

## Appendix G

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 026-0309 – Proposed Regulation to Prohibit Mandatory Enhanced Development Standards as a Condition of Land Division Approvals**

Dear Sir/Madam,

The City of Brampton recognizes the Province's objective to improve consistency and predictability in development standards across Ontario. However, the proposed regulation to limit municipal authority to require certain enhanced development standards as a condition of land division approvals may have unintended consequences for municipalities seeking to advance climate resilience, sustainable growth, and complete community objectives.

Municipal tools such as Brampton's Green Development Standards, Sustainable New Communities Program, and related engineering or community design frameworks support outcomes such as tree canopy expansion, soil volume standards, permeable surfaces, low-impact development features, and sustainable neighbourhood design. These measures help implement Council-adopted priorities related to climate adaptation, environmental sustainability, and livable communities.

While the proposal indicates that requirements tied to health, safety, accessibility, or protection of adjoining lands (including stormwater management) may continue to be permitted, there remains uncertainty regarding how municipalities may address broader sustainability objectives through the land division process.

A province-wide restriction on these standards could reduce municipal flexibility to respond to local environmental conditions, growth pressures, and infrastructure needs. Municipalities vary significantly in geography, servicing context, climate risks, and urban form. A one-size-fits-all approach may limit innovation and locally appropriate solutions.

### **Recommendation to the Province**

That the Province:

1: **Clarify the scope of standards** that would remain permissible, including sustainability measures with demonstrated environmental or infrastructure benefits.

2. **Retain municipal discretion** to apply locally appropriate enhanced development standards where justified by local conditions and supported through approved municipal policies.

3. **Consider a provincial framework that establishes minimum baseline standards** while allowing municipalities to exceed them through transparent local programs.

4. **Consult further with municipalities, developers, and conservation authorities** to ensure any framework supports innovation, integrated stormwater management, climate resilience, and housing delivery objectives.

Thank you for the opportunity to provide input on this proposal.

Sincerely,

**Steve Ganesh, MCIP, RPP**

Commissioner

Planning, Building and Growth Management

City of Brampton