

November 22, 2025

Environmental Registry of Ontario
Ministry of Municipal Affairs and Housing
777 Bay Street, 2nd Floor
Toronto, ON M7A 2J3

Subject: City of Brampton Response to ERO 025-1071: Modern Transportation – Prohibiting Vehicle Land Reduction for New Bicycle Lanes

To Whom It May Concern,

The City of Brampton appreciates the opportunity to provide comments in response to the proposed changes to the *Highway Traffic Act* as introduced through **Bill 60, *Fighting Delays, Building Faster Act, 2025***.

The City of Brampton appreciates the Province's efforts to improve transportation coordination, support housing delivery, and enhance integration across Ontario's mobility networks. The City recognizes that a consistent provincial approach to traffic management and data-sharing can provide benefits for regional coordination, particularly along corridors that serve multiple jurisdictions.

However, the proposed amendments to the *Highway Traffic Act* represent a substantive change in the balance of municipal and provincial authority over road design, lane management, signal operations, and the implementation of multimodal infrastructure. Several of the proposed measures—such as requiring provincial approval for lane reallocations and expanding Ministerial control over intersection design and signal timing—may limit the City's ability to implement Complete Streets, Vision Zero, and active-transportation priorities adopted by Council.

Brampton has advanced several corridor projects that rely on strategic lane reallocation to improve safety and support multimodal access. The City's Active Transportation Master Plan identifies a network of four-lane collector roads that were historically over-designed and now function as high-speed cut-through routes. Through targeted road diets, Brampton has safely repurposed approximately 26 km of excess general-purpose lanes for dedicated cycling facilities, and an additional 37 km are being reviewed. Evidence demonstrates that these conversions reduce speeds, collisions, and neighbourhood infiltration while improving safety for all road users.

On arterial roads, Brampton follows provincial guidance by implementing separated cycling infrastructure within the boulevard where speed and volume thresholds warrant it. These design choices reflect a context-sensitive approach consistent with the Brampton Mobility Plan and aligned with provincial objectives to support mode shift and safer road environments. The requirement for provincial approval prior to reallocating lanes on designated corridors would introduce new delays and potentially impede ongoing projects such as the Queen Street BRT, Higher-Order Transit initiatives, and other Complete Streets transformations.

Further clarity is requested regarding provisions that prohibit lane conversions for “any other prescribed purpose,” as well as the proposed authority to establish standards for the “operation of rapid transit and public transportation systems.” These elements may affect the City’s ability to implement transit-priority measures and road-capacity improvements aligned with long-term growth planning.

Recommendations to the Province

The City of Brampton respectfully recommends that the Province:

1. Maintain Municipal Flexibility for Lane Conversions

2. Allow municipalities to convert existing general-purpose lanes to cycling, transit, or safety-related facilities without additional provincial approvals, particularly on municipally owned corridors.

3. Align Provincial Standards With Complete Streets and Vision Zero

Ensure that any new standards for lane use, signal design, or traffic operations support multimodal road design, safety, and context-sensitive planning consistent with Brampton’s Mobility Plan.

4. Clarify Key Provisions

Provide clear definitions for:

- “any other prescribed purpose” related to lane conversion restrictions;
- the scope of provincial authority over rapid transit and public transportation system standards;
- standards relating to the “safety and mobility of people and goods.”

5. Enable Timely Implementation of City-Led Mobility Projects

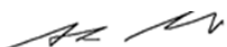
Ensure provincial approval processes do not delay municipal transit-priority corridors, cycling projects, or Complete Streets initiatives that improve safety and network performance.

6. Collaborate on Traffic-Management Integration

Work with municipalities to develop interoperable, scalable systems for data-sharing and signal coordination without imposing one-size-fits-all operational standards that conflict with local corridor design.

The City welcomes ongoing collaboration as the implementation details for these legislative changes are developed. Please do not hesitate to contact us for further discussion or technical input.

Yours truly,



Steve Ganesh, MCIP, RPP

Commissioner, Planning, Building and Growth Management
City of Brampton

steve.ganesh@brampton.ca