

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 025-1100: Consultation Minimum Lot Size**

To Whom It May Concern,

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

The City of Brampton appreciates the Province's continued efforts to broaden housing choice, enable gentle density, and support more diverse ownership opportunities within established neighbourhoods. The City supports initiatives that aim to improve affordability, streamline planning tools, and expand housing options for residents across Ontario. As one of the province's fastest-growing and most diverse municipalities, Brampton recognizes the importance of modernizing residential land-use standards to meet evolving housing needs.

However, Brampton's local context is distinct. The City has already experienced significant gentle intensification through the rapid expansion of Additional Residential Units (ARUs), resulting in notable increases in population density within mature neighbourhoods. This growth has placed strain on existing water, wastewater, stormwater, transportation, parkland, and community infrastructure. Areas such as Peel Village are already experiencing servicing constraints, parking pressures, and compatibility challenges associated with cumulative infill activity. Introducing additional reductions to minimum lot sizes and frontage standards without corresponding investments in hard and soft infrastructure risks compounding these pressures and affecting overall community livability.

Further, the City anticipates that reforms to minimum lot-size standards would accelerate severance activity, shifting application volumes toward the Committee of Adjustment and increasing the importance of design-based compatibility standards over traditional numeric lot-size controls. Proactive public communication, clear design guidance, and community engagement will be critical to maintain neighbourhood trust and support successful implementation.

The City of Brampton understands and supports the intent behind encouraging gentler forms of intensification. However, Brampton's infrastructure realities, service pressures, and demonstrated record in enabling ARUs mean that further reforms must be paired with adequate funding tools, implementation supports, and flexibility to address local conditions. Ensuring complete, safe, and livable communities requires coordinated investments in parkland, libraries, recreation facilities, emergency services, and community-serving amenities.

## Recommendations to the Province

The City of Brampton respectfully recommends that the Province:

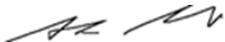
1. Acknowledge Brampton's existing contributions to gentle density through ARUs and ensure that further lot-size reductions do not exacerbate servicing or livability challenges in mature neighbourhoods.
2. Pair any reforms to minimum lot-size or frontage standards with funding and implementation tools to address servicing capacity, stormwater management, transportation needs, parkland acquisition, and community amenities.
3. Collaborate with municipalities to develop design-based compatibility criteria to support harmonious integration of infill development with existing built form and neighbourhood character.
4. Engage municipalities early in regulatory design to ensure workload impacts—particularly on the Committee of Adjustment—are fully considered and supported.

### Additional Detail:

Detailed answers to the Province's consultation questions are included as an appendix to this submission. These responses identify contextual considerations, infrastructure impacts, opportunities, and required implementation tools to ensure reforms can be delivered in a responsible, community-oriented manner.

Thank you for the opportunity to comment on this proposal.

Yours truly,



**Steve Ganesh, MCIP, RPP**

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## Appendix – Detailed Responses to Consultation Questions

### 1. Benefits and Risks of Reducing or Removing Minimum Lot Size Requirements

The City recognizes that reducing minimum lot sizes can support public-interest objectives such as diversified housing options, increased supply, improved affordability, and expanded opportunities for home ownership. Smaller lots can also support compact, efficient land use patterns aligned with gentle density goals.

However, Brampton has already experienced substantial intensification through Additional Residential Units (ARUs), resulting in cumulative servicing, parking, and compatibility pressures in mature neighbourhoods. Further reductions to lot-size standards introduce risks related to:

- Neighbourhood character impacts, as lot width and area are defining elements of built form and streetscape rhythm.
- Increased strain on existing water, wastewater, stormwater, and transportation infrastructure.
- Parking overflow and on-street congestion.
- Heightened built form and privacy conflicts.
- Accelerated severance activity, shifting workload toward the Committee of Adjustment.

These risks are particularly pronounced in established communities already accommodating significant population growth.

### 2. Best Practices from Jurisdictions That Have Implemented Lot-Size Reform

Common best practices observed elsewhere include:

- Design-based compatibility frameworks that prioritize massing, transitions, and façade treatment rather than relying solely on lot-size metrics.
- Infrastructure-first sequencing, ensuring servicing and mobility capacity is evaluated and upgraded in parallel with zoning reform.
- Pre-approved small-lot housing typologies, such as cottage courts, narrow-lot homes, and multiplex templates.
- Clear public communication and engagement, helping residents understand the intent, benefits, and safeguards associated with gentle density.
- Monitoring mechanisms to track neighbourhood impacts and adjust standards as needed.

### 3. Circumstances Where Minimum Lot Sizes Remain Necessary

Minimum lot-size standards may remain essential under the following conditions:

- Infrastructure limitations, including older neighbourhoods with constrained water, wastewater, or stormwater capacity.
- Transportation and access considerations, such as driveway spacing, emergency access, sightline requirements, and on-street parking constraints.
- Public health and safety requirements, including grading, drainage, and separation distances that cannot be satisfied through other performance standards.

In such areas, minimum lot sizes continue to play a role in safeguarding basic functional and servicing needs.

### 4. Suggested Minimum Lot Size, Frontage, and Depth in the Ontario Context

In Brampton's context, the smallest lot size currently contemplated in the City's draft Comprehensive Zoning By-law for single detached dwellings includes:

- Minimum lot area: 200 m<sup>2</sup>
- Minimum lot frontage: 8.5 m

These standards reflect the lower threshold at which functional servicing, parking, drainage, and built-form performance can be reliably maintained given Brampton's existing ARU permissions and neighbourhood conditions.

Opportunities include:

- Increased affordability and ownership access.
- Support for compact, gentle intensification.
- Flexibility for innovative housing forms.

Limitations include:

- Potential for over-intensification if ARUs or multiplexes are layered onto small lots.
- Need for enhanced design controls to manage privacy, massing, and streetscape integration.
- Greater demand on Committee of Adjustment processes for severances and variances.

### 5. Additional Zoning or Performance Standards Needed to Support Reduced Lot Sizes

If minimum lot sizes are reduced or removed, additional performance standards may be required to ensure compatible and complete development, including:

- Built-form and design compatibility criteria, such as height transitions, massing controls, and façade design.
- Parking and mobility standards responsive to local street widths and on-street conditions.

- Lot coverage and building envelope controls to maintain adequate open space, stormwater management, and drainage.
- ARU-specific standards, to avoid cumulative over-intensification on small parcels.
- Guidance for multiplex typologies, including access, waste storage, and amenity requirements.
- Enhanced landscaping and tree-protection standards to retain neighbourhood character and environmental performance.