Bay Area Climate Change Council
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November 21, 2025

Subject: ERO 025-1101: Consultations on Enhanced Development Standards – Lot Level

The Bay Area Climate Change Council ("BACCC") catalyzes climate action across the Hamilton–Burlington Bay Area. BACCC brings together a diverse cross-section of partners, including municipal leaders, non-profit organizations, academic institutions, the business community, and grassroots advocates.

This letter responds to the Consultation on Enhanced Development Standards – Lot Level ("GDS Consultation"). BACCC welcomes the opportunity to provide input and has addressed the questions outlined on the ERO page (see Schedule "A" to this letter). We also look forward to offering further feedback at the next stage, once there is greater clarity on the Ontario-led approach to "Enhanced Development Standards."

PROVINCIAL LEADERSHIP

Under section 2 of the Planning Act, both municipalities and the Minister must "have regard to" important matters of provincial interest that include climate mitigation and adaptation to a changing climate. Many municipalities are already acting on these obligations through Green Development Standards ("GDS"), which provide a holistic framework that consolidates requirements and helps coordinate internal municipal review processes.

BACCC believes a province-wide, science and data-based GDS framework would create significant benefits for all parties. A unified provincial approach would provide clear direction, reduce red tape, and help Ontario achieve its sustainability, climate resilience, public safety, and economic objectives. Without provincial leadership, the costs of a changed climate will fall to residents, the insurance industry and will have important health and safety implications.

PROVINCE-WIDE MANDATORY GDS

A mandatory GDS framework across Ontario would reduce regulatory inconsistencies, support municipal planning, and help address electricity system constraints. Key benefits include:

- Predictability for industry adoption of climate innovation through a consistent provincial GDS baseline, with optional higher tiers to address local conditions;
- Flexibility municipalities and industry actors to choose cost-effective, low-carbon space and water heating options based on grid capacity;
- Improved stormwater management through site-level requirements that reduce long-term infrastructure costs; and

- Enhanced ability to respond to community-level resilience needs that fall outside the scope of the Ontario Building Code.

ALIGNING THE OBC WITH NATIONAL STANDARDS

Ontario should pair an effective GDS framework with harmonizing the Ontario Building Code (OBC) to the energy standards in the 2020 National Model Building Code ("NMBC"). Ontario should also prepare a clear plan for accelerating alignment with the 2025 NMBC. This is especially important for small builders—who represent over 90% of Ontario's development sector—so they have clear, modern, and competitive standards, along with adequate time to adapt. Other provinces have already set this direction.

Inaction will leave new homeowners facing costly retrofits, higher energy bills, and increasing climate-related risks. Homes built to outdated standards expose residents to extreme heat, flooding, poor air quality, and other hazards.

ONTARIO'S OPPORTUNITY

Ontario has a clear opportunity to modernize the OBC and implement a mandatory provincial GDS framework in collaboration with municipalities. Together, these actions will improve climate resilience, lower long-term costs, support a competitive and innovative building sector, and expand access to high-quality jobs.

We urge the province to work closely with municipalities and local actors to develop a holistic, efficient, and forward-looking building sector—one that strengthens climate action, protects human health and safety, and fosters sustainable economic growth.

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SCHEDULE "A"

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?**

BACCC set up a multi-stakeholder group from across the Hamilton and Burlington Bay Area to discuss the issues that the Bay Area was facing o such issues as flooding, extreme heat, aging infrastructure and a number of other sustainability priorities. This group also provided recommendations about how Green Development Standards ("GDS") could address these issues. The group also provided recommendations about how community organizations can support the adoption of GDS and the market transformation needed to ensure the health of the building sector.

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

Early municipal GDS efforts understandably produced a range of frameworks tailored to local needs. However, recent updates—such as the City of Mississauga's GDS refresh and new programs in Caledon and Hamilton—show increasing **alignment with the Toronto Green Standard ("TGS")** and, in some cases, the 2020 National Model Building Code (NMBC). Industry in Toronto has adapted to TGS, such that **this consultation only broadcasts an unpredictable future** for Toronto-based developers**.**

Municipalities have consistently expressed strong support for a provincially led GDS program with a tiered structure. Such a program must be developed in close collaboration with municipalities, and should include a clear guide to help each community adopt GDS levels appropriate to its local context. British Columbia has already demonstrated this approach through its municipal guide for implementing the BC Building Code's Step Codes—a model that could be readily adapted for Ontario.

Municipalities have also emphasized the need **for Ontario to harmonize with the NMBC's energy efficiency standards**. The Ontario Building Code (OBC) is becoming increasingly outdated. Harmonization would provide industry with modern, tiered minimum performance standards and the time to adapt to new requirements. It would create a **unified, industry-wide approach,** replacing the current patchwork system where only leading companies carry the burden of innovation.

Today, leading developers are already building to higher standards and integrating technologies not reflected in the OBC. As a result, **building officials are forced to self-educate** to evaluate designs that exceed outdated provincial requirements. With SB-10 and SB-12 no longer aligned with evolving technologies and national best practices, officials lack the consistent tools they need to apply the Code reliably and confidently.

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-level standards are essential for municipalities to ensure new developments align with existing infrastructure plans. A key example is on-site stormwater management. If stormwater is not managed at the site level, **municipalities will be forced to either oversize infrastructure** to handle what were once "100-year" floods—now occurring far more frequently—or leave residents and insurers to absorb the financial losses when sites inevitably flood.

Requiring more greenery and green roofs is equally critical for **protecting human health as extreme heat events become more common**. Communities with stronger tree canopy coverage are significantly cooler, and buildings with green roofs maintain safer indoor temperatures while reducing strain on mechanical systems.

Thought his question is about standards applied outside of buildings, but we can no longer separate the two. High-performing, energy efficient buildings have been evidencing that they maintain temperatures for much longer. **In extreme heat or an electricity outage in the winter, this becomes a life-and-death issue**, as the 2021 BC heat dome showed, with more than 600 people dying from heat exposure. Even how a building is designed and built plays a role in health and safety at the site level.

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

Contrary to common perception, Green Development Standards do not necessarily increase costs. Experts have shown that designing a Part 9 building to Tier 3 performance under the National Model Building Code using a performance-based approach can be **cheaper than following current Ontario Building Code prescriptive rules**. This approach also allows mechanical systems to be properly sized, lowering equipment costs, and gives builders the flexibility to select modern, efficient technologies with reliable supply chains—delivering **energy efficiency, cost savings, and resilience without adding financial burden**.

For example, experts have indicated that within a project, the cost of adding green roofs and more greenery can be a minor cost. Yet they provide significant benefit when a whole new community is developed around the principles of using nature-based solutions to manage heavy rain events to prevent stormwater from overwhelming municipal infrastructure.

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

Please refer to the main body of BACCC's letter.