

Ministry of Municipal Affairs and Housing

Provincial Planning Branch
777 Bay St
Toronto, Ontario
M7A 2J3

November 22, 2025

Re: Consultation on Enhanced Development Standards – Lot Level (outside of buildings) – [ERO 025-1101](#)

The Atmospheric Fund (TAF) is a regional climate agency serving the Greater Toronto and Hamilton Area (GTHA). We work closely with public and private partners to advance practical urban climate solutions that support affordability, equity, and resilience.

TAF appreciates the opportunity to comment on the Ministry of Municipal Affairs and Housing’s consultation regarding enhanced development standards at the lot level. We support the province’s efforts to increase housing supply, modernize planning and development processes, and reduce the costs and delays preventing much-needed housing and infrastructure from being built. In TAF’s experience working with municipalities to develop Green Development Standards (GDS), we’ve seen firsthand how these policies have reduced red tape and standardized municipal planning processes. The result has been long-term predictability that housing developers need to succeed. Streamlining development processes has been a cornerstone feature of GDS across Ontario.

Regional overview of how GDS developed in tandem

Over the past 15 years, the Toronto Green Standard (TGS) has become a regional model for GDS across the GTHA. Since its launch in 2010, TGS has provided a clear, performance-based framework for reducing energy use and carbon emissions in new buildings. Its success has driven widespread adoption. Municipalities across Ontario have been adopting GDS since 2020 using Toronto’s sustainable design requirements to reduce expenses for homeowners and the strain on local energy systems. These outcome-based standards are not prescriptive, and they do not conflict with the Ontario Build Code.

Today, all GTHA municipalities with a GDS have aligned energy and carbon performance targets with Toronto. Five cities are aligned with Toronto’s current requirements (TGS version 4), and eight others use the same metrics, with targets aligned to TGS version 3. This reflects municipal

recognition of the need to move in a graduated fashion to enable local builders to adjust while working within a common framework.

TAF has worked with most of these municipalities in developing their GDS and found that pre-Bill 23 differences stemmed from unclear authorities. Since the passage of Bill 23 and the [clarifying letter from Minister Clark](#), processes are much more aligned. To complete this harmonization, municipalities now need clearer guidance on their ability to require sustainable design.

As the Association of Municipalities of Ontario (AMO) noted in its [response to Bill 17](#) earlier this year, streamlining approval processes must be balanced with strong energy efficiency and green building standards. This echoes what we've heard directly from municipalities across the GTHA: GDS are essential tools for managing long-term costs, keeping property taxes from increasing, ensuring grid stability, and protecting communities from climate-related risks.

Success stories - Green Condo Loans, DC rebates

Part of the rationale for creating GDS was to streamline the planning process. GDS consolidate pre-existing sustainability-related planning requirements into a single document with clear expectations. Far from creating greater divergence in planning processes, the harmonization of GDS in the GTHA has created greater consistency. This is reflected in the pace of housing development. Toronto introduced the TGS in 2010 and has consistently led North America in the pace of housing development over the past fifteen years. The city remains on track to meet or exceed provincial housing targets.

Toronto updated to version 4 of the TGS in 2022. Since that time, according to the [Canadian Home Builders' Association \(CHBA\)](#), Toronto has reduced development approval timelines by 22%. Similarly, Pickering approved its first GDS in 2022 and has since reduced approval timelines by 16%. Brampton also updated its GDS in 2022 to harmonize more closely with other GTHA municipalities and has seen its approval timelines fall by 26%. In contrast, the City of Ottawa voted against adopting a GDS in 2022 and has seen approval timelines get 30% slower. Looking across all the Ontario municipalities benchmarked by the CHBA, all the cities with a GDS have made progress in accelerating approval timelines, and all the cities without a GDS have seen timelines get slower. The evidence is clear that GDS accelerate rather than slow housing development.

Toronto's GDS was co-developed with various developers, including Tridel and Daniels, to ensure it was financially viable. The City's [development charge refund program](#) rewards developers for exceeding minimum performance requirements and has returned over \$120 million in rebates. Further, the TGS has resulted in an estimated \$407.6 million in utility cost savings for home and building owners, with approximately 86% of these savings coming from electricity use, and the remaining 14% from natural gas. New housing built to municipal green standards also cuts costs

for homebuyers, as they qualify for financial incentives such as the CMHC Eco Plus mortgage insurance rebate.

TAF has also partnered with industry on financing tools, including the Green Condo Loan program, first launched with Tridel in 2005, which supported early adoption of higher-performance design features. The program provided low-interest financing to offset upfront costs for measures such as high-efficiency HVAC systems, improved building envelopes, and better ventilation. Many of the measures pioneered through the Green Condo Loan program later became common practice and are now embedded in GDS.

GDS Metrics at the Lot Level (Outside Buildings)

Across the GTHA, municipalities use two primary approaches to structuring their GDS: **tiered systems** and **point-based systems**. While they differ in how compliance is demonstrated and how flexibility is provided to developers, all GDS aim to improve environmental performance and streamline development approvals.

In **tiered systems** (e.g., Toronto, Mississauga), Tier 1 lot-level requirements address planning priorities set out in the Provincial Planning Statement. These include essential, universally applied site design elements such as stormwater management, accessibility, lighting, and tree planting. Higher tiers are voluntary and outcome/performance-based, allowing developers to exceed minimum standards through innovative design solutions, such as enhanced permeable surfaces, expanded tree canopy coverage, and advanced water conservation systems. In **point-based systems** (e.g., Brampton, York Region), developers select from a menu of measures to reach a required point threshold. This approach provides flexibility in meeting sustainability goals, without prescriptiveness or any forced design choices.

In both systems, requirements and optional elements are carefully designed to avoid any conflict with the Ontario Building Code. Claims that GDS impose excessive or inappropriate lot-level requirements are not consistent with how these systems are structured or implemented.

Lot-level GDS metrics generally fall into three categories:

1: Community Planning and Site Function

- Active transportation infrastructure – including AODA-compliant walkways and cycling paths
- Proximity and connectivity to transit, community amenities, and schools
- Bicycle planning, play areas, and public realm features

2: Safety and Climate Comfort

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- Tree canopy and shading to mitigate urban heat island effects
 - Lighting and visibility standards
 - Surface materials that improve walkability and reduce heat exposure

3: Property Safeguarding and Climate Resilience

- Stormwater and wastewater management
- Soil quality and infiltration standards
- Permeable surfaces and irrigation efficiency
- Water conservation
- Biodiversity and native plants
- Resilience measures – fire prevention, flood mitigation

Recent [analysis by the City of Mississauga](#) further confirms that lot-level GDS requirements do not impose financial burdens. As part of its review of the ERO consultations related to Bill 60, Mississauga conducted a detailed costing analysis across a range of building types. The City found that the cost implications associated with implementing the majority of enhanced lot-level design standards are minimal and do not significantly affect overall construction costs for any building type covered by its GDS. This aligns with the broader GTHA experience.

Enhancing consistency in lot-level development standards

We appreciate the province’s intent to increase consistency in lot-level development standards across municipalities. As noted above, there is more consistency than may be apparent at first glance, as many cities’ GDS have been modelled on the Toronto Green Standard. If even greater consistency is desired, we would suggest that any future regulatory or legislative changes be oriented towards harmonizing standards rather than constraining municipal authorities for standard-setting. For example, the province could consider mandating that only one set of GDS can be applied within a regional (upper-tier) municipality. Lower-tier municipalities would need to harmonize standards within that region or opt out of GDS altogether. It would be important to allow for a reasonable transition period for municipalities within each region to come into alignment. This would greatly increase harmonization for builders, many of whom work at a regional level.

Sincerely,
Bryan Purcell



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The Atmospheric Fund

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About the Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.