



Ministry of Municipal Affairs and Housing
Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON
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Canada

November 21, 2025

Re: Climate Action Council Response to Consultation on Enhanced Development Standards – Lot Level (outside of buildings) ERO 025-1101

The Climate Action Council (CAC) is a network of over 40 municipalities from across southern Ontario that work collaboratively on the development and implementation of climate change mitigation and adaptation actions. Climate Action Partnership (formerly Clean Air Partnership), a charitable organization whose mandate is to advance climate action ambition and implementation, serves as the facilitator of the CAC.

We are deeply concerned about the implications of Bill 60, the Fighting Delays, Building Faster Act, 2025, which, under the guise of economic development, proposes sweeping changes that threaten environmental protection, public health and safety, community livability and democratic processes.

Below is the consensus-based input from across the CAC municipal network related to ERO posting number **025-1101**:

- 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?**

The CAC is committed to advancing climate action and sustainable community development. Most CAC member municipalities have declared climate emergencies, adopted science-based greenhouse gas reduction targets, and are actively implementing their climate action plans.

CAC members are collectively interested in the implementation of Green Development Standards (GDS) at the lot level, as these standards are a critical tool for achieving

municipal climate, resilience, and sustainability goals, all goals the province has mandated them to pursue via the Provincial Planning Statement (PPS). Member municipalities have direct experience developing, adopting, and implementing GDS and related site-level policies that address areas such as stormwater management, green infrastructure, energy performance, site resiliency, and urban heat reduction.

While the term “enhanced development standards” is sometimes used, it does not fully capture the intent or function of GDS. GDS are best understood as implementation tools that operationalize Official Plan policies and broader policy direction from the Planning Act and the PPS. CAC’s interest lies in supporting consistent, evidence-based, and scalable approaches to lot level implementation that help municipalities meet their climate and sustainability commitments.

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

GDS are well-established across many leading Ontario municipalities and demonstrate a high level of consistency in both intent and structure. While individual frameworks are unique to reflect local priorities and geography, all address common sustainability themes such as climate resilience, public health, stormwater management, resource efficiency, and biodiversity.

Measures that are consistently found across multiple GDS frameworks include but are not limited to:

- Promoting energy efficiency in buildings,
- Protecting natural heritage areas,
- Providing trees and landscaping,
- Providing bicycle parking infrastructure,
- Reducing urban heat island effect,
- Improving on-site stormwater management,
- Encouraging bird-friendly design to protect local wildlife, and
- Promoting for electric vehicle (EV) ready infrastructure

These shared measures demonstrate a common understanding of the role that site design plays in advancing sustainability, livability, and climate resilience.

Although the specific metrics and implementation approaches may vary by municipality, the overarching objectives remain aligned, to ensure that new development contributes

to safer, healthier, and more sustainable communities, communities that are more desirable to live in.

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?

Municipalities must retain the authority to apply standards for sustainable site design elements. These standards are essential for managing environmental risks, protecting public health, and supporting long-term community resilience.

Common site-level measures include stormwater management to reduce flooding during extreme rainfall, bioswales and retention features to protect water quality, and reflective or permeable surfaces to mitigate urban heat during heatwaves. These interventions protect residents by preventing property damage, reducing flood risks, and lowering health risks from extreme heat. By addressing the impacts of increasingly frequent extreme weather, GDS enhance public safety while contributing to long-term community livability and resilience. The measures reduce the burdens on existing infrastructure and reduce the demand for new physical infrastructure such as water and sewer pipes and the energy grid.

Municipalities are keen and have been asking the province to engage with them on the advancement of an Ontario Step Code that would increase the consistency of energy and emissions requirements in municipal GDS. Sadly, the provincial Ontario Building Code (OBC) has not had any improvements in energy efficiency in almost a decade and does not have any requirements that drive climate and GHG emission considerations of new developments. This is the gap that municipal GDS are trying to address.

Bringing in a tiered code provides clarity and transparency to the development sector for where minimum requirements are headed and over what time frame. The Climate Action Council network recognizes that when the Province sets mandatory standards within the OBC, it needs to take the province's vast geography with varying markets and capacity into consideration. As such, the Province is required to set the Building Code at a level that can be achieved across all regions in Ontario. By providing municipalities with by-law authority to mandate above the minimum requirements within the Ontario Building Code via Green Development Standards, Ontario municipalities can serve as delivery agents of provincial code objectives. In doing so, they help advance market readiness for future code updates and changes and facilitate gradual market growth through smaller-scale implementation. Successful adoption of standards at the municipal scale can then inform and be integrated into future updates to mandatory

components of the OBC. Thereby increasing capacity of the wider market more efficiently, and with less costs and risks.

A similar approach is being advanced in British Columbia via the BC Step Code where municipalities can work with their development community to require a higher tier and thereby drive market capacity. Having a BC Step Code has also helped increase consistency across municipal energy and emissions requirements, something that has been identified by the development community as a hoped-for outcome.

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

There are often concerns raised that increased energy efficiency, site resiliency, and decarbonization will increase housing costs and exacerbate an already challenging housing market. This concern is one of the reasons we need to make continual improvements to OBC requirements to ensure that our development sector builds their capacity to move towards net zero carbon buildings over time. It should be part of the decision-making process that affordability doesn't only relate to upfront capital costs, but should also bring operational costs into consideration, costs to homeowners. In addition, there are business models, such as geothermal utilities, that address the issue related to upfront capital costs resulting from the geo-exchange route towards efficiency and GHG reductions that enable those systems to cost the same as traditional systems.

Many municipalities, in response to feedback from the low-rise development community, have provided an alternate pathway for compliance with GHG requirements by simply installing a three-season heat pump rather than an air conditioner. This achieves the desired efficiency and GHG reductions for both heating and cooling as it displaces the use of fossil fuel for heating, but also increases the efficiency of the cooling system thereby reducing summer peak electricity needs because heat pumps are much more efficient than air conditioners without adding to upfront capital costs.

Improving energy efficiency is critical at the construction stage because that is the most cost-effective time to make improvements to the building envelope. Building envelope improvements will play the biggest role in reducing energy costs and expensive retrofits.

CAP's [EV Ready costing study](#) found that installing EV-ready parking at the time of construction is three to four times cheaper than retrofitting later, with costs dropping from \$10-20,000 per spot to \$2-3,000 per spot. The study was carried out in collaboration with key stakeholders, including municipalities and developers, to address

concerns and ensure a coordinated approach to advancing EV readiness in new developments

The more we delay that progress the more Ontarians will have to pay for more expensive retrofits into the future.

Excluding sustainability and energy efficiency considerations from the planning process will leave new housing exposed to spiraling energy costs, possible future carbon prices, and expensive future retrofit and repair costs. GDS is a planning tool intended to complement, not override and certainly does not conflict with the Ontario Building Code, that supports long-term affordability by accounting for operational energy costs and avoiding stranded asset risks.

In addition, the perception that GDS have slowed down housing construction is inaccurate. The Atmospheric Fund reported that, in 2023, Toronto exceeded its housing targets by 51%, with nearly 96% of housing starts being subject to the Toronto Green Standards (TGS). Overall, Toronto's housing starts have grown or stayed consistent nearly every year since the TGS was implemented.

GDS promote improved energy efficiency, sustainable design, and climate resilience in new buildings, helping reduce energy poverty by lowering operational costs for tenants and owners, as well as enabling occupants to shelter in place in case of power disruption thereby reducing costs over the longer term. Buildings constructed today in a greenhouse gas intensive manner will require costly retrofits in the near future to meet local, provincial, and federal climate targets.

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

The CAC is deeply concerned that municipal site plan control is fundamentally at risk in light of Bill 60, and that previous provincial legislation, such as Bills 5, 17, and 23, have progressively eroded local authority over site planning. These legislative changes undermine municipalities' ability to apply and enforce site-level GDS, which address not only environmental improvements but also essential safety and infrastructure measures. By restricting municipal oversight of these standards, the province is jeopardizing key aspects of public safety, particularly in areas such as stormwater and extreme heat management. Effective on-site management of precipitation is critical to preventing flooding, protecting property, and ensuring the long-term resilience and livability of communities.



As a reminder, Premier Ford supported and voted in favor of the Toronto Green Standard when he was a Toronto Councillor. Green standards are in place in Whitby, Halton Hills, Ajax, Brampton, Markham, Richmond Hill, Vaughan, King Township, Kingston, Ottawa, Pickering, East Gwillimbury, Mississauga and in the process of being developed in several other Ontario municipalities. GDS are broadly supported by key development stakeholders such as constructors, developers, architects and utilities for providing clarity and transparency on the desired sustainability metrics right at the beginning of the planning and design process. Municipalities have worked together and will continue to improve coordination and drive consistency of GDS to achieve our mutual outcomes.

The CAC appreciates the opportunity to provide input and would be keen to engage more with the Ministry to answer any questions and provide more information related to this submission. The CAC can be engaged by reaching out to Dhiyandra Faizal at dfaizal@climateactionpartnership.ca.

Sincerely,

Dhiyandra Faizal

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