



BUILDING A GREATER GTA
Building Industry and Land
Development Association



October 16, 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 Standard – BILD & RESCON Comments

BILD is the voice of the home building, land development and professional renovation industry in the Greater Toronto Area. The building and renovation industry provides \$33 billion in investment value and employs 271,000 people in the region. BILD is proudly affiliated with the Ontario and Canadian Home Builders' Associations.

The Residential Construction Council of Ontario (RESCON) represents over 200 production builders of high-rise, midrise and low-rise residential buildings in the province. Our goal is to work in cooperation with government and related stakeholders to offer realistic solutions to a variety of challenges facing the residential building industry, which in turn have wider societal impacts. The focus of RESCON's work is on technical standards; labour relations; industry research and innovation; health and safety; regulatory reforms; and training and apprenticeship.

The Building Industry and Land Development Association (BILD) and the Residential Construction Council of Ontario (RESCON) would like to take this opportunity to thank the Town for hosting a second consultation meeting on Tuesday, October 6th to review the recently released Draft Green Development Standard (the 'Standard'). As interested and directly affected stakeholders, we appreciate the additional consultation prior to Council's consideration on Monday, October 26th.

As expressed in our meeting, BILD and RESCON are concerned with the direction of the Draft Green Development Standard, and believe it may not effectively achieve its intended purpose. We are disappointed to see that a number of the recommendations outlined from our preliminary submission in June were not meaningfully applied or considered in this iteration of the document. We hope that we can continue to address these outstanding concerns with staff, prior to the finalization of the document, and as well as the additional concerns contained herein.

To begin, BILD and RESCON members remain committed to the delivery of sustainable communities and environmentally conscious development; however, while we support sustainable development, it is important for the Town to recognize that building practices must demonstrate a proven cost-benefit to future homeowners. Town Staff have not yet presented a feasible cost-benefit analysis of their proposal as requested in our previous submission. It is crucial for municipalities to be mindful that any costs associated with implementing additional 'green' development practices is ultimately passed onto the new homeowners of these units and will effectively further challenge the affordability and even the viability of new housing development projects in the Town.

As previously discussed, the Ontario Building Code (OBC) is the governing legislation that has been judiciously developed and vetted for the purpose of providing the development industry in Ontario with a clear set of uniform construction requirements. It is important to recognize that the OBC has been substantively enhanced with each new successive iteration and already exceeds the energy efficiency requirements of the current National Building Code of Canada (NBC). We again reiterate the recommendation made within our previous submission that advocates for this municipal guideline to be implemented on a voluntary basis considering that the provincial Planning Act and Building Code Act do not enable a municipality to regulate their own construction requirements outside of the prevailing OBC. Furthermore, the development of municipally

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mandated construction standards does not align with provincial and federal governments current efforts of harmonizing construction standards across Canada through the NBC. The decision of upper tier governments to pursue building code harmonization eliminates the need for authorities having jurisdiction (municipalities) to develop their own unique requirements and reduces the duplication of efforts happening in each level of government. The overlap of municipal and OBC requirements creates regulatory confusion in the development planning approval and building permitting process.

From an implementation perspective, the introduction of a minimum point system in this draft standard is of concern to our respective members. Making this Standard a requirement of all new developments and additions that submit a rezoning, subdivision, or site plan control application to meet a required minimum target of 20-points will inevitably add an additional regulatory layer to the development review process. This new requirement will unavoidably cause further delays when working towards approvals as it will penalize all new developments against the required targets of the Standard. This can be a problem, as it would be unreasonable and prohibitive to hinder the approval of a project when awarding points and the Town must be mindful of the unintended consequences when doing so.

BILD and RESCON continue to strongly recommend the use of incentives and/or offsets as a means to encourage developments to meet the Standard on a voluntary basis, such as development charge relief or fast tracking approval timelines. This would motivate and assist the development industry to achieve higher levels of participation, which ultimately will translate to increased experience and a positive outcome for the Town.

In our October 6th consultation, the Town identified that incentives will be considered in the next phase of the review. While we are encouraged to hear this, we strongly recommend that this Standard not be finalized until these economic incentives can be formulated so that a full understanding of the program can be made. In this regard, we kindly request to be involved in the conversations when the Town looks to formulate such incentives as we look forward to continued engagement on this Standard.

Thank you for taking the time to consider our comments and should you have any questions, please do not hesitate to contact the undersigned at vmortelliti@bildgta.ca and deberardis@rescon.com.

Sincerely,



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