

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 025-1101: Consultation on Enhanced Development Standards – Lot Level (outside of buildings)**

To Whom It May Concern,

The City of Brampton appreciates the opportunity to provide comments in response to consultation on enhanced development standards as introduced through **Bill 60, *Fighting Delays, Building Faster Act, 2025***.

The City of Brampton appreciates the Province's objective of improving consistency, predictability, and cost efficiency in the application of development standards across Ontario. The City recognizes that aligning certain requirements may reduce complexity for the development industry and support faster delivery of new housing. Brampton supports efforts that streamline processes while maintaining the ability of municipalities to plan effectively for resilient, safe, and complete communities.

However, Brampton's local context and Council-adopted policy framework depend significantly on lot-level performance measures to advance climate adaptation, stormwater management, tree canopy expansion, and high-quality public-realm design. Standards such as permeable paving, bioswales, soil volume requirements, native plantings, cycling infrastructure, and other green development elements are key components of Brampton's Green Development Standards (GDS), Sustainable New Communities Program (SNCP), and Complete Streets Guidelines — all of which were developed in collaboration with the development industry to balance feasibility, cost, and environmental performance.

A province-wide restriction or standardization of these municipal tools risks unintentionally constraining local innovation and reducing the City's ability to achieve Council priorities under the Brampton Grow Green Environmental Master Plan, the Climate Adaptation Strategy, and the City's overarching sustainability and resilience objectives. Brampton's GDS and Complete Streets frameworks rely directly on lot-level standards that support tree canopy targets, low-impact development (LID) practices, stormwater infiltration, and safe, active transportation networks. Limiting municipal discretion in these areas could produce a lowest-common-denominator effect that impedes the delivery of complete communities and increases long-term climate and infrastructure vulnerabilities.

Cities across Ontario face diverse climatic, hydrological, and growth-management conditions. A one-size-fits-all approach to lot-level development standards would not adequately respond to these differences. Instead, a provincial approach that sets minimum baselines — while enabling municipalities to exceed them through approved and evidence-based programs — would better support both provincial housing goals and local environmental performance.

## Recommendations to the Province

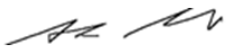
The City of Brampton respectfully recommends that the Province:

1. Retain municipal discretion to apply enhanced lot-level standards that address local climate, hydrology, and urban-design conditions.
2. Establish a tiered provincial framework with clear minimum expectations, while enabling municipalities to exceed these standards through programs such as Brampton's GDS or SNCP.
3. Consult municipalities, developers, conservation authorities, and technical experts to ensure any framework supports innovation, integrated stormwater management, and low-carbon community design.
4. Acknowledge the critical role of enhanced standards in achieving municipal and provincial greenhouse-gas reduction targets, flood-mitigation objectives, and tree-canopy goals — particularly in high-growth urban municipalities such as Brampton.

### Additional Detail:

Detailed answers to the Province's consultation questions are included as an appendix to this submission.

Yours truly,



**Steve Ganesh, MCIP, RPP**

Commissioner, Planning, Building and Growth Management

City of Brampton

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## Appendix: Detail responses to consultation questions

1. What is your interest in and/or experience with the implementation of enhanced development standards at the lot level (outside of buildings)? For example, are you a municipal staff member, homebuilder, planner, Indigenous representative, or member of the public?
  - In 2015, the City of Brampton commenced the Sustainability Metrics and Sustainability Score Thresholds, referred to as the Sustainable New Communities Program (SNCP), to encourage and evaluate the sustainability performance of new development.
  - The SNCP is a point-based system whereby development proposals earn points for achieving specific criteria/metrics, which include enhanced development standards at the lot level.
  - Development proponents can select any combination of metrics to achieve the minimum required Score. This enables the proponent to choose metrics that best suit their individual property, project, and level of sustainability aspiration. The program emphasizes flexibility, distinguishing itself from the more prescriptive approaches found in other Municipal Green Development Standard programs.
  - The program was developed and later updated through a robust engagement process that included the development industry, including a dedicated working group of municipal and development industry representatives to ensure the program is clear, measurable, and implementable while providing the flexibility needed by the development industry.
  - This program was developed in partnership with the Cities of Richmond Hill and Vaughan, and recognized by the Ontario Professional Planners Institute (OPPI) through its Research and New Direction: Excellence in Planning award, as well as the American Planning Association through its Award of Excellence in Sustainability.
2. In your experience, are enhanced development standards applied consistently across municipalities? Please provide examples where possible.
  - As noted above, the SNCP was collaboratively developed by the Cities of Brampton, Richmond Hill, and Vaughan, and was subsequently adopted by the City of Markham. This joint effort has established a familiar, consistent, and predictable set of standards for the development community across four major municipalities within the Greater Toronto Area (GTA).
  - The development industry has commended and strongly supported this collaborative, multi-municipal approach, recognizing it as an effective model for harmonization, efficiency, and clarity in advancing
3. What types of standards, should municipalities be allowed to apply outside of buildings and how do these requirements maintain the health and safety of the site if at all?
  - It is well documented that community/public health and safety are significantly influenced by the built environment, which encompasses factors such as transportation systems, land use patterns, and urban design.

- In 2009, Peel Public Health conducted a [research review](#) in partnership with McMaster University and St. Michael's Hospital to establish an evidence base for creating healthy built environments in Peel.
  - Building on this research, the Region of Peel created a planning toolset to assess the health potential of the built form, referred to as the [Healthy Development Framework \(HDF\)](#). Emphasizing walkability, reduced auto-dependence, improved street connectivity, and proximity to services, the HDF and associated [Healthy Development Assessment](#) established a strong foundation for Brampton and its municipal partners in creating the Sustainable New Communities Program (Green Development Standards).
  - To continue improving public health and safety, municipalities must be able to apply standards related, but not limited to, the following areas:
    - Housing diversity
    - Land use mix
    - Service proximity
    - Street connectivity
    - Pedestrian amenities and connectivity
    - Multi-modal transportation
    - Urban tree canopy
    - Low Impact Development
    - Urban Agriculture
    - Water quality and efficiency
    - Biodiversity
  - While Official Plans establish the overarching policy direction for creating complete communities that promote public health, safety, and overall quality of life, they are not the instruments for more detailed, site specific design direction. Instead, municipal development standards serve as the practical tools that translate policy direction into tangible outcomes at the neighbourhood and lot level.
4. Do you / your organization have information about the short- and long-term costs of enhanced development standards at the lot level?
- The City of Brampton does not have current information about the costs of all lot-level design standards (outside of buildings) encouraged through the SNCP.
  - The City welcomes the opportunity for the Province to fund a third-party, peer-reviewed study to provide independent analysis and evidence-based guidance on this matter, and confirms its willingness to participate in any such research.
5. Do you have any additional comments or suggestions relating to site plan control or other related subjects?
- The City of Brampton welcomes to the opportunity to engage in further consultation with the Province regarding how municipalities can apply a consistent approach for enhanced lot level design standards to support public health and safety outcomes.