

## 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 026-0312 – Proposed Changes to Support Standardizing of Parkland Requirements Under the Planning Act**

Dear Sir/Madam,

On behalf of the City of Brampton, thank you for the opportunity to comment on ERO 026-0312.

The City of Brampton supports the Province's objective of increasing certainty and consistency within the parkland dedication framework while facilitating housing delivery and development approvals. The City recognizes that modernized tools may assist in securing parkland within built-up and intensifying communities where traditional land conveyance opportunities can be limited.

However, parkland dedication remains a critical municipal tool to ensure growing communities are supported by functional, publicly accessible parks and open spaces. As one of Canada's fastest-growing municipalities, Brampton must continue to secure high-quality parkland to meet recreation needs, support healthy communities, and deliver complete neighbourhoods.

The City has significant concern with proposals that would require municipalities to accept encumbered lands or privately owned public spaces (POPS) in satisfaction of parkland obligations where such lands do not provide equivalent long-term public value, flexibility, or functionality compared to unencumbered municipal parkland. While these tools may have a role in select urban contexts, they should not become a default substitute for traditional public parkland.

POPS arrangements remain privately owned and may create long-term operational, legal, access, maintenance, or programming limitations. Similarly, encumbered lands or strata park arrangements may constrain tree planting, recreation programming, grading, servicing, or future improvements depending on what lies beneath or adjacent to the land.

The City is also concerned with a prescribed minimum credit framework that may overvalue certain land forms relative to their true recreational function. A mandatory

credit standard may reduce municipal flexibility to assess site conditions and determine appropriate valuation based on usability, visibility, access, size, and long-term public benefit.

Further, permitting lands within or adjacent to natural heritage features to count toward parkland dedication may create pressure to use ecologically sensitive lands for recreational purposes where municipalities may otherwise prioritize restoration, enhancement, habitat connectivity, or passive use objectives.

Where non-traditional parkland forms are accepted, municipalities may ultimately need to secure additional parkland in the future to meet recreation programming needs and serve growing communities.

While Brampton supports increased flexibility where appropriate, municipalities should retain discretion to determine whether proposed lands meaningfully advance local parkland objectives.

## **Recommendation to the Province**

That the Province:

1. **Maintain municipal discretion to determine whether developer-identified lands are appropriate for parkland dedication** based on local recreation needs, functionality, long-term maintenance implications, and community benefit.
2. **Ensure POPS and encumbered lands are optional tools rather than default substitutes** for traditional publicly owned and unencumbered parkland.
3. **Permit municipalities to apply context-specific credit valuation** that reflects the true usability, accessibility, programming potential, and lifecycle value of proposed lands.
4. **Protect municipal ability to secure functional parkland in growth areas** where active recreation space and future flexibility are essential.
5. **Avoid unintended pressure on natural heritage lands** and preserve municipal authority to prioritize ecological protection, restoration, and connected green networks.
6. **Consult municipalities further on implementation, legal agreements, maintenance obligations, and appeal processes** associated with POPS and encumbered land arrangements.

Thank you for the opportunity to provide input.

Sincerely,

**Steve Ganesh, MCIP, RPP**

Commissioner

Planning, Building and Growth Management

City of Brampton