TOWN OF CALEDON

November 22, 2025

Christina Thomas, Manager (Acting), Growth Planning Unit
Provincial Land Use Plans Branch
Ministry of Municipal Affairs and Housing
13th Floor, 777 Bay St.
Toronto, ON M7A 2J3

Re: ERO # 025-1101 – Consultation on Enhanced Development Standards – Lot Level (outside of buildings)

Dear Christina:

Thank you for the opportunity to provide comments on the Province's above-noted ERO posting. The Town of Caledon supports streamlining the construction of new homes and infrastructure, as well as ensuring new communities are livable, prosperous, energy efficient and resilient to climate change impacts. This is aligned with Provincial Policies in the Planning Act and Provincial Planning Statement directing municipalities to ensure the conservation of energy and water, reduce greenhouse gas emissions and prepare for the impacts of a changing climate.

The enhanced development standards described in the posting such as low impact development features, native trees and soil volumes, and bicycle parking, all support climate resiliency, stormwater management, improved air quality and the reduction of vehicular traffic.

The following feedback has been prepared by staff in response to the questions provided in the posting:

1. ***What is your interest in and/or experience with the implementation of enhanced development standards at the lot level (outside of buildings)? For example, are you a municipal staff member, homebuilder, planner, Indigenous representative, or member of the public?***

   Town of Caledon staff have experience with implementation of its Green Development Standards (GDS), unanimously adopted by Council in May 2024 and effective July 1, 2024. Staff have reviewed well over 40 GDS checklist submissions from the development community.

   The GDS is a tool to implement Provincial and Town policies related to climate change as part of a larger focus on building complete, livable, prosperous communities. The objectives are to

TOWN OF CALEDON

ensure the significant new growth coming to Caledon would be energy efficient, green and resilient to climate change impacts.

2. ***In your experience, are enhanced development standards applied consistently across municipalities? Please provide examples where possible.***

   Based on the Town's research into other municipal GDS programs, there is broad consistency in the requirements. Caledon specifically drew on examples from Brampton, Toronto, Whitby, Pickering and others to ensure our requirements did not diverge significantly from other jurisdictions. For example, Caledon's GDS followed the lead of many other GTA municipalities in requirements for native plant species, soil volume, and active transportation. The targets are generally the same and rely on the same submission requirements for applicants to demonstrate compliance.

   Caledon did conduct research into innovative practices for site-scale green infrastructure and adopted a different metric than other municipalities. However, this was done to increase flexibility for builders so they could achieve the target in the ways that best suited their site and development process.

3. ***What types of standards should municipalities be allowed to apply outside of buildings and how do these requirements maintain the health and safety of the site if at all?***

   Site standards are critical to creating livable neighbourhoods and communities. Public consultation on the GDS and Caledon's Official Plan consistently demonstrated the high value that residents place on having green space in urban areas, abundant trees and shade, active transportation infrastructure and amenities close to where they live. Key elements of site design that influence health and safety include:

   a. Green infrastructure/landscaping/soil - beyond their aesthetic value, there is ample evidence that access to nature and green spaces improves mental and physical health, and offers opportunities for recreation. As climate change leads to more extreme heat and precipitation, features such as trees, landscaping, and low impact development (bioswales, raingardens, etc.) are critical to help cool neighbourhoods and manage increases in stormwater. Taken together, these relatively simple strategies can improve the safety of neighbourhoods and

communities in the face of increasingly unpredictable weather patterns.

b. Active transportation – the research is clear that robust active transportation infrastructure (pedestrian walkways, bike paths, bike parking, etc.) and planning (proximity to amenities and transit) is directly linked to better health outcomes. Multiple surveys have shown Caledon residents want easy access to transit and active transportation infrastructure and not be solely reliant on personal vehicles. Traffic congestion and road safety is consistently a concern for residents and there is a desire to see new communities strike the right balance between cars, pedestrians, cyclists, and transit to enhance convenience and safety.

c. Energy and GHG emissions – the Planning Act and Provincial Planning Statement direct municipalities to plan for energy conservation, GHG emissions reduction, and climate resiliency. These policies are reflected in the Town's Official Plan as well. Site plan control gives the Town the ability to work with applicants on energy and emissions outcomes early in the development process, without setting any prescriptive construction standards.

4. ***Do you / your organization have information about the short- and long-term costs of enhanced development standards at the lot level?***

As part of the GDS program development, Caledon retained a consultant to conduct a business case analysis on the long-term costs and benefits of implementing different measures. The analysis found that while some materials may cost more up front, their implementation produces long term savings for residents and the municipality in lower operating costs. For example, using permeable paving rather than traditional asphalt over Caledon's growth areas could lead to net savings of over $500 million by 2050 due to lower operating and maintenance costs. Applying bioretention swales to just 15% of new soft-scaping was estimated to result in net savings of up to $50 million by 2050. Neither of these measures are required in Caledon's GDS but may be considered as part of a development's overall approach to green infrastructure. This aligns with Caledon's overall approach to its GDS – set high but reasonable standards while leaving considerable flexibility for

industry to determine the most cost-effective way to implement them.

5. ***Do you have any additional comments or suggestions relating to site plan control or other related subjects?***

   The Town of Caledon is committed to achieving its housing targets and has been working to streamline processes to speed up construction. In the Town's experience implementing the GDS over the past year and a half, there have been no significant delays for applications submitting GDS checklists, and staff have worked directly with applicants to ensure flexibility and recognition of unique site conditions.

   Site plan control provides municipalities with the tools to develop communities consistent with local priorities, economic needs, and resident input. The Town recognizes the need to reduce duplication and complexity in the planning process, however the proposed changes risk applying a one-size-fits-all approach to development and limiting municipalities' ability to respond to the unique needs of our communities.

If you require clarification on any of the comments above, please contact me.

Sincerely,

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