TORONTO

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Ministry of Municipal Affairs and Housing
Provincial Planning Branch
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Re: Consultation on Enhanced Development Standards – Lot Level (outside of buildings) – (ERO 025-1101)

On behalf of the City of Toronto, I am pleased to submit the City's comments and recommendations on the use of "enhanced development standards" at the lot level.

The ERO posting identifies that "The Ministry of Municipal Affairs and Housing (MMAH) is seeking input on the use of enhanced development standard at the lot level, specifically outside the building envelope; for example, this could apply to green development standards that are required by only some municipalities, and not in a consistent manner." Municipalities are responsible for ensuring planning decisions are consistent with provincial policies and objectives. Green development standards and other elements secured at the lot level, through planning tools that are part of the development review process, implement Official Plan policies and policy and legislative direction from the Provincial Planning Statement (2024) and the *Planning Act*. Development standards such as landscaping, tree planting, and other low-impact development measures help achieve key planning objectives, protect public health and safety, provide clear and predictable direction to developers that help streamline application review, and avoid additional costs to developers, owners and tenants, and taxpayers.

The City continues to regularly update its standards and processes to improve service and address changing conditions and Provincial policy directions. Toronto is currently undertaking a complete overhaul of its site plan review process to scope requirements, streamline applications based on scale and complexity, and standardize material. It is timely then to consider how development standards at the lot level facilitate development in support of housing outcomes. The following recommendations highlight key opportunities to achieve multiple objectives while supporting the goal of simplifying development approvals while reducing costs:

1. The City welcomes the opportunity for further discussions with MMAH staff and municipalities across Ontario, such as through the Regional and Single Tier Planning Leaders of Ontario (RSTPLO), to identify opportunities to continue to align green development standards with the goal of providing a consistent and predictable experience for applicants while continuing to reflect and implement local policy objectives.

2. The Province should finalize the Low Impact Development (LID) Stormwater Management Guidance Manual (ERO # 019-4971) to provide standardized guidance for LID implementation that is supported by literature, research and field studies that will reduce costs for developers by demonstrating proven ways to comply with stormwater runoff requirements.

3. Based on City/Ministry staff engagement throughout Toronto's Site Plan Process Review, MMAH should consider updating its site plan control guide to integrate further best practices.

The comments below respond to the five questions identified in the ERO posting. These comments provide input to assist the Ministry in understanding current municipal practices and to help ensure any future changes are technically and economically sound and supportive of Toronto's and the Province's mutual housing delivery goals while continuing to implement provincial policies and objectives, including health and safety.

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?**

Implementing Provincial Objectives

As described in the ERO posting, we understand "enhanced development standards" to refer to elements at the lot level of a development, including but not limited to green development standards. Toronto and other municipalities currently use land use planning tools, such as zoning by-laws and site plan control, to address and secure relevant components within new developments that implement Official Plan policies. The Provincial Planning Statement, 2024 (PPS) describes Official Plans as the most important vehicle for the implementation of provincial policy, including PPS policies and matters of provincial interest in section 2 of the *Planning Act* that municipalities must have regard for when making planning decisions.

For over fifteen years, the Toronto Green Standard (TGS) has implemented the City's obligations under provincial legislation and policy to address such matters as the protection of public health and safety, the protection of natural areas, the supply, efficient use and conservation of energy and water, and building community resilience. The TGS is updated

regularly based on industry feedback and to ensure measures are consistent with current Provincial legislation and policy direction.

Streamlined, Consistent and Predictable

The TGS is **a one-window tool** used within planning application processes that streamlines review and establishes consistent and predictable measures to meet various development application requirements that stem from federal, provincial, and municipal legislation and policy.

Without the TGS, developers would need to determine for themselves how to meet these requirements. The TGS framework provides clear ways for developers to meet requirements and provides for straightforward and consistent staff review of applications; the framework relies on standard templates and notations applied to typical plans and drawings submitted at the planning application stage. Performance measures and supporting guidance are posted publicly to provide an opportunity for applicants to incorporate them into early design thinking. This transparent and predictable approach ensures expectations are clear at the outset and reduces time and cost for developers.

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

Including Toronto, 14 municipalities in the GTHA have green development standards. Green development standards are a well-established framework across the GTHA, with consistent objectives and similar content across these municipalities.

At the lot level, all municipalities with a green development standard apply measures that protect natural heritage areas and biodiversity, provide trees and landscaping, reduce the urban heat island effect, and manage stormwater runoff. The consistency of these measures across the GTHA demonstrates one of the key benefits of green development standards, which provide predictable expectations to developers to implement provincial legislative and policy requirements.

Toronto's green standard has been in place for over 15 years. Other municipalities have adopted green development standards since this time in recognition of the effectiveness of this tool within the planning process. Various industries supporting sustainable landscaping and green infrastructure have also emerged and flourished during this period, helping to create local jobs, within and outside of Toronto. Skilled jobs such as landscape architects, horticulturalists, green roof contractors, and product manufacturers employ **approximately 84,000 workers** in Ontario and contribute to a green construction industry that contributed **an estimated $4.64 billion in GDP annually** (GIOC, 2020). Products that support green development standards, such as green roofs, soil cells, and permeable pavers, address

typical requirements in every municipality, highlighting consistency in the application of standards.

While all municipalities with green development standards target consistent objectives with similar structures and approaches, specific performance measures reflect the priorities and context of each municipality. As green development standards implement Official Plan policies, these standards will reflect the local City Council direction of each unique municipality. There is an opportunity for more coordination across the Province to strengthen the predictability and consistency of how measures are applied. However, it is important for individual municipalities to establish green development standards that implement their Official Plan policies. The City of Toronto is committed to coordinating with other Ontario municipalities and the Province to identify opportunities to improve the consistency of these tools while leveraging the expertise of municipal staff involved in the development and implementation of green development standards through the Regional and Single Tier Planning Leaders of Ontario (RSTPLO). Province-wide guidance on LID measures would also further this goal.

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?**

The requirements of the Toronto Green Standard address major health and safety concerns for the residents of Toronto: extreme heat, air and water quality, flooding and erosion. Health and safety risks are expected to accelerate with the projected increase of more extreme heat (number of days over 30 degrees Celsius), heavy rainfall (frequency of 100-year storm events) and forest fire smoke events.

Extreme heat is a concern particularly in urbanized areas like Toronto with large amounts of paved surfaces. These surfaces absorb sunlight, significantly increasing local temperatures during already hot days and creating what is known as the heat island effect. It is a direct danger to health and a strain on the health care system. For example, heat-related emergency department visits in Toronto hospitals more than doubled at 42 visits in June 2025 compared to the same month in the previous two years, according to Toronto Public Health. The number of residents facing disproportionate heat risk is anticipated **to rise 7 times (up to 1.3 million people in Toronto) by the 2050s**. Extreme heat also puts additional stress on peak electricity use times, potentially leading to brown outs that negatively impact economic activity and leave thousands of residents without power and air conditioning, increasing vulnerability to extreme heat.

Extreme heat can also be a safety issue as it can damage road infrastructure (e.g. softening asphalt) creating hazardous conditions, potential traffic delays and adding costs with more frequent maintenance. By keeping the pavement cooler and moderating temperature swings, tree canopies and vegetated or cool surfaces substantially reduce the overall thermal stress on the road surface.

Parts of the City of Toronto with tree cover and green spaces are significantly cooler than those with predominantly paved areas. Achieving Toronto's 40% tree canopy coverage target by 2050 could cut the number of residents at risk during extreme heat events by half. New developments are a key part of achieving this strategy, and in addition to contributing to thermal comfort, health and safety, trees and landscaping add visual appeal and monetary value to projects.

Runoff from heavy rainfall is also a significant safety concern. In 2024 two "100-year storms" resulted **in billions in flood damages for residents, businesses and the public sector**. These events disrupt mobility, escalate property maintenance costs, damage property and put people at risk. As Toronto and surrounding areas continue to develop, the area of impervious surface has increased, meaning more potential for surface water run-off. Managing precipitation where it falls on-site reduces the peak flow of water that reaches the municipal infrastructure, which can be overwhelmed during heavy rainfall.

Low impact development (LID) measures at the lot level such as green roofs, trees, vegetation and porous pavement help to absorb and detain run-off. These interventions not only reduce stormwater infrastructure costs for the developer and the city, but by decreasing the amount of water that enters the sewer system, they can assist in mitigating combined sewer overflows and basement flooding. They also reduce contaminants entering the rivers and storm water sewers, improving the water quality of Toronto's rivers and Lake Ontario, which is important for aquatic life as well as human uses including drinking water and tourism. If water balance is not managed on-site, by default runoff will divert to the road right-of-way adding cost to the taxpayer and exacerbation of flood hazards city-wide.

Toronto is a city of deeply incised ravines and erosion is a threat to people and property. The presence of invasive non-native plant materials (such as Norway maples) in the ravine system has led to shading of the understory and erosion of the steep banks. The lot level requirements for native and diverse plant species in new development in the city, especially adjacent to ravines, not only supports slope stabilization and local ecosystem function but has helped to grow an Ontario-based native plant nursery industry, creating jobs and investment outside of Ontario's major urban centres.

Lot level requirements for trees, vegetation and green roofs also contribute to improving local air quality through the absorption of particulate matter. This becomes especially important during wildfire smoke events, such as Toronto experienced in 2023 and 2025.

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

Green development standards establish clear expectations to help developers understand how they can implement policy from the outset and to help streamline the review process by establishing predictable performance measures and a consistent review process.

Effective implementation of these standards helps to reduce costs. Green development standards provide an opportunity for municipalities to clearly identify the most beneficial measures up front, helping developers make more cost-effective early design decisions while ensuring municipalities can effectively plan for and manage infrastructure. Without the ability to use planning tools to secure these measures, infrastructure costs may increase, which may result in development delays due to reduced sewer capacity for future development, and costly and disruptive infrastructure upgrades putting an increased strain on municipalities' capital budgets. Communities already face challenges in supporting infrastructure, with a 2021 FAO report identifying a $52 billion infrastructure deficit for Ontario municipalities.

Stormwater management measures on site must comply with Provincial legislation and satisfy municipal requirements. A key requirement is the ability of development to manage runoff on the property during a rainfall event. In accordance with Provincial guidance within the Stormwater Management Planning and Design Manual, City stormwater management requirements set out in the Wet Weather Flow Master Plan do not permit new development to increase pre-development runoff levels. The simplest and most cost-effective way to manage initial runoff is through the treatment of surfaces to make them more permeable – for example, green roofs or on-site soft landscaping. Installation of **a green roof is estimated at less than 0.3% of hard construction costs**, and lot level measures for a typical midrise development, such as tree planting and landscaping, **are estimated to cost less than 0.1% of total hard construction costs**. Without these measures, a development would need to reuse water within a building, resulting in increased construction costs, and if not properly mitigated on-site, there would be an additional burden placed on municipal infrastructure to manage increased runoff loads within public rights-of-way.

On a larger scale, the cost of not implementing low-impact development (LID) measures that help manage stormwater runoff and mitigate urban heat on a site-by-site basis will result in increased costs and burden on local taxpayers, businesses and Ontario communities. Increasing extreme heat events, as discussed above, will lead to a rise in costs to the healthcare system as hospitals see more emergency room visits and worsening cardiovascular health conditions. Communities that are predominantly hardscape will also see exacerbated flooding events, as stormwater in neighbourhoods finds its way more quickly to combined sewers, storm drains and watercourses, resulting in increased basement flooding and costly emergency response from overland floods.

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

Site Plan Review Service Overhaul

Toronto's Development Review Division is currently undertaking a full overhaul of how it delivers its site plan review service, taking a Lean Six Sigma approach. The primary goal of this process transformation is to provide excellent service to stakeholders and optimize staff efforts by creating clear, collaborative, flexible and data-driven processes and decision-making.

Toronto's Site Plan Process Review will fully leverage the significant changes that have been made to provincial legislation in recent years, and build on them by:

Scoping: reducing application submission requirements and focusing application review and comments

Streaming: grouping applications based on their scale and complexity and ensuring requirements, review effort and output are proportionate for each stream

Standardizing: efforts will be made to standardize plans, comments, conditions, agreements, etc. to the extent possible

Significant internal technical work is already underway, led by the Development Review Division working closely with City Planning as well as all commenting partners to assess the full extent of changes that will need to be made to the various policies and broader processes that currently link to site plan review. This review of the site plan process will also assist in better streamlining the outcomes of the Toronto Green Standard.

Process improvements will begin to be implemented throughout 2026, towards launching a new fully operational streamed service (including standard operating procedures and templates, tailored fee schedule, technology integration, etc.) by early 2027. The Development Review Division in collaboration with City Planning and other commenting partners will continue to consult with Ministry staff throughout the course of this project to ensure the outcome aligns with provincial objectives.

Based on City/Ministry staff engagement throughout Toronto's Site Plan Process Review, MMAH should consider updating its site plan control guide to integrate further best practices.

Consistent Province-Wide LID Guidance

The use of lot level LID stormwater management practices to address runoff and heat simultaneously is facilitated by the availability of clear, consistent guidance based on current research and best practices. In 2022, the Province began consulting on an updated Low Impact Development Stormwater Management Guidance Manual. An updated manual would help municipalities, property owners, planners, and developers manage stormwater runoff and improve resilience to climate change.

The availability of guidance applied across the province will support the use of multi-functional, cost-effective design and limit the risk associated with unclear criteria and approvals. For example, in Toronto, green roofs have been used as part of stormwater management approvals for most development applications and are frequently proposed by developers to be larger than required or provided on buildings where a green roof was not mandated. This uptake was facilitated by the availability of simple, clear and consistent design criteria for green roofs allowing engineers and landscape architects to know how much stormwater management the green roof will be credited for. Similar guidance for at-grade landscape features including bioswales, trees, and soft landscaping will facilitate consistent practices across the province.

Consistent Green Development Standard Approach

The Toronto Green Standard has been recognized as an effective and forward-looking tool for over 15 years. The standard has gone through regular updates which has involved extensive industry consultation to ensure performance measures continue to be cost-effective and feasible. Since 2010, the TGS has resulted in **an estimated $407.6 million in utility cost savings for home and building owners.**

In addition to municipality-specific process updates, there is an opportunity for increased coordination amongst municipalities across Ontario to address concerns about differing development requirements. Leveraging the Regional and Single Tier Planning Leaders of Ontario (RSTPLO) as an existing platform can facilitate an outcome that creates consistency across the region while ensuring municipalities can continue to plan our communities to avoid long-term costs and protect health and safety, including from the impacts of climate change.

Should you have any questions regarding the City's submission or would like to arrange a meeting with City staff, please contact Corwin Cambray, Director, Strategic Initiatives, Policy & Analysis Section (Corwin.Cambray@toronto.ca).

Sincerely,

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cc.
Valesa Faria
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