



Planning and Economic Development Department

Planning Division

71 Main Street West, 5<sup>th</sup> Floor - Hamilton

Phone: 905-546-2424

November 21, 2025  
Ministry of Municipal Affairs and Housing  
Province of Ontario

***SENT VIA ERO POSTING***

**RE: City of Hamilton Comments on ERO 025-1101 - Consultation on Enhanced Development Standards – Lot Level (Outside of Buildings)**

Attached, please find City of Hamilton Staff Comments in response to the above noted ERO posting. Hamilton Planning Committee and City Council will be reviewing these comments at their January 13, 2026 and January 21, 2026, meetings.

Hamilton City Council may choose to amend or add to the enclosed comments which would be provided in a subsequent letter. Should you have questions or comments, please contact myself or Mark Kehler, Program Lead – Site Plan, Heritage & Urban Design Section at (905) 546-2424 Ext. 4148 or by email at [mark.kehler@hamilton.ca](mailto:mark.kehler@hamilton.ca).

Regards,

A handwritten signature in black ink, appearing to read "Anita Fabac".

Anita Fabac, MCIP, RPP  
Acting Director of Planning and Chief Planner,  
Planning Division  
Planning and Economic Development Department  
City of Hamilton

Enclosed.

## ERO 025-1101 - Consultation on Enhanced Development Standards – Lot Level (Outside of Buildings)

The following table contains guiding questions provided by the province through [ERO 025-1101](#) to elicit feedback on proposed changes to the use of enhanced development standard at the lot level.

While there is no definition of enhanced development standards in the Planning Act or the Provincial Planning Statement 2024, these matters may include: requirements for features such as bioswales, permeable pavement, and other vegetative elements, and direction around matters such as native tree planting and soil volume, and bicycle parking but are not limited to such items.

Additional information on the proposed changes, along with supporting materials provided by the Province can be found via [ERO 025-1101](#).

ERO 025-1101 Guiding Questions	
Question	Comments
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?	Municipal staff members working for the City of Hamilton who have developed enhanced development standards and implemented them through the planning application review process.
In your experience, are enhanced development standards applied consistently across municipalities? Please provide examples where possible	In the City of Hamilton’s experience developing and implementing enhanced development standards, Ontario municipalities collaborate to ensure consistency across jurisdictions while also addressing local policy objectives. Some examples include: <ul style="list-style-type: none"> <li>• Many municipalities have developed city-wide design guidelines to encourage the consistent application of enhanced streetscaping, tree planting and landscape buffers. Elements of the design guidelines vary across municipalities, but they have many common themes.</li> </ul>

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

<b>ERO 025-1101 Guiding Questions</b>	
<b>Question</b>	<b>Comments</b>
	<ul style="list-style-type: none"> <li>• During the development of Green Building Standards for the City of Hamilton, staff met with multiple other municipalities and sat on a group that discussed alignment and best practices. The Hamilton Green Building Standards (not yet in effect) was designed to align with the Toronto Green Standard where applicable, while addressing unique to Hamilton policy objectives.</li> <li>• Some enhanced development standards have been utilized across Ontario Municipalities for many years. Examples include the Stormwater Management Planning and Design Manual (2003) from the MOECP and the Low Impact Development Stormwater Management Planning and Design Guideline (2010) prepared by the Credit Valley Conservation Authority and the Toronto and Region Conservation Authority that has become an industry standard. More recently, the Canadian Standards Association has developed a number of enhanced development standards including the Design of Bioretention Systems (CSA W200:18), Construction of Bioretention Systems (CSA W 201:18) and Rainwater Harvesting System (CSA B805:22).</li> </ul>
<p>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?</p>	<p>Municipalities should be allowed to apply standards outside of buildings that address urban design, active transportation, crime prevention, emergency access and climate resilience. Enhanced development standards provide the following benefits, amongst others, and are vital to the maintaining the health and safety of communities:</p>

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<b>Question</b>	<b>Comments</b>
	<ul style="list-style-type: none"> <li>• Standards that mitigate heat island effects, improve stormwater management, and enhance natural systems create more resilient communities in the face of intensifying climate challenges. Municipalities should be allowed to implement standards that address their unique geography and environment.</li> <li>• Well-designed communities attract investment, increase property values, support local businesses, reduce infrastructure maintenance costs, and create distinctive places that drive economic health and vitality.</li> <li>• Urban design standards shape how people interact, influence accessibility and inclusivity, create public gathering spaces, and foster community connections that improve the health and wellbeing of residents.</li> <li>• Standards that address the pedestrian realm and cycling infrastructure provide for better barrier-free environments and ensure safe movement for people of all ages and abilities. The promotion of active transportation helps residents lead healthier lifestyles.</li> <li>• Crime prevention through environmental design (CPTED) is an important health and safety consideration that can be addressed through standards that ensure clear sightlines, open spaces and sufficient lighting that increases passive surveillance.</li> </ul>

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<b>Question</b>	<b>Comments</b>
<p>Do you / your organization have information about the short- and long-term costs of enhanced development standards at the lot level?</p>	<p>The City compiles construction cost data submitted by proponents that could be used to estimate the short-term cost of enhanced development standards. For long both short-term and long-term costs, the Sustainable Technologies Evaluation Program (STEP) provides a Life Cycle Costing Tool that demonstrates that lot level stormwater controls are cost effective and do not impose a financial burden on development.</p> <p>Staff are familiar with several studies and reports that have demonstrated the cost benefits of enhanced development standards, including:</p> <ul style="list-style-type: none"> <li>• Research from the Canada Mortgage and Housing Corporation shows that well-designed, compact development reduces infrastructure costs by 30-50% compared to conventional suburban environments (CMHC, “Infrastructure Costs and Urban Development Patterns,” 2022).</li> <li>• A 2023 study by the Canadian Urban Institute found that municipalities with strong urban design standards approved housing developments 15% faster due to clearer expectations and fewer redesign cycles (CUI, “Design Excellence and Development Approval Timelines,” 2023).</li> <li>• The Canadian Housing and Renewal Association has documented that neighbourhoods with cohesive urban design strategies maintain property values more consistently over time, reducing investment risk and financing costs for</li> </ul>

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	<p>developers (CHRA, “Urban Design and Housing Market Stability,” 2024).</p> <ul style="list-style-type: none"> <li>• Walkable, transit-oriented communities designed with strong urban design principles reduce transportation costs for residents by up to \$10,000 annually per household, significantly improving overall affordability. (Smart Prosperity Institute, “The True Cost of Housing: Transportation, Energy and Affordability in Canadian Cities,” 2023).</li> </ul>
<p>Do you have any additional comments or suggestions relating to site plan control or other related subjects?</p>	<p>Site Plan control is a delegated process that can provide greater efficiency and flexibility than other planning tools (such as zoning). The ability to implement enhanced development standards through site plan control is vital to the success of the planning process in achieving development that is functional, resilient and supports the health and safety of residents.</p> <p>Staff support efforts to facilitate partnerships among municipalities to make enhanced development standards more consistent, fair, and transparent. Rather than eliminating enhanced development standards, staff recommend the Government of Ontario support:</p> <ul style="list-style-type: none"> <li>• The streamlining of processes for design review based on development scale and impact; and,</li> <li>• Creating clear guidelines and checklists (where possible) to make compliance more straightforward.</li> </ul>