

Thursday, May 14, 2026

Minister Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Flack,

Re: OPPI Feedback on ERO 026-0312: Proposed Changes to Support Standardizing of Parkland Requirements Under the Planning Act

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry's proposal to standardize parkland dedication requirements in Ontario with respect to the conveyance of developer-identified parkland.

Overall, the proposed suitability criteria appear reasonable and reflect a thoughtful approach to ensuring that privately owned publicly accessible spaces can function effectively as parkland. We appreciate the exclusion of natural heritage feature buffer lands, which recognizes the potential conflicts between recreational use and the preservation and long-term evolution of natural heritage systems.

We suggest that the regulations further strengthen the suitability criteria by establishing a clearer connection between hazardous lands and planning for a changing climate. Consideration should be given to how these lands may be affected over the long term by climate-related impacts such as flooding, erosion, and other environmental risks. Integrating a forward-looking lens into the criteria would help make certain that publicly accessible spaces remain safe, functional, and resilient over time.

We recommend that the suitability criteria include more explicit direction regarding minimum standards for lot area and configuration to ensure that privately-owned public spaces (POPS) are of a size and shape that can meaningfully function as park space. While the proposal notes that land must be capable of serving park or public recreational purposes, additional clarity on how this is defined would be beneficial. This could include consideration of the parcel's size, dimensions, and usability, as well as its relationship to the surrounding context. Small or fragmented parcels that cannot reasonably support recreational use should not be accepted as fulfilling parkland objectives.

At the same time, the criteria should retain sufficient flexibility to respond to local context and community needs. In areas where there is limited access to larger recreational spaces, municipalities should not be constrained from securing larger or more functional parkland where opportunities exist. Aligning suitability criteria with both site-specific characteristics and broader service gaps would help ensure that POPS contribute meaningfully to livability, particularly in communities experiencing growth and intensification.

Thank you for the opportunity to provide feedback on ERO 026-0312. We would be delighted to meet with you to discuss our recommendations in further detail, and how they would serve to support the Ministry's objectives relating to the standardization of parkland dedication requirements. If you have any questions or would like to schedule a meeting, please do not hesitate to contact us at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI