



BUILDING A GREATER GTA
Building Industry and Land
Development Association



June 23, 2020

Mr. Michael Dean
Senior Climate Change and Energy Planner
Town of Halton Hills
1 Halton Hills Drive
Halton Hills, Ontario
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Mr. Michael Dean,

RE: Town of Halton Hills Draft Green Development Standards – Preliminary Comments

The Building Industry and Land Development Association (BILD) and the Residential Construction Council of Ontario (RESCON) are in receipt of the Town of Halton Hills Draft Green Development Standards ('the standards'). On behalf of our collective members, we would like to take this opportunity to thank you for engaging us in this process and for consulting us on this initial draft of the standards. We understand Council will review a draft of the standards at their workshop in early July and in advance of that meeting, BILD and RESCON would like to provide you with some preliminary comments for your consideration.

To begin, both BILD and RESCON members continue to be committed to the delivery of environmentally conscious development and sustainable communities. However, while we support sustainable measures, it is important to recognize that building practices must demonstrate a cost-benefit to future homeowners. Though we acknowledge that these standards are in the preliminary stages of being developed, the document in its current state, presents numerous concerns in terms of how it aligns with provincial building standards and whether the standards were prepared based on current, expertise and proven sustainability building practices. In this regard, we would like to provide a few key principle sentiments for your consideration.

'Code is King'

As a standard principle, it is imperative to note that the Ontario Building Code (OBC) is the governing legislation that has been judiciously designed for the purpose of providing the development industry in Ontario with a clear set of uniform construction requirements, including governance surrounding environmental sustainability.

The OBC has been substantively enhanced over the last decade and continues to be regularly updated. This means newer developments today are more sustainable as they are already subject to rigorous environmental standards that have been tested and explored by industry experts. For this reason, members of RESCON and BILD are not clear to why the Town of Halton Hills is targeting new development, especially when many of the inefficiencies of buildings are within older structures, which can also include the Town's own municipal facilities.

After a review of this initial draft, it is clear that a number of these preliminary recommendations are outdated when compared to what is currently prescribed in the most updated version of the OBC. Being that the OBC has the most up-to-date sustainably tested practices and is already a valued and relevant tool to the development industry, there is no need to surpass these regulations. In point of fact, proponents are

not legislatively required to exceed the requirements of the Ontario Building Code and any conflicting standards are recommended to not be considered.

Assumptions Used to Prepare the Standards

From an implementation perspective, in all instances where municipalities create a 'better than code' scenario, confusion is created for the industry around the implementation and viability of projects. Furthermore, standards of this nature typically involve extensive research and development, cost-benefit justification, as well as lengthy field testing and monitoring before implementation options are ever considered. This is why it is imperative to remember, that any costs associated to employing additional sustainable development practices is ultimately passed onto the new homeowners of these units and can effectively challenge the affordability and availability of new homeownership in the Province.

From a consultation standpoint, we believe that the Town has not meaningfully engaged with a number of key stakeholders, whose opinions and expertise would be pivotal in these conversations. To start, we were disappointed to see that the authors of this draft have not considered the practicality in gathering sufficient input from field experts when preparing this standard. We are also deeply concerned that internal consultation with municipal and regional staff has yet to be conducted.

BILD and RESCON strongly recommend the scheduling of internal consultations with the intention of ensuring that any expectations within this standard, are clearly translated and applicable across multiple jurisdictional departments. Being that this draft has not been prepared or informed with the appropriate stakeholders, this standard should not proceed for Council's consideration

Additional Considerations

In addition to the overarching concerns we have with this standard, there are more specific questions from our memberships that need to be clarified and further explored.

- BILD and RESCON hold a longstanding position that any sustainable building standards that go beyond the mandated requirements of the OBC be practiced under **voluntary participation** by development industry members who have the knowledge and resources to do so. An effective voluntary sustainable program is one that incentivizes sustainable development practices, uses less prescriptive terms regarding how targets are to be met, and allows for the proponent to have barrier-free access to best deliver the targets that are most appropriate for their respective site. How is a voluntary, incentivized program being considered?
- Is the planning rationale for this program in line with the engineering and legal services departments within the Town of Halton Hills?
- How will this standard be graded against development submissions? What department(s) will be reviewing development applications against this standard?
- How will these standards be measured for their effectiveness and how effective has it been in the past that demonstrated a need for this update?
- Where there are contradictions or conflicts between other plans or policy points, which will take precedence?

- As of today, who has been additionally consulted on these standards? How will the Town be engaging with other external stakeholders, such as Halton Hills Hydro, the local schoolboards and Conservation Halton? Will municipal staff be trained on how to utilize this standard when reviewing it against development applications?
- Has this document been compared against the Sustainability Initiatives outlined by the Region?

As your community-building partners, BILD and RESCON hope you find our comments within this letter helpful. We strongly believe that further conversation and significant refinement is needed before moving forward with a new set of standards. We look forward to discussing this with you in future and would appreciate being notified of further updates as new information comes forward.

In the interim, should you have any questions please feel free to contact the undersigned.

Sincerely,



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