

Appendix D

April 29, 2026

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

Subject: Submission Regarding ERO 026-0310 – Proposal to Reform Site Plan Control under the Planning Act and the City of Toronto Act, 2006

Dear Sir/Madam,

On behalf of the City of Brampton, thank you for the opportunity to comment on ERO 026-0310.

The City supports the Province's objective of improving the efficiency, predictability, and timeliness of site plan approvals. Faster approvals, coordinated review processes, and clearer expectations can assist in accelerating housing and employment development.

However, site plan control remains one of the City's most important implementation tools to ensure development proceeds in a safe, functional, and coordinated manner. In many instances, zoning establishes permissions broadly, while site plan is the stage where detailed matters such as access, servicing, grading, drainage, waste collection, pedestrian movement, landscaping, loading, and public realm integration are resolved.

Brampton has significant concern with any proposal that would remove site plan control as a planning tool or overly restrict municipal authority to address site-specific issues. This is particularly important in intensification areas and Protected Major Transit Station Areas, where permissions may already be established and site plan is often the primary remaining approval mechanism.

The City also has concern with a rigid, province-wide checklist that limits the ability to request additional studies or information where warranted by local context. Brampton includes greenfield communities, mature neighbourhoods, employment lands, transit-oriented growth areas, flood-sensitive lands, and complex redevelopment sites. A one-size-fits-all framework may not adequately respond to local conditions.

The City further notes that overreliance on studies prepared solely by applicant-retained professionals, without appropriate municipal peer review or oversight, may reduce confidence in approvals and limit the City's ability to ensure technical completeness.

At the same time, Brampton supports practical reforms that improve process performance, including clearer submission standards, differentiated review streams for simpler applications, better coordination across departments, and earlier issue resolution.

Recommendation to the Province

That the Province:

1. **Retain site plan control as a core municipal planning and implementation tool** to address safety, servicing, functionality, accessibility, and site-specific design matters.
2. **Avoid a one-size-fits-all provincial checklist** and preserve municipal discretion to request additional studies or technical information where justified by local conditions.
3. **Recognize the importance of site plan control in intensification areas and Major Transit Station Areas**, where it may be the principal remaining tool to secure coordinated development outcomes.
4. **Permit differentiated approval streams** that allow simpler applications to move faster while maintaining fuller review for large, complex, or sensitive development proposals.
5. **Maintain municipal authority to independently review and validate technical submissions**, including reliance on peer review where appropriate.
6. **Support process improvements focused on coordination and timelines** rather than removal of municipal oversight tools that protect long-term community interests.

Thank you for the opportunity to provide input.

Sincerely,

Steve Ganesh, MCIP, RPP

Commissioner

Planning, Building and Growth Management

City of Brampton