



April 15, 2026 Council Meeting

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Addition to the Agenda Questions received from Council seeking additional information and the corresponding responses provided by staff regarding the April 15, 2026 Council agenda items.

6.2 Ministry of Municipal Affairs and Housing Spring Housing Bill 2026 House of Commons Notification Letter

-re. ERO 026-0302 Communal drinking water and wastewater system municipal consent requirements

It appears that the changes would be advantageous for us. Could comments be provided for the May 6th meeting for submission?

The submission deadline for this ERO posting is April 29, 2026. If Council would like staff to prepare comments for Council's review comments prior their submission for this ERO should there be any concerns, staff can schedule a Special Council meeting accordingly.

-re ERO 026-0304 Draft Projection Methodology Guideline (PMG) to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)

-if the County has provided comments, it would be appreciated if they could be provided **Staff have reached out to the County of Wellington Planning Department requesting that the County provide any comments they submit for the ERO posting for Council's consideration.**

-re ERO 026-0305 Proposed Changes to Various Regulations Under the Planning Act to Facilitate the Electronic Submission of Information and Materials to Approval Authorities and Allow Notices to be Given Electronically to the Province

- will staff be reviewing and proposing comments if there is a concern at the May meeting for submission?

Staff did not have any concerns with the proposal to permit electronic submission of materials/notices as described in the ERO and therefore were not planning to submit comments.

-re ERO 026-0315 Consultation on upper-tier official plans, secondary plans, and site and area-specific policies



- will staff be reviewing and proposing comments if there is a concern at the May meeting for submission?

The submission deadline for this ERO posting is April 29, 2026. If Council would like staff to prepare comments for Council's review prior their submission for this ERO staff can schedule a Special Council meeting accordingly.

6.3 AMO Policy Update – Funding Development Charge Reductions Bill 98 Building Homes and Improving Transportation Infrastructure Act

-is there a timing when we will know the impact on our development charges?

This is the information provided in an update from Watson & Associates in addition to the attached letter to clients:

The provincial government has introduced Bill 98, an Act to enact the *Fare Alignment and Seamless Transit Act, 2026* and to amend various Acts (referred to as the *Building Homes and Improving Transportation Infrastructure Act, 2026*). This Bill proposes amendments to the following legislation:

- *Building Code Act, 1992;*
- *City of Toronto Act, 2006;*
- *Development Charges Act, 1997;*
- *Metrolinx Act, 2006;*
- *Municipal Act, 2001;*
- *Planning Act;*
- *Safe Drinking Water Act, 2002;* and
- *Water and Wastewater Public Corporations Act, 2025.*

The Bill also introduces new legislation, i.e., the *Fare Alignment and Seamless Transit Act, 2026*.

In addition to the legislative amendments, the Province is also proposing changes to the *Planning Act* regulations (Ontario Regulation 509/20). The proposed changes, which are intended to standardize parkland requirements, are available for comments via the Environmental Registry of Ontario at the following link: <https://ero.ontario.ca/notice/026-0312>. The deadline to submit comments is May 14, 2026.



Comments related to changes to the D.C.A. can be made at the following link: <https://www.regulatoryregistry.gov.on.ca/proposal/53553>. The deadline to submit comments is April 29, 2026.

The attached letter provides a summary and preliminary analysis of the proposed changes with respect to development charges (D.C.s) and parkland dedication requirements. In addition, the provincial and federal governments recently announced a joint funding program to invest in infrastructure and reduce D.C.s (i.e., “The Canada-Ontario Partnership to Build”). This letter also provides our preliminary analysis with respect to the funding announcement.

6.9 Conservation Halton Update on Consolidation to Western Lake Ontario Regional Conservation Authority

-is there a concern that we would not be able to participate on the board given the following:

“The current section 14 provides, among other matters, that the number of members of a conservation authority to be appointed by the participating municipalities’ councils is based on the population of the participating municipality and provides that 70 per cent of a municipality’s appointees must be from among members of council. The section also provides that the total number of members to be appointed by a municipality may be adjusted by agreement among all participating municipalities. Section 14 is re-enacted to provide for the number of members to be appointed by participating municipalities to be determined in accordance with the method prescribed by the regulations. All participating municipalities of a conservation authority may agree to a different method for determining the number of members each participating municipality appoints subject to certain restrictions.”

The Township raised its concerns regarding representation through the consultation process prior to the determination of amalgamation by the Province. It is correct and staff remain concerned that the Township would no longer have local representation on the board as board members are only being selected from the participating upper tiers. No further consultation is being undertaken regarding the amalgamation at this time.

6.11 Town of Northeastern Manitoulin Resolution for The Ministry of the Environment to Reconsider Lighter Oil Tar and Chip

-would a heavier oil with Tar and Chip be a viable option for us to consider?



Staff can investigate this as an option, should Council give that direction, however our Roads Management Plan and Asset Management Plan do not contemplate this type of resurfacing.

6.12 Township of Oro-Medonte support Association of Ontario Road Supervisors Health and Safety Request

-do we have similar problems?

Staff would recommend supporting this resolution.

6.13 Town of Lincoln Resolution Request Ontario to Extend Deadline Notices to Designated

Listed Heritage Properties

-are we pressed for time as well?

The Township is on track to have reviewed and made recommendations for all of the properties that were included on its Heritage Register by January 1, 2027. However, staff have no concerns with supporting other municipalities that may be struggling with the timelines.

6.15 Wellington County Ontario Provincial Police Detachment Board Report February 2026

-p.24 of report re e-ticket warnings. Is the 2026 increase attributable to the loss of automatic speed enforcement cameras?

Staff have provided this question to the OPP and will report back at a future meeting with the response.

6.17 Puslinch Profile Feature April 2026

-if a Puslinch resident owns and operates a business outside of the Township albeit in an adjacent municipality are they eligible to be included in a Puslinch Profile Feature?

This is a free program to support economic development within the Township of Puslinch, it is not contemplated to be available for businesses that operate outside of the Township. This can be amended as the discretion of Council.

9.4.1 Report COR-2026-014 ERO Postings Proposed Changes to Planning Act, Building Code Act, Municipal Act, City of Toronto Act

-with regard to ero 026-0300 can staff provide a verbal snapshot of the intended comments at the meeting?



Staff are still working through the review of the ERO postings. If Council would like to review the proposed comments prior to their submission to the ERO, staff recommend scheduling a special Council Meeting.

-will staff be voicing our concern with the province's proposal regarding Encumbered Parkland and Privately Owned Public Spaces (POPS)?

Yes, staff will be prepare comments with respect to Encumbered Parkland and Privately Owned Public Spaces (POPS) in response to ERO 026-0312.

-re ero 026-0314 what were our comments that were sent to the Ministry regarding the previous similar ero ie. ero 025-0462

Staff have attached the comments that were submitted to ERO 025-0462 for Council's information.

10.1 ERO 026-0290 Environmental Compliance Assessment Application McNally Pit (5497) and ERO 026-0291 Environmental Compliance Assessment Application CBM Aberfoyle Pit (5520)

-is there a concern on timing given due date is May 2 and next Council meeting is May 6?

Staff have submitted an objection to both of the ECA applications on the basis of adequate time for review and comment. Staff will report back once we have a detailed review completed.

9.2.1 11:30 A.M. Presentation by pl.ural regarding Community Improvement Plan Update

-glad to see entire Puslinch is now eligible for the program: bylaw to be updated

-how do financial incentives apply to Goal #3: Address countryside matters such as farming and/or agricultural/rural community economic problems ie. are farms considered businesses?

Yes, public-facing farms serving the community are considered businesses, and while many of the financial incentive programs are indeed available to farms, the Facade, Signage, and Landscape Improvement Grant is specific, in its intention to assisting with the financing of improvements to an existing building's façade or signage, it is also meant to assist with other eligible improvements to private property (i.e., parking and landscaping) **and agriculture-related uses(e.g. farm stands) which are open to the visiting public and which represent value added agricultural activity.**



- re "m. It is important to note that these financial incentive programs are only eligible for local business and cannot be applied to residential properties."; should be clarified to state without home businesses

I don't see why not; if this is the will of the Township, we can certainly make this clarification — again I would advise that it be written something like " . . . for local business and cannot be applied to residential properties other than those with public-facing, home-based businesses."

-re Section 4 The Wellington County Financial Incentive Program; it is not clear whether the proponent or the Township on behalf of the proponent shall apply for grant funding

Yes, the proponent submits the grant application in collaboration with the Township's finance/corporate services staff and the County's economic development staff.

April 10, 2026

To our Municipal Clients:

Re: *Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026 and Regulatory Proposal 026-0312*

In our continued efforts to keep our clients up to date on legislative changes that may impact them, we are writing to inform you of proposed legislative changes to the *Development Charges Act, 1997* (D.C.A.) and the *Planning Act* (with respect to parkland dedication requirements). The provincial government has introduced Bill 98, an Act to enact the *Fare Alignment and Seamless Transit Act, 2026* and to amend various Acts (referred to as the *Building Homes and Improving Transportation Infrastructure Act, 2026*). This Bill proposes amendments to the following legislation:

- *Building Code Act, 1992;*
- *City of Toronto Act, 2006;*
- *Development Charges Act, 1997;*
- *Metrolinx Act, 2006;*
- *Municipal Act, 2001;*
- *Planning Act;*
- *Safe Drinking Water Act, 2002; and*
- *Water and Wastewater Public Corporations Act, 2025.*

The Bill also introduces new legislation, i.e., the *Fare Alignment and Seamless Transit Act, 2026*.

In addition to the legislative amendments, the Province is also proposing changes to the *Planning Act* regulations (Ontario Regulation 509/20). The proposed changes, which are intended to standardize parkland requirements, are available for comments via the Environmental Registry of Ontario at the following link: <https://ero.ontario.ca/notice/026-0312>. The deadline to submit comments is May 14, 2026.

Comments related to changes to the D.C.A. can be made at the following link: <https://www.regulatoryregistry.gov.on.ca/proposal/53553>. The deadline to submit comments is April 29, 2026.

This letter provides a summary and preliminary analysis of the proposed changes with respect to development charges (D.C.s) and parkland dedication requirements. In addition, the provincial and federal governments recently announced a joint funding program to invest in infrastructure and reduce D.C.s (i.e., “The Canada-Ontario



Partnership to Build”). This letter also provides our preliminary analysis with respect to the funding announcement.

1. Proposed Changes to the Development Charge Framework

1.1 Proposed Changes to the *Development Charges Act, 1997*

The proposed changes to the D.C.A. are presented in Schedule 3 of Bill 98. These changes include the addition of a new section 4.5 to provide for a mandatory exemption for non-profit retirement home development and minor corrections to references under subsection 52 (3.1) of the D.C.A.

1.1.1 *New Statutory Exemption*

Non-profit Retirement Home Development is defined as: the development of a building or structure intended for use as a retirement home, as defined in subsection 2 (1) of the *Retirement Homes Act, 2010*, and developed by,

- (a) a corporation to which the *Not-for-Profit Corporations Act, 2010* applies, that is in good standing under that Act, or
- (b) a corporation without share capital to which the *Canada Not-for-profit Corporations Act* applies, that is in good standing under that Act.

This exemption does not apply to charges payable prior to the day the Bill receives Royal Assent, but does apply to any future instalment payments.

1.1.2 *Canada-Ontario Partnership to Build Funding Announcement*

On March 30, 2026, the federal and provincial governments announced a new funding partnership that would provide a combined \$8.8 billion over 10 years for infrastructure investments in Ontario, with Canada’s share of funding from the Building Communities Strong Fund’s provincial and territorial stream. The main points of the funding announcement are as follows:

- The goal of the funding is to support housing-enabling infrastructure projects.
- Funding will be prioritized for municipalities that reduce and maintain reductions on D.C.s.
- The federal and provincial government will agree on a list of priority municipalities where D.C.s are seen as cost-prohibitive and where growth is essential to support Ontario’s future.
 - Ontario would require a commitment to reduce D.C.s by 30% to 50% and maintain the reduction for at least three (3) years.



- This new funding is intended to offset the financial impact of D.C. reductions; however, municipalities are expected to support the D.C. reductions so that all three (3) levels of government are supporting increased housing supply and affordability.
- Funding will be made available for municipalities that do not levy D.C.s where infrastructure projects are prioritized by the Province.
- Municipalities will be required to identify projects for which the funding may be used, which must be ready-to-build and may include other requirements of Ontario and Canada.

To date, no additional information has been provided by the federal or provincial government. It is anticipated that further details will be provided by the Province when available.

2. Proposed Changes to the Parkland Dedication Framework

2.1 Proposed Changes to the *Planning Act*

2.1.1 *Legislative Amendments*

Type of Land Eligible for Dedication

In 2022, Bill 23 (*More Homes Built Faster Act*) introduced amendments to section 42 of the *Planning Act* that would provide that certain lands may be required to be accepted as part of parkland dedication requirements. These changes are included in subsections 42 (4.30) through 42 (4.39) but are not yet in force.

Bill 98 provides for an amendment to subsection 42 (4.32) to clarify that if a municipality intends to accept the conveyance of land or an interest in land, it is subject to the description of land included in subsection 42 (4.31). That is, that the land is:

- Part of a parcel of land that abuts one or more other parcels of land on a horizontal plane;
- Subject to an easement or other restriction; or
- Encumbered by below-grade infrastructure.

This also includes an interest in land other than the fee, where interest is sufficient to allow the land to be used for park or other public recreational purposes (4.31) (b).

Bill 98 also adds the following subsection:

(4.32.1) If the interest in land described in clause (4.31) (b) is an easement, the easement is valid whether or not the municipality owns



appurtenant land or land capable of being accommodated or benefited by the easement.

Appeal

Subsection 42 (4.35) provides that an owner of land who has received notice of refusal to accept parkland dedication may appeal within 20 days to the Ontario Land Tribunal.

Bill 98 adds the following subsection:

(4.35.1) An owner of land who has not received a notice under subsection (4.34) within 90 days of identifying land in accordance with subsection (4.30) may, at any time before receiving notice under subsection (4.34), appeal to the Tribunal the municipality's failure to make a decision as to whether to accept the conveyance by filing with the clerk of the municipality a notice of appeal accompanied by the fee charged by the Tribunal.

This additional subsection allows an owner of land to appeal where no decision has been made within 90 days of identifying the lands to be dedicated.

Order by Tribunal

Subsection 42 (4.38) provides that the Ontario Land Tribunal has the authority to consider whether the land identified for dedication meets prescribed criteria, and if so, order that the land be conveyed to the municipality and that it counts towards parkland dedication requirements.

Bill 98 adds the following subsection:

(4.38.1) For the purposes of clause (4.38) (b), any land described in clause (4.31) (a) or any interest in land described in clause (4.31) (b) that is conveyed in accordance with clause (4.38) (a) shall be counted towards any requirement set out in the by-law by multiplying the area of such land by a factor of 0.7 or such other larger factor as may be determined by the municipality.

This subsection provides that any lands ordered to be conveyed that are encumbered as noted in subsection (4.31) be counted towards parkland dedication requirements at a discounted rate of 0.7. For example, in a situation where an applicant is required to dedicate 2 hectares of land for parkland dedication and proposes to provide 1 hectare of that land that is encumbered, the Tribunal may order these lands to be accepted and they would be equivalent to the dedication of 0.7 hectares of land. The applicant would still be required to dedicate an additional 1.3 hectares of unencumbered land.



2.1.2 Proposed Amendments to Ontario Regulation 509/20

The Province has identified new regulations related to identifying which types of land will be suitable for land dedication. The land suitability criteria would identify ineligible land and land accessibility requirements.

Ineligible Land

The proposal would identify the following land as ineligible for parkland dedication:

- Contaminated lands – lands that have in or on them any contaminants from industrial or other uses that pose a public health risk.
- Natural and human-made hazard lands – hazardous lands and hazardous sites as described in section 5.2 of the Provincial Planning Statement, 2024 (P.P.S., 2024), as well as lands affected by human-made hazards as described in section 5.3 of the P.P.S., 2024.
- Lands within and adjacent to natural heritage features and areas are eligible on the condition that a park would not interfere with or compromise the natural heritage features and areas.
- Lands in the Natural Heritage System of the Greenbelt Plan or in the Natural Core or Natural Linkage Areas of the Oak Ridges Moraine Conservation Plan or unless in accordance with policies of the Niagara Escarpment Plan.
 - Lands that would not support park use – lands that would not accommodate fill and/or soil depths to accommodate structural footings as per the Ontario Building Code or support tree planting.
 - Lands with financial encumbrances – lands with liens, charges, etc., registered on title.
 - Lands that are privately owned and not accessible to the public at all times.

Land Accessibility/Comfort for Use

The proposed regulation notes that parkland must be accessible, visible, and comfortable to facilitate public use of it and, in particular, must be:

- Accessible by all users directly from the public realm and readily visible from the public realm.
- Of a size and shape that is capable of serving park or public recreational purposes.

2.1.3 Summary of Proposed Parkland Dedication Amendments

With the addition of the proposed criteria identified in the proposed regulations, the Province is seeking to enact the subsections of section 42 of the *Planning Act* that allow developer-identified lands to be required for parkland dedication. Once identified, if



refused by the municipality or no decision is provided, the developer may appeal the decision (or non-decision) to the Ontario Land Tribunal. The Tribunal then has the authority to review the proposed land to be dedicated against the criteria in the *Planning Act* and the associated regulations, and may order the land to be accepted by the municipality.

3. Concluding Remarks

Although the changes to the D.C.A. are limited to the addition of an exemption for non-profit retirement home developments, as noted in previous correspondence, exemptions from D.C.s are funded from non-D.C. sources.

The announcement of the Canada-Ontario Partnership to Build provides municipalities with additional funding for infrastructure; however, it is contingent on municipalities reducing their D.C.s. It appears that not all the reduction will be funded through these grants, and municipalities will be required to contribute some portion from non-D.C. sources.

With respect to parkland dedication, the Province is seeking to implement sections of the *Planning Act* added through Bill 23 by providing criteria for which municipalities would accept encumbered lands from developers. These encumbered lands must meet the criteria set out in the *Planning Act* and associated regulations; however, it is anticipated that municipalities will see an increase in appeals to the Ontario Land Tribunal with respect to this issue.

We will continue to monitor any changes and inform you of the potential impacts on municipalities.

Should you have any questions, please contact any of the undersigned or send an email to info@watsonecon.ca.

Yours very truly,

WATSON & ASSOCIATES ECONOMISTS LTD.

Andrew Grunda, MBA, CPA, CMA, CEO
Peter Simcisko, BA (Hons), MBE, Managing Partner
Sean-Michael Stephen, MBA, Managing Partner
Daryl Abbs, BA (Hons), MBE, PLE, Managing Partner
Byron Tan, BA (Hons), MBE, PLE, Managing Partner
Jamie Cook, MCIP, RPP, PLE, Managing Partner
Jack Ammendolia, BES, PLE, Managing Partner



Ministry of Municipal Affairs and Housing Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON, M7A 2J3, Canada
Email: PlanningConsultation@ontario.ca

June 4, 2025

RE: ERO Number 025-0462 – Proposed Regulations– Complete Application

The Township of Puslinch Council at its meeting held on May 28, 2025 directed Township staff to submit comments with respect to ERO 025-0462 Proposed Regulations– Complete Application and respectfully submits the following comments and concerns with respect to the proposed legislative amendments.

The Township has significant concerns with respect limiting the requirements for supporting studies as a condition for deeming a *Planning Act* application complete, specifically that these limitations may impact the municipalities' ability to adequately assess development applications. Supporting studies and information regarding sun/shadow, wind, urban design and lighting, are important in evaluating the merits and appropriateness of a proposed development. These documents provide the technical basis upon which informed decisions are made and ensure that development proceeds in a manner that aligns with local planning goals, environmental protection, and public safety as outlined below:

- Not considering impacts of sun/shadow, wind and lighting are concerning because it ignores potential impacts on adjacent properties and the public right-of-way.
- It is appropriate to consider impacts such as sun/shadow, and wind when evaluating proposals for increased height.
- Lighting could cause visibility issues on the public right-of-way.
- Urban design ensures proposed development is compatible in built form with adjacent uses. Design Guidelines that provide directions for developers and staff when assessing new developments to ensure compatibility. Urban design guidelines undergo a public process, and such design guidelines should continue to have effect on land use planning.

Should the Province proceed with its limitation of supporting studies which are required in order to deem an application complete, the Township recommends the following studies be identified as being permitted to be required by a municipality as part of its planning application:



- Planning Justification Report
- Environmental Impact Assessment
- Traffic Impact Assessment
- Agricultural Impact Assessment
- Fiscal Impact Assessment
- Heritage Impact Assessment
- Archaeological Assessment
- Disclosure Report
- Dust Study
- Elevation Plan
- Environmental Site Assessment
- Exterior design
- Farm Data Sheets (Minimum Distance Separation)
- Farm Viability/Agrologist Study
- Farm Information Form
- Floodplain study
- Functional servicing report for water, wastewater, and storm water
- Geotechnical Assessment
- Grading and Drainage Plan
- Hydrogeological cumulative effects assessment where aggregate extraction is proposed below the water table. The appropriate boundaries, level of detail, and baseline data to be used will be determined by the County, local municipalities and Conservation Authority
- Hydrogeological impact
- Landscape Plan
- Lighting Plan
- Noise Study
- Odour Study
- Servicing Options Assessment
- Shadow Analysis
- Slope Stability study
- Socio-economic impact
- Tree preservation and replacement
- Vibration Study
- Visual impact study
- Studies required to fulfill the polices for lands within the Greenbelt.



Further, the Township recommends that the following certified professionals be included in the list of professionals whose reports/studies would be required to be accepted as final submissions by a municipality as part of a complete planning applications:

- Architect
- Agrologist
- Land Use Planner
- Traffic Engineer
- Hydrologist
- Geotechnical Engineer
- Civil Engineer
- Environmental Engineer
- Ecologist
- Heritage Professional
- Archaeologist
- Ontario Land Surveyor

Thank you for the opportunity to provide comments. The Township looks forward to ongoing engagement and consultation to ensure that any legislative changes support an efficient, fair, and evidence-based land use planning process.

Sincerely,

Justine Brotherston,
Interim Municipal Clerk
Township of Puslinch