

Ministry of Municipal Affairs and Housing

Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

June 11, 2025

RE: Proposed Planning Act and City of Toronto Act, 2006 Changes (Schedules 3 and 7 of Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025) - [ERO 025-0461](#)

The Atmospheric Fund (TAF) supports a collective effort to increase housing supply and modernize the province's planning and development systems. As a regional climate agency, TAF works closely with public and private partners to advance practical urban climate solutions that reduce emissions while supporting affordability, equity, and resilience. We also support efforts to accelerate and reduce the cost of delivering much-needed housing and infrastructure.

Green Development Standards (GDS) reduce red tape and standardize planning processes, resulting in long-term predictability that housing developers need to succeed. Streamlining development processes has been a cornerstone feature of GDS across Ontario.

Bill 17 would negatively impact municipalities' ability to implement GDS, limiting their capacity to ensure that new development is not only built quickly, but also remains energy-efficient, livable, and affordable over the long term. These standards help lower utility bills, reduce infrastructure costs and cut emissions, delivering lasting affordability year after year.

TAF offers the following comments on the proposed legislative and regulatory changes proposed through Bill 17:

Context of Green Development Standards

Over the past 15 years, the Toronto Green Standard (TGS) has become a regional model for GDS across the Greater Toronto and Hamilton Area (GTHA). Since its launch in 2010, TGS has provided a clear, performance-based framework for reducing energy use and carbon emissions in new buildings. Its success has driven widespread adoption. Municipalities across Ontario have been adopting GDS since 2020 using Toronto's sustainable design requirements to reduce expenses for homeowners and the strain on local energy systems. These outcome-based standards are not prescriptive, and they do not conflict with the Ontario Build Code.

Today, all GTHA municipalities with a GDS have aligned energy and carbon performance targets with Toronto. Five cities are aligned with Toronto's current requirements (TGS version 4), and eight others use the same metrics but with targets aligned to TGS version 3. This reflects municipal recognition of the need to move in a graduated fashion to enable local builders to adjust while working within a common framework.

TAF has worked with the majority of these municipalities on their GDS, and we know that any divergence between municipalities that adopted GDS prior to Bill 23 was from a lack of clarity around authorities. After the passage of Bill 23 and the [clarifying letter from Minister Clark](#), we have seen an even closer harmonization of processes. What is needed now is to provide further clarity to municipalities around their ability to request sustainable design requirements to finalize the harmonization process. Municipalities are enacting GDS to lower the energy bills of homeowners, prevent municipal property taxes from increasing, and lower projected demand on our energy systems.

Green Development Standards Accelerate Housing Development

Part of the rationale for creating GDS was to streamline the planning process. GDS consolidate pre-existing sustainability-related planning requirements into a single document with clear expectations. Far from creating greater divergence in planning processes, the harmonization of GDS in GTHA has created greater consistency. This is reflected in the pace of housing development. Toronto introduced the TGS in 2010, and in the past 15 years, Toronto has consistently led North America in the pace of housing development. Toronto remains on track to meet or exceed provincial housing targets.

Toronto updated to version 4 of the TGS in 2022. Since that time, according to the [Canadian Home Builders' Association \(CHBA\)](#), Toronto has reduced development approval timelines by 22%. Similarly, Pickering approved its first GDS in 2022 and has since reduced approval timelines by 16%. Brampton also updated its GDS in 2022 to harmonize more closely with other GTHA municipalities and has seen its approval timelines fall by 26%. In contrast, the City of Ottawa voted against adopting a GDS in 2022 and has seen approval timelines get 30% slower. Looking across all the Ontario municipalities benchmarked by the CHBA, all of the cities with a GDS have made progress in accelerating approval timelines, and all of the cities without a GDS have seen timelines get slower. ***The evidence is clear that GDS accelerate rather than slow housing development.***

Study Requirements and Topics

TAF is concerned that the proposed regulatory powers in Bill 17 would restrict municipalities to a one-size-fits-all provincially approved list of studies. If not carefully designed, these changes could undermine municipal ability to address matters of provincial interest as specified in Part I of the Planning Act. The Planning Act requires cities, in carrying out their responsibilities under the act, to have regard to the protection of ecological systems, conservation of energy and water, and mitigation of greenhouse gas emissions. Cities cannot exercise this duty if they do not have the flexibility to require appropriate studies as part of a complete planning application. Which studies are reasonably required varies both by the type and scale of the project as well as the local municipal context. Regulations related to Bill 17 must be in compliance with other powers and authorities granted to municipalities to avoid confusion and delays for future developments. **TAF recommends that in developing the proposed regulations governing planning studies, the**

province should regard municipalities' responsibilities as outlined in the Planning Act and the Provincial Planning Statement. This includes but is not limited to the components of the Planning Act and Provincial Planning Statement below:

Planning Act Requirements for Municipalities
<ul style="list-style-type: none"> • The protection of ecological systems • The protection of public health and safety • The protection of the financial and economic well-being of the Province and its municipalities • The orderly development of safe and healthy communities • The adequate provision and efficient use of ... sewage and water services and waste management systems • The minimization of waste • The accessibility for persons with disabilities to all facilities • The promotion of development that is designed to be sustainable
Provincial Planning Statement Requirements for Municipalities
<ul style="list-style-type: none"> • Improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society • Protect, improve or restore vulnerable surface and ground water, and their hydrologic functions • Promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality • Planning authorities shall prepare for the impacts of a changing climate that may increase the risk associated with natural hazards • Establishing and implementing minimum targets for the provision of housing that is affordable to low- and moderate-income households

TAF understands and appreciates the provincial intent to streamline the development approval process. However, given the broad range of planning priorities cities are required to address in the planning process, caution is required in restricting the range of planning studies. **Rather than prohibiting certain types of studies altogether, TAF recommends that the Province instead consider restricting the scale of development at which such studies may be required.** For example, the Province has identified sun/shadow and wind studies as types that might be restricted. Rather than prohibiting them outright, the regulation could restrict such studies to high-rise buildings where there is more potential for impacts on adjoining properties. This approach would preserve municipal ability to address their planning obligations while streamlining the planning process for low-and-mid-rise housing.

Minor Variance Changes

Finally, TAF welcomes the proposed change granting the Minister of Municipal Affairs and Housing regulation-making authority to allow “as-of-right” minor variances to zoning setback requirements. This change will help reduce administrative burdens and accelerate responsible, low-impact development in urban areas. Removing the need for formal applications for minor variances supports more efficient land use and aligns with Ontario’s housing and growth objectives. These reforms align with red tape reduction recommendations [TAF has recently highlighted](#) to streamline approvals and enable climate action.

Conclusion

Our recommendations will allow municipalities to retain the authorities they need to ensure development focuses on health, safety, and long-term affordability for Ontarians while reducing red tape and increasing efficiency. We note that Premier Ford supported and [voted in favour](#) of the Toronto Green Standard when he was a city councillor and that green development standards are broadly supported by key industry stakeholders including [constructors](#), [developers](#), [architects](#), and [utilities](#).

We urge the government to carefully design forthcoming regulations to ensure that all stakeholders, including municipalities, can do their part to ensure streamlined approval and construction of efficient, resilient and affordable buildings for Ontarians.

Sincerely,
Bryan Purcell



VP of Policy & Programs
The Atmospheric Fund
bpurcell@taf.ca

About the Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising

concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.