

Appendix E

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 026-0311 – Proposed Regulatory Approach to Establish a Minimum Residential Lot Size in Urban Areas

Dear Sir/Madam,

On behalf of the City of Brampton, thank you for the opportunity to comment on ERO 026-0311.

The City of Brampton understands and supports the Province's objective of facilitating gentle density, improving housing choice, and expanding ownership opportunities within existing urban areas. Enabling more efficient use of serviced land can play a role in addressing housing supply and affordability challenges.

However, Brampton's local context is distinct. The City has already experienced substantial gentle intensification through Additional Residential Units and infill activity within established neighbourhoods. In some areas, this growth has increased pressure on roads, parking, parks, stormwater systems, and other community infrastructure.

The proposed province-wide minimum residential lot size of 175 square metres raises significant concerns regarding the potential override of recently completed local planning work, including Brampton's Comprehensive Zoning By-law. The City's new zoning framework established lot size, frontage, and neighbourhood standards through an extensive review process intended to balance housing opportunities with neighbourhood compatibility, infrastructure capacity, and local context.

The proposed minimum lot size of 175 square metres is smaller than some minimum lot size standards in Brampton's Comprehensive Zoning By-law, where single detached dwelling minimums generally range from 200 to 225 square metres. The proposed change may therefore permit forms of development not anticipated through the City's recently adopted zoning framework.

The City is also concerned that the proposed standard may significantly increase the number of lots eligible for severance or redevelopment in established neighbourhoods, as historic development patterns often created parcels larger than the proposed provincial minimum. Existing local zoning provisions, including minimum frontage

requirements and retained site-specific standards, were intended to manage neighbourhood transition and compatibility. The proposed regulation may override or materially reduce the effectiveness of those locally developed measures.

While the City supports housing supply objectives, a uniform province-wide standard may not adequately account for differing municipal conditions, servicing constraints, neighbourhood patterns, and infrastructure readiness.

Recommendation to the Province

That the Province:

1. **Recognize local municipal context and recently completed zoning reviews** before imposing a uniform province-wide minimum lot size standard.
2. **Permit municipalities to maintain higher local standards where justified** by infrastructure capacity, neighbourhood conditions, urban design objectives, or established planning frameworks.
3. **Assess infrastructure implications of additional lot creation and infill**, including impacts to roads, parking, parks, stormwater, water, wastewater, and community amenities.
4. **Ensure municipalities retain authority over frontage, access, design, and compatibility matters** necessary to integrate new development appropriately within established neighbourhoods.
5. **Consult municipalities further on implementation details** and monitor impacts on severance volumes, neighbourhood change, and municipal resourcing pressures.
6. **Pair housing intensification measures with infrastructure funding tools** so municipalities can support complete and livable communities as density increases.

Thank you for the opportunity to provide input.

Sincerely,

Steve Ganesh, MCIP, RPP

Commissioner

Planning, Building and Growth Management

City of Brampton

