$750.00	$0	$100,000	$0
Pools Enclosure	2	11	$516.00	$2,761	$57,200	$1,569,500
Residential Buildings	11	18	$77,013.85	$102,312	$9,340,000	$11,273,000
Residential Sewage System	13	18	$9,222.00	$12,587	$396,550	$526,115
Signs	0	3	$0.00	$1,216	$0	$455,915

SUMMARY TOTALS	2025	2024
Total Permits Issued	41	79
ARU's created	2	6
Dwellings Created	6	8
Total Dwellings Units Created	8	14
Total Permit Fees	$94,171	$144,659
Total Permit Value	$10,269,251	$19,146,946


Total # of Permits, 12 Month Rolling Total
450
400
350
300
250
200
150
100
50
0
2020.04
2021.01
2021.02
2021.03
2021.04
2022.01
2022.02
2022.03
2022.04
2023.01
2023.02
2023.03
2023.04
2024.01
2024.02
2024.03
2024.04
2025.01
2025.02


Total Fees Collected, 12 Month Rolling Total
$1,200,000.00
$1,000,000.00
$800,000.00
$600,000.00
$400,000.00
$200,000.00
$-
2020.04
2021.01
2021.02
2021.03
2021.04
2022.01
2022.02
2022.03
2022.04
2023.01
2023.02
2023.03
2023.04
2024.01
2024.02
2024.03
2024.04
2025.01
2025.02


Total Value of Permits, 12 Month Rolling Total
180,000,000
160,000,000
140,000,000
120,000,000
100,000,000
80,000,000
60,000,000
40,000,000
20,000,000
0
2020.04
2021.01
2021.02
2021.03
2021.04
2022.01
2022.02
2022.03
2022.04
2023.01
2023.02
2023.03
2023.04
2024.01
2024.02
2024.03
2024.04
2025.01
2025.02

REPORT PW-2025-002

TO:	Mayor and Members of Council
PREPARED BY:	Mike Fowler, Director of Public Works, Parks, and Facilities Courtenay Hoytfox, CAO
PRESENTED BY:	Mike Fowler, Director of Public Works, Parks, and Facilities Courtenay Hoytfox, CAO
MEETING DATE:	September 17, 2025
SUBJECT:	Township Speed Limit Study and Solar Powered Mobile Speed Identification Sign Recommendations

RECOMMENDATION

That Report PW-2025-002 entitled Township Speed Limit Study and Solar Powered Mobile Speed Identification Sign Recommendations be received; and

That Council endorse the recommendations of the Paradigm Speed Study; and

That Council direct staff to prepare a comprehensive signage plan in accordance with the Paradigm Speed Study, including recommended locations for additional solar-powered mobile speed identification signs, implementation strategies, and detailed costing, for Council's consideration during the 2026 budget process.

Purpose

The purpose of this report is to provide Council with the results of the public engagement conducted on the Township Speed Study prepared by Paradigm, and to bring forward recommendations related to speed limits, signage, and speed mitigation options.

Background

On July 12, 2023, Council heard a delegation from the Maltby Community Association regarding concerns about speeding on Maltby Road East. Following the delegation, Council directed staff to review the material in relation to the Roads Management Plan (RMP) once approved, to report back during the 2024 budget process on the feasibility of purchasing two solar-powered mobile speed identification signs, to incorporate lane marking strategies into the RMP, to implement electronic speed indicators

into future road projects, and to forward the delegation materials to the Police Services Board for its information.

In February 2025, two solar-powered mobile speed identification signs were purchased in accordance with the approved budget and were delivered in June 2025 at a cost of approximately $4,000 each. While these signs are portable and can be relocated throughout the Township, staff recommend that they remain in place for extended periods to maximize effectiveness. Staff further recommend that the two purchased signs be placed on Maltby Road East between Victoria Road South and Watson Road South. Council has budgeted $14k per year for the next 10 years for the purchase of additional speed signs to strengthen speed management efforts in other areas of the Township.

On October 9, 2024, Council reviewed the Paradigm Speed Study and endorsed its findings in principle, subject to public consultation. At that time, Council directed staff to seek feedback through EngagePuslinch, to inquire with the OPP regarding the enforceability of a by-law reducing unposted area speed limits to 60 km/h through gateway signage, to review the Roads Management Plan for adequacy in monitoring and evaluating speed management, and to report back on these items. Council also directed that a signage plan, a strategic speed limit implementation plan, and costing for additional speed mitigation tools be brought forward through future budget and work plan processes.

Analysis

In response to Council's request for clarification regarding the enforceability of a 60 km/h unposted speed limit with gateway signage, staff consulted with a prosecutor from the City of Guelph Legal and Court Services. Under the Highway Traffic Act, municipalities only have authority to designate area-wide speed limits if the prescribed speed is less than 50 km/h. Since the proposed 60 km/h limit exceeds this threshold, such a by-law would not be enforceable through gateway signage alone. Speed limits of 60 km/h must therefore be established on individual highways or portions of highways, and proper signage must be installed at intervals not exceeding 600 metres. Based on a desktop review, staff estimate that converting the Township's unposted 80 km/h road sections—approximately 48.9 kilometres in total—to 60 km/h would require 164 signs at a cost of approximately $33,000, in addition to higher annual costs for reflectivity testing.

With respect to the Township's Roads Management Plan, staff have confirmed that it provides an adequate framework for responding to and tracking speed complaints but the use of tools for monitoring and evaluating traffic patterns are required. Enhanced monitoring could be achieved through the use of Black Cat devices and speed radar signs capable of collecting and storing traffic data.

Public engagement was conducted through EngagePuslinch between November 25, 2024, and January 15, 2025. Survey results, attached as Schedule "A," demonstrate that residents generally agree speeding is a Township-wide concern. Half of respondents supported a uniform 60 km/h limit, citing consistency and safety, while the other half opposed such a change, favouring retention of 80 km/h limits on arterial

and rural roads and identifying enforcement as the more effective solution. Several respondents questioned the validity of the Paradigm study, suggesting that the Township should rely on Transportation Association of Canada (TAC) standards and increased OPP presence to guide speed management decisions.

Recommendation

Based on legislative requirements, the costs associated with signage, the feedback received through public engagement, and the need for enhanced monitoring and enforcement, staff recommend that the Township proceed with the recommendations of the Paradigm Speed Study. Specifically, speed limit changes should continue to be guided by TAC standards and implemented through a comprehensive signage plan. Staff will prepare this plan, including recommended locations for additional solar-powered mobile speed identification signs, implementation strategies, and detailed costing, for Council's consideration during the 2026 budget process.

Financial Implications

As noted throughout the report.

Applicable Legislation and Requirements

Highway Traffic Act, R.S.O. 1990
Municipal Statute Law Amendment Act, 2006
Safer School Zones Act, 2017

Engagement Opportunities

Township Website & Engage Puslinch

Attachments

Schedule "A" EngagePuslinch Paradigm Speed Study Survey

Respectfully submitted,

Mike Fowler,
Director of Public Works, Parks, and Facilities

Reviewed by:

Courtenay Hoytfox,
CAO

Survey Responses

25 November 2024 - 15 January 2025

Speed Study Engagement Survey

Engage Puslinch

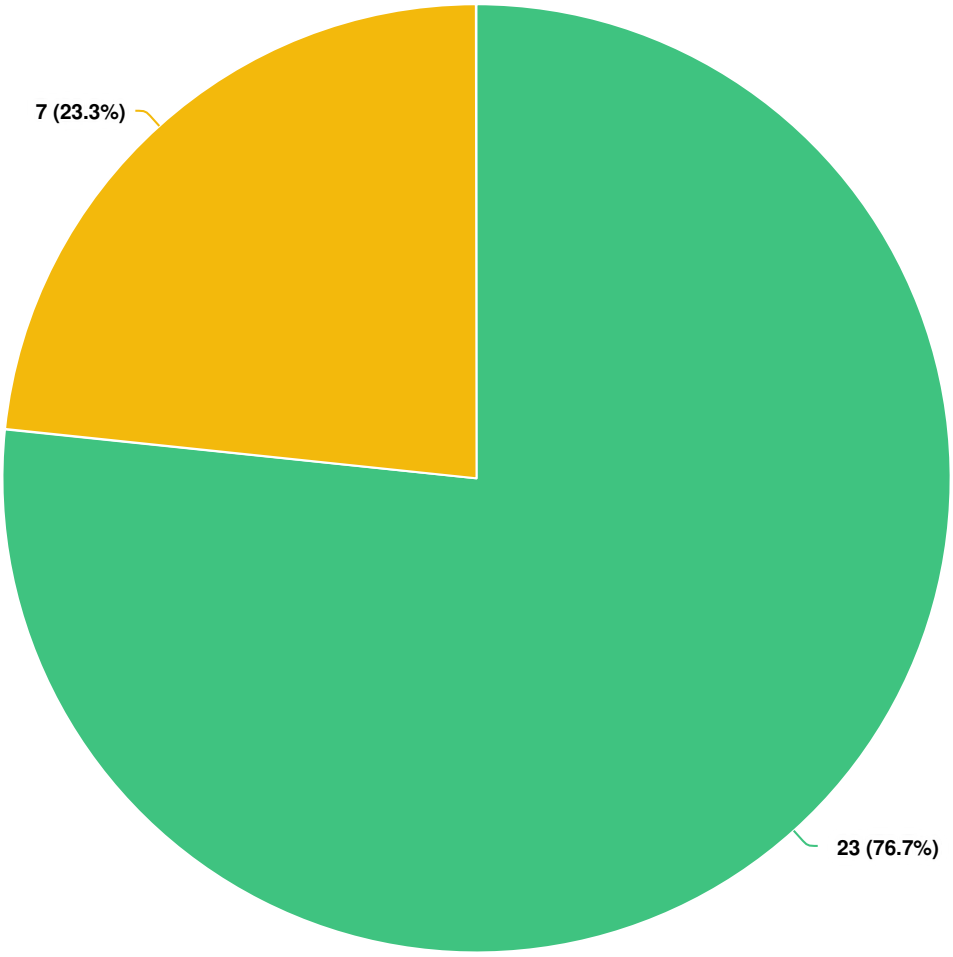
Project: Speed Study Engagement Survey

GRANICUS

VISITORS	
	37

CONTRIBUTORS			RESPONSES		
30			30		
0 Registered	0 Unverified	30 Anonymous	0 Registered	0 Unverified	30 Anonymous

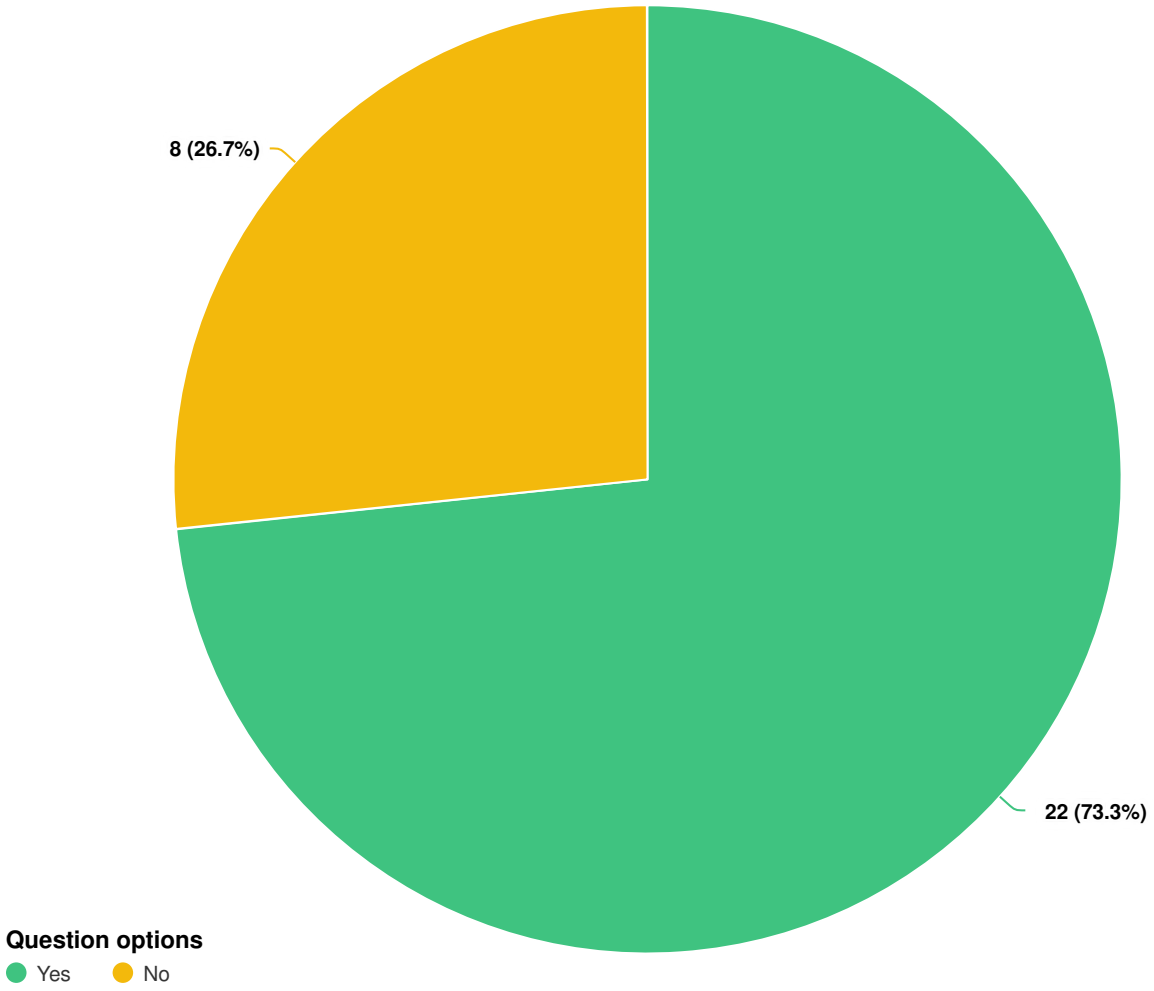
Q3 Do you believe that there are concerns related to speeding on the road that you live on?



Mandatory Question (30 response(s))
Question type: Radio Button Question

Question Options	Responses
Yes	23
No	7

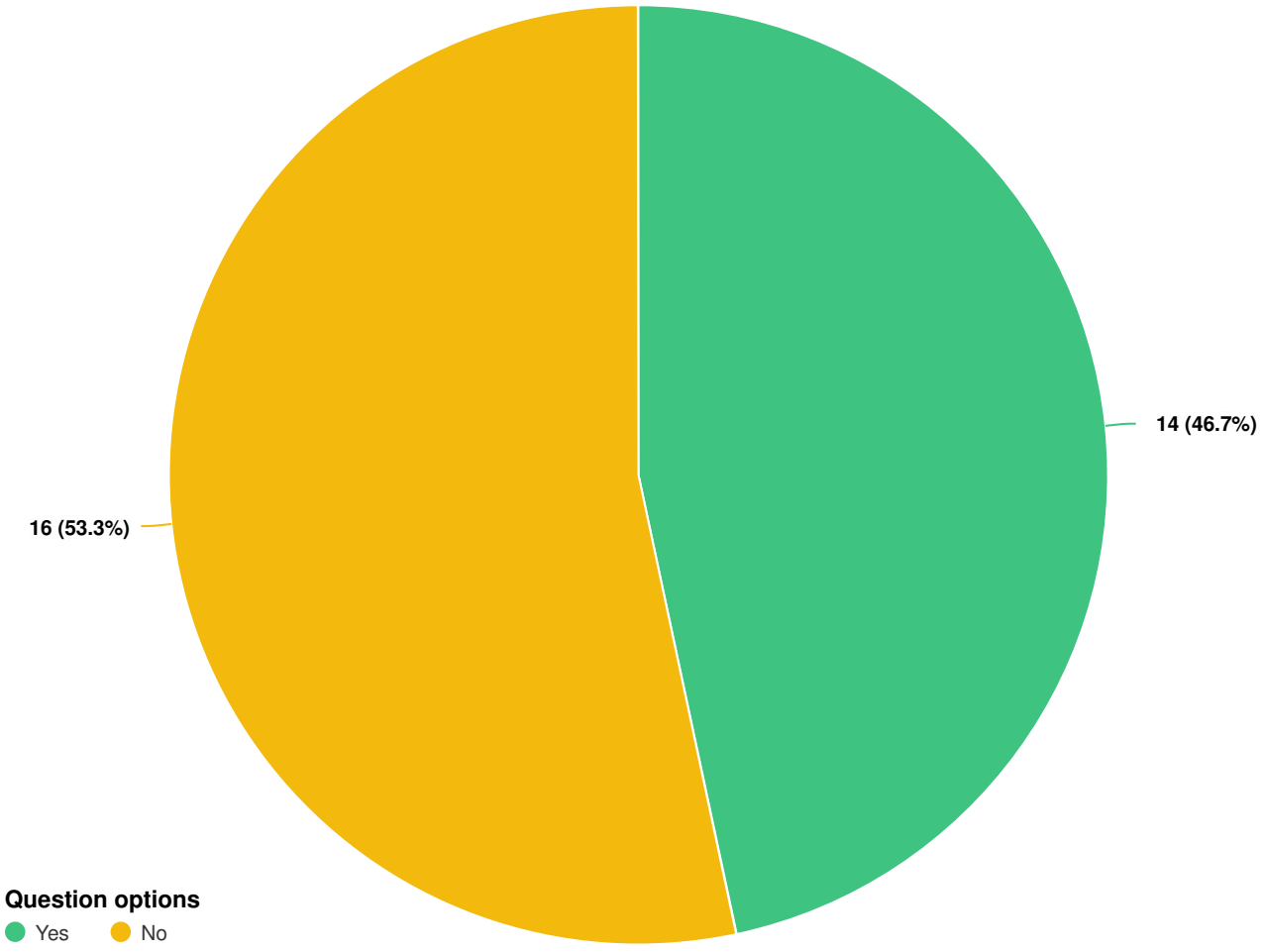
Q5 Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?



Mandatory Question (30 response(s))
Question type: Radio Button Question

Question Options	Responses
Yes	22
No	8

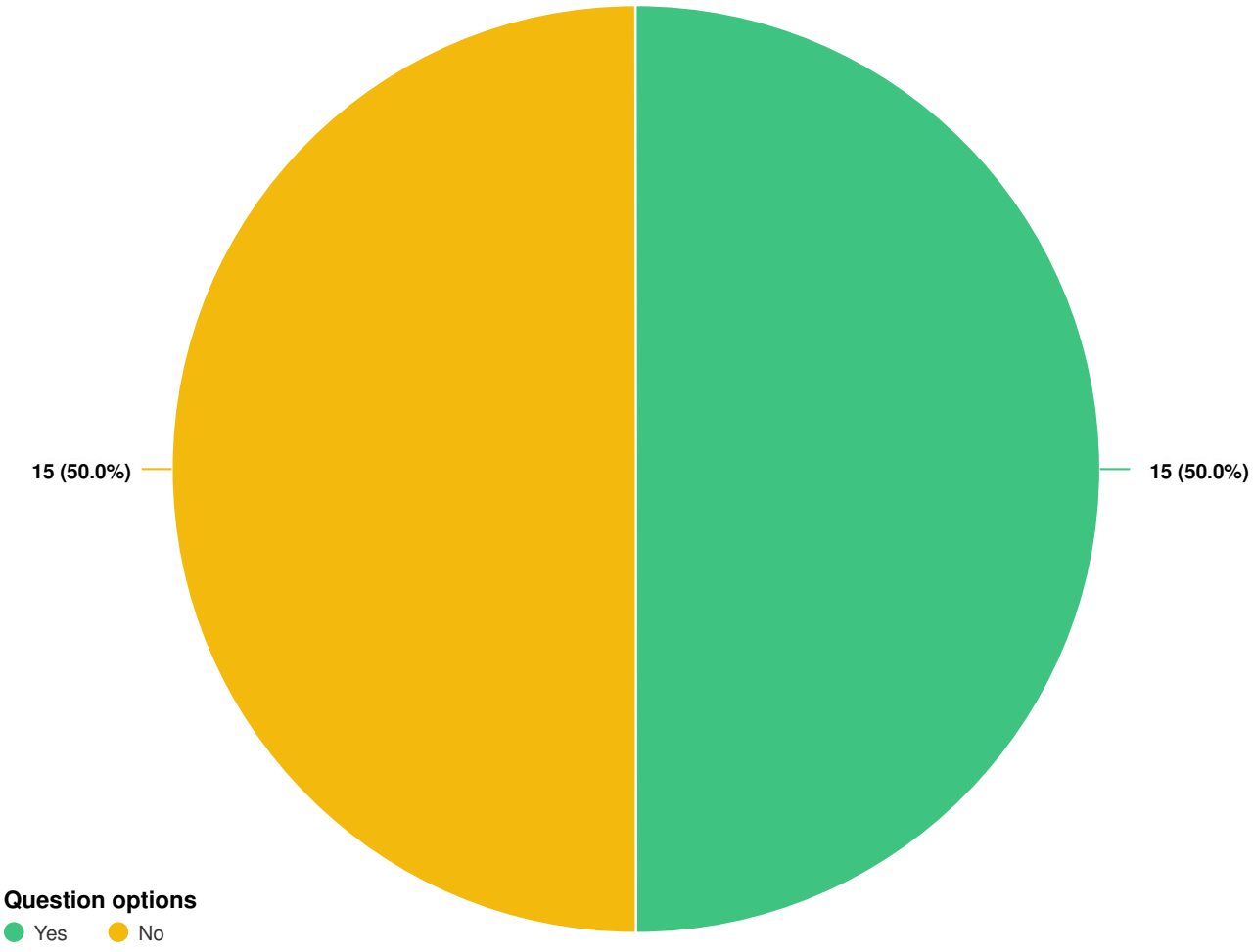
Q8 Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?



Mandatory Question (30 response(s))
Question type: Radio Button Question

Question Options	Responses
Yes	14
No	16

Q10 Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?



Mandatory Question (30 response(s))
Question type: Radio Button Question

Question Options	Responses
Yes	15
No	15

Respondent No: 1
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 13:50:56 pm
Last Seen: Nov 26, 2024 13:50:56 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	County road 35
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Vehicles have past my house on a regular basis so fast that they are just a blur. At 80 k cars pass like I'm not moving. I've had people screaming that I'm pulling in my driveway too slow.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	All roads

Q7. **Please briefly explain your answer:**

People have a general disregard for the speed limit. Speed limits should be enforced but very difficult to do.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	If you post 60 they will probably do 80 instead of 100 to avoid a racing.

Q12. **Do you have any other comments regarding the Speed Study?**

Why was county road 35 not included?

Respondent No: 2
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 14:02:51 pm
Last Seen: Nov 26, 2024 14:02:51 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Concession 4
Q2.	**How old are you?**	35-44
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Vehicle speed is significantly higher than posted limits. Its really bad on days where the 401 is jammed up.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Puslinch is situated geographically where we are a rural community impacted in large part by commuter traffic. In order of priority 1) Brock Rd, 2) Cty Rd 35 & Cty Rd 34.

Q7. **Please briefly explain your answer:**

I have noticed heavy traffic and excessive speeds on noted roads. Concession roads generally have less traffic. I really notice them where 401 is jammed up.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	I'm less concerned with a 60 km zone and more enforcement of 80 km zone.
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	See answer on #9.

Q12. **Do you have any other comments regarding the Speed Study?**

I feel requesting OPP enforcement of our current speed limits effectively is more impactful that reducing the speed limits and having (i.e. the same) enforcement. i think the proposed change to uniform 60 km will not be effective alone.

Respondent No: 3
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 14:37:36 pm
Last Seen: Nov 26, 2024 14:37:36 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Badenoch Street
Q2.	**How old are you?**	35-44
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Posted 50 km - very few vehicles go 50km beginning where posted limit starts--> also used as ETR for 401 even though not designated for that purpose
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Victoria Road, Maltby Road, Wellington Road 34, 32, & 35. Concession 7, Concession 2, Concession 11, Hume Road, County Road 46

Q7. **Please briefly explain your answer:**

OPP presence for enforcing speed limits throughout the township is limited and it shows based on the speeding occurring throughout the Township

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	80km is appropriate - anything other than this should be posted

Q12. **Do you have any other comments regarding the Speed Study?**

Speed limits set are adequate - the issue lies on the fact that the limits are not enforced

Respondent No: 4
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 15:50:27 pm
Last Seen: Nov 26, 2024 15:50:27 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Victoria
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	There needs to be a 3 way stop at Old Ruby Lane to slow traffic down. Transports also use this road on a daily basis to by pass going up 6 to Clair
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Victoria and 34
Q7.	**Please briefly explain your answer:**	
	Need more enforcement	
Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	I don’t agree
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	60 isn’t necessary on most roads
Q12.	**Do you have any other comments regarding the Speed Study?**	
	It was a waste of money.	

Respondent No: 5
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 16:12:41 pm
Last Seen: Nov 26, 2024 16:12:41 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Watson Rd S
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	No
Q4.	**Please briefly explain your answer:**	Most cars are driving 80-90km per hour. This is what you would expect on a rural commuter road. There is definitely the odd vehicle driving well above the limit, but no more than anywhere else.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	All roads through Aberfoyle, concession 2, concession 1

Q7. **Please briefly explain your answer:**

These are the roads I most often notice tailgating and passing

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	Where do you find the speed study? It is not attached to this survey. So not sure what the recommendations are.
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	It's too slow on some of the roads. The roads are there to move vehicles - not pedestrians.. A 60km speed limit on all roads would not be realistic because the roads have designs that the natural driving speed is above 60.

Q12. **Do you have any other comments regarding the Speed Study?**

Changing the speed limits doesn't do anything without the police around to give fines.

Respondent No: 6
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 16:41:24 pm
Last Seen: Nov 26, 2024 16:41:24 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Forestell Rd
Q2.	**How old are you?**	65+
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	People speed on this road all the time., there is a sharp corner at Roszell and some end up in the trees.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	1st Conc, 2nd Conc, 4th Conc, Forestell, Roszell and all the County Rds

Q7. **Please briefly explain your answer:**

People speed on all roads that they can, not much police enforcement. When 401 is blocked the vehicles treat the township and county roads like 401 and speed.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	-

Q12. **Do you have any other comments regarding the Speed Study?**

-

Respondent No: 7
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 18:38:10 pm
Last Seen: Nov 26, 2024 18:38:10 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Nassagaweya Puslinch Townline
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Yes, there are no stop signs on our road , since Watson was closed for paving more stop signs added more traffic is on our road now. Drivers Love the hills for more speed which is dangerous for oncoming traffic and walkers .
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Nassagaweya Puslinch townline , Hume's road , Maltby south
Q7.	**Please briefly explain your answer:**	

Nassagaweya Puslinch townline has no stop signs ,

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	Yes of course , country roads are unpredictable , farm machinery , walkers , bikers

Q12. **Do you have any other comments regarding the Speed Study?**

Police are welcome to sit at the end of our driveway

Respondent No: 8
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 19:00:39 pm
Last Seen: Nov 26, 2024 19:00:39 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	side road 10 south
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	we live on corner of gore and sr 10. gore is a speedway. People not stopping coming off wellington 35 and have had to slam brakes on daily to avoid those that either don't stop or just pull out in front
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	gore/wellington 35 / sr 10
Q7.	**Please briefly explain your answer:**	

see above

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	may save lives but people pass you if you are going 80

Q12. **Do you have any other comments regarding the Speed Study?**

none

Respondent No: 9
Login: Anonymous
Email: n/a

Responded At: Nov 26, 2024 21:27:08 pm
Last Seen: Nov 26, 2024 21:27:08 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Telfer Glen St
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Cars speed through the stop sign on Calfass at settlers Glen . People don't stop , someone is going to get badly injured.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	There is a lot of speeding on the side roads
Q7.	**Please briefly explain your answer:**	No explanation
Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	No explanation necessary
Q12.	**Do you have any other comments regarding the Speed Study?**	No

Respondent No: 10
Login: Anonymous
Email: n/a

Responded At: Nov 27, 2024 07:41:39 am
Last Seen: Nov 27, 2024 07:41:39 am
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Sideroad 20
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	No
Q4.	**Please briefly explain your answer:**	Not unless roads are closed or the 401 is backed up
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Brock road in Aberfoyle

Q7. **Please briefly explain your answer:**

Restrictions on speed during school hours may be necessary and patrolled. The entire township does not need new speed limits.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	Actual incident data was not considered.
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	Limit the changes to only high incident areas.

Q12. **Do you have any other comments regarding the Speed Study?**

Fact versus perception. Utilize actual incident data, not just complaints. No need for a great expense for the entire township.

Respondent No: 11
Login: Anonymous
Email: n/a

Responded At: Nov 27, 2024 14:55:14 pm
Last Seen: Nov 27, 2024 14:55:14 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Gore
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Constant speeding on my road. Complaints to police and Blackcats were installed at end of 2023
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	ALL roads in the township

Q7. **Please briefly explain your answer:**

Doesn't matter the road, speeding is happening throughout the township

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	60 km/h would be an adequate speed for any unmarked roads

Q12. **Do you have any other comments regarding the Speed Study?**

Changing speed limits won't do much. What is needed however is MORE enforcement from the OPP!

Respondent No: 12
Login: Anonymous
Email: n/a

Responded At: Nov 29, 2024 08:07:11 am
Last Seen: Nov 29, 2024 08:07:11 am
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Gore road
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Morning and night commute the road becomes highway. Also the artery for when 401 accident and it becomes worse
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Road north concession 1 and 2 also arteries when accidents.

Q7. **Please briefly explain your answer:**

All arteries when 401 shuts down. People are speeding. Running stop signs this 35 and concession 1 accidents and 35 and concession 2 So many

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	Support

Q12. **Do you have any other comments regarding the Speed Study?**

But is there a budget for extra police patrol to Monitor because it means nothing if you don’t have that suppprt

Respondent No: 13
Login: Anonymous
Email: n/a

Responded At: Dec 14, 2024 00:21:33 am
Last Seen: Dec 14, 2024 00:21:33 am
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Brock rd
Q2.	**How old are you?**	65+
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Trucks and cars barrel down at all times of the day and night.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Lake rd

Q7. **Please briefly explain your answer:**

People in a hurry no stopping and straight roads. Speeding/drunk driving funding cut backs

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	Opp does not have the manpower to follow thorough
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	Note above

Q12. **Do you have any other comments regarding the Speed Study?**

Nil

Respondent No:	14	**Responded At:**	Dec 17, 2024 17:51:23 pm
Login:	Anonymous	**Last Seen:**	Dec 17, 2024 17:51:23 pm
Email:	n/a	**IP Address:**	n/a

Q1.	**What road in the Township do you live on?**	Sideroad 10 South
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	We are posted at 60 and a dead end street. Should be lower due to length of road
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	No
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	not answered

Q7. **Please briefly explain your answer:**

I am not aware of anyone complaining we are too fast or too slow on our roads

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	Not sure of what their plan is. If it is 60 on all marked roads then it will
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	Again not aware of any thing wrong wit the speeds on our road

Q12. **Do you have any other comments regarding the Speed Study?**

No

Respondent No: 15
Login: Anonymous
Email: n/a

Responded At: Dec 18, 2024 09:08:51 am
Last Seen: Dec 18, 2024 09:08:51 am
IP Address: n/a

Q1.	**What road in the Township do you live on?**	34
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	As the emergency route and commuter route it is insane how fast people travel over the posted 80 kms on my road and the adjacent connector roads
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	34, 35, 32, concession 1 & 2, gore, Maltby, Gordon, etc etc

Q7. **Please briefly explain your answer:**

Traffic has increased incredibly all over the township. More traffic more speeding and garbage dumping along with it!

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	80 is high as it is and many drive faster than that!

Q12. **Do you have any other comments regarding the Speed Study?**

More patrolling required. Never see any speed enforcement measures

Respondent No: 16
Login: Anonymous
Email: n/a

Responded At: Dec 28, 2024 10:28:13 am
Last Seen: Dec 28, 2024 10:28:13 am
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Maple Leaf Lane
Q2.	**How old are you?**	65+
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	We are one house away from Cty Rd 46 in Aberfoyle which has a speed limit of 50 k/hr. There are often cars flying through the village including dump/gravel trucks and transports. Motorcycles also like to go thru at top speed.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	CR 46, Victoria Rd., CR 34, round-about at 34 & 46

Q7. **Please briefly explain your answer:**

I mainly do the speed limit and am tailgated or passed. Was recently passed near the top of a hill.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	Did not read the report as it was too long. Sorry.
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	People generally drive too fast & appear to be in a big hurry. Most often go over the speed limit, so slowing it down would be good.

Q12. **Do you have any other comments regarding the Speed Study?**

No.

Respondent No: 17
Login: Anonymous
Email: n/a

Responded At: Jan 03, 2025 11:03:58 am
Last Seen: Jan 03, 2025 11:03:58 am
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Concession rd 1
Q2.	**How old are you?**	35-44
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	a posted 60 km between con 7 and hwy 6 south. Moved in two years ago, almost been hit getting mail 4 times. One in which my mailbox was hit and driver continued on at 100kms. It's a connection from Cambridge traveled 80-120kms no less passing on hills.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Concession rd 1

Q7. **Please briefly explain your answer:**

It's a drag way from Cambridge to hwy 6 south, speeds of 80 min to 120-140 kms per hour. Never cops on the road and the one I did see in tow years was also speeding back to the office and not concerned about others speed at 100kms. So if cops don't care why would the citizens driving through our communities care?

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	Yes. It's dangerous trying to get out of our driveways in the am and around 3 pm as cars are doing 100-140 kms in the 60 kms zones. Someone or myself are going to get killed by speeding drivers coming through with no concerns or cop presents.

Q12. **Do you have any other comments regarding the Speed Study?**

If police aren't policing our communities to catch these drivers they will continue to speed eventually killing someone pulling out of our driveways. I'll update in 2 weeks if I see a police presents, but it doughtfull.

Respondent No: 18
Login: Anonymous
Email: n/a

Responded At: Jan 06, 2025 13:40:21 pm
Last Seen: Jan 06, 2025 13:40:21 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Arkell Road (east)
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	It's a residential area, speed limit too high, too many trucks, even city bus, road is a cut through, It's very dangerous for us to pull into our own driveway as people are accelerating to overtake us as we are slowing with our left indicator on early!
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Arkell Road eastbound between Victoria and Watson. People using county roads to whip through and bypass highway 6 / Gordon / Victoria.

Q7. **Please briefly explain your answer:**

Dangerous drivers love this straight strip to speed, most including commuters use it as a cut through to bypass highway 6 / Gordon St and Victoria Rd. Need to lower speed limit, as posted 70 means most are going 80-90 and above. Need more OPP presence…they are welcome to use my driveway to nail speeders.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	Too many trucks destroying county roads
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	Consistency helps drivers, if 60 they'll go 80 instead of 90+

Q12. **Do you have any other comments regarding the Speed Study?**

Didn't notice anyone around here doing a study of traffic or speed.

Respondent No: 19
Login: Anonymous
Email: n/a

Responded At: Jan 06, 2025 15:10:44 pm
Last Seen: Jan 06, 2025 15:10:44 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Victoria Rd S
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Posted speed is 60km and cars are travelling at minimum 80km
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Victoria Rd S

Q7. **Please briefly explain your answer:**

Most cars are travelling in excess of 60km and its difficult to get out of the driveway without having a car right on your back bumper due to the hills on the road obstructing cars from view.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	Hopefully it will slowdown cars

Q12. **Do you have any other comments regarding the Speed Study?**

No

Respondent No: 20
Login: Anonymous
Email: n/a

Responded At: Jan 10, 2025 17:09:40 pm
Last Seen: Jan 10, 2025 17:09:40 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Maltby Road East
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Traffic has increased significantly in the last year with many speeding and racing on our road. We can not walk the dogs on our road any longer and bringing the garbage down or plowing the snow is increasingly dangerous.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Maltby, Watson, Victoria

Q7. **Please briefly explain your answer:**

As Guelph grows, many commuters are using roads in Puslinch. Drivers leave the golf course with a few drinks and actually laugh out the window as you are jumping from the front of their car.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	The smaller, curved roads with limits of 60 should be decreased to 50, especially heavily treed roads with hidden driveways

Q12. **Do you have any other comments regarding the Speed Study?**

The city of Guelph has taken a stance on speeding and safety with decreased limits and speed cameras and Puslinch should follow their lead.

Respondent No: 21
Login: Anonymous
Email: n/a

Responded At: Jan 11, 2025 21:46:09 pm
Last Seen: Jan 11, 2025 21:46:09 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Gore rd
Q2.	**How old are you?**	35-44
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	No
Q4.	**Please briefly explain your answer:**	I have no concerns about speed.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	No
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	not answered

Q7. **Please briefly explain your answer:**

Traffic already flows poorly during rush hour adding speed restrictions won't help traffic flow better and will only expose people to being more vulnerable to being ticketed by police because they are used to driving at 80km in permitted areas, when people are already feeling how expensive life is, this is not the way forward

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	Consulting companies make overly cautious recommendations because they are paid to be a liability scapegoat, their insights aren't worth the paper they are written on
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	See above.

Q12. **Do you have any other comments regarding the Speed Study?**

Stop wasting money on consulting, do research and governing yourselves. Also fire your CAO, she's useless.

Respondent No: 22
Login: Anonymous
Email: n/a

Responded At: Jan 12, 2025 06:41:25 am
Last Seen: Jan 12, 2025 06:41:25 am
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Gilmour rd
Q2.	**How old are you?**	65+
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	trucks passing on the road over the speed limit (with a posting no trucks allowed on Gilmour)
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	Brock rd south and Gilmour road
Q7.	**Please briefly explain your answer:**	excessive sped especially in the round abouts
Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	consistency throghout the township
Q12.	**Do you have any other comments regarding the Speed Study?**	lack of enforcement

Respondent No: 23
Login: Anonymous
Email: n/a

Responded At: Jan 13, 2025 18:27:24 pm
Last Seen: Jan 13, 2025 18:27:24 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Leslie Rd W.
Q2.	**How old are you?**	65+
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	No
Q4.	**Please briefly explain your answer:**	Most cars are repsectful of the speed limit, however it is difficult to really determine what speed they are actually driving
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	No
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	not answered

Q7. **Please briefly explain your answer:**

Again most people drive within speed limits up to 10 kPH over which is not unreasonable.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	The study is full of errors, as I reported to Council earlier
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	Most roads in Puslinch are arterial roads which according to the province use a 80 KPH speed limit.

Q12. **Do you have any other comments regarding the Speed Study?**

It must be redone and resubmitted to remove the errors.

Respondent No: 24
Login: Anonymous
Email: n/a

Responded At: Jan 13, 2025 19:13:26 pm
Last Seen: Jan 13, 2025 19:13:26 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Leslie Rd W
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	No
Q4.	**Please briefly explain your answer:**	Speeding is simply not an issue. It's a country road with not that much traffic thankfully and as in there is no speed limit posted most people do somewhere around 60-70 km/h which is perfectly safe,
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	No
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	not answered

Q7. **Please briefly explain your answer:**

People only seem to be speeding in built up areas.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	I think the study is somewhat flawed. There is never any speed enforcement anyway by the OPP and it's unlikely to ever be.
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	There is never any speed enforcement anyway by the OPP and it's unlikely to ever be.

Q12. **Do you have any other comments regarding the Speed Study?**

Not sure why we're wasting time and funds on something that is not a general concern. If a few people have a concern then they should have a localized speed limit.

Respondent No: 25
Login: Anonymous
Email: n/a

Responded At: Jan 13, 2025 20:12:29 pm
Last Seen: Jan 13, 2025 20:12:29 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	1
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	No
Q4.	**Please briefly explain your answer:**	There's no speed signs. How can you say There's a problem
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	No
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	not answered
Q7.	**Please briefly explain your answer:**	

Most of tge township has no speed signs

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	Put 80 km/h signs and ticket people
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	It's an ope. Country rd. Are you delusional

Q12. **Do you have any other comments regarding the Speed Study?**

Put speed signs up for 80 km/h

Respondent No: 26
Login: Anonymous
Email: n/a

Responded At: Jan 13, 2025 20:55:05 pm
Last Seen: Jan 13, 2025 20:55:05 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Brock Road
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	This is a major route between Guelph and the 401 and therefore drivers are eager to get to their destination
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	No
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	not answered

Q7. **Please briefly explain your answer:**

In general, I don't experience excess speeding on other roads from mine

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	In general, I think the posted limits represent the appropriate speed for the road
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	I think most of these roads can support the 80km/h

Q12. **Do you have any other comments regarding the Speed Study?**

No

Respondent No: 27
Login: Anonymous
Email: n/a

Responded At: Jan 13, 2025 22:21:08 pm
Last Seen: Jan 13, 2025 22:21:08 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Brock Rd
Q2.	**How old are you?**	45-54
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	In Aberfoyle proper it can be a concern because there's a school and it's more densely populated than rural areas. There's also been issues at the Maltby intersection, but I'm not sure how much of that is speeding related.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	No
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	not answered

Q7. **Please briefly explain your answer:**

In more densely populated areas there are, but the appropriate speed limits are already in place, people just aren't abiding by them. I'm sure there are other specific locations where speeding may be a concern, like at specific intersections, but I don't think it's an issue everywhere.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	They should follow the TACs recommendations.
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	While I'm sure there are a few isolated locations where lowering the speed limit to 60 may be beneficial, a blanket 60 seems like a heavy handed solution that doesn't make a lot of sense, from a safety or financial standpoint.

Q12. **Do you have any other comments regarding the Speed Study?**

I think they should follow TAC recommendations..

Respondent No: 28
Login: Anonymous
Email: n/a

Responded At: Jan 13, 2025 23:50:13 pm
Last Seen: Jan 13, 2025 23:50:13 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	Brock Road South
Q2.	**How old are you?**	Under 18
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	Whilst I do have concerns about speeding on my local road, this study does not affect my road in its recommendations. To add, my road is posted at 50 km/h and part of it is under a community safe zone, so many solutions have been applied already.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	N/A

Q7. **Please briefly explain your answer:**

As said by Councillor Hurst in the October 9, 2024 council meeting, "I think the average speed on concession four is about 110 type of thing right and so I'm concerned with reducing the speeds to 50 and 60 and having little enforcement, setting unrealistic expectations within the community so we can say great, put a 60 sign on concession 4, and if it's not being enforced, I'm envisioning a number of Township residents saying, 'What was the whole process of doing this if we haven't addressed the speeding issue in the first place,' so that's a tough thing to not to crack, and I would say on some roads probably maybe 80 is fine, in a good concession road that's well paved and it's good." Councillor Hurst's wisdom surrounding this topic shows how that without proper inforcement, people who speed will still speed, especially out of habit, even if the limit has changed. Furthermore, all this could do would decrease traffic speeds and lead to more upset by the community. Referencing back to what Councillor Hurst said, these upsets would lead people to question why so much money was spent, with them perceiving it as a waste of their hard-earned taxed money.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	The reductions in speed limits is not the only answer to increase road safety. For example many of the roads qualified as having high pedestrian and cyclist risk, and these risks could be reduced if there was investment into proper infrastructure.
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No

Q11. **Please briefly explain your answer:**

As stated earlier reducing a speed limit is not the only answer to increase road safety. Furthermore, to effectively use this reduced this speed limit it would be too expensive. This conversation shall be continued in the following question.

Q12. **Do you have any other comments regarding the Speed Study?**

In regards to question 11: As much as Mayor Seeley, staff, and some of the council may believe that a single sign at each entrance to the township may suffice to keep people going to the new speed limit, this would not properly work. For example, as admitted by Councillor Goyda at that same October 9, 2024 meeting, keeping to the speed limit can be hard to do, especially if you have been conditioned over years to know that a certain area means a specific speed should be followed. It follows that sufficient signage throughout the township should be used to remind people and build new habits that a certain area has a new speed limit instead of the older, and likely higher, speed limit. This approach would allow for greater obediance to the speed limit compared to if there is just one sign at the entrance to the township, as consistent reminders would ensure to keep people with the speed limit in mind. Finally, the question must be raised: what if, for some reason, someone doesn't see the signage at the entrance to the township? For example, as drivers, we must always be alert to our surroundings, so we should be seeing signage, but maybe visibility is reduced, or someone else is driving recklessly, and you must divert focus to the task at hand, which would be avoiding the reckless driver and ensuring the safety of yourself and others; if someone doesn't see this sign, then how would they necessarily know the changed speed limit and be able to obey the new speed limit? In addition to these, this report seems to raise some concerns about some scientific validity around this study. For example, it states, "Paradigm assigned the highest risk level when assessing roads without dedicated pedestrian facilities, regardless of the volume of traffic or pedestrians. Pedestrian use may be low because the speed limit is high or the road is currently providing an uncomfortable environment for pedestrians" (24). Disregarding the pedestrian flow clearly does not take all factors into account when deciding the safety of a road. To take an example, the 401 is a high-speed highway that does not provide well-made infrastructure, and under the definition of this study, it would be placed in the category of "higher" risk, but since no pedestrians can be on the 401, they can ignore that risk. As such, it follows that the number of pedestrains is essential to deciding the safety of a road for pedestrains. As if very few pedestrians are on a road, but it is considered "higher" risk, we can still almost pretend pedestrians don't exit because there cumulative effect is very low. Furthermore, Paradigm's disregard for the recommendations of the TAC shows some concern, as a national organization dedicated to transportation should have a critical decision factor in the speeds, but in some cases the speeds recommended by the TAC are 20–30 km/h higher than the Paradigm's suggested numbers, even though the TAC has a much better understanding of the situation due to their access to resources and information that surpasses what many other organizations would have access to. Such a disparity between the numbers presents concerns about why they are so different. This speed study, whilst providing an important perspective, should not be the ending of the discussion about speed limits, and it should be put under a closer lens in the future in order to deal with many of the inconsistencies. Overall, the speed study should have closer consideration put to it, and then laws should be passed about these speed limits while ensuring to also provide enforcement to make a reduced speed limit more effective, instead of just trying to make a costly and possibly ineffective solution to the problem at hand.

Respondent No:	29	**Responded At:**	Jan 14, 2025 00:00:03 am
Login:	Anonymous	**Last Seen:**	Jan 14, 2025 00:00:03 am
Email:	n/a	**IP Address:**	n/a

Q1.	**What road in the Township do you live on?**	Leslie Road W
Q2.	**How old are you?**	Under 18
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	No
Q4.	**Please briefly explain your answer:**	Few cars drive down my road, as it is out of the way.
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	No
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	not answered

Q7. **Please briefly explain your answer:**

I find that cars often drive at speeds appropriate for the road conditions.

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	No
Q9.	**If no, please explain your answer:**	The Speed Limited Study is rather flawed, considering its observations seem arbitrary and its recommendations do not follow that of the TAC. The idea of having absolutely no roads with a 80km/h speed limit is bizarre and impractical.
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	No
Q11.	**Please briefly explain your answer:**	I believe that the current 80km/h speed limit is appropriate for most all unmarked roads.

Q12. **Do you have any other comments regarding the Speed Study?**

The Speed Limit Study contradicts itself, for example it defines "higher" pedestrian and cyclist exposure as "used by" pedestrians and cyclists while also saying "Paradigm assigned the highest risk level when assessing roads without dedicated pedestrian facilities, regardless of the volume of traffic or pedestrians. "

Respondent No: 30
Login: Anonymous
Email: n/a

Responded At: Jan 14, 2025 13:43:06 pm
Last Seen: Jan 14, 2025 13:43:06 pm
IP Address: n/a

Q1.	**What road in the Township do you live on?**	35
Q2.	**How old are you?**	55-64
Q3.	**Do you believe that there are concerns related to speeding on the road that you live on?**	Yes
Q4.	**Please briefly explain your answer:**	This road is used from 401 to Guelph. Very unsafe driving and speeding. I have had drivers scream at me for not pulling in my driveway fast enough. Also passing me when trying to turn left into my driveway..
Q5.	**Do you believe that there are concerns related to speeding broadly within the Township of Puslinch?**	Yes
Q6.	**Please indicate the road(s) that concern you the most when it comes to high vehicle speeds:**	35 brock road

Q7. **Please briefly explain your answer:**

Speeding unsafe passing speeding up to get in roundabout

Q8.	**Should the Township follow the recommendations as outlined in the Speed Limit Study conducted by Paradigm Transportation Solutions Limited?**	Yes
Q9.	**If no, please explain your answer:**	not answered
Q10.	**Would you be supportive of the Township adopting a uniform speed of 60 km/h on all unmarked roads in the Township?**	Yes
Q11.	**Please briefly explain your answer:**	If you lower the speeds maybe they will drive 80 instead of 100

Q12. **Do you have any other comments regarding the Speed Study?**

Teach drivers how to stop at stop signs. Portable speed cameras moved around randomly

September 8, 2025

Mayor and Council
7404 Wellington Road 34,
Puslinch, Ontario

Dear Mayor and Council,

RE: 2025 Population Methodology Guideline – Province of Ontario

Purpose

The Province of Ontario has released a new document, for comments, on how population and employment forecasts will be prepared (see **Appendix A**) to implement growth in Ontario's municipalities. The purpose of this report is to provide an overview of the new proposed methodology for population and employment forecasting.

Background

Population and employment forecasts are required to plan for a community's future growth and development. Wellington County, as the upper tier municipality, prepares the forecasts and works with each member municipality to determine how both population and employment will be shared across the County. The population and employment forecasts are the basis for analyzing the need for land for housing and jobs, ensuring there is sufficient land for growth to implement the population and job forecasts.

Since 2006, the Province required municipalities to use a Provincial Land Use Plan - "Places to Grow (more recently called A Place to Grow) – the Provincial Land Use Plan for the Greater Golden Horseshoe". This Plan included population and jobs forecasts for each upper and single tier municipality, as well as a number of policy requirements. The forecasts were used by the upper/single tier municipalities to complete the analysis of land supply and determine how and where growth would occur. A companion document to Places to Grow was the "Land Needs Methodology for the Greater Golden Horseshoe" – a guideline on how to use the population and employment forecasts to determine the need for land for housing and jobs.

In 2024, the Province released the Provincial Planning Statement (PPS 2024) and, at the same time, repealed "A Place to Grow" – the Land Use Plan for the Greater Golden Horseshoe resulting in a need for provisions to allow municipalities who were within the Plan Area for A Place to Grow to transition to the new requirements. The PPS 2024 contains two key policy requirements regarding population forecasts and this transition period:

"2.1 Planning for People and Homes

1. As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance and may modify, as appropriate.
2. Notwithstanding policy 2.2.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning."

The Ministry of Finance has released population forecasts to the year 2051 for each Census Division (CD) in Ontario. Puslinch is within the Wellington Census Division. Of note, A Place to Grow provided a separate forecast for the City of Guelph. The new Ministry of Finance forecasts do not provide a separate forecast for the City of Guelph – the City's forecast is included within the Wellington County forecast. The Ministry of Finance forecasted population for Wellington County in 2051 is 371,289 which is slightly higher than the previous A Place to Grow forecast for Wellington County and Guelph combined (363,000).

The Province has now released the "Projection Methodology Guideline" (2025 Guideline) – the proposed approach to translating the population forecasts from the Ministry of Finance into details needed for growth planning:

- Determining the local municipal share of population;
- Determining the housing need for the forecasted population;
- Determining the job needs using the forecasted population;
- Translating the "need (housing and jobs)" into what additional land will be required to meet the need.

The 2025 Guideline is available for comments currently through the Environmental Registry of Ontario. Comments are due by October 20, 2025.

Summary of Key Points

The Guideline is largely a technical document to guide municipalities in using the Ministry of Finance forecasts to plan for growth. The key highlights are these:

1. The 2025 Guideline provides direction on how municipalities who were previously subject to A Place to Grow are to transition to the new Ministry of Finance

forecasts. Per the PPS 2024 policy above (2.1.2). municipalities may continue to use the forecasts from A Place to Grow. This provides an appropriate transition. Municipalities will need to utilize the Ministry of Finance forecasts when the requirements of a 20 year land supply (PPS 2024) are no longer met. For Wellington County and Puslinch, this would occur around 2031 meaning there is time for transition to the Ministry of Finance forecast.

2. The 2025 Guideline provides technical requirements that can be summarized as follows:
    a. Two approaches are identified for taking the Census Division (Wellington) population forecast and assigning them to local municipalities. These two methods can result in different forecasts – one is a higher forecast and one is a lower forecast.
    b. A multi-step approach is used for translating population into housing needs and thus land needed for housing. Of note, the 2025 Guideline only requires a total number of housing units. Land need for housing is to be informed by the local market – factors such as available land, infrastructure, demographics, and employment trends. Land need must also segment housing location – intensification and greenfield areas (similar to A Place to Grow). Existing vacant land is factored into the analysis. The results of this analysis are the number of homes needed through settlement area expansion.
    c. The second multi-step approach is translating the population forecast to job needs. Job needs are determined using the activity rate (generally number of people working). Job needs are further segmented into three categories: General Employment (within settlement areas but not Employment Land – downtowns, highway commercial), Employment Land Employment, and Rural Employment based on the activity rate adjusted to local circumstances. Intensification of employment locations (General, Employment Land, Rural Employment) is to be reviewed and included in the forecast. Existing vacant land is factored into the analysis. The results of this analysis are the number of jobs needed through settlement area expansion.
    d. For both housing and jobs, the Guideline provides three methods to determine land needed for both housing and jobs. The methods would be utilized depending on available information, local economic circumstances, and municipal capacity to undertake the analysis.
3. The 2025 Guideline is to assist municipalities in forecasting land need for housing and jobs, ensuring there is land available to meet each community's growing

population. The 2025 Guideline is not prescriptive in that municipalities have choices to determine the method (and policies such as intensification rate) that best suits their needs given available information, the local economy, infrastructure, and the housing market.

4. Wellington County currently undertakes the population and employment forecasts for Puslinch and all member municipalities. The County has established processes, local understanding, and the technical skills to work with the new forecasts and plan for growth with each community. The County has completed recently worked to support growth in Puslinch including Puslinch by Design and the current work regarding the Aberfoyle Settlement Area.
5. It is expected that the County will play a key role to transition to the Ministry of Finance forecasts. As indicated above, the transition provisions provide a few years of time to understand how this transition will occur and what it means for each member municipality and Puslinch.

Recommendation

The commenting period on the proposed updates to the Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024) closes on October 11, 2025. There is no further action required at this time. This update is for information for Township Council.

Sincerely,

Mary Lou Tanner, FCIP, RPP
Senior Partner
NPG Planning Solutions Inc.
mtanner@npgsolutions.ca

August 28, 2025

To our municipal clients:

Re: Summary of Proposed Updates to the Projection Methodology Guideline to Support Implementation of the Provincial Planning Statement, 2024

In the interests of our many municipal clients, we are writing to inform you that the Ontario Ministry of Municipal Affairs and Housing has released a proposed update to the Provincial Projection Methodology Guideline (P.M.G.) to support implementation of the Provincial Policy Statement, 2024 (P.P.S, 2024). This proposed update, hereinafter referred to as the proposed P.M.G., would replace the 1995 Projection Methodology Guideline (1995 P.M.G.), as well as other guidance documents released under the Growth Plan for the Greater Golden Horseshoe (the Growth Plan), to assist in determining population and employment forecasts as well as assessing housing and land needs requirements.

The Province is now seeking feedback on the proposed guideline that would replace and repeal the existing 1995 P.M.G. and other relevant guidance under the former Growth Plan. A key objective of the proposed P.M.G. is to provide a clear set of guidelines that can easily be followed by upper-tier, lower-tier, and single-tier municipalities of varying sizes and conditions. The deadline for written comments is October 11, 2025. Provided below is a brief summary of the proposed P.M.G. and its potential implications on population, housing, and employment growth forecasts and land needs assessments for Ontario municipalities.

1. Background and Overview of Proposed Changes

Consistent with relevant P.P.S., 2024 policies, the proposed P.M.G. is intended to help municipalities develop population and employment forecasts and identify the quantity of land needed by Ontario municipalities over a determined planning horizon of between 20 and 30 years. Policy 2.1.3 of the P.P.S., 2024 specifies that, "planning for infrastructure, public service facilities, strategic growth areas, and employment areas may extend beyond this time horizon." It is noted that the primary focus of this guidance is on establishing the quantum of land required for settlement areas and employment, rather than identifying the location of new settlement area expansions.

As informed by provincial guidance, planning authorities shall base population and employment forecasts on Ontario population projections published annually by the Ministry of Finance (M.O.F.) and may modify as appropriate (refer to policy 2.1.1 of the P.P.S., 2024). The M.O.F. provides year-over-year population projections utilizing Statistics Canada Census data and other relevant data sources. These projections typically extend over a 25-year period and consider various factors, including all forms

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of inward and outward migration patterns (international, interprovincial, and intraprovincial) and trends in fertility and mortality. The M.O.F. notes that these projections do not include explicit economic assumptions or public policy choices and represent the base-case scenario if current trends continue. The M.O.F. prepares three long-term population projection scenarios for the Province of Ontario: a low, reference, and high scenario. The medium scenario is then allocated by Census Division (C.D.).[1] Notwithstanding P.P.S., 2024, policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning (P.P.S., 2024, policy 2.1.2). It is noted that the M.O.F. does not prepare employment projections.

As previously mentioned, the M.O.F. population projections are updated annually, including a major update every five years that incorporates the results of the latest Census. The *Planning Act* requires Official Plans to be revised every five years after an amendment is made, or 10 years after a new Official Plan is approved. While population growth trends can vary on an annual basis, the land needs of a community do not generally fluctuate annually, given the long-term nature of land use planning.[2] Accordingly, municipalities are not required to update their long-range forecasts outside of the statutory *Planning Act* requirements.

The proposed P.M.G. includes the following components, which are briefly discussed below:

- Establishing Municipal Population Projections;
- Developing Housing Needs Forecasts;
- Developing Employment Forecasts;
- Land Needs Assessment; and
- Implementation.

2. Establishing Municipal Population Projections

As previously stated, planning authorities shall base population and employment forecasts on Ontario population projections published annually by the M.O.F. and may modify as appropriate (P.P.S., 2024, policy 2.1.1). As noted on page 12 of the proposed P.M.G., the M.O.F. projections are ultimately based on historical trends and cannot fully account for future events, such as, but not limited to, significant changes to near-term economic or housing market conditions, major business expansions or closures within a region of Ontario, infrastructure constraints and/or the timing of major regional or local improvements/expansions. It is important to acknowledge that the

[1] A Census Division (C.D.) is a geographic area defined by Statistics Canada that typically represents upper-tier municipalities, including separated municipalities and large urban single-tier municipalities.
[2] Proposed Updates to the Projection Methodology Guideline. Ontario. p. 4.

proposed methodology provides a guideline only to assist municipalities with the preparation of growth forecasts and urban land need assessments. Accordingly, all municipalities have the flexibility to test and modify their approach and ultimate population, housing, and employment projections based on local considerations and circumstances. This may result in a different and potentially more accurate outcome regarding the total population projections, growth allocations, and urban land needs.

When addressing the M.O.F. population projections, municipalities are required to determine their respective share of projected population by C.D. To address this population allocation process, the proposed P.M.G. offers two methods:

- Method A: is based on a municipality's current population share of the C.D. (e.g., 2021 or 2024, based on the most recent Census data or postcensal data); and
- Method B: is based on the municipality's share of population growth within the C.D. over a 10-year period (e.g., 2011 to 2021 or 2014 to 2024, based on the most recent Census data or postcensal data). The proposed P.M.G. recommends applying population growth share trends from consecutive five-year periods within the previous 10 years to account for short-term variations in population growth.

We note that these two methods have the potential to generate varying outcomes regarding the percentage share of population growth, particularly in cases where a municipality has experienced notably higher population growth over the past 10 years relative to the average population growth rate for the C.D. Figure 1, below, illustrates these two approaches when applied to the Region of Halton, as an example.

Figure 1
Summary of M.O.F. Halton Region Population Projection by Municipality, 2024 to 2051
Using Proposed P.M.G. Method A and Method B

Method A – Existing Population Share

Municipality	2024 Population Share[1]	2024 to 2051 Population Growth Projection	2051 Total Population Projection
City of Burlington	30%	68,500	265,900
Town of Halton Hills	10%	23,600	91,600
Town of Milton	23%	53,000	205,800
Town of Oakville	36%	82,900	321,600
Halton Region	**100%**	**228,000**	**884,900**

[1] Historical population share derived from Statistics Canada population estimates.
Note: Population includes net Census undercount.
Source: Historical population shares derived from Statistics Canada Table 17-10-0155-01, 2024 to 2051 Halton Region population projections adapted from Ontario Ministry of Finance Population Projection, Summer 2025, and municipal allocations derived by Watson & Associates Economists Ltd.

Method B – 10-Year Trend-Adjusted Population Share

Municipality	2014 to 2019 Population Growth Share	2019 to 2024 Population Growth Share	Population Growth Share - Trend Adjustment	2024 to 2051 Population Growth Projection	2051 Total Population Projection
Calculation Step	**A**	**B**	**C = B + (B - A)**		
City of Burlington	13%	9%	4%	9,600	207,000
Town of Halton Hills	6%	6%	5%	12,300	80,300
Town of Milton	44%	42%	41%	93,000	245,800
Town of Oakville	38%	44%	50%	113,100	351,800
Halton Region	**100%**	**100%**	**100%**	**228,000**	**884,900**

[1] Historical population derived from Statistics Canada population estimates.
Note: Population includes net Census undercount.
Source: Historical population shares derived from Statistics Canada, Table 17-10-0155-01, 2024 to 2051 Halton Region population projections adapted from Ontario Ministry of Finance Population Projection, Summer 2025, and municipal allocations derived by Watson & Associates Economists Ltd.

As summarized in Figure 2 below, the two methods generate significantly different outcomes with respect to the share of population growth by local municipality and the total projected population for the C.D. For Halton Region, if each municipality were to use the upper range in assigning their respective population growth allocation, the total 2051 population forecast would be 955,100, which is 70,200 people (8%) above the 2025 M.O.F. population projection for Halton Region by 2051.

Figure 2
Range of M.O.F. Population Projection by Municipality for Halton Region, 2024 to 2051
Using Proposed P.M.G. Method A and B

Municipality	2024 to 2051 Population Growth Range (Method A or B in Brackets)	2051 Total Population			
		Method A	Method B	Percentage Difference Between Method A and B	Choosing Highest Growth Between Methods A and B
City of Burlington	9,600 (B) - 68,500 (A)	265,900	207,000	-22%	265,900
Town of Halton Hills	12,300 (B) - 23,600 (A)	91,600	80,300	-12%	91,600
Town of Milton	53,000 (A) - 93,000 (B)	205,800	245,800	19%	245,800
Town of Oakville	82,900 (A) - 113,100 (B)	321,600	351,800	9%	351,800
Halton Region	**157,800 - 298,200 (Mix)**	**884,900**	**884,900**	**0%**	**955,100**
2051 Halton Region total population difference relative to the 2025 M.O.F. projections if choosing the high growth method by municipality.					**70,200**
2051 Halton Region population percentage difference relative to the 2025 M.O.F. projections if choosing the high growth method by municipality.					**8%**

Note: Population includes net Census undercount.
Source: 2024 to 2051 Halton Region population projections adapted from Ontario Ministry of Finance Population Projection, Summer 2025, and municipal allocations derived by Watson & Associates Economists Ltd.

It is acknowledged that long-range population forecasting is not precise. Typically, the longer the projection period, the less accurate long-term growth projections become. Given this uncertainty, it is industry practice to often identify a range when preparing long-term growth forecasts or projections. For example, the 2025 M.O.F. projections identify a range of 13% between the medium and high provincial growth scenarios with respect to the difference in the total 2051 population. A similar range is also identified between the medium and low provincial M.O.F. growth scenarios. Based on our experience, the population ranges between the M.O.F. provincial growth scenarios are large, and they should generally represent the upper and lower thresholds regarding the range in population projections at the C.D. level.

It is important to recognize that the guidance provided by the Province in establishing population, housing, and employment projections and allocations represents a first step in establishing a baseline analysis. As previously stated, the M.O.F. projections are ultimately based on historical trends and cannot fully account for future events that would impact the future rate of population growth. Such events can include, but are not limited to, long-term municipal servicing constraints, planned water and wastewater treatment plant expansions, large-scale urban boundary expansions, or significant local/ regional economic investment. Accordingly, it is appropriate for municipalities to test the proposed P.M.G. methodology to demonstrate where local circumstances may

result in a different and potentially more accurate outcome regarding the long-term population outlook at the C.D. level, and/or growth allocations by local municipality.

As identified in the proposed P.M.G., lower-tier, single-tier, and/or upper-tier municipalities, as well as other orders of government, agencies, boards, and Service Managers, are encouraged to coordinate with one another when undertaking long-term growth forecasts and land need assessments (refer to section 6, herein, for further discussion on this issue).

3. Developing Housing Needs Forecasts

The proposed P.M.G. recognizes a number of broad factors that influence housing needs, including population growth, economic factors, housing supply and demand, and infrastructure capacity. The proposed P.M.G. provides a comprehensive three-step approach to determining the amount of housing needed for municipalities over the planning horizon based on the amount of population growth projected over the period. This includes identifying the type of housing units needed and the allocation by geographic location to assess housing and residential land needs in accordance with the P.P.S., 2024. Municipalities can also consider housing affordability and market choice provisions in their housing needs assessments, which is considered a positive advancement in promoting a greater supply and diversity of housing options.

Step 1 recommends using the forecast population by age structure and the application of age-specific headship rates (i.e., household formation rates) to determine forecast housing needs. The proposed P.M.G. also suggests considering household suppression to address unmet (latent) housing demand in the current population. This is considered a robust approach to calculating existing and future housing needs. It is important, however, to recognize that headship rates used to calculate future housing needs may vary from those in the latest Census data.

Step 2 recommends that the housing needs generated from Step 1 be adjusted to reflect local housing market factors and conditions that may impact the quantum of housing needs by housing type. The approach is intended to capture both existing and future housing needs, considering market vacancy, market contingency, market choice, and existing housing inventory (including units under construction) in accommodating the housing needs calculated. Furthermore, housing needs are recommended to be assessed by market/affordability, to help inform municipal housing targets. Again, this is considered a comprehensive approach to assessing both existing and future housing needs in a municipality and providing a standardized approach to identifying housing affordability needs. While the approach is intended to be fact-based, certain metrics may be difficult to ground truth (e.g., anticipated housing unit demolitions and conversions and/or housing units generated through additional residential units (A.R.U.s)).

Step 3 requires municipalities to establish and implement minimum intensification and redevelopment targets within their Built-Up Area (B.U.A.), in accordance with the requirements of the P.P.S., 2024. The identified intensification targets are to be established based on a range of supply and demand considerations and are intended to capture opportunities for housing accommodated through a range of supply potential, including A.R.U.s and mixed-use development. This progressive approach will require municipalities to comprehensively assess intensification potential to help inform the intensification targets. The identified intensification targets should then be subtracted from the identified total housing needs established in Step 2, to determine housing needs outside the B.U.A. This is considered a pragmatic and important step to determining urban land needs, including potential urban expansion requirements.

4. Developing Employment Forecasts

Under the proposed P.M.G., municipalities are provided with four steps to prepare employment forecasts in developing their respective Land Needs Assessment (L.N.A.). The process begins with the employment activity rate approach (Step 1), which is calculated by dividing the total population by the total jobs within a municipality. In Step 2, the forecast is adjusted to reflect key considerations, such as remote work, automation, commuting trends, and macroeconomic conditions. The first two steps are generally consistent with standard industry practice.

In Step 3, employment growth is categorized into broad land use types: General Employment, Employment Land Employment, and Rural Employment. The proposed P.M.G. allows flexibility in defining these categories and introduces the term General Employment, referring to jobs located outside Employment Areas but within settlement areas.

In Step 4, municipalities are further guided to allocate employment growth between the B.U.A. and Designated Growth Areas (D.G.A.). This requires greater attention to how General Employment uses are distributed spatially. Most municipalities (except those selecting the simplified L.N.A. method) will need to assess whether their existing designated land supply can adequately accommodate General Employment uses. The outcome of jobs that cannot be accommodated on existing designated lands is then used as an input in the L.N.A.

Based on our review, the following key observations relate to the employment forecasting component of the proposed P.M.G.

Emphasis on Accommodating Employment through Intensification and Assessing Land Capacity

A key focus of the employment forecast is understanding the opportunities to accommodate employment growth through intensification, including opportunities in both the Community Area and the Employment Area. This will require municipalities to

demonstrate how jobs will be accommodated in intensification areas. Often, intensification direction by the Province (e.g., L.N.A. Methodology for the Greater Golden Horseshoe) has focused on intensification based on accommodating housing. Furthermore, the proposed P.M.G. requires municipalities to demonstrate opportunities to accommodate jobs on existing designated lands.

Observations Regarding Recommended Employment Data Sources

It is recommended in the proposed P.M.G. that municipalities should use National Occupational Classification (N.O.C.) data from Statistics Canada to help categorize jobs by land use. Typically, employment forecasts carried out by municipalities are usually informed by the North American Industry Classification System (N.A.I.C.S.) by Statistics Canada. The N.O.C. classifies jobs and occupations based on the type of work performed, regardless of the industry, whereas N.A.I.C.S. classifies jobs by the type of business or economic activity in which they are performed.

The N.O.C. system has advantages and disadvantages when utilized in growth forecasts. In our opinion, a key advantage of using employment classified by N.O.C. lies in the ability to understand employment by specific skills, responsibilities, education, and training. This insight is useful for understanding the quality and type of workforce a municipality needs to attract, especially given the shift toward a knowledge-based economy.

The fundamental limitation of using N.O.C. employment data for land use planning is the inability to directly correlate occupations with the specific land use requirements of an industry. In contrast, N.A.I.C.S. sectors like Manufacturing (N.A.I.C.S. 31-33) and Transportation and Warehousing (N.A.I.C.S. 48-49) are inherently understood as Employment Lands Employment, as most jobs are accommodated in industrial-type buildings. Relying on N.O.C. could lead to an underestimation of Employment Area land demand, as the rise in high-skilled jobs in industrial operations might be mistakenly classified as office uses. Therefore, it is our opinion that municipalities should continue to use N.A.I.C.S. data as the primary source for employment growth forecasts, with N.O.C. data serving as a supplementary tool. N.O.C. data could be a valuable source of information for economic development strategies where municipalities seek to identify and address local workforce gaps.

It should be noted that the proposed P.M.G. allows municipalities to utilize locally prepared employment surveys to supplement the basis of the employment growth forecast.

5. Land Needs Assessment

The proposed P.M.G. offers three distinct methods for conducting a Community Area L.N.A. to determine the land required for housing and jobs. Each approach aligns with the policies in the P.P.S., 2024, and considers local data and conditions. Prior to

identifying land requirements, it is necessary to assess housing need by comparing projected demand with existing supply. Additionally, a review of the capacity on designated land to support General Employment (outside of Employment Areas) must be undertaken for Methods 1 and 2. The three methods presented in the proposed P.M.G. differ primarily in how they translate housing and employment needs into land requirements, particularly for Community Areas (i.e., areas outside of designated Employment Areas) as outlined below.

- **Method 1 (People and Jobs Density Method):** calculates the shortfall of residents and jobs not accommodated on currently designated lands over the planning horizon, then divides this total by a municipality-established density target. Since this method combines population and job shortfalls into a single land needs calculation, it is well-suited for municipalities prioritizing mixed-use development in Community Areas, where land may accommodate multiple uses on a single site and a detailed distinction between residential and General Employment needs is not required.
- **Method 2 (Multiple Densities Method):** calculates net residential and General Employment land needs separately, then adjusts for infrastructure such as roads and parks to determine the gross developable land area. This method is well-suited for municipalities planning for a range of land use designations on D.G.A. lands, including expansion lands, particularly commercial uses, as it provides clear guidance on breaking down designated land requirements for Community Area uses.
- **Method 3 (Simplified Method):** focuses on calculating residential land needs, with less detailed analysis of General Employment requirements. A general upward adjustment is applied to the residential land area to account for employment uses, followed by further adjustments for local infrastructure to determine the gross developable land area. According to the proposed P.M.G., this method is only recommended for small and rural municipalities.

The proposed P.M.G. calls for a range of housing types, but it is unclear about the level of detail needed to translate those housing needs into the net residential land area for the purpose of the L.N.A. More specifically, there is a lack of guidance for situations where a shortfall of low-density housing units coexists with a surplus of medium-density and/or high-density units. It is assumed under Methods 1 and 3 that the housing needs are blended (i.e., low-density, medium-density, or high-density units), where the housing needs are calculated based on a net housing need (i.e., no differences in need by housing type). Method 2 utilizes multiple net residential density assumptions, as directed on page 45 of the document. This approach applies different densities to specific housing needs by housing unit types, such as low-density, medium-density, or high-density housing, but does not explain how mismatches in supply and demand between housing density types are to be addressed when assessing urban land needs.

To calculate the required land for an Employment Area, the proposed P.M.G. outlines three methods. The key difference between these methods is the approach used to determine density. One approach is a simple general density (jobs per hectare) calculation, while another is a more detailed land surface area approach, which uses floor space per worker and floor space index metrics. The latter approach offers a more detailed consideration of non-residential built forms, which can be useful for implementation tools such as zoning.

Below are key highlights from our review of the proposed P.M.G. related to preparing an L.N.A.

An Assessment of General Employment Land Needs is Required for Most Municipalities

Methods 1 and 2 require a detailed assessment of General Employment needs after determining how much of this employment can be accommodated in D.G.A.s and through intensification. In contrast, Method 3, which is a simplified approach, generally involves adding a specific amount of land (based on an additional percentage of land) to the gross developable land area to account for General Employment. The proposed P.M.G. suggests that this simplified method is most suitable for smaller, more rural municipalities with limited resources or capacity to meet the detailed requirements of Methods 1 and 2 in calculating General Employment land requirements. The proposed P.M.G. for Methods 1 and 2 generally applies a more rigorous approach to calculating General Employment land needs compared to previous P.M.G. guidelines.

It is Recommended to Use Two L.N.A. Methods and Provide a Rationale

According to the proposed P.M.G., municipalities are encouraged to use both Methods 1 and 2 and compare the results. This comparative exercise is designed to help municipalities avoid underestimating or overestimating their land needs. Following this exercise, municipalities are required to provide a rationale for their chosen method and the resulting land need.[1] While the proposed P.M.G. offers flexibility in selecting a method, it also places the onus on municipalities to justify their choice based on local conditions and planning objectives. This may require additional effort to communicate and validate the approach with stakeholders and council.

It is Recommended to Measure the L.N.A. Outcome versus a People and Jobs Density Target

The proposed P.M.G. recommends that municipalities, especially large and fast-growing ones, consider a gross people and jobs density target in the L.N.A. This is in line with

[1] Proposed Projection Methodology Guideline, p. 40.

policy 2.3.1.5 of the P.P.S., 2024.[1] Although not explicitly stated, it is assumed that the average density does not include developed D.G.A. lands. It is noted that the L.N.A. methodology supporting the Growth Plan implementation measured average density across all D.G.A. lands, which often required assuming an even higher density on vacant lands to offset lower densities on developed lands.

6. Implementation

Chapter 6 of the proposed P.M.G. emphasizes the need for collaboration between lower-tier, single-tier, or upper-tier municipalities, as well as with other orders of government, agencies, boards, and Service Managers to achieve the outcomes at all steps of the forecasting and L.N.A. process and ultimately implement the relevant P.P.S., 2024 policies.

It is recommended that lower-tier municipalities within two-tier municipal structures, as well as separated single-tier municipalities and Counties within C.D.s, establish a growth management framework that provides coordination between municipalities when establishing long-range population projections and assessing urban land needs. A key objective of this framework should be to provide leadership and direction with respect to inter-jurisdictional coordination and monitoring of long-range growth projections, land use planning, and development phasing with the delivery of public infrastructure and municipal services.

Enhanced growth monitoring systems are recommended to provide a clearer understanding of recent growth trends across a municipality and insights into the potential broad-ranging impacts of urban growth. Ultimately, such tools would generate greater growth management efficiencies within municipalities when responding to changes in real estate market conditions, development pressures, and provincial planning policy direction.

It is noted that some Ontario municipalities have engaged with Watson to establish a comprehensive population, housing, and employment growth management software tool to spatially monitor, test, and report on population, housing, and employment trends at various geographic levels.

[1] Proposed Projection Methodology Guideline, p. 43.

Watson will provide a submission through the Environmental Registry of Ontario on the proposed P.M.G. We will continue to monitor the progress of this document and inform our clients of any changes. If you have any questions, please do not hesitate to contact us.

Yours very truly,

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MINISTRY OF MUNICIPAL AFFAIRS AND HOUSING

Ontario

PROPOSED UPDATES TO THE PROJECTION METHODOLOGY GUIDELINE

To support implementation of PPS, 2024

PROPOSED UPDATES TO THE PROJECTION METHODOLOGY GUIDELINE

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Preface

In 2024, the Province released the Provincial Planning Statement (PPS, 2024), replacing the Provincial Policy Statement, 2020, and revoked the Growth Plan for the Greater Golden Horseshoe 2019 (Growth Plan). The PPS, 2024 is a policy statement issued under the authority of section 3 of the *Planning Act* and came into effect on October 20, 2024. The PPS, 2024 applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024.

Planning authorities shall base population and employment forecasts on the Ontario Population Projections (MOF projections), published by the Ministry of Finance (MOF) and may modify, as appropriate. Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance.

The Ministry of Municipal Affairs and Housing (MMAH) is seeking feedback on proposed guidance that would assist planning authorities with establishing population and employment forecasts and identifying related land needs requirements to plan their communities and support meeting Ontario's significant growth needs.

Before the PPS, 2024 came into effect, in accordance with the Growth Plan, municipalities in the Greater Golden Horseshoe were required to use a land needs assessment methodology. The 1995 Projection Methodology Guideline (PMG) has been available to be used elsewhere in Ontario to assist in determining population and employment forecasts and assessing housing and land needs requirements. An update to the PMG is needed to support the implementation of the PPS, 2024, reflect recent provincial government priorities, and incorporate new information, data sources and best practices.

Seeking feedback

The Province is now seeking feedback on a proposed population and employment forecast guidance that would replace the existing PMG. Should the government adopt the proposed guidance, subject to consultation, input and refinement, and issue new guidance, the government would consequentially repeal the PMG.

While not included here, the final version of guidance may include hypothetical scenarios to show how municipalities could implement the recommended methods. These scenarios could be based on specific geographies and/or typologies (e.g., *large and fast-growing municipalities*, northern municipalities, and small or rural municipalities).

Each scenario could include a background narrative with hypothetical local conditions to illustrate step-by-step how different municipalities would follow and implement the guidance. The scenarios could illustrate how the proposed guidance is applicable to a range of considerations. If there are any specific matters you would like addressed or better explained through case study scenarios, please include the specifics of what would be most helpful.

Please submit comments on the Environmental Registry of Ontario (ERO) in response to posting #025-0844. Comments may also be provided by email to growthplanning@ontario.ca. The deadline for written comments is October 11, 2025. Feedback will be taken into consideration prior to a final decision about the proposed guidance.

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List of Acronyms

Acronym	Term
ARU	Additional Residential Unit
CMHC	Canadian Mortgage and Housing Corporation:
CD	Census Division
CSD	Census Subdivision
DGA	Designated Growth Areas
ELE	Employment Land Employment
FSI	Floor Space Index
FSW	Floor Space per Worker
GE	General Employment
MZO	Minister's Zoning Order
MOF	Ministry of Finance
MMAH	Ministry of Municipal Affairs and Housing
MPAC	Municipal Property Assessment Corporation
NOC	National Occupation Classification data
PPU	Persons-per-unit
PMG	Projection Methodology Guideline
PPS	Provincial Planning Statement
SABE	Settlement Area Boundary Expansion

Chapter 1: Introduction

As Canada continues to be a leader in population growth among the G7 nations, the bulk of this growth is occurring in Ontario. It is essential that Ontario municipalities' growth planning adequately anticipates these pressures, both in the near term and well into the future. Adequate growth planning ensures the land and infrastructure needs of current and future Ontarians are in place and reflect the diverse needs of Ontarian families and businesses, as well as overall balance in the housing market.

A major step towards achieving the ambitious planning required to adequately and affordably house a growing population and workforce the Province released the Provincial Planning Statement (PPS, 2024). The PPS, 2024 is a policy statement issued under the authority of section 3 of the *Planning Act* and applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024.

The PPS, 2024 provides overall policy directions on matters of provincial interest related to land use planning and development in Ontario, and applies province-wide, except where provincial policy, a provincial plan or applicable legislation or regulation provides otherwise. Provincial guidance, including guidance material, guidelines and technical criteria may be issued from time to time to assist planning authorities and decision-makers with implementing the policies of the PPS, 2024. Information, technical criteria, and methods outlined in the guidance are meant to support implementation but not add to or detract from the policies of the PPS, 2024.

PPS, 2024 policy context

As a part of the implementation of the PPS, 2024, planning authorities must establish the amount of population and employment growth to plan for and determine the amount of land required to accommodate that growth.

The PPS, 2024 policies provide the parameters for the amount of growth to be planned for in municipalities. Of specific relevance is the following policy direction:

As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the MOF and may modify as appropriate (policy 2.1.1).

Notwithstanding policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning (policy 2.1.2).

At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance (policy 2.1.3).

In addition, the PPS, 2024 provides policy direction that could impact the amount of growth to be planned for and the associated land needs. This includes, but is not limited to, the following policies:

Planning authorities shall provide for an appropriate range and mix of *housing options* and densities to meet projected needs of current and future residents of the *regional market area* (policy 2.2.1).

Planning authorities shall support general *intensification* and *redevelopment* to support the achievement of *complete communities*, including by planning for a range and mix of *housing options* and prioritizing planning and investment in the necessary *infrastructure* and *public service facilities* (policy 2.3.1.3).

Planning authorities shall establish and implement minimum targets for *intensification* and *redevelopment* within built-up areas, based on local conditions (policy 2.3.1.4).

To support the achievement of *complete communities*, a range and mix of *housing options*, *intensification* and more mixed-use development, *strategic growth areas* should be planned:

a) to accommodate significant population and employment growth;

b) as focal areas for education, commercial, recreational, and cultural uses;

c) to accommodate and support the transit network and provide connection points for inter- and intra-regional transit; and

d) to support *affordable*, accessible, and equitable housing (policy 2.4.1.2).

Planning authorities are encouraged to establish density targets for *designated growth areas*, based on local conditions. *Large and fast-growing municipalities* are encouraged to plan for a target of 50 residents and jobs per gross hectare in *designated growth areas* (policy 2.3.1.5).

Planning authorities shall designate, protect, and plan for all *employment areas* in *settlement areas* (policy 2.8.2.3).

They must also promote economic development through the provision of a mix and range of employment uses, *intensification* of employment uses and mixed-use development, and the provision of employment uses located both inside and outside of *employment areas* (policy 2.8.1.1).

Major office and major institutional development should be directed to *major transit station areas* or other *strategic growth areas* where *frequent transit* service is available (policy 2.8.1.4).

The guidance supports policy implementation but does not add to or detract from the policies of PPS, 2024.

Scope

Population and employment forecasts are important components needed for planning authorities, including upper-tier, single-tier, and lower-tier municipalities without planning responsibilities ('municipalities'), to plan their communities. This information can be used by municipalities to identify growth areas, manage infrastructure, attract employment and economic development, and coordinate public services to meet short and long-term needs. Municipalities make local land use planning decisions that will determine the future of their communities and municipal planning decisions and planning documents (e.g., official plans) must be consistent with the PPS, 2024.

This guidance is intended to help municipalities develop population and employment forecasts and identify the quantity of land needed by the municipality by the planning horizon. However, the focus of guidance is on the quantum of lands required for *settlement areas* and employment, and not the location of new *settlement areas*, location of expansions to *settlement areas*, location of *employment areas*, or the suitability of whether a particular area of land should be included or removed from an *employment area*. These matters are to be addressed consistent with relevant PPS, 2024 policies.

Guiding principles

This guidance is based on the following principles:

Ambition and balance: provide ample, adequate planned and serviced land, reducing and avoiding market imbalances or distortions stemming from an insufficient land supply relative to demand.

Consistency and functionality: produce functional and actionable results that assist municipalities in ensuring land use planning decisions are consistent with the policies of the PPS, 2024.

Transparency: provide a standardized approach to identifying the forecasted population and employment to the planning horizon, transparently allow for identifying the quantity of housing needs by type and assessing land needs.

Clarity and ease of implementation: provide a clear set of guidelines that can easily be followed by upper, lower, and single-tier municipalities of varying size and conditions.

Considerations for the guidance

There are several aspects to consider when using the guidance, including:

- Municipalities would update their population and employment forecasts and implement them in their official plans at the time of their next official plan update pursuant to the *Planning Act*. The *Planning Act* requires official plans to be revised every five years after an amendment is made, or ten years after a new official plan is approved. Municipalities would not be required to update their long-range forecasts outside of the statutory *Planning Act* requirements.

  The land needs of a community generally do not fluctuate on an annual basis given the longer-term nature of land use planning. As such, municipalities can accurately address changes in growth forecasts and land needs through the standard official plan review cycle.

- The PPS, 2024 requires municipalities plan to meet projected needs for a time horizon of at least 20 years, but not more than 30 years. The MOF publishes the MOF projections, which are projected by year for a range of up to 25 years beyond the census year on which the projections are based.

Municipalities should use the most recent MOF projections published and available at the time of an official plan update, accompanied by relevant market indicators aimed at providing the most accurate picture possible of the supply and demand dynamics relating to land use.

It is recommended that municipalities plan to the horizon that aligns with the outer range of the MOF projections available at the time of an official plan update. Municipalities could use any specific horizon, provided that the projection year is within 20 to 30 years.

In addition, municipalities should consider the timing of a 'major' update issued by the MOF (i.e., projections that are updated to incorporate data published from the most recent census) and align their long-range forecasting work accordingly.

- A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies, boards, and Service Managers. The guidance reflects PPS, 2024 policy direction encouraging inter-municipal collaboration and coordination through all stages of the forecasting and land needs assessment processes. Coordination is recommended to ensure the methods of allocating projections for each municipality consider the future population, housing, land use, infrastructure needs within an entire census division, in accordance with PPS, 2024 policies.

Projections and forecasts: A projection extrapolates present trends (e.g., fertility, mortality, and migration) to a future state (e.g., population) based on the assumption that the trends would continue. A projection is neutral and does not consider how changes in assumptions or potential uncertainty in the continuation of past trends would impact the future. By contrast, a forecast is a best estimate to predict a future state (e.g., population, employment) that builds on present trends and considers the potential impacts that changing variables and assumptions may have.

Guidance contents

The proposed guidance is organized as follows:

- chapter 2 outlines the methods for establishing a municipality's population projection
- chapter 3 outlines the steps for developing a municipality's housing needs forecast
- chapter 4 outlines the methods for determining a municipality's employment needs forecast
- chapter 5 outlines the steps to undertake a land needs assessment to accommodate a municipality's projected population and employment needs
- chapter 6 outlines information on implementation, including collaboration between municipalities, documentation, and using the results

Where a word is italicized, the definition of the word or phrase is to be understood as reflecting the corresponding definition in PPS, 2024. For non-italicized terms, the normal meaning of the word applies. Where a word or phrase is typically used in a planning context, the meaning associated with the use of that word or phrase within the planning context is intended to apply. A glossary is provided to clarify certain terms that are used in the guidance.

Any references to specific policies and associated policy numbers in this document are references to the corresponding policies in the PPS, 2024.

Chapter 2: Establishing Municipal Population Projections

Overview

The purpose of Chapter 2 is to identify and allocate the MOF population projections from the census division (CD) to the municipality (i.e., census subdivision (CSD)) to the planning horizon.

The MOF population projections reflect annual demographic trends and are issued for each of Ontario's 49 CDs. They are foundational to the development of future municipal population projections.

The approach is to develop upper and lower future population projection ranges, to support municipalities plan for future needs, while providing a test on municipal projections in relation to the CD to ensure a reasonable outcome. The range would be developed using two methods:

1. a municipality's population share of the CD, and
2. the municipality's share of population growth within the CD.

The outcome of this chapter would be used as an input in developing housing and employment forecasts.

Population step 1: obtaining and determining municipal projections

Purpose

The purpose is to identify the MOF projections for the applicable CD geography and determine each municipality's share of the projection.

Policy basis

As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the MOF and may modify, as appropriate (policy 2.1.1).

Recommended approach

To achieve the objective, municipalities should disaggregate the MOF projections from the CD to the CSD (i.e., the municipality) to the planning horizon. Municipalities should apply at least two different methods (outlined below) to obtain projection results based on past growth and on assumptions for future growth.

Single-tier municipalities whose geographic boundary aligns with a CD could use the MOF projections for the CD.

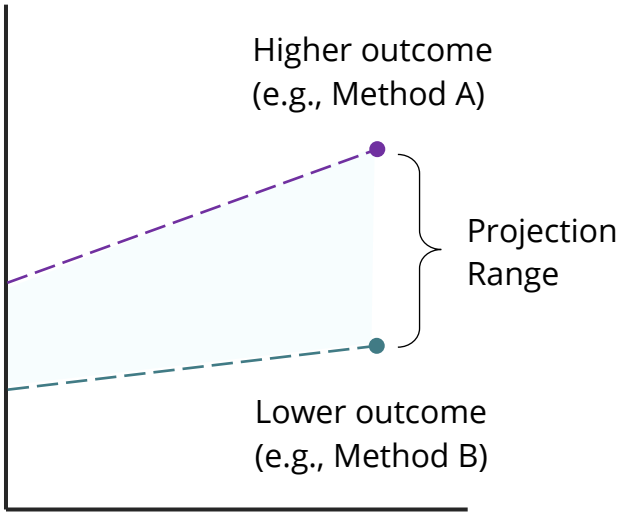
Municipalities are equipped to develop employment forecasts and assess housing and land needs based on the MOF projections (as explained in other parts of the guidance).

There are two recommended methods for determining the municipality's share in the projection:

1. **Population share (Method A):** Accounting for the municipality's share in the CD projected population, according to the MOF projections. For this method:
    - municipalities should use the latest data available from Statistics Canada for their population and the CD total population to calculate the share of CD scale population
    - municipalities apply the population shares to the MOF's CD scale population projections for the municipality's planning horizon to get their population projection
2. **Growth share (Method B):** This method relies on linear growth for each municipality within the CD to calculate the share of a municipality's growth within the CD. For this method:
    - municipalities use the latest data available from Statistics Canada on population growth for the CD and for the CSD/municipal level to calculate their share of CD growth
    - municipalities, to obtain their population projections, would calculate growth shares from an appropriate consecutive five-year period within the previous 10 years to account for short term variations in population. They would then apply the growth shares to the MOF's CD population projections for the municipality's planning horizon.

If a municipality anticipates growth outside the projection range, it should document the approach and data sources used and provide the rationale and methodology behind the calculation. Examples of rationales may include assumptions such as major infrastructure investment, unusual growth patterns that would skew the development of a municipal-scale projection, and immigration forecast updates, etc.

The approach might result in a diverse range of growth projections for different municipalities. As such, municipalities with minimal population growth should use the current population as a 'floor'. Later steps consider other matters that would affect housing, employment, and land use planning to ensure adaptable and resilient resource allocation and infrastructure development.



The two methods each yield a different outcome. These two outcomes serve as forecasting parameters by providing municipalities with a range for reasonable growth projections.

Figure 1: Illustration of the population projection range

Municipalities in the Greater Golden Horseshoe (GGH) may continue to use the population growth forecasts to 2051 provided in Schedule 3 of A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2019, to help with the transition to base population and employment forecasts on the MOF projections. Municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning (policy 2.1.2).

However, they will be required to base their population and employment growth forecasts on the MOF projections in the future, where the forecasts in Schedule 3 no longer satisfy the policy requirement to plan for a horizon of at least 20 years.

Considerations

The MOF updates population projections annually to reflect the latest and emerging demographic trends and data on fertility, mortality, and migration. There is a comprehensive review, and major updates conducted every five years, which are based on the most recent census and additional supporting data, review of methodology and long-term assumptions.

The methodology used by the MOF to develop long-term population projections is the cohort-component method, essentially a demographic accounting system. The calculation starts with the base-year population (the starting year where the population number from which the accounting method adds and subtracts population), distributed by age and gender.

A separate analysis and projection of each component of population growth is made for each year, starting with births. Then, projections of deaths and the five migration components (immigration, emigration, net change in non-permanent residents, interprovincial in- and out-migration, and intra-provincial in- and out-migration) are also generated and added to the population cohorts to obtain the population of the subsequent year, by age and gender.

This methodology is followed for each of the 49 CDs. The Ontario-level population is obtained by summing the projected CD populations.

The MOF projections are based on population growth trends and consider all streams of inward and outward migration patterns and targets. They do not include explicit economic assumptions or public policy choices (e.g., regional development, land use, infrastructure). They represent the base-case scenario if current trends continue.

While the MOF publishes three population growth scenarios at the provincial level (i.e., reference, high and low), projections at the CD scale are issued using the reference scenario. It is recommended that CD projections are used as the basis for the population projection, as it is more reflective of growth in the municipality.

While population projections are the policy basis on which to plan for future needs, they are subject to uncertainty due to factors such as economic downturn/recession, population surge/decline etc., which can create significant challenges for land use planning. For example, if a sudden economic downturn occurs, it could lead to lower population growth than projected, resulting in overestimation of the need for housing, infrastructure, and services. Alternatively, an unexpected population surge due to migration could strain a municipality's existing resources and infrastructure.

The MOF projections do not reflect local characteristics regarding existing and planned infrastructure capacity or availability, economic and planning assumptions, information from official plans or locally prepared projections. Therefore, the local context is helpful in supplementing the MOF projections.

Every five years, a major update to the MOF projections is produced to include results from the latest Census (now 2021) and to review the methodology and long-term assumptions. This is a major update. A consultation process with ministries, upper-tier municipalities, and academic demographers takes place to gather feedback to validate the major assumptions.

Every year, an update to the technical report and tables is released by the MOF to include the latest population estimates and the most recent data on fertility, mortality, and migration. This is a minor update.

The MOF projections are the only publicly available set of population projections for Ontario and its 49 CDs, where the population of the CDs sum to the population of Ontario. Because the MOF projections are updated each year and provide detailed age results, they are used for planning purposes throughout the Ontario government, and by municipalities, school boards, health units, researchers, and the private sector.

The MOF projections are based on population growth trends and consider all streams of inward and outward migration patterns and targets. They do not include explicit economic assumptions or public policy choices (e.g., on regional development, land use, new infrastructure). They represent the base-case scenario if current trends continue.

Unusual growth scenarios (e.g., high, or low) that use the MOF projections can lead to planning outcomes that misalign population and employment land needs and infrastructure. For example, overestimating growth may cause infrastructure to be overbuilt and create financial strain for the municipality. Alternatively, underestimating growth can result in insufficient infrastructure, service shortfalls, and municipalities may face increased capital costs to address undercapacity issues.

In cases where the municipality is aware of upcoming significant development or infrastructure investment, it may adjust its population forecast upwards to best utilize available (and planned) infrastructure. These may include, for example, upgraded municipal water servicing, impacts of Minister’s zoning orders, or new major facilities. Municipalities should ensure that any adjustment is grounded in local data availability and circumstances, and the rationale is clearly documented to ensure that they can demonstrate how and why the adjustments were made to support informed decisions by the approval authority.

The recommended approach mitigates some of the uncertainty by establishing a range of population projections that would inform municipal forecasts. However, it is ultimately based on historical trends and cannot fully account for future events.

All municipalities have the flexibility to modify their projections, within the projection range, based on local conditions. The approach fits a variety of different types of municipalities and diverse local conditions using publicly available data sources. This approach:

- enables lower-tier municipalities with planning authority to establish forecasts through evidence-based decision-making
- supports planning authorities to assess whether municipalities are over- or under-projecting the population at the planning horizon
- provides flexibility to municipalities to convert the MOF projections (as required by the PPS, 2024) to support long range planning within an official plan; and
- equips municipalities to assess housing, employment and land needs with a municipal population projection based on the MOF projections (as explained in other parts of the guidance)

Outcome

The results of the two methods would become the upper and lower parameters of the range of reasonable growth projections for each municipality (before the application of adjustments based on additional market indicators—see chapter 3). Each one of the recommended methods could produce either the higher or lower parameters of a municipality's projection range, depending on the population and growth patterns of the municipality in relation to the CD. Each municipality would select a growth projection within its projection range. The projection range provides flexibility to municipalities to convert the MOF projections (as required by the PPS, 2024) into forecasts to support long range planning within an official plan.

Determining population projections at the CSD level provides a starting point for population step 2, where population projections by age cohort are established as an input for identifying required housing. The outcome is also a direct input for identifying employment need.

Municipalities that anticipate no growth or negative growth in the planning horizon may still benefit from developing housing and employment forecasts. Therefore, they should follow relevant steps in the guidance. For example, existing housing stock may not match the type of housing identified in the housing needs or employment may require additional land, etc.

Population step 2: developing population projections by age cohorts

Purpose

The purpose is to project future population size and characteristics, by age cohorts. Information on the share of each age group in the municipality's population then informs the development of housing forecasts, as changes in the age structure of the population impacts housing needs in the municipality.

Policy basis

As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the MOF and may modify, as appropriate (policy 2.1.1).

Recommended approach

Municipalities are recommended to take census data on the age of primary household maintainer and compile the data into five-year age groups. This data is used to determine the share of each age group in the projected population. Five-year age groups are generally used, as annual projections require more data and labour to calculate.

Municipalities should extrapolate the census population for the latest census year by applying a growth calculation, similar to the growth share approach in population step 1. For each five-year cohort, municipalities apply the growth shares for an appropriate consecutive five-year period within the previous 10 years. The share of the growth for each cohort would then be applied to the municipal projected population from population step 1. The approach accounts for short term variations in population projections.

As an alternative, a municipality may undertake a more complex cohort-survival model accounting for births, deaths and immigration using additional data sources. The approach should be documented with a rationale provided to explain why the cumulative total would be different from population step 1.

Whether developing an age structure projection, or extrapolating age cohorts from the latest census, the projected population at the horizon for the municipality from population step 1is the control for the results developed in this step. Municipalities should review the total population by age cohort developed in this step against the results of population step 1. It is anticipated that municipalities would refine their approach and calculations through an iterative process to ensure the results of both population step 1and population step 2 align.

Considerations

The MOF publishes projections by age and sex for the 49 CDs. This data could be used as a control when assessed in coordination and collaboration with municipalities within the same CD to ensure that the combined projected population by age cohorts are not over- or under-projecting the CD population at the horizon. However, the age cohort projections themselves are not useful as a starting point to disaggregate at the municipal scale.

Outcome

The result is a municipal level population projection by five-year age groups that is the input for calculating housing needs (Chapter 3).

Chapter 3: Developing Housing Needs Forecasts

Overview

The purpose of Chapter 3 is to determine the amount of housing needed to the horizon year, accounting for *intensification* within built-up areas in existing *settlement areas* and the need for additional *settlement area* land (i.e., *designated growth area* land) to accommodate future housing needs.

Once municipalities have established their population projections, they should calculate the housing needs for the entire population and develop a housing needs forecast to accommodate growth in the planning horizon.

The approach to developing housing needs forecast to the horizon considers a municipal level forecast of housing by type (e.g., low, medium, high density) and location (*intensification* within *settlement areas*/*designated growth areas*) based on housing needs by age cohort. This housing needs information would be used as an input for assessing land needs. Municipalities could adjust their housing needs forecast to account for additional data sources, affordable housing, and market demand forecasts or indicators.

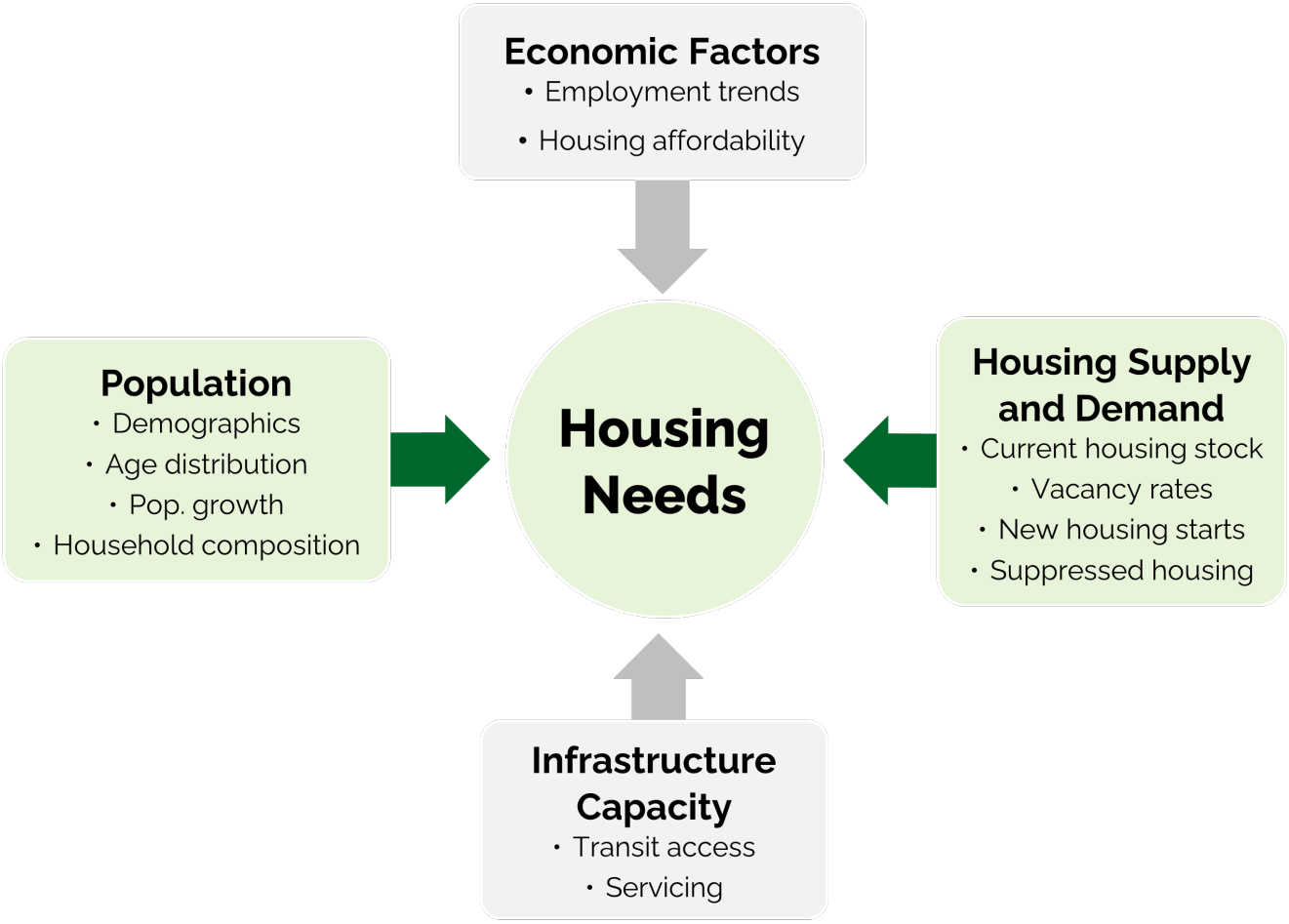


Figure 2: Diagram of factors influencing housing needs

Housing step 1: calculating projected housing needs

Purpose

The purpose is to determine the municipality's projected total housing needs, which is the number of households to be accommodated in the planning horizon, in housing units.

Policy basis

At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance (policy 2.1.3).

To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and

b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans (policy 2.1.4).

Recommended approach

Municipalities should use the municipal-level population projections, calculated in chapter 2, and apply the age-specific headship rate to calculate the projected total housing needs. The headship rate is defined as the proportion of people who head a household (i.e., primary household maintainer) within a population cohort.

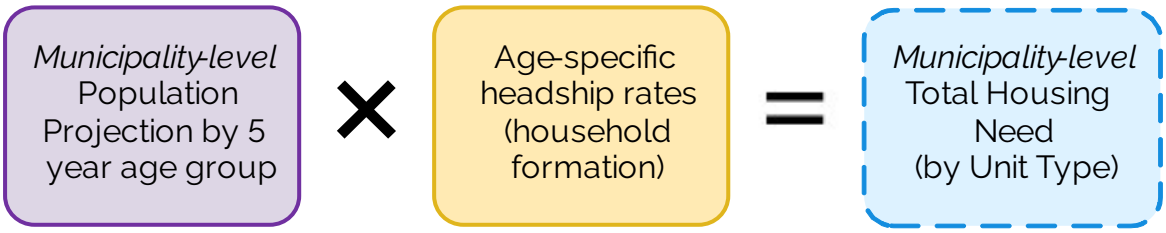


Figure 3: Diagram of housing step 1 – calculating housing needs

Considerations

In general, municipalities should assume that household formation rates by age will not vary significantly from those in the latest census. While each household is associated with a housing unit, it is not necessarily linked to a particular type of housing unit. As a result, household formation should not vary in response to the expected change in the mix of housing types resulting from policy. If any deviation from recent census rates is assumed, a clear rationale and robust analysis should be provided to substantiate the change.

Municipalities should consider suppressed household formation, housing tenure and propensities for households to occupy certain types of housing starting at this step. Housing needs categorized by unit type may be carried over through subsequent steps for a more accurate land needs assessment in chapter 5 (and especially using method 2 for land needs assessment).

Headship rates that are age specific are available at the CSD level through the most recent census household data from Statistics Canada, and they are generally consistent over time. Households are social arrangements that vary by age and life cycle choices and includes events such as moving away from one's parents, forming couples, getting divorced, or the death of a spouse. Municipalities may refine headship rates data to reflect anticipated demographic changes and household trends, provided the adjustment is evidence-based, follows a clear rationale and that the decision-making process is clearly documented.

To be consistent with PPS, 2024 policies, municipalities should consider repeating Housing Step 1 to account for a 15-year planning horizon. PPS, 2024 policy 2.1.4 a requires planning authorities maintain at all times the ability to accommodate residential growth for a minimum of 15 years.

The short-term planning horizon in PPS, 2024 policy 2.1.4.b (see above), seeks to maintain a minimum availability of a three-year supply of residential units, on land suitably zoned with sufficient servicing capacity, to accommodate short-term development growth patterns. In particular, to coordinate infrastructure needs with land supply. This three-year supply is accounted for within the land need assessment adjustments detailed in Chapter 5.

Outcome

The outcome is the number of housing units needed in the horizon year. This is the input for developing a housing needs forecast in Housing Step 2.

Housing step 2: Developing a housing needs forecast

Purpose

The purpose of housing step 2 is to develop a housing needs forecast for the total number of households anticipated in the planning horizon. This is based on number of housing units needed in the horizon year, which would be adjusted according to local conditions and to reflect existing housing stock.

Policy basis

At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance (policy 2.1.3).

To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are *designated and available* for residential development; and

b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans (policy 2.1.4).

Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

a) establishing and implementing minimum targets for the provision of housing that is *affordable* to *low and moderate income households*, and coordinating land use planning and planning for housing with Service Managers to address the full range of *housing options* including *affordable* housing needs;

b) permitting and facilitating:

    1. all *housing options* required to meet the social, health, economic and well-being requirements of current and future residents, including *additional needs housing* and needs arising from demographic changes and

employment opportunities; and

2. all types of residential *intensification*, including the *development* and *redevelopment* of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new *housing options* within previously developed areas, and *redevelopment*, which results in a net increase in residential units in accordance with policy 2.3.1.3;

c) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of *active transportation*; and

d) requiring *transit-supportive* development and prioritizing *intensification*, including potential air rights development, in proximity to transit, including corridors and stations (policy 2.2.1).

Recommended approach

Municipalities should adjust the projected total housing needs obtained in Housing Step 1 to consider any relevant local housing market factors that could impact the number and type of units needed.

Then, the existing housing stock should be subtracted from the total housing needs to get a forecast of the number of additional units required to accommodate growth in the municipality.

It is recommended that when developing a housing needs forecast municipalities consider factors such as the following (the list of local housing market factors is not exhaustive):

- suppressed household formation:

  Due to factors including demographic shifts, housing affordability, and availability of different unit types, there may be fewer census households than would have formed otherwise. Municipalities should use an approach that could be applied to calculate the extent of household suppression that is appropriate for its local data, circumstances and context. Each municipality should seek to obtain and document information that is relevant to its local circumstances.

  Municipalities may include an analysis of headship rates in comparison to other comparable municipalities. Where a municipality may identify a trend where its historical headship rates is lower than rates of similar municipalities, the

municipality should adjust headship rate upward to account for lower, or suppressed, household formation.

Available general resources include reports by Canada Mortgage and Housing Corporation (CMHC), for example, on household by maintainer, and by the Office of the Parliamentary Budget Officer on household formation and the housing stock.

- *housing options* and affordability:

  Municipalities should develop their housing needs forecast while considering their minimum targets for the provision of housing for all market segments, especially as suggested by market indicators. These include a mix of larger, family-sized homes, smaller workforce or student housing, ground-oriented housing, mid-rise, and high rise, as well as housing that is *affordable* to *low and moderate income households* and the PPS, 2024 requirement to provide for an appropriate range and mix of *housing options*. These factors may require adjustments relative to affordability and housing options, including the availability of various unit types, at the census base year.

- target vacancy rates to achieve market balance:

  The forecast could be adjusted to compensate for significant over- or under-supply in housing stock in the census year, which, if exists, is evident by data on vacancy rates. To determine unusually high or low vacancies, planning authorities from each market area should calculate their natural rate of vacancy. This means the rate of unoccupied housing units that allows for the normal functioning of the housing market, including turnover, choice, and mobility. The intention is to achieve a balance in the market, without inducing rent inflation, such as due to a chronic undersupply of housing units, or deflation, such as being the result of a structural oversupply of housing units. In the absence of data or capacity to calculate the natural rate of vacancy, a range of 3% to 5% should be applied.

- "market contingency factor":

  This factor indicates fluctuations in supply and demand due to unusual events. Examples include: changes in the economy on the provincial, federal or international level; changes in land use planning or other legislation or regulations that would affect landowners' ability to develop their land or the pace of development; and macro changes that could have implications on local housing markets, such as a major change in seasonal population (e.g., students), intra-provincial relocation decisions driven in part by affordability) or major

technological or societal shifts (e.g. hybrid/remove work enabled through technological enhancements), and increasing demands to live beyond core metropolitan regions. A municipality could provide for a contingency factor by adjusting the forecasted housing needs upwards by a percentage, depending on the extent of data available.

Any adjustments should take into account the character and type of the units (e.g., size, quality, affordability, etc.).

When adjusting the housing needs forecast to reflect these or other factors, municipalities should substantiate the adjustment(s) by documenting the evidence and the decision-making process on which they rely.

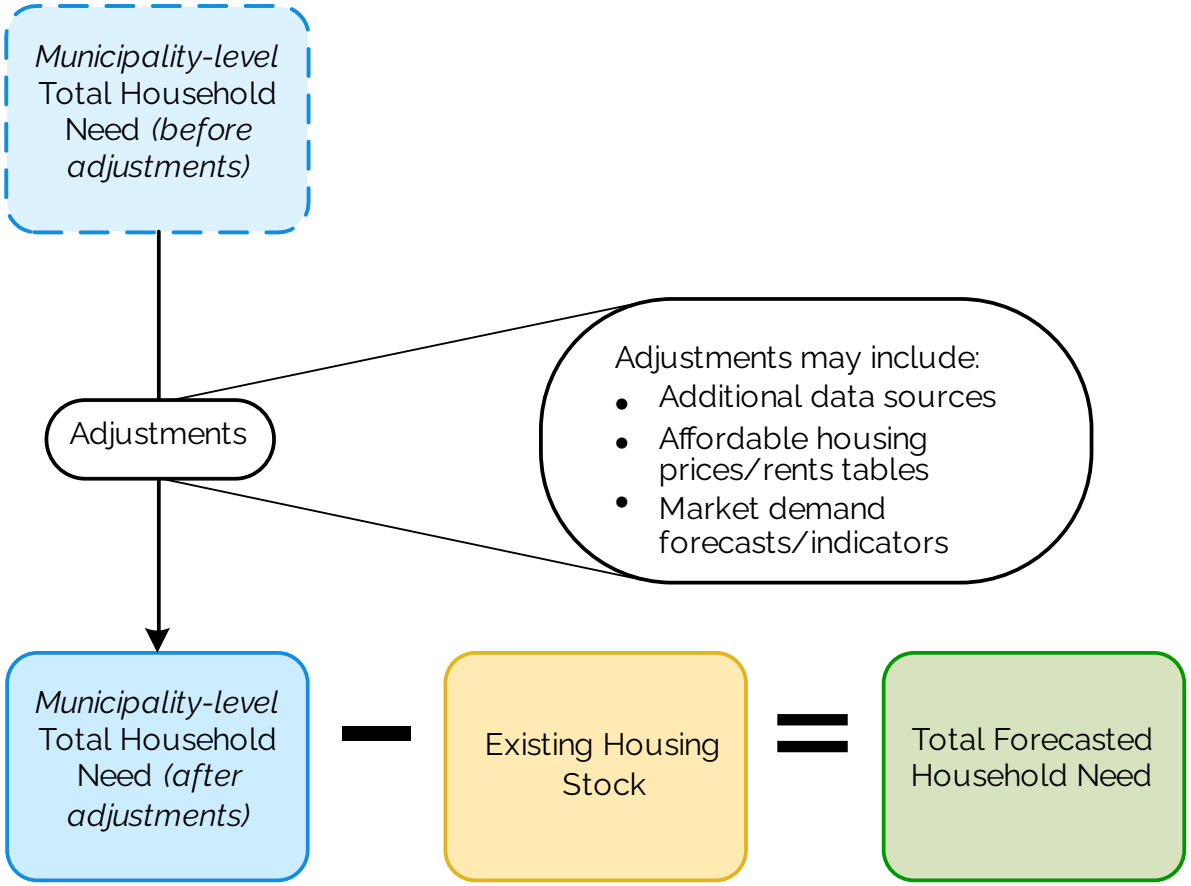


Figure 4: Diagram of housing step 2 – developing a housing needs forecast

Considerations

Housing needs adjustments, particularly for vacancy rates and market contingency, may or may not have a significant impact on the forecasted housing needs to the horizon year. However, they are more likely to have implications for short- and medium-term land needs assessments per policy 2.1.4.

Existing stock includes units that are under construction. Municipalities should also consider fluctuations of stock, such as the results of seasonal occupancy. Housing units that are in land use approval process would be accounted for in the land needs assessment, not in the existing housing stock in this step.

When calculating the existing housing stock, municipalities should consider additions to the housing stock since the census base year that was used for projections and subtract those housing units from the forecasted need. A municipality could use, for example, information from building permits, classified by unit type.

Moreover, municipalities should consider stock loss that needs to be replaced due to demolitions, conversions, abandonment, impacts of a changing climate and natural hazards. Information on stock loss may be available internally (e.g., building permits issued) or from external sources (e.g., CMHC starts/completions data or updated assessment data from the Municipal Property Assessment Corporation (MPAC)).

Municipalities who are able to obtain the data needed to support housing needs adjustments would be able to determine land needs more accurately (chapter 5).

Once municipalities calculate the total forecasted housing needs (i.e., the outcome of this step), they should also plan for infrastructure development to match the increase of supply to accommodate that need. This includes improving existing infrastructure to facilitate some of the housing needs to be accommodated through intensification, which is accounted for in housing step 3.

Outcome

The outcome is the total forecasted housing needs, in the planning horizon. This is the input for determining housing accommodated through *intensification* and the estimated housing to be accommodated through new development in housing step 3.

Housing step 3: planning for intensification

Purpose

The purpose is to determine the amount of housing that can be accommodated through *intensification*. Furthermore, it provides supporting data needed to estimate the amount of housing to be accommodated through new development, which would impact land needs. This is referred to here as the estimated housing needs outside the built-up area.

Policy basis

Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities (policy 2.3.1.3).

Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions (policy 2.3.1.4).

To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned:

a) to accommodate significant population and employment growth;

b) as focal areas for education, commercial, recreational, and cultural uses;

c) to accommodate and support the transit network and provide connection points for inter-and intra-regional transit; and

d) to support *affordable*, accessible, and equitable housing (policy 2.4.1.2).

Recommended approach

To estimate housing needs outside the built-up area, municipalities should subtract the amount of housing that can be accommodated through *intensification* (according to their *intensification* targets) from the total forecasted housing needs.

The municipality's *intensification* targets should be set to reflect municipal objectives, local conditions, and various forms of *intensification*, such as (but not limited to):

- opportunities for in-fill and *redevelopment*, including reuse of *brownfield sites* and underutilized shopping malls and plazas, development of vacant and/or underutilized lots within previously developed areas, the expansion or conversion of existing buildings, and additional residential units (ARU) on farms where appropriate
- *infrastructure* availability and capacity
- market demand
- availability and viability of surrounding *prime agricultural areas*; and
- environmental constraints



Figure 5: Illustration of housing step 3 – planning for intensification

Considerations

In setting intensification targets and determining the amount and type of housing units that can be accommodated through *intensification*, municipalities should consider the overarching PPS, 2024 goal of creating and supporting *complete communities*, affordability needs, transit supportive densities, housing typology, tenure trends and seasonal housing. In addition, municipalities should consider the PPS, 2024 requirement to plan for a range and mix of *housing options*.

Outcome

The outcome is the total estimated housing needs outside the built-up area and is the input to identify the amount of land needed to accommodate new housing developments.

Chapter 4: Developing Employment Forecasts

Overview

The purpose of Chapter 4 is to establish the amount and type of employment growth that should be accommodated over the planning horizon; as well as the location of the employment growth (*intensification* within *settlement areas* / *designated growth area*). This employment growth information would be an input in assessing land needs.

The relationship between employment and housing (Chapter 3) is circular. Through income, employment influences housing demand; while through mobility, housing availability affects employment opportunities along with other factors (e.g., climate change impacts, supply chain considerations, geopolitical instability).

The recommended approach for identifying employment needs focuses on considering demographic factors (e.g., population growth, labour supply etc.), in addition to other, factors such as *infrastructure* capacity and government policies at the federal, provincial, and municipal levels.

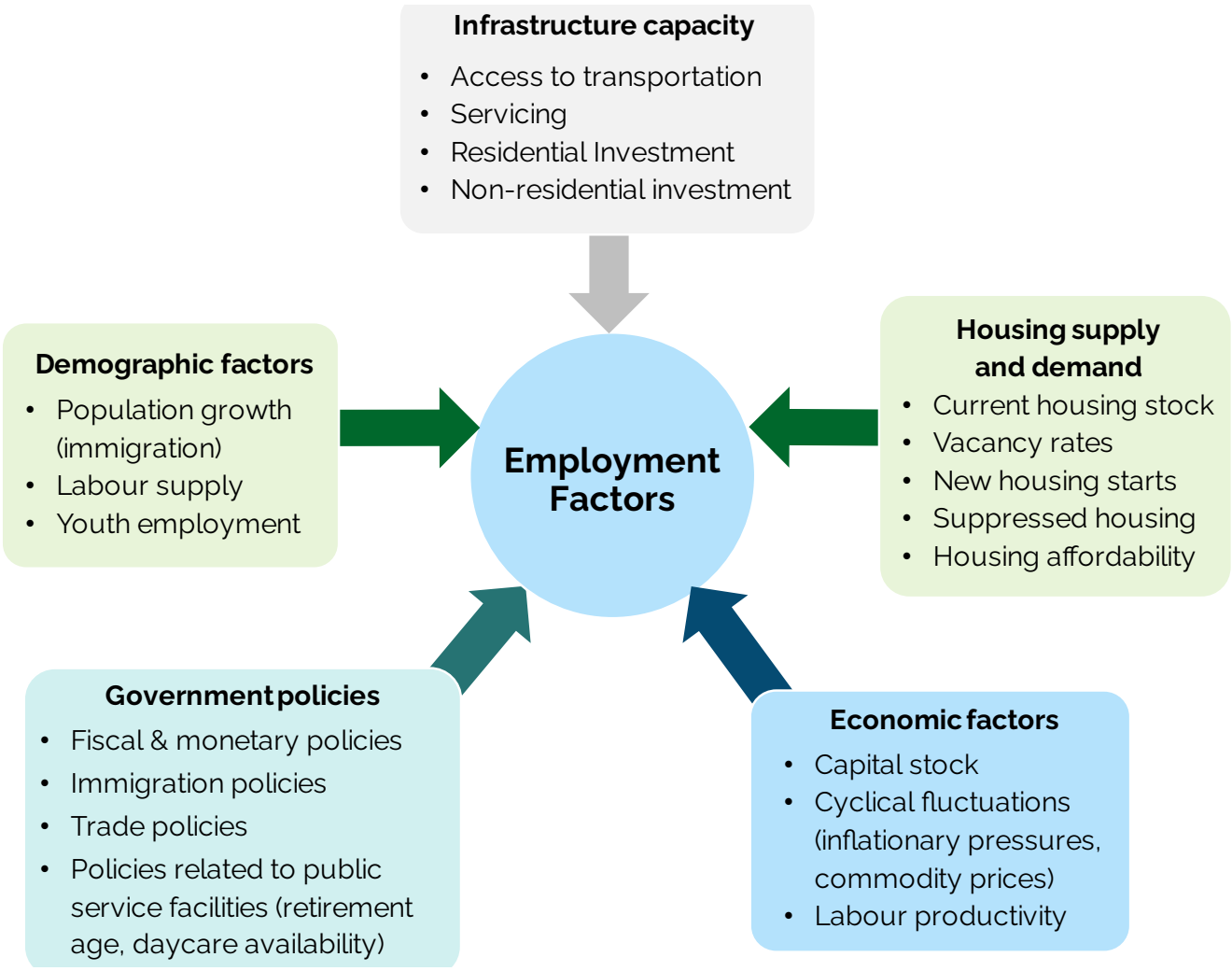


Figure 6: Illustration of factors informing employment projections

Employment step 1: calculating projected employment need

Purpose

The purpose is to determine the municipality's projected total employment needs, which is the number of jobs needed to accommodate employment in the planning horizon.

Policy basis

As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the MOF and may modify, as appropriate (policy 2.1.1).

Recommended approach

Municipalities should identify employment needs by calculating their municipal activity rate and applying it to their projected population.

Calculating municipal activity rate

The municipal activity rate is the ratio of jobs in a municipality to the population of the municipality. It is determined by dividing the base (present day) employment, or the total number of jobs, by the municipality's base (present day) population. Municipalities are recommended to obtain their base employment from a combination of data sources including:

- the Place of Work Status occupation data at the CSD scale

  Statistics Canada defines Place of Work Status as whether a person worked at home, worked outside Canada, had no fixed workplace address, or worked at a specific address (i.e., usual place of work). Consequently, Place of Work data takes into consideration fixed and non-fixed places of work and work from home circumstances

- municipal employment surveys (if available) to support obtain the municipality's base employment; and

- base population, which is the present-day population, may be obtained from Statistics Canada and is available at the CSD (municipal) level

Municipalities are encouraged to refine their respective activity rate, to accommodate the potential for future changes in employment needs, by considering a variety of factors including an analysis of recent changes in the type and nature of employment (i.e., increased automation, micro-distribution models, sectoral concentration within a municipality), municipal land use planning objectives, significant changes made or proposed by major local or regional employers, and infrastructure availability and planned investment.



Figure 7: Illustration of step 1 – calculating municipal activity rate

The municipality's role as provincial and regional employment and service centre may result in significantly different municipal activity rates and employment compositions between municipalities. Therefore, coordination between municipalities is crucial and recommended as outlined in PPS, 2024 policy 6.2.1.

Applying municipal activity rate to forecast population

Once the municipal activity rate is calculated, it would be multiplied by the municipality's projected population in the planning horizon, obtained in Chapter 2, population step 1. The result is the total municipal employment needs – the number of jobs anticipated in the horizon year.

Considerations

The municipal activity rate provides for a comprehensive view of employment in a municipality. In addition to accounting for work from home and commuter employment, it takes into consideration variations in age structures, demographic differences, circumstances of underemployment and market limitations.

Not all municipalities have access to a municipal employment survey to help assess current employment within their geographic area. Therefore, by coordinating with one another, municipalities can ensure that individuals working outside their municipality of residence are counted in the municipality where they are employed**.**



Data obtained from: *Statistics Canada Census Data at the census subdivision (municipal) level.*

Figure 8: Illustration of step 1 – calculating municipal employment needs

The municipal labour force participation rate is the ratio of people employed (or looking for work) to the population of the municipality. Both the municipal labour force participation rate and the municipal activity rate are available from Statistics Canada.

In developing employment forecasts, municipalities should use the municipal activity rate, which provides a comprehensive metric of how employment interacts with the entire population and is useful for municipal and land use planning. The municipal activity rate captures variations in age structure and demographic differences, supports growth planning (i.e., alignment between jobs creation, housing, infrastructure, and services), and reflects local conditions.

The labour force participation rate risks undercounting jobs within municipalities as a result of the scope of what is being counted. The participation rate does not account for people who are underemployed, or people who may be eligible to work but cannot, due to familial obligations or job market limitations. As a result, the labour force participation rate only accounts for a subset of workers and their full capacity to be employed.

Outcome

The outcome of this step is the projected estimate of future jobs needed. This is the input in employment step 2 for developing an employment forecast needed to accommodate employment in the planning horizon.

Employment step 2: developing an employment forecast

Purpose

The purpose is to develop an employment forecast for the total population in the planning horizon. This is based on the projected employment need, while considering local conditions.

Policy basis

As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the MOF and may modify, as appropriate (policy 2.1.1).

Recommended approach

Municipalities should make adjustments to the total employment need, based on local factors and available data, and document any adjustments to demonstrate their rationale and accompanying evidence. Municipal forecasts should consider any potential impacts of shifting economic conditions, and it is important to use a variety of data sources to assess and refine the growth potential of employers, to accommodate new employment trends, and take into consideration local factors such as communities with a predominant student population and seasonal employees.

Key factors influencing adjustments may include:

- planned future business investments and infrastructure development
- labour market policies and changes in demographic trends
- changes in industrial composition and
- shifts in trade policies and international market conditions

In addition, the existing jobs stock needs to be subtracted from the total employment needs to determine the employment forecast.

Considerations

Possible sources of adjustments of the municipal employment forecast include municipal employment surveys, development data and infrastructure constraints and opportunities.

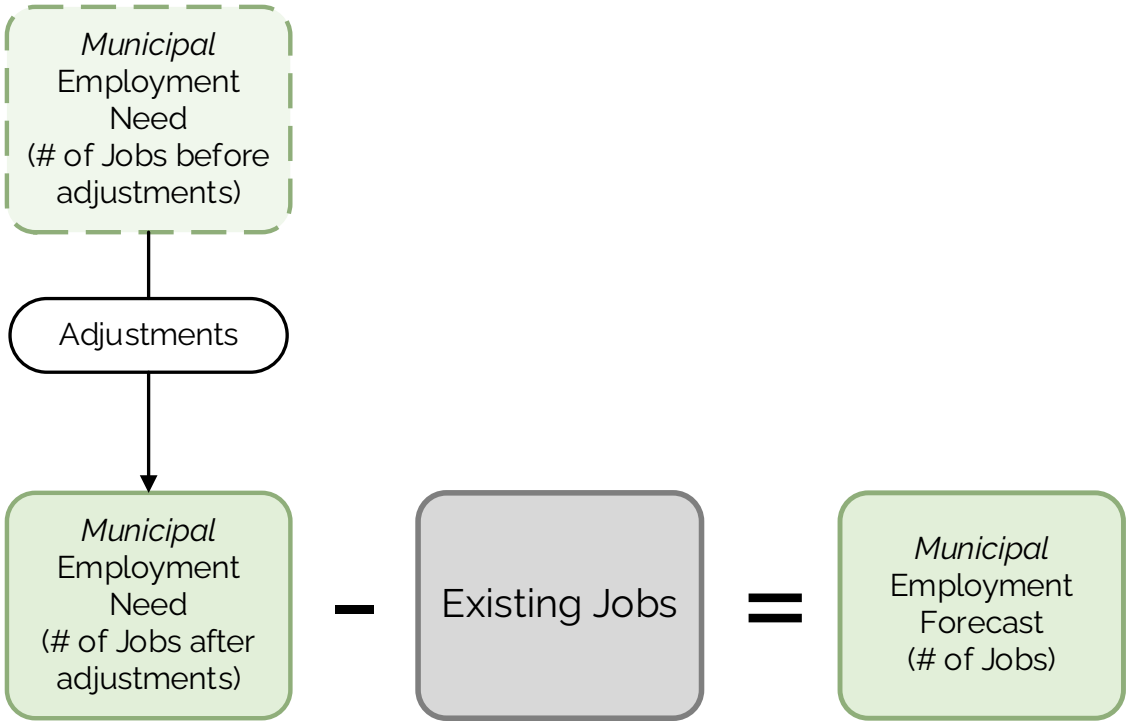


Figure 9: Diagram of step 2 – developing an employment forecast

Outcome

The outcome is the total forecasted employment in the municipality in the planning horizon. This is the input for determining the number of jobs to be accommodated by land use category in employment step 3.

Employment step 3: employment categorization by land use

Purpose

The purpose is to categorize forecast jobs for the municipality into different types of employment uses to ensure that there is a sufficient land supply for all uses.

Policy basis

Planning authorities shall promote economic development and competitiveness by (policy 2.8.1.1):

a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;

b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;

c) identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;

d) encouraging *intensification* of employment uses and compatible, compact, mixed-use development to support the achievement of *complete communities*; and

e) addressing land use compatibility adjacent to *employment areas* by providing an appropriate transition to sensitive land uses.

As defined in the PPS, 2024, *employment areas* are areas designated in an official plan for clusters of business and economic activities including manufacturing, warehousing, and goods movement. Uses excluded from *employment areas* are institutional and commercial, retail and office not associated with the examples of primary employment uses listed above, unless subject to transition under the *Planning Act*.

Planning authorities shall protect *employment areas* that are located in proximity to *major goods movement facilities and corridors*, including facilities and corridors identified in provincial transportation plans, for the *employment area* uses that require those locations (2.8.2.2).

Recommended approach

In accordance with PPS, 2024, some types of jobs may be located within *employment areas* while others may not. The types of jobs that may be located in *employment areas* include manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. To accurately calculate municipal land needs, municipalities should determine the number of jobs within and outside *employment areas*.

Municipalities should classify forecast jobs into the following employment land use categories:

- **General Employment (GE):** Jobs primarily serving the needs of the local and regional population that are within the *settlement area* but are primarily outside of *employment areas*. These jobs primarily serve a resident population, including retail, commercial, hospitality, institutional, educational, health care and work from

home employment. Jobs typically located in standalone office buildings. Some smaller or rural municipalities may not have many of these types of jobs.

- **Employment Land Employment (ELE):** Jobs related to industries and activities that are generally not compatible with sensitive land uses and are primarily located within or adjacent to *employment areas* (e.g., manufacturing & warehousing jobs)
- **Rural Employment:** Resource and agriculture-based jobs (e.g., mining, forestry, feed / fertilizer facilities) that are typically located outside of *settlement areas.* Municipalities may consider including an appropriate share of other job categories such as GE jobs located outside of *settlement areas* (e.g., gas and service stations).

Municipalities may consider including fewer or additional land use sub-categories as appropriate, reflecting local conditions and planning objectives.

Small municipalities that do not have detailed data available may use a simplified method to determine the accommodation of GE jobs. Further details are provided in Chapter 5: Land Needs Assessment.

The simplified method enables municipalities to estimate the land need for GE jobs forecasted, based on inputs such as past permits, approvals, official plans and known employment trends in the municipality.

Considerations

Municipalities are recommended to use the National Occupation Classification (NOC) data provided by Statistics Canada, as a special request for details that would be useful for municipalities beyond the broad classifications publicly available, to inform the classification of jobs by land use category, as it provides for a standardization in the identification and categorization of jobs, which is based on the training, education, experience, and responsibilities that they entail.

Jobs can further be classified through supplemental data such as employment surveys, development applications received / approved or an economic development strategy (if applicable).

However, municipalities do have the flexibility to adjust their job structures and the provision of jobs within each land use category based on local conditions including market disruptions, changes in economic activity, changes in *infrastructure* and capital investments etc., which in turn impacts the total percentage share of employment in each land use category and the resultant number of jobs per land use category.

The mix could be assumed to remain constant, or municipalities may anticipate that its job structure would change, over the planning horizon. Municipalities could adjust the current job category structure accordingly. These adjustments provide municipalities flexibility to adapt to local employment circumstances and recognize varying local contexts.

In some situations, industrial lands need to be redesignated to accommodate food or agricultural processing to support employment within the agri-food sector, whereas agricultural production and some direct processing likely occurs in *prime agricultural area* and/or rural lands. Growth in this type of employment may or may not trigger a need for additional employment lands but this potential scenario should be taken into consideration when categorizing forecasted jobs.

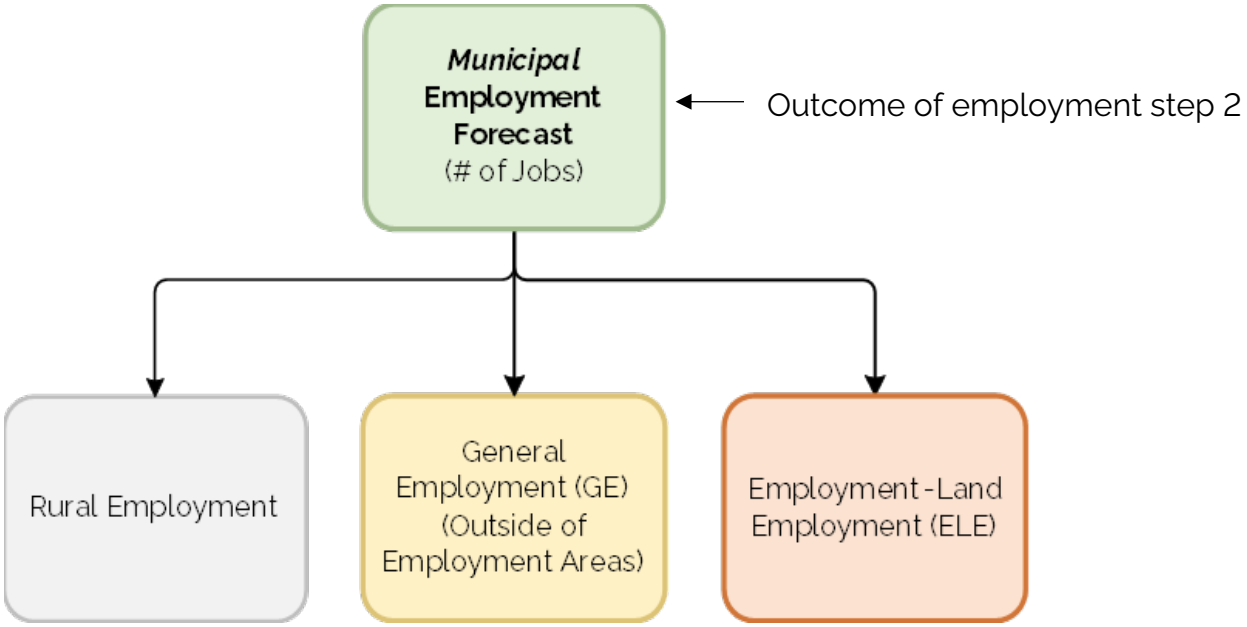


Figure 10: Diagram of employment step 3 – employment categorization by land use

Outcome

The outcome is the categorization of the jobs forecasted for the municipality by different types of employment uses. The results are an input to determining the ability of municipalities to accommodate jobs through *intensification* in employment step 4.

Employment step 4: planning for employment intensification

Purpose

The purpose is to determine the number of jobs that can be accommodated through *intensification* and through new development which would impact land needs.

Policy basis

Planning authorities should support the achievement of complete communities by accommodating an appropriate range and mix of land uses, *housing options*, transportation options with *multimodal* access, employment, *public service facilities* and other institutional uses, recreation, parks and open space, and other uses to meet long-term needs (policy 2.1.6a).

Planning authorities are encouraged to establish density targets for *designated growth areas*, based on local conditions. *Large and fast-growing municipalities* are encouraged to plan for a target of 50 residents and jobs per gross hectare in *designated growth areas* (policy 2.3.1.5).

Major office and major institutional development should be directed to *major transit station areas* or other *strategic growth areas* where *frequent transit* service is available (policy 2.8.1.4).

Planning authorities shall plan for, protect and preserve *employment areas* for current and future uses, and ensure that the necessary *infrastructure* is provided to support current and projected needs (policy 2.8.2.1).

Recommended approach

Once the employment forecast is grouped into land use categories, municipalities should determine the number or share of GE jobs and ELE jobs that may be planned to be accommodated within the existing built-up area through *intensification*.

Municipalities would consider recent building permit data and development applications to assist with understanding market absorption and *intensification* potential. Determining the number or share of jobs that go into built-up areas or *designated growth areas* would be based on the existing employment patterns, size, and community characteristics. Municipalities may consider policy-based *intensification* potential encouraging the *redevelopment* of underutilized land and planning for higher densities (e.g., within *major transit station areas*). *Intensification* of ELE jobs refer to jobs that may be accommodated

within existing *employment areas* and would be generally less responsive to policy initiatives in favour of market demand and industry needs.

In turn, this provides supporting data needed to assess land needs and estimate the number of jobs to be accommodated within *designated growth areas*, or as part of a *settlement area* boundary expansion, including new *employment areas* for ELE jobs. This step also helps municipalities satisfy PPS, 2024 requirements as municipalities are required to establish minimum *intensification* targets per policy 2.3.1.4.

Considerations

If a municipality does not currently have or anticipate having significant office development in the future, the office employment category can be omitted, and any non-ELE jobs can be reflected as part of the GE category.

Generally, in larger municipalities, a significant amount of GE jobs would be directed to built-up areas. This is due to factors such as *intensification*, and development within *strategic growth areas*, *major transit station areas* and others, such as mixed-use areas where *frequent transit* is available.

Municipalities with major office development and major institutional development may consider subdividing the GE category to assist in planning, such as within *strategic growth areas*.

Municipalities have the flexibility to remove consideration of work-from-home from the GE category and create a separate category to account for remote and hybrid work options.

Municipalities can also create additional categories to forecast by type of employment in each land use area.

Municipalities should consider underutilized *employment areas* (i.e., vacant or under used) to accommodate growth, as these areas could result in unaccommodated jobs that need to be addressed. Furthermore, the new definition of *employment area* results in more jobs to be accommodated by *intensification*, for areas such as underdeveloped strip malls etc.

In some situations, warehousing and logistics uses located within *employment areas* may not have a significant number of jobs or may be heavily automated. However, due to the nature of their function, these uses have sensitive / intensive land uses and cannot be intensified. Municipalities should take this into consideration when determining additional employment land needs.

This work would be coordinated with the housing forecast and its calculation for intensification in the next chapter, especially with respect to 'work-from-home' employment. Not all 'work-from-home employment is fully remote and as a result cannot be excluded from calculations to determine adequate land supply for a mix of uses.

Outcome

The outcome is the number of GE and ELE jobs that would be anticipated to be accommodated outside of the built-up area and existing *employment areas*. In turn, this will assist in determining land needs.

Where appropriate, industrial, manufacturing, and small-scale warehousing are encouraged to locate in *strategic growth areas* and other mixed-use areas where *frequent transit* service is available, outside of *employment areas*. As such, functionally, these jobs may be treated as GE jobs as they do not impact *employment area* land needs.

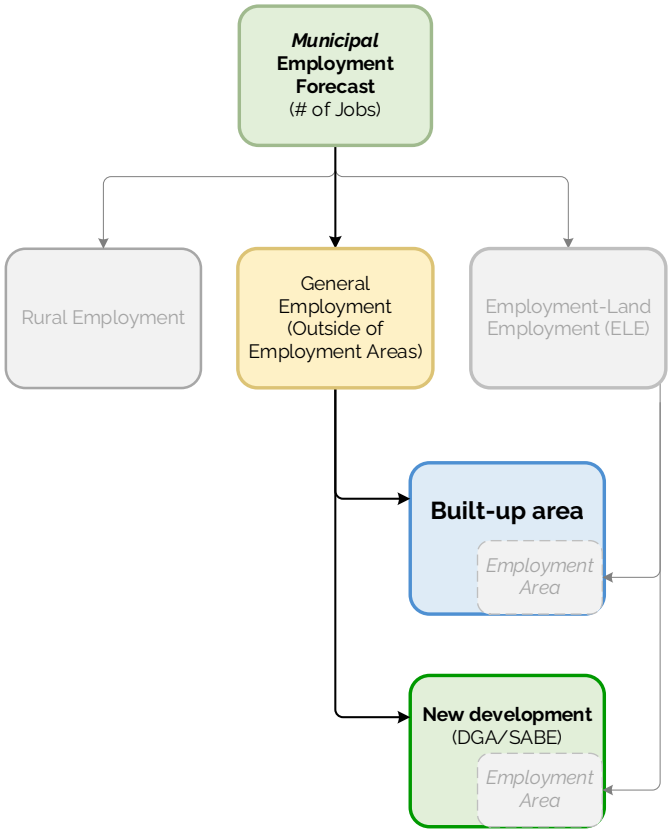


Figure 11: Diagram illustrating jobs in the Employment Land Employment category feeding into the employment area land use.

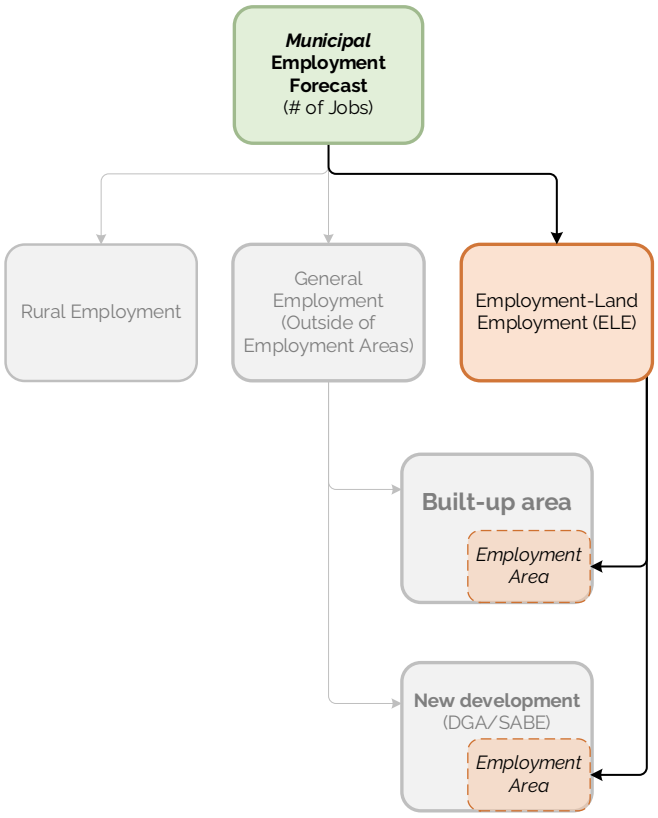


Figure 12: Diagram illustrating jobs in the General Employment category feeding into both built-up areas and new development.

Chapter 5: Land Needs Assessment

Overview

Chapter 5 guides municipalities in determining the amount of land required to accommodate an appropriate range and mix of land uses to meet a municipality's projected needs over a 20 to 30-year planning horizon.

Three methods are provided to identify the quantity of land needed for housing and jobs, while considering *employment area* land needs separately from GE and rural employment land needs. Each method is based on PPS, 2024 policy direction and considers available data and local conditions.

Purpose

The purpose is to determine if land is required to accommodate the forecasted needs identified in Chapters 3 and 4 and, if so, calculate the amount of land needed.

Policy basis

At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for *infrastructure*, *public service facilities*, *strategic growth areas* and *employment areas* may extend beyond this time horizon (policy 2.1.3).

The intention of the guidance is to assist municipalities develop population and employment forecasts and identify the overall quantity of land needed by the municipality to the planning horizon. The location of new settlement areas, location of expansions to settlement areas, location of employment areas, or the suitability of whether an area of land should be included or removed from an employment area are therefore not in scope to be addressed in the guidance. However, the outcome of quantifying land needs would be a supporting resource for municipalities in implementing these other aspects of the PPS, 2024.

Recommended approach

It is recommended that municipalities quantify municipal land needs based on municipal forecasted population and employment, using one of (or combination of) the following three methods:

method 1: People and jobs per hectare

method 2: Multiple densities

method 3: A simplified method, using Method 1 or 2 for housing land need plus an estimate (i.e., a percentage) for employment land need (i.e., GE and ELE jobs)

methods 1 and 2 are appropriate for most municipalities. Where the data is available for some of the forecasts (i.e., housing and/or employment), it is recommended that the municipality uses the most elaborate method to develop a land needs assessment for those forecasts.

Municipalities are encouraged to use both methods 1 and method 2 and compare their results. The comparison assists in ensuring land need is neither under or over estimated. Following this exercise, municipalities should provide a rationale for their chosen method, and the resulting land need.

Method 3 is only recommended for cases where a municipality does not have sufficient data or lacks the means/capacity to obtain the data necessary for applying one or both of the methods. In general, the simplified approach is only appropriate for a largely rural municipality with a very small population.

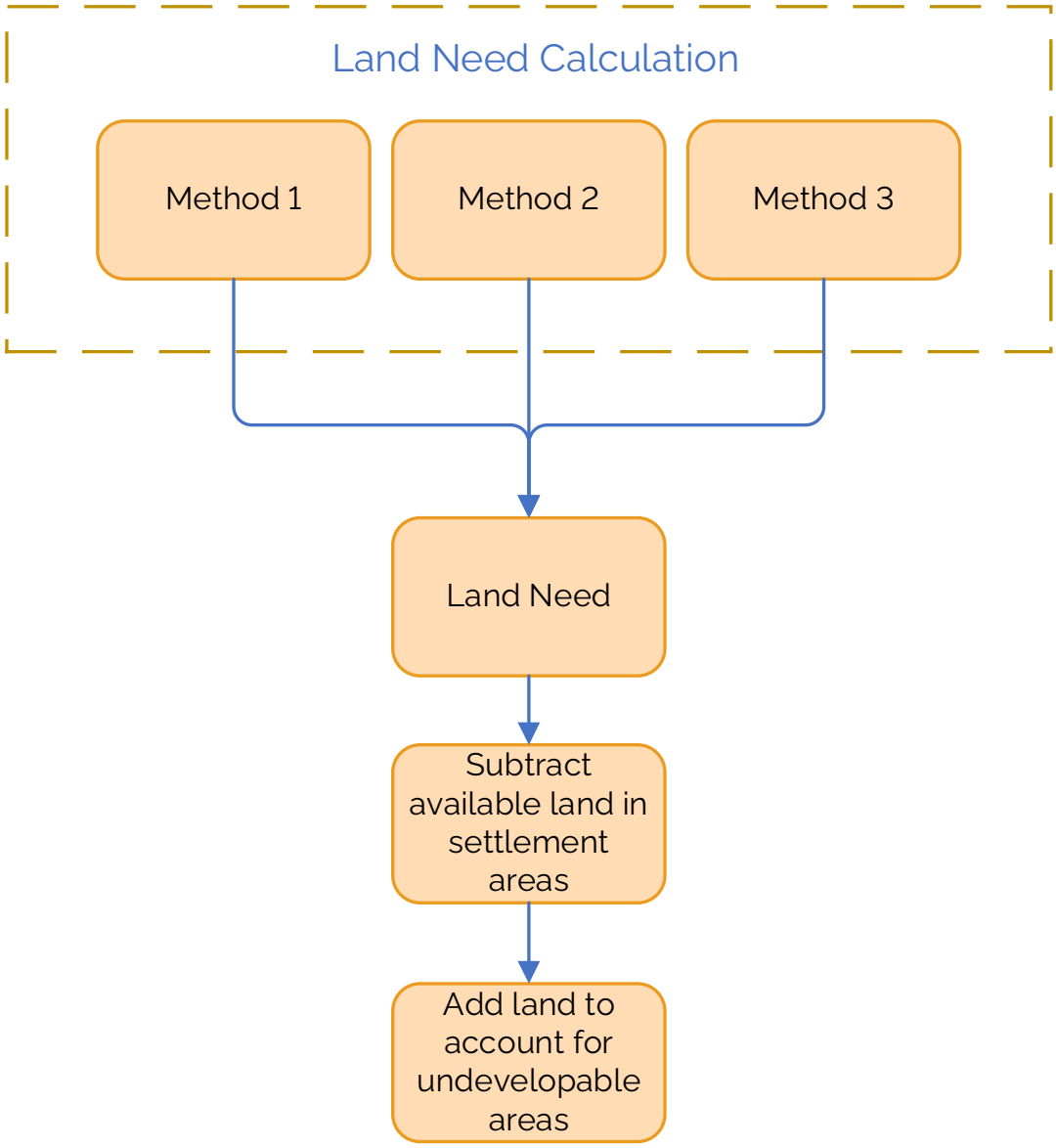


Figure 13: Calculation steps for adjusting land need outcomes. These steps are performed after land need is calculated, regardless of method used.

It is recommended that municipalities choose the method or methods that is most suitable for them, considering available data and local conditions. It is also possible to mix and match components of the methods depending on available data and land use planning approaches to density.

A common aspect to each method is that municipalities would consider land adjustments, (both upward and downward) to account for land designated and available for development, the impact of Minister's zoning orders (MZOs) issued or other provincial priorities affecting the use of land since the official plan or official plan update came into effect, and compensation steps (i.e., considering the impact of employment land removals):

- Subtract developable and vacant land

  This is to account for land that is already available to accommodate development within the *settlement area* and *employment area* to prioritize existing land, ensure its efficient use and support the orderly progression of growth.

- Add to compensate for undevelopable lands or anticipated lags in land development (if needed)

  There may be lands within *settlement areas* that are not able or anticipated to be developed by the horizon for a range of policy reasons or market conditions. Municipalities should compensate for these lands to ensure there is sufficient land to the horizon.

An integral aspect in each method is coordination between lower-tier municipalities, and coordination between lower-tier municipalities and upper-tier municipalities with planning responsibilities.

Method 1: people and jobs per hectare

Municipalities would add up the number of residents in estimated housing units (i.e., number of people) and the number of jobs outside of *employment areas* (i.e., number of GE jobs).

The number of people is obtained from the housing forecast is then converted from housing units to people by undertaking an analysis of persons-per-unit (PPU) according to unit type.

The number of jobs is obtained from the employment land needs. For the purpose of the mixed-use portion of *settlement areas*, the basis for the assessment is the GE jobs after subtracting existing jobs and *intensification*.

The combined total of residents and jobs would be divided by the planned density target set by the municipality. The outcome of dividing residents and jobs by the planned density

targets is the municipality's developable land needs in net hectares. Municipalities will then determine an adjusted land needs in gross hectares.

Municipalities may rely on census data for information on unit size by housing type to assist in determining an appropriate PPU by housing type. The level of detail for the analysis should be commensurate with the size of the municipality, the amount and type of housing demand and the available data. Statistics Canada provides data at the census tract level to inform a detailed analysis. However, municipalities may use aggregated data at the CSD level.

For *employment areas*, municipalities would follow a similar approach using ELE, and then apply the density target (i.e., jobs per hectare).

Municipalities would be recommended to use a gross density target. PPS, 2024 policy 2.3.1.5 encourages all municipalities, to establish density targets, and explicitly encourages *large and fast-growing* municipalities to plan using a specified gross density target.

The intent is that the results reflect all the land needed to accommodate the forecasted need before any adjustments are applied. The resulting land needs is the total quantity of land required for housing and employment.

Method 1:

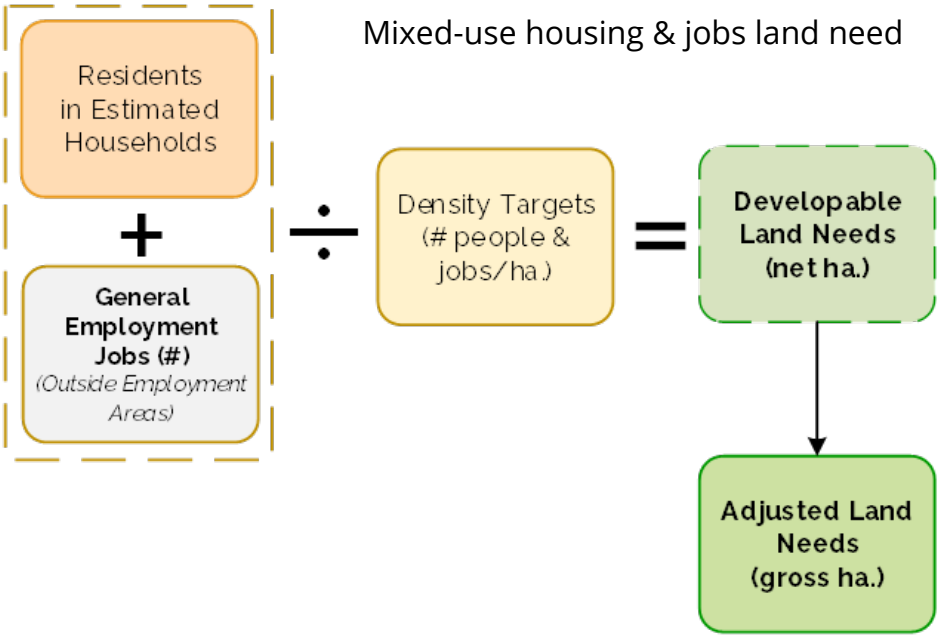


Figure 14: Method 1 steps for calculating housing and jobs land needs using people & jobs per hectare.

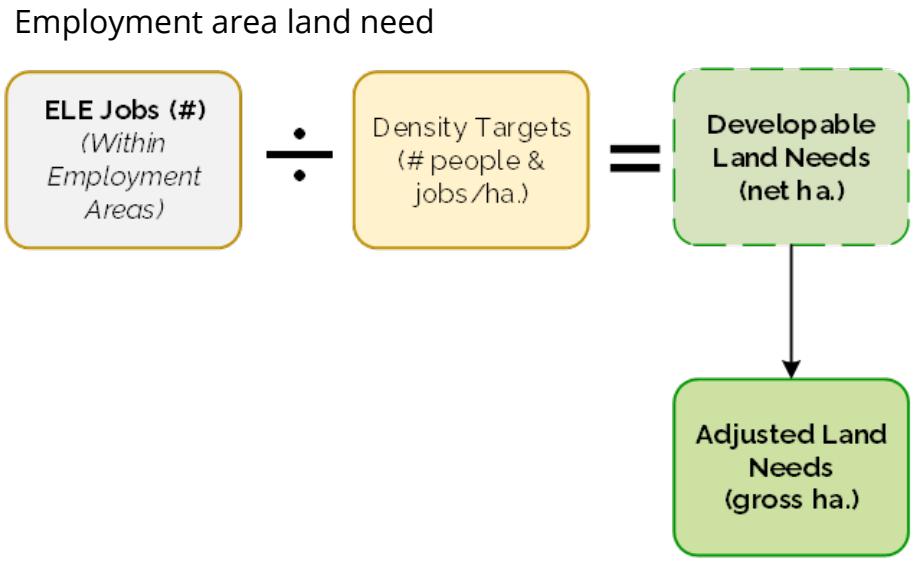


Figure 15: Method 1 steps for calculating *Employment Area* land needs using people & jobs per hectare.

Method 2: multiple densities

Method 2 is the most detailed of the three methods because it applies a specific density to each type of development (i.e., each type of housing unit and each type of job). By using specific densities, municipalities would achieve the most accurate land assessment with the intention that this would lead to the most efficient use of land that best reflects community needs.

Method 2 supports the PPS, 2024 policy encouragement for mixed-use development and a range and mix of *housing options* to the extent that data is available to the municipality.

The amount of land is calculated by multiplying each type of development by its relevant density factor, given the extent of available data.

For housing, different housing typologies should be accounted for. The housing needs by type (e.g., low-density, medium-density and high-density) that remain to be accommodated after housing step 3 should be taken into account, each according to their specific net density assumptions. Municipalities should consider densities of different typologies by using standard industry and land use planning practices, i.e., the floor space index (FSI) or unit per hectare.

For employment, municipalities may rely on standard industry and land use planning practices to identify the floor space per worker (FSW) ratio for different job types.

Specifically, method 2 uses a FSW ratio to calculate GE jobs and *employment area* land needs. The land for GE jobs is combined with the housing land needs to determine the overall land needs for both housing and jobs, separate from *employment areas*.

Since both housing and employment assessments are ‘net’, narrowly accounting for only the land required for the specific typology, municipalities should adjust the results upward to account for gross land needs required to accommodate development, including roads, parks, stormwater management and other components not accounted for. The adjustments would be expected to vary by typology and need, according to community needs. Municipalities could base the adjustment on local data, including recent development proposals and approvals, building permit applications, price, rent, and vacancy dynamics across building types, and land use planning requirements. Municipalities are encouraged to engage the public and stakeholders early in local efforts to inform any adjustments, as a component of implementing the PPS, 2024. Municipalities should document the adjustments made to determine the gross land needs.

The resulting land needs is the total quantity of land required for housing and employment.

Method 2:

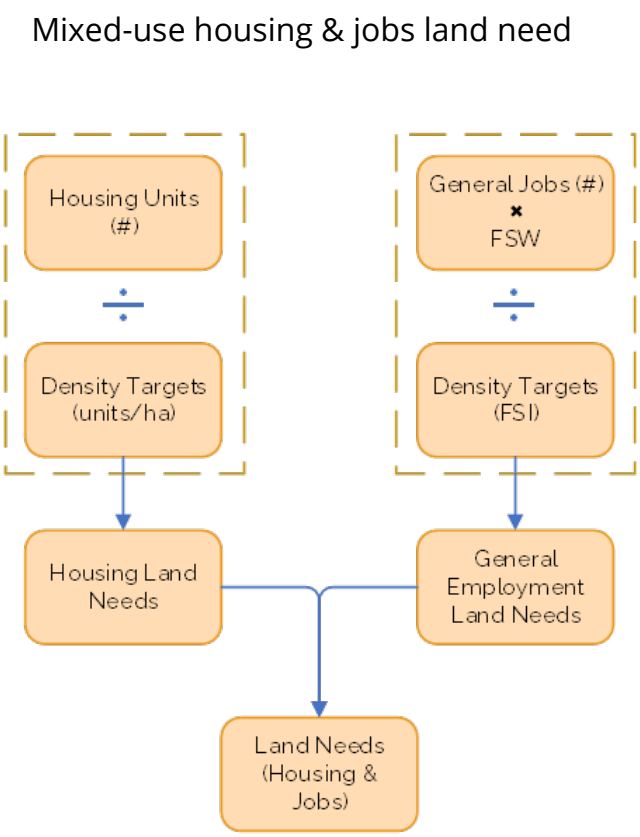


Figure 16: Method 2 steps for calculating land needs for housing and jobs.

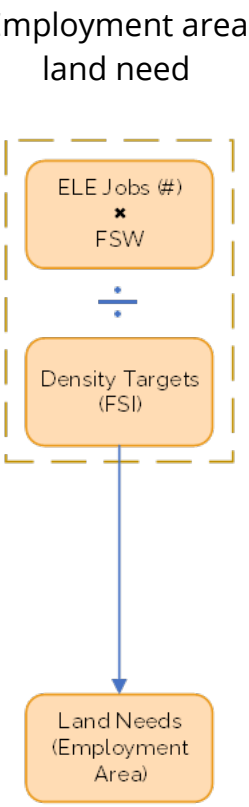


Figure 17: Method 2 steps for calculating *employment area* land.

Method 3: simplified

Method 3 is a simplified method, which provides steps to determining land needs when a municipality does not have detailed data available.

For housing and GE jobs, municipalities could determine their housing land needs and then add an estimated factor (i.e., percentage) to accommodate jobs. Municipalities may use method 1 (i.e., applying people per gross hectare density) or method 2 (i.e., applying housing units per net hectare density) to determine their housing land needs.

Once a municipality determines the housing land needs, the simplified method enables municipalities to estimate the land needs for non-*employment area* jobs forecasted, which is based on factors such as the existing built form, building permit approvals, current zoning, official plan designations and historic development and growth patterns. Estimates can also be forward looking, if for example there is knowledge of a major employment change coming to a municipality.

For *employment areas*, municipalities would develop an estimate of *employment area* density to apply to their forecasted ELE jobs. The estimate would be based on available data and past development.

Considerations for using method 3

Smaller and more rural municipalities would be advised to use this method, where there are resources and capacity constraints in undertaking the work required for methods 1 or 2. For example, small, rural, or northern municipalities may not have sufficient data to assess land needs for each type of housing and employment development.

Municipalities may opt to use this simplified method based on population size, lack of data necessary for utilizing the land-based method involving FSW, availability of data on previous employment growth (within and outside of *employment areas*), or other considerations.

Method 3 is based on estimations, with housing and job land needs deriving from available housing density data, and *employment area* land needs deriving from employment estimates and local job typologies. As an approach based on estimations, the results from method 3 may cause an over- or under-projection of land needs. However, the scope would be relatively minimal.

Method 3:

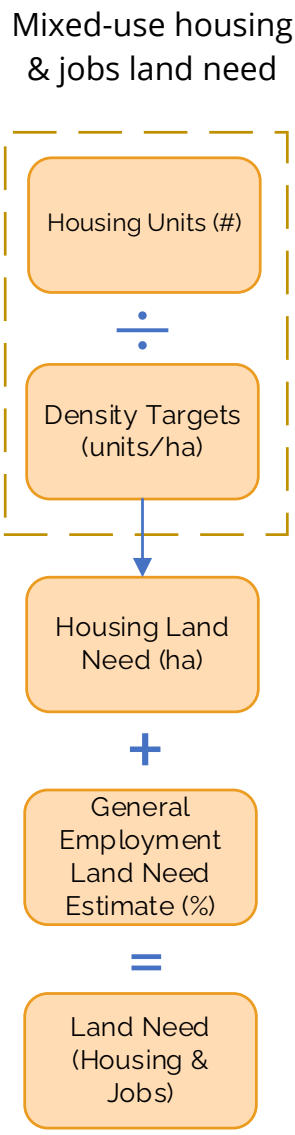


Figure 18: Method 3 steps for calculating land need for housing and jobs.

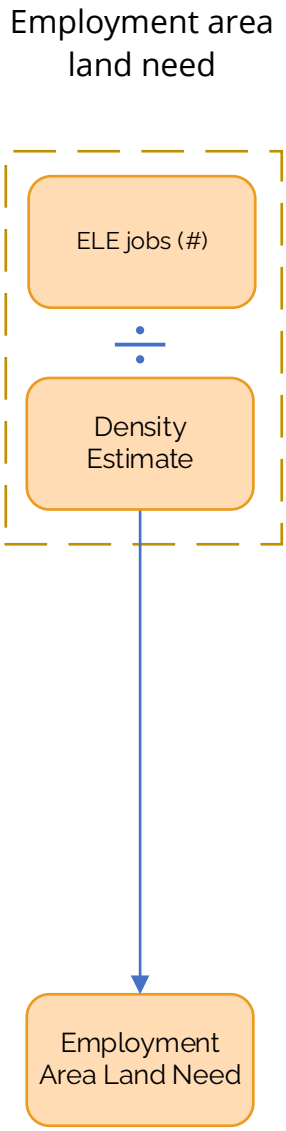


Figure 19: Method 3 steps for calculating *employment area* land need.

Comparing the land needs assessment methods

A table comparing the three methods, their benefits and considerations for municipalities when selecting their approach to their land needs assessment, can be found below.

Methods provided in guidance	Benefits
Method 1: Using a people and jobs per hectare density factor. • People – converted back from number of housing units forecasted. • Jobs – from employment land needs.	• Measuring the number of people rather than housing units allows municipalities to more accurately gauge density (e.g., identifying service levels needed).
Method 2: multiple densities calculation using FSW data for jobs and a Floor Space Index (FSI) density factor. • Housing units from forecasting. • Employment space in square metres calculated from FSW.	• Using surface area instead of number of jobs as a unit of measurement for employment accounts for variations in land needs for different types of jobs. • Allows for calculation of land needs that are reflective of needs for specific housing and jobs by type.
Method 3: simplified method, using method 1 or 2 for housing land needs + estimate (percentage) for employment land needs. • Results from housing forecasts or people converted from number of housing units forecasted. • Estimate for employment land needs.	• This simplified version may be used by municipalities that lack sufficient data to calculate specific employment outside of *employment areas*.

Figure 20: Chart illustrating a comparison of the three land needs methods

Considerations

- inter-municipal collaboration is encouraged through all stages of the forecasting process
- method 2 provides a more accurate assessment of land needs that reflects built form and end-user needs. In the case of neighbouring jurisdictions using different methods, the result calculated by the municipality using method 2 would take precedence; and
- municipalities without readily available data for calculating their own FSW ratios may consider using FSW ratios from a neighbouring municipality that has this data available

Outcome

Using any of the above methods would provide municipalities with the information needed to assist in future planning to ensure sufficient land is available to achieve market balance and to support PPS, 2024 implementation.

Where there is an identified need for land beyond what is available within *settlement areas* (land for mixed-use housing and jobs and *employment areas*) municipalities would ensure that the appropriated policies of the PPS, 2024 are applied. Municipalities may also consider the removal of land from *employment areas*.

Chapter 6: Implementation

The purpose of Chapter 6 is to recommend to municipalities general best practices for the implementation of the guidance. The chapter outlines the significance of collaboration between municipalities and documentation of land needs assessment processes. Finally, chapter 6 identifies uses for the municipal land needs assessment results as part of PPS, 2024 implementation.

Intermunicipal coordination

Collaboration between municipalities would be essential for achieving the outcomes of all steps of the forecasting and land needs assessment process and is encouraged as a cornerstone of the methodologies in the guidance for supporting the implementation of PPS, 2024 policies. Coordination between municipalities is recommended to ensure the distribution of projections for each municipality considers the future housing, population, *infrastructure*, and other land use needs within the whole CD. In addition, each municipality could test its calculations compared with the projections for the CD.

Policy basis

A coordinated, integrated, and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies, boards, and Service Managers including:

a) managing and/or promoting growth and development that is integrated with planning for *infrastructure* and *public service facilities*, including schools and associated childcare facilities;

b) economic development strategies;

c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources;

d) infrastructure, multimodal transportation systems, public service facilities and waste management systems;

e) ecosystem, shoreline, watershed, and Great Lakes related issues;

f) natural and human-made hazards;

g) population, housing and employment projections, based on *regional market areas*, as appropriate; and

h) addressing housing needs in accordance with provincial housing policies and plans, including those that address homelessness (policy 6.2.1).

Municipalities, the Province, and other appropriate stakeholders are encouraged to undertake a coordinated approach to planning for large areas with high concentrations of employment uses that cross municipal boundaries (policy 6.2.8).

Where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with lower-tier municipalities shall:

a) identify and allocate population, housing and employment projections for lower-tier municipalities;

b) identify areas where growth and development will be focused, including strategic growth areas, and establish any applicable minimum density targets;

c) identify minimum density targets for growth and development taking place in new or expanded settlement areas, where applicable; and

d) provide policy direction for the lower-tier municipalities on matters that cross municipal boundaries (policy 6.2.9)

Where there is no upper-tier municipality or where planning is not conducted by an upper-tier municipality, planning authorities shall ensure that policy 6.2.9 is addressed as part of the planning process, and should coordinate these matters with adjacent planning authorities (policy 6.2.10).

Documentation

Municipalities should document their forecasting and land needs assessment work through a detailed written report that substantiates the specific quantitative values reported.

In addition, if a municipality decides to use an alternative approach (or approaches) for the forecasts and land needs assessment than what is outlined in this guidance, they are expected to document that information. Municipal staff will need to document the approach (or approaches) used, the base data, the adjustments made and provide the rationale and methodology (or methodologies) behind the calculations.

Municipalities should share with the appropriate approval authority all documentation regarding the forecasting and land needs assessment to demonstrate how they have satisfied the PPS, 2024 requirements.

Using the municipal land need assessment results

Municipalities should use the results of their land needs assessment process to ensure satisfying PPS, 2024 requirements.

The result of the land needs assessment is a total quantum of land needed at the municipal level. This provides a critical input to the official plan or official plan amendment process through which the appropriate locations of any proposed *settlement area* boundary expansions, the removal of *employment area* land for non-employment uses, and the planning of development in *designated growth areas* will ultimately be determined. These decisions will be updated by municipalities through official plan or official plan amendment process, subject to statutory approval.

Glossary

Base year: Base year is the present-day population, or the latest available population. It may be obtained from Statistics Canada and is available at the CSD (municipal) level.

Census Division: A census division (CD) is a geographic term used by Statistics Canada for statistical reporting. It falls between the province/territory level and the municipality (i.e., census subdivision). It refers to a group of neighbouring municipalities joined together for the purposes of regional planning and managing common services (such as police or ambulance services). These groupings are established under laws in effect in certain provinces of Canada. Census division is the general term for provincially legislated areas (such as county, and regional district) or their equivalents. Census divisions are intermediate geographic areas between the province/territory level and the municipality (census subdivision).

Census Subdivision: A census subdivision (CSD) is a geographic term used by Statistics Canada for statistical reporting. It is general term for municipalities (as determined by provincial/territorial legislation). This includes cities, towns, townships, and other types of incorporated municipalities. This also includes areas treated as municipal equivalents for statistical purposes, such as Indian reserves, Indian settlements, and unorganized territories.

Cohort survival model: A method to track births, deaths, and migration patterns over time to forecast the future population. Though tracking cohorts, this method provides information about how populations change over time, which can be used to plan service delivery and resource allocation.

Complete communities: means places such as mixed-use neighbourhoods or other areas within cities, towns, and *settlement areas* that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, *public service facilities*, local stores, and services. *Complete communities* are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations (PPS, 2024).

Employment areas*:* means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research, and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An *employment area* also includes areas of land described by subsection 1(1.1) of the *Planning Act*. Uses that are excluded from *employment areas* are institutional and commercial, including retail and office not associated with the primary employment use listed above (PPS, 2024).

Employment Land Employment (ELE): Jobs related to industries and activities that are generally not compatible with sensitive land uses and are primarily located within or adjacent to *employment areas* (e.g. manufacturing & warehousing jobs).

General Employment (GE):

a) Jobs primarily serving the needs of the local and regional population that are within the settlement area but are primarily outside of *employment areas*. These jobs primarily serve a resident population, including retail, commercial, hospitality, institutional, educational, health care and work from home employment. As institutional uses (e.g., hospitals, health care, education) are excluded from *employment areas* and as a result must be accommodated in the GE category consistent with the new definition of employment in the PPS, 2024.

b) Jobs typically located in standalone office buildings (e.g., company headquarters or a consulting firm). Some smaller or rural municipalities may not have many of these types of jobs located in standalone office buildings (e.g., a doctor's office within a plaza with retailers and personal care services). This category may vary based on municipal interpretations of e*mployment areas.*

Headship rates, or household formation rates: the proportion of primary household maintainers (i.e., household heads) in a given population. This information is available through the census household data from Statistics Canada.

Housing options: means a range of housing types such as, but is not limited to: single-detached, semi-detached, rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, laneway housing, garden suites, rooming houses and multi-residential buildings, including low- and mid-rise apartments. The term can also refer to a variety of housing and tenure arrangements.

Intensification: means the development of a property, site or area at a higher density than currently exists through:

a) *redevelopment*, including the reuse of *brownfield sites* and underutilized shopping malls and plazas;

b) the development of vacant and/or underutilized lots within previously developed areas;

c) infill development; and

d) the expansion or conversion of existing buildings

(PPS, 2024).

Labour force participation rate: Defined by Statistics Canada as the percentage of the working age population (i.e., age 15 years or older) that are either employed or unemployed. This rate measures the portion of working age population who are employed or actively seeking employment.

Major transit station area: the area including and around any existing or planned *higher order transit* station or stop within a *settlement area*; or the area including and around a major bus depot in an urban core. *Major transit station areas* generally are defined as the area within an approximate 500 to 800-metre radius of a transit station (PPS, 2024).

Municipal activity rate: the total number of jobs located within a municipality divided by its base (present-day) population. The municipal activity rate provides a more comprehensive metric of how employment interacts with the entire population, which is useful for municipal and land use planning. The activity rate captures variations in age structure and demographic differences, supports growth planning (alignment between jobs creation, housing, infrastructure, and services), and reflects local conditions.

Place of Work Status by Occupation: refers to the physical space in which a person works, which along with municipal employment surveys can be used to obtain the municipality's base employment. This data is available from Statistics Canada at the census subdivision level.

Primary household maintainer: defined by Statistics Canada for the purposes of the Census, refers to the first person in the household identified as someone who pays the rent or the mortgage, or the taxes, or the electricity bill, and so on, for the dwelling. In the case of a household where two or more people are listed as household maintainers, the first person listed on the Census form is chosen as the primary household maintainer.

Projection range: refers to applying the two methods for disaggregating the MOF projection. The result of applying the two outcomes serve as forecasting parameters – or projection range – as a basis to form a future population projection at the municipal scale.

Regional market area: refers to an area that has a high degree of social and economic interaction. The upper or single-tier municipality, or planning area, will normally serve as the *regional market area*. However, where a *regional market area* extends significantly beyond these boundaries, then the *regional market area* may be based on the larger market area. Where *regional market area*s are very large and sparsely populated, a smaller area, if defined in an official plan, may be utilized (PPS, 2024).

Rural Employment: Resource and agriculture-based jobs, typically outside of *settlement areas* (includes a share of other job categories).

Settlement areas: means urban areas and rural *settlement areas* within municipalities (such as cities, towns, villages, and hamlets). Ontario's *settlement areas* vary significantly in terms of size, density, population, economic activity, diversity and intensity of land uses, service levels, and types of *infrastructure* available. *Settlement areas* are:

a) built-up areas where development is concentrated, and which have a mix of land uses; and

b) lands which have been designated in an official plan for development over the long term.

(PPS, 2024)

Strategic growth areas: means within *settlement areas*, nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating *intensification* and higher-density mixed uses in a more *compact built form*. *Strategic growth areas* include *major transit station areas*, existing and emerging downtowns, lands in close proximity to publicly-assisted postsecondary institutions and other areas where growth or development will be focused, that may include infill, *redevelopment* (e.g., underutilized shopping malls and plazas), *brownfield sites*, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned *frequent transit* service or *higher order transit* corridors may also be identified as *strategic growth areas* (PPS, 2024).

Suppressed Household Formation: New households that would have been formed but are not due to a lack of attainable options. The persons who would have formed these households include, but are not limited to, many adults living with family members or roommates and individuals wishing to leave unsafe or unstable environments but cannot due to a lack of places to go.

Appendix: List of Data Sources

- Ministry of Finance: Ontario Population Projections
- Ministry of Finance: Ontario Population Projections – Data Catalogue
- Statistics Canada - Municipal data on population estimates: StatsCan CSD Population Estimates
- Statistics Canada - CD data on population estimates: Statistics Canada CD Population estimates
- Rural Ontario Institute: data source of additional rural demographic data
- StatsCan data on household size by housing type and community
- School board enrollment projections may account for school age cohort data
- Statistics Canada population data by age by CSD

Ministry of Municipal Affairs and Housing

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Ontario Environmental Registry of Ontario

Con-Cast Pipe Limited

Instrument type: Environmental Compliance Approval (sewage) (/taxonomy/term/375)

ERO (Environmental Registry of Ontario) number	025-0950
Ministry reference number	0086-DGWQM5
Notice type	Instrument
Act	Environmental Protection Act, R.S.O. 1990
Posted by	Ministry of the Environment, Conservation and Parks
Notice stage	Proposal
Proposal posted	August 21, 2025
Comment period	August 21, 2025 - October 5, 2025 (45 days) Open
Last updated	August 21, 2025

This consultation closes at 11:59 p.m. on:

October 5, 2025

Proposal summary

This proposal is for a new Environmental Compliance Approval (sewage) to establish a stormwater management works structure owned and operated by Con-Cast Pipe Limited, servicing the Drycast and wetcast - precast concrete manufacturing facilities located at 299 Brock Road South in Puslinch, County of Wellington, Ontario.

Location details

Site address

299 Brock Road South
Township of Puslinch, ON
N1H 6H9

Canada

Site location details

299 Brock Road South
Township of Puslinch, County of Wellington, Ontario, N1H 6H9

Site location map

The location pin reflects the approximate area where environmental activity is taking place.

View this location on a map (https://maps.google.com/?q=43.453736,-80.1335)

Proponent(s)

Con-Cast Pipe Limited
299 Brock Road South
Puslinch, ON
N0B 2J0
Canada

Proposal details

This proposal is for a new Environmental Compliance Approval (sewage) to establish a stormwater management works structure owned and operated by Con-Cast Pipe Limited, servicing the Drycast and wetcast - precast concrete manufacturing facilities located at 299 Brock Road South in Puslinch, County of Wellington, Ontario.

The proposed works consist of a maintenance hole, a double catchbasin maintenance hole, culvert, a double ditch inlet, storm sewers, vegetated swales, two underground infiltration storage systems, and four oil-grit separator (OGS) units; designed to collect site stormwater run-off; for quantity and quality control; discharging within the Grand River Watershed, via Municipal Drain - Carroll Pond.

Supporting materials

View materials in person

Some supporting materials may not be available online. If this is the case, you can request to view the materials in person.

Get in touch with the office listed below to find out if materials are available.

Comment

Let us know what you think of our proposal.

Have questions? Get in touch with the contact person below. Please include the ERO (Environmental Registry of Ontario) number for this notice in your email or letter to the contact.

Read our commenting and privacy policies. (/page/commenting-privacy)

Submit by mail

Client Services and Permissions Branch

Client Services and Permissions Branch
135 St Clair Ave West
1st Floor
Toronto, ON
M4V 1P5
Canada

Connect with us

Contact

Client Services and Permissions Branch

416-314-8001 or 1-800-461-6290

enviropermissions@ontario.ca

September 9, 2025
GEI Project No. 2501655 – 125006-011

VIA EMAIL: jbrotherston@puslinch.ca

Justine Brotherston
Township of Puslinch
4704 Wellington Road 34
Puslinch, ON N0B 2J0

Re: ERO 025-0950 - Con-Cast Pipe Limited (ECA)
299 Brock Road South
Puslinch, ON

Dear Ms. Brotherston:

Following our review of the Environmental Compliance Approval (ECA) Application received on August 28, 2025, we are providing comments related to the proposed stormwater management improvements on the subject lands located at 299 Brock Road South (Con-Cast Pipe Limited) in the Township of Puslinch.

It is our understanding that the application is for an Industrial Sewage Works ECA. Proposed works include storm sewers, swales, infiltration storage systems and oil-grit separator units.

The following documents were received and reviewed:

- ECA Application, prepared by GHD Limited, including:
    - Stormwater Management (SWM) Report, dated May 21, 2025.
    - Stormwater Management Improvements Drawings, revision D, dated May 6, 2025.

From an engineering perspective, we provide the following comments on the ECA Application:

- Stormwater Quantity:
    - Existing conditions have not been modelled or reported on. It is implied that flows to the Carroll Pond will not increase, but this should be explicitly stated and demonstrated if possible. Please also discuss any impacts on peak flows and flow volumes to other outlets.

- Stormwater Quality:
    - Per Section 4.3 of the SWM report, StormTrap#1 is to include a sediment chamber, however this is not shown on Drawings C-002 or C-009.
    - The OGS sizing sheets in Appendix F appear to mix up the catchment parameters for OGS 1 and 2, although the correct sizing is shown in Table 4.1 and on the drawings.
    - The catchment area contributing to OGS 4 seems to be too small per the sizing sheet in Appendix F. Please confirm.
    - We assume that OGS 3 has been sized for only 70% TSS removal due to the sediment chambers in the upstream StormTraps. Can this treatment train approach please be discussed in Section 4.3, with discussion provided about how enhanced treatment is provided for the overall site?
    - It appears that there is a drainage split at CB.23, with flows directed to the vegetated swale in catchment E202. Is this correct? Are there any quality concerns with this?
- Grading:
    - The SWM report states that Catchment P102 will be re-graded to promote positive drainage towards a new DCBMH and StormTrap #1, but proposed grades are not shown. Is the area to be re-graded per existing contours? Or is grading limited to the immediate vicinity of StormTrap #1? Please confirm.
- Stormwater management design:
    - Please provide a schematic for the PCSWMM model.
    - A geotechnical investigation report is referenced in the SWM report. Given that the SWM design relies on this geotechnical data, this report should be provided for review. Please discuss the separation from the bottom of the proposed StormTraps to the seasonally high groundwater elevation.
    - The IDF parameters for design storm events do not appear to be the current 2023 City of Guelph IDF parameters. The hydrologic modelling and SWM calculations should be updated. The SWM report states that the 2016 City of Guelph Development Engineering Manual was used. The latest 2023 version should be referenced and used instead.
    - For storm sewer design parameters, the Township of Puslinch's 2019 Municipal Development Standards should be referenced and used. Please note that the Township Standards require a minimum inlet time (time of concentration) of 10 minutes.
    - The depression storage values used for impervious and pervious areas in the hydrologic modelling seems high. Please update or justify why these numbers are appropriate.
- Erosion and sediment control:
    - The silt fence proposed is light-duty. Given the proximity of proposed grading and servicing works to the GRCA wetland and the Carroll Pond Municipal Drain, the silt fence should be revised to heavy-duty, wire-backed silt fence.

- Maintenance:
    - We note that some of the existing storm sewer is undersized, has very little slope, and has inadequate velocities per current standards. While there are reportedly no drainage issues onsite, increased maintenance may be required for these sections to ensure continued functionality.
- Sampling Plan:
    - Please confirm how often the results of monthly grab samples taken from the Carroll Pond inlets will be reported and to whom.
- Minor Errors:
    - Figure 3 labels catchments P201 and P202 as E201 and E202.
    - The 300 mm diameter storm sewer from CBMH.12 to CB.19 is not shown on Drawing C-002, although it is in the storm sewer design sheet.
    - Do MH7 and MH5 connect to the nearby storm sewer networks?

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

GEI Consultants Canada Ltd.

[redacted]

Andrea Reed, P.Eng.
Project Engineer

[redacted]

Parth Lad, E.I.T.
Technical Specialist

09/12/2025

Memorandum

To: Justine Brotherston, Director of Corporate Services / Municipal Clerk, Township of Puslinch

From: Keira Martinson, Source Protection Coordinator, Wellington Source Water Protection

Reviewed by: Kyle Davis, Risk Management Official, Township of Centre Wellington

RE: Ministry Reference Number 0086-DGWQM5, Environmental Compliance Approval (Sewage), ERO # 025-0950 - Con-Cast Pipe Inc, 299 Brock Road South, Puslinch

General

1. The following comments are related to the above referenced Environmental Compliance Approval (ECA) application (Ministry reference number 0086-DGWQM5). This is an application for a new ECA for the approval to establish a stormwater management works. The proposal includes a maintenance hole, a double catch basin maintenance hole, culvert, a double ditch inlet, storm sewers, vegetated swales, two underground infiltration storage systems, and four oil-grit separator (OGS) units designed to collect site stormwater run-off for quantity and quality control. The stormwater run-off will discharge within the Grand River Watershed, via the Municipal Drain - Carroll Pond.

2. These comments are provided in regards to the *Clean Water Act*, Grand River Source Protection Plan and source water protection implementation by Wellington Source Water Protection, a partnership of the Wellington County municipalities. These comments should not be construed as a hydrogeological, engineering, ecological or technical review of the application. These comments are strictly provided in regards to our municipality's role in implementing the *Clean Water Act* and municipal source water protection.

Summary of Source Protection Vulnerable Areas and Drinking Water Threats

The subject property is located in:

a) a Significant Groundwater Recharge Area (SGRA); and
b) a draft Wellhead Protection Area for Quantity (WHPA-Q) with a significant risk level.

Attachments show the relevant mapping. Please note the subject property is not located in an Issue Contributing Area (ICA), a Highly Vulnerable Aquifer (HVA), or a Wellhead Protection Area for Quality.

3. Due to the site's location outside any water quality WHPA or ICA, and because the draft WHPA-Q is not yet in legal effect, there are no Significant Drinking Water Threat policies that currently apply.

4. Although significant drinking water threat policies do not currently apply for this site, approved policy WC-MC-23.2 in the Wellington County Chapter of the Grand River Source Protection Plan will apply in the future to this site once the draft WHPA-Q is approved. The draft WHPA-Q is part of a pre-consultation process that is ongoing in Fall 2025 and includes commenting opportunities for municipalities and Provincial Ministries. It is therefore recommended that the Ministry consider the policy text referenced below and add terms and conditions to the ECA, where appropriate:

For reference, please see the policy wording WC-MC-23.2 below:

To ensure that any Recharge Reducing Activity never becomes a significant drinking water threat, where this activity would be a significant drinking water threat as prescribed by the CWA, the MECP should, during any pre-submission consultation for Environmental Compliance Approvals for Stormwater Management Facilities and / or Sewage Works, encourage design and implementation measures for the maintenance of groundwater recharge functions including but not limited to LID, minimizing impervious surfaces and lot level infiltration. The MECP shall issue Environmental Compliance Approvals for Stormwater Management Facilities and / or Sewage Works that, where appropriate, incorporate

conditions that address groundwater recharge considerations. In addition, the MECP, where appropriate, shall consider incorporating conditions in the Environmental Compliance Approvals to address the proper functioning of groundwater recharge measures including, but not limited to, conditions requiring or related to operations, inspection and maintenance of the Stormwater Management Facilities and / or Sewage Works, groundwater or surface water monitoring related to groundwater recharge, and documentation including manuals and maintenance records. For Stormwater Management Facilities and / or Sewage Works located within the WHPA-Q in a Chloride, Sodium or Nitrate ICA, the MECP shall consider conditions that require best management practices that address how recharge will be maintained and water quality will be protected from application and storage of winter maintenance materials including Salt.

5. It is understood that contingency plans and procedures for dealing with potential spill, bypasses, and any other abnormal situations were a condition of the original ECA as outlined in the Certificate of Approval dated December 5, 2005. These plans and procedures were not noted in this documentation. We recommend that the Ministry continue to include these contingency plans and procedures as requested in 2005 as a condition of the new ECA approval.

6. As noted in Section 3., Existing Site Conditions, of the Storm Water Management Report, the site surface cover is approximately 60% asphalt, concrete, and gravel paving. It is assumed that winter maintenance chemicals will be applied on the site due to the increased imperviousness, therefore, we strongly recommend that chloride and sodium be added to the monitoring program as outlined in the email correspondence between Nishant Patel (GHD) and Mohammad Sajjad Khan (MECP) on May 8, 2025.

7. It is understood that StormTrap #2 is designed as an underground infiltration system for catchment E103, which has the potential to infiltrate salt laden waters from winter maintenance activities due to the impervious areas. Given that this site is in a Significant Groundwater Recharge Area, utilizing rooftop runoff for recharge is typically preferred, as it reduces the potential for road salt infiltration into the groundwater system. However, it is understood that this may not be possible in all situations and defer to the Ministry to consider the above referenced policy and to balance groundwater quality and groundwater recharge / infiltration.

It is requested that the Ministry consider the above recommendations while reviewing this ECA application and add terms and conditions, as appropriate.

Sincerely,

[redacted] 12/09/2025

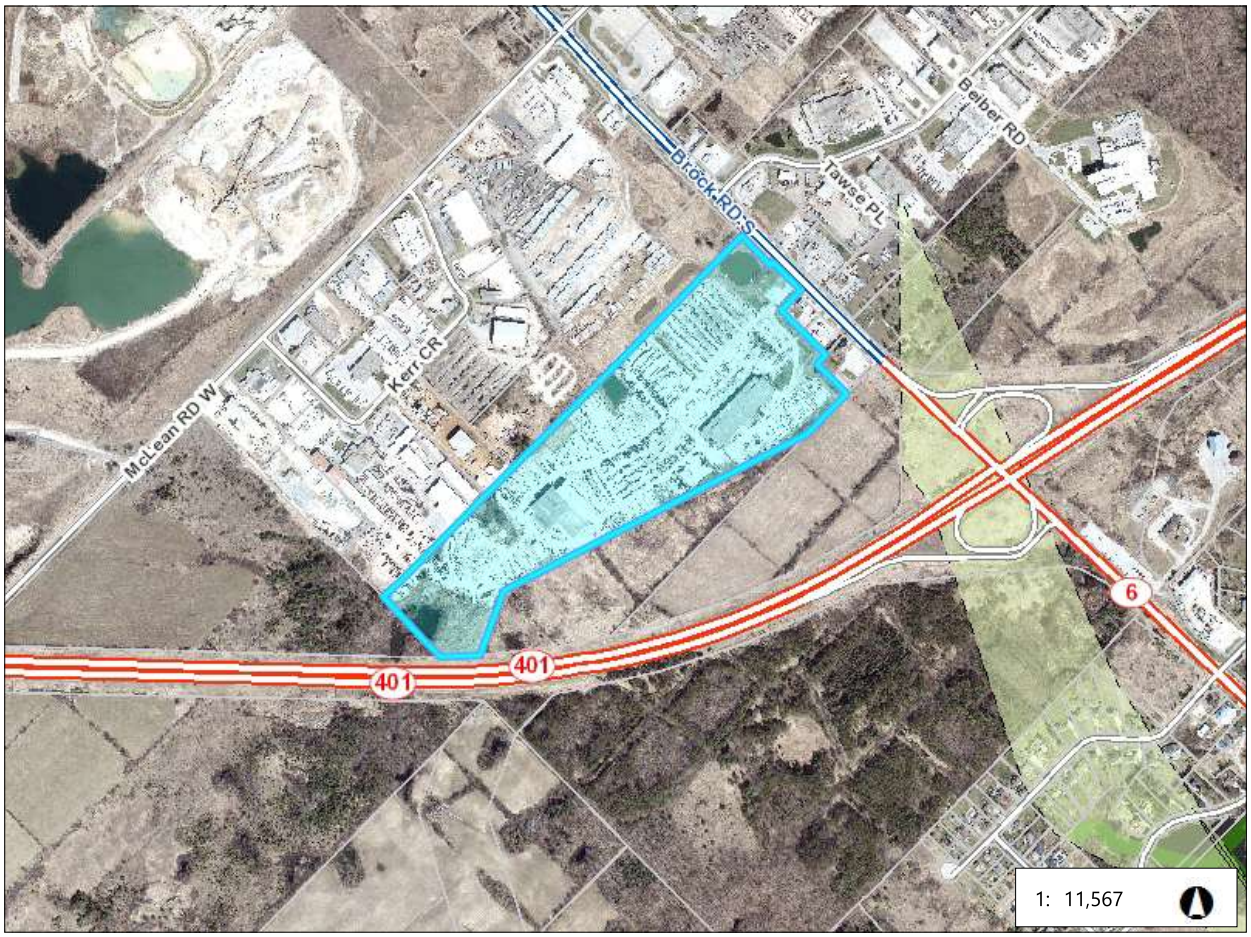
Keira Martinson
Source Protection Coordinator
519-846-9691 ext 283
kmartinson@centrewellington.ca

[redacted] 12/09/2025

Kyle Davis
Risk Management Official
519-846-9691 ext 362
kdavis@centrewellington.ca

Attachments – WHPA Maps

299 Brock Road South, Puslinch





Legend

- Parcels
- Roads
  - Local Road
  - County Road
  - Highway
- Well Locations
  - Existing
  - Proposed
- Wellhead Protection Area
  - A
  - B
  - C
  - D
- Vulnerability Score
  - 10
  - 8, D; 8; 8, C
  - 2, 4, 6 (A, B or C)
  - 2,4,6, D; 2,4, D; 2, 4, 6 (D); 4, D; 6,
- HVA
- RoadsLookup
- Halton_MeanderBeltHazard
- Halton_HeadwaterFloodplainsl
- Prime Agriculture

0.6 0 0.29 0.6 Kilometers

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
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WGS_1984_Web_Mercator_Auxiliary_Sphere

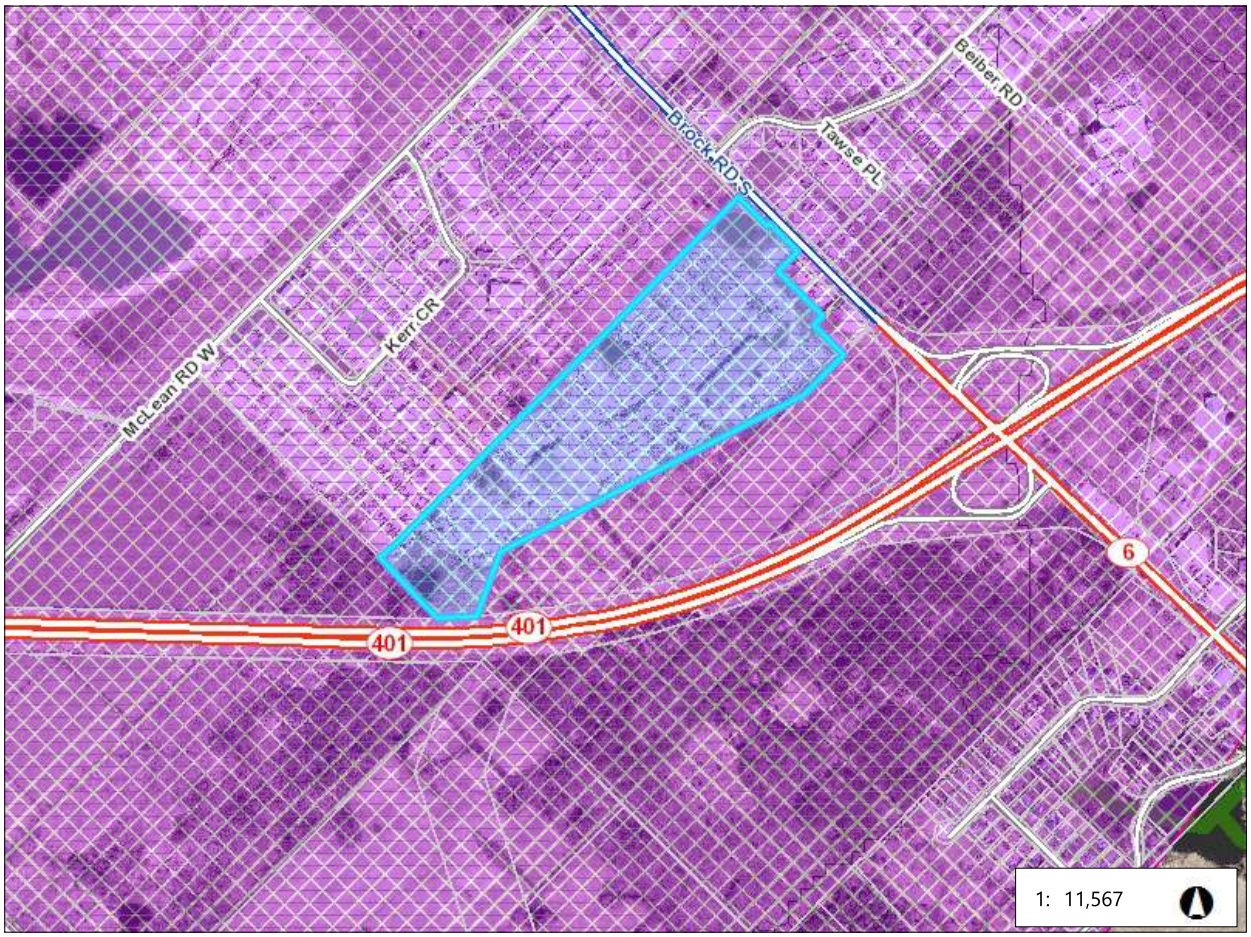
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THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2022

Notes

Explore Wellington

299 Brock Road South, Puslinch





Legend

- Parcels
- Roads
  - Local Road
  - County Road
  - Highway
- Well Locations
  - Existing
  - Proposed
- WHPA Q1_Q2_Boundary
- WHPA Q1_Q2
  - Approved
  - Draft
- SGRA
- RoadsLookup
- Halton_MeanderBeltHazard
- Halton_HeadwaterFloodplainsl
- Prime Agriculture

0.6 0 0.29 0.6 Kilometers

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WGS_1984_Web_Mercator_Auxiliary_Sphere

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THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2022

Notes

SWP_Comments_BrockS_299_SewageWorksECA

Final Audit Report 2025-09-12

Created:	2025-09-12
By:	Keira Martinson (kmartinson@centrewellington.ca)
Status:	Signed
Transaction ID:	CBJCHBCAABAAwWa8Ul8YtjxfF2y3MUuCbMculubu5caS

"SWP_Comments_BrockS_299_SewageWorksECA" History

Document created by Keira Martinson (kmartinson@centrewellington.ca)
2025-09-12 - 1:15:25 PM GMT

Document emailed to Kyle Davis (kdavis@centrewellington.ca) for signature
2025-09-12 - 1:15:30 PM GMT

Document emailed to Keira Martinson (kmartinson@centrewellington.ca) for signature
2025-09-12 - 1:15:30 PM GMT

Email viewed by Keira Martinson (kmartinson@centrewellington.ca)
2025-09-12 - 1:17:02 PM GMT

Document e-signed by Keira Martinson (kmartinson@centrewellington.ca)
Signature Date: 2025-09-12 - 1:18:32 PM GMT - Time Source: server

Email viewed by Kyle Davis (kdavis@centrewellington.ca)
2025-09-12 - 2:50:20 PM GMT

Document e-signed by Kyle Davis (kdavis@centrewellington.ca)
Signature Date: 2025-09-12 - 2:50:35 PM GMT - Time Source: server

Agreement completed.
2025-09-12 - 2:50:35 PM GMT

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW 2025-071

A by-law to authorize the entering into of a Site Alteration Agreement with Gina Fosca Martinello and Gino Martinello.

WHEREAS the Municipal Act, S.O. 2001, c.25 authorizes a municipality to enter into agreements; and,

WHEREAS the Council for the Corporation of the Township of Puslinch deems it expedient to enter into a Site Alteration Agreement with Gina Fosca Martinello and Gino Martinello;

NOW THEREFORE the Council of the Corporation of the Township of Puslinch HEREBY ENACTS AS FOLLOWS:

1. That the Corporation of the Township of Puslinch enter into a Site Alteration Agreement with Gina Fosca Martinello and Gino Martinello for the lands described as CON 4 PT LOT 10 RP 61R9488 PT PART 1 municipally known as 4670 Sideroad 10 N.

2. That the Mayor and Clerk are hereby authorized to execute the said Site Alteration Agreement.

3. That this by-law shall come into effect on September 17, 2025.

READ A FIRST, SECOND AND THIRD TIME AND FINALLY PASSED THIS 17th DAY OF SEPTEMBER, 2025.

_____
James Seeley, Mayor

_____
Justine Brotherston, Municipal Clerk

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER 2025-072

Being a by-law to confirm the proceedings of the Council of the Corporation of the Township of Puslinch at its Council meeting held on September 17, 2025.

WHEREAS by Section 5 of the *Municipal Act, 2001, S.O. 2001, c.25* the powers of a municipal corporation are to be exercised by its Council;

AND WHEREAS by Section 5, Subsection (3) of the *Municipal Act,* a municipal power including a municipality's capacity, rights, powers and privileges under section 8, shall be exercised by by-law unless the municipality is specifically authorized to do otherwise;

AND WHEREAS it is deemed expedient that the proceedings of the Council of the Corporation of the Township of Puslinch at its Council meeting held on September 17, 2025, be confirmed and adopted by By-law;

NOW THEREFORE the Council of the Corporation of the Township of Puslinch hereby enacts as follows:

1) The action of the Council of the Corporation of the Township of Puslinch, in respect of each recommendation contained in the reports of the Committees and each motion and resolution passed and other action taken by the Council at said meeting are hereby adopted and confirmed.

2) The Head of Council and proper official of the Corporation are hereby authorized and directed to do all things necessary to give effect to the said action of the Council.

3) The Head of Council and the Clerk are hereby authorized and directed to execute all documents required by statute to be executed by them, as may be necessary in that behalf and the Clerk authorized and directed to affix the seal of the said Corporation to all such documents.

READ A FIRST, SECOND AND THIRD TIME AND FINALLY PASSED THIS 17 DAY OF SEPTEMBER 2025.

_____

James Seeley, Mayor

_____

Justine Brotherston, Municipal Clerk