



**Re: Bill 60 – Consultations on Enhanced Development Standards – Lot Level (outside of buildings)**

**Date:** November 19, 2025

**ERO NUMBER: 025-1101**

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## **Introduction**

The Masonry Council of Ontario (MCO) appreciates the opportunity to provide feedback on the Ministry of Municipal Affairs and Housing’s consultation regarding the use of enhanced development standards at the lot level—often referred to as green development standards—across Ontario municipalities.

MCO represents Ontario’s masonry manufacturers, suppliers, contractors, and industry professionals. As a sector committed to building durable, sustainable, and resilient communities, the masonry industry supports efforts to address climate change through thoughtful municipal planning and development practices.

## **Support for Climate Policy Through Municipal Planning**

MCO supports the role of municipalities in addressing climate change through land use planning. Green development standards can play a meaningful role in:

- supporting low-impact development approaches,
- improving on-site stormwater performance,
- enhancing public realm quality,
- promoting more sustainable site-level practices.

However, the growing variation in municipal standards across Ontario has resulted in a highly inconsistent regulatory environment. Requirements often differ dramatically from one municipality to the next, creating complexity, uncertainty, and uneven expectations for builders, trades, and suppliers.

## **The Need for Province-Wide Standardization**

MCO strongly recommends that **green development standards be standardized across Ontario**, rather than created uniquely by individual municipalities.

A consistent provincial framework would:



- reduce regulatory uncertainty,
- lower administrative burden for industry and municipalities,
- support predictable development timelines,
- ensure fairness across jurisdictions, and
- better align with provincial housing and infrastructure delivery goals.

A standardized approach would also ensure that municipal climate-focused policies remain technically sound, practical, and measurable across communities of varying size and capacity.

## **Green Development Standards Must Consider Full Lifecycle Performance (Cradle-to-Cradle)**

To ensure long-term sustainability and genuine emissions reductions, green development standards should incorporate **full building lifecycle assessments**, including:

- embodied carbon of materials,
- durability and lifespan of construction systems,
- end-of-life reuse and recyclability,
- maintenance and replacement cycles.

When viewed through a cradle-to-cradle lens, **durable materials with long service life and high recyclability**, such as masonry, provide significant benefits:

- Masonry materials are fully recyclable and can be reintroduced into new products.
- Their long lifespan dramatically reduces replacement cycles and waste.
- Their thermal mass and energy performance reduce operational emissions over decades.
- Their resilience minimizes long-term environmental and financial costs.

Lifecycle-focused standards will produce greater reductions in embodied carbon over time than standards that emphasize only immediate or short-term performance.

## **Comments on Enhanced Development Standards at the Lot Level**

Based on industry experience:

- Enhanced development standards are **not currently applied consistently** across municipalities and often vary significantly in scope and stringency.
- Municipal requirements outside the building envelope can include stormwater elements, tree planting, soil volumes, permeable surfaces, bike parking, and more—but the definitions and thresholds differ widely.
- Where enhanced standards are imposed without alignment to provincial guidance, they can create complexity, cost uncertainty, and delays without necessarily improving sustainability outcomes.



MCO supports the government's interest in clarifying and potentially limiting the scope of municipal authority in this area where it exceeds health and safety or conflicts with standardized frameworks.

## Conclusion

The Masonry Council of Ontario supports the development of climate-oriented municipal policies but emphasizes the need for **provincial standardization** of green development standards to avoid a patchwork of inconsistent requirements across Ontario.

To ensure genuine sustainability outcomes, green development standards should be grounded in **full lifecycle (cradle-to-cradle) analysis**, recognizing the importance of material durability, recyclability, and long-term embodied carbon performance. Masonry materials are fully recyclable and offer significant long-term environmental benefits, making them an important part of Ontario's climate strategy.

MCO appreciates the opportunity to contribute to this consultation and looks forward to continued engagement as the province considers future policy directions.