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**SUBJECT: Halton Hills Green Development Standards  
Southwest Georgetown Landowners Group  
Town of Halton Hills**

On behalf of the Southwest Georgetown Landowners Group (“Group”), thank you for meeting with us and your continued consultation on the Town’s update to their Green Development Standards (“GDS”). The Group has reviewed the proposed GDS updates and has comments around the following general themes for your consideration:

- Align the standards with provincial and federal construction standards.
- Demonstrate a proven cost-benefit to future homeowners.
- Apply an overall community-based approach.
- Provide incentives to promote implementation.
- Balance the point system.
- Provide greater incentive for innovation.
- Resolve conflicting objectives of GDS and the parking needs assessment study.

A more detailed discussion of these themes follows.

**Overall GDS**

The GDS include five categories of performance: Energy and Water, Ecology, Resiliency, Transportation, and Innovation. It is notable that this proposed GDS is not based on measurement of metrics from previous versions. It represents an increase in requirements that in some cases exceed other leading municipalities with greater density of development, like Toronto.

The updated GDS needs to align with the local context, predominately low-density communities. Emphasis also needs to be placed on other uses, such as institutional, municipal and commercial, where opportunity can be better tied to operational benefit, versus creating stranded investment in low rise homes. An understanding of actual interest and future application by homeowners is key to ensure that the standards are providing opportunities that homeowners will actually implement and benefit from.



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. It exceeds the energy efficiency requirements of the current National Building Code of Canada (“NBC”).

Best efforts should be made to align standards 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.

The Group is 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. Standards need flexibility including voluntary levels, which is typical in other municipalities across the GTHA.

A detailed study on the costs to implement each performance criteria should be undertaken to ensure the standards provide value and are the best use of funds to achieve the overall Town goals. This costing will also assist in determining the appropriate balance of cost versus points achieved for implementing each performance criteria as the points system currently does not appear to factor in the cost or level of effort to implement.

An overall community- based approach should be applied ensuring the co-benefits of adaptation. This provides Greenhouse House Gas (“GHG”) reductions but also addresses important asset management benefits for the community.

To create community-based benefit from these Standards, the Town needs to:

- Accept a balance between public and private space in how standards are applied. In a community like Southwest Georgetown, where ultimately over half the land will be in the public realm, GDS measures need to consider not just the private space, but also look at opportunities for measures to be implemented in and on public spaces. Not only does this support a community-based approach to GHG reduction, but it also puts implementation in the control of the Town and other public bodies so you can ensure the measures are undertaken. It will require changes to Town standards and buy-in from all departments and approval agencies.
- Provide a clear path for how the approvals process will relate to application of points ensuring the process does not result in delays. It is unclear at the moment how the



standards will be applied as some aspects are better implemented at the Secondary Plan scale while others are site specific.

### **Implementation and Incentives**

Overall benefit can only be achieved if there is balance in investment and incentives to support the additional cost of measures expected through new home construction. The Town needs to align policies and programs with incentives to support the incremental cost impact for requirements. This should include opportunities for reduced costs, land requirements, and efficiencies in planning approvals. Incentives also encourage greater implementation of the goals of GDS, which assists the Town in achieving their climate change objectives. Implementation of green standards in both Richmond Hill and Whitby include expectation for a complete review of incentives to align with requirements. Finalizing these standards cannot be completed until cost and incentives review has been completed. This study needs to demonstrate how incentives will support implementation.

### **Specific GDS Comments**

#### **Energy and Water**

The GDS intent includes measures that *“will help mitigate climate change by ensuring that new developments are designed to higher performance energy and water use thresholds, and by encouraging renewable energy generation.”* This intent needs to align with implementation opportunities that consider actual uptake.

The Building Code is a progressive standard that is being updated regularly to make sure that it is meeting contemporary performance. The GDS should harmonize with code and include a range of flexible opportunities for additional considerations.

The renewable energy category is not aligned with the cost-benefit for the proposed expectations. It also does not consider the actual uptake of homeowners, who require short paybacks and are not necessarily purchasing homes for long term needs. Emerging opportunities for energy include geo-exchange and uptake in EV vehicles and battery storage should be considered.

The expectations for the increased thresholds exceed all other GDS in the GTHA. There is no research that supports the theory that if builders invest in building design to accommodate solar infrastructure, homeowners will invest in this. Hence the notion that this requirement supports the climate objectives is unfounded. There is also no incentive-based program established with the utility to support the implementation of solar. If this requirement is pursued it will require additional consultation with Halton Hills Hydro so that incentives can be clearly identified and communicated to homeowners.



Expanding the potential for this category provides a greater ability for a range of homebuilders to provide potential benefit through this category. Points should be increased, eg. 5-8 points allocated to a greater range of measures. We recommend the following modifications,

- Establishment of an incentive program by the Town with Halton Hills Hydro
- Geo-exchange as a renewable option
- Garage wiring for EV and future battery storage
- Provision of a homeowner implementation plan on all the options for after market home modifications for any renewables, including Town and utility incentives that can be accessed.

## Ecology

The GDS intent is *“to help maintain and restore the Town’s natural water infiltration, watershed, and ecological environment.”*

The benefit of green infrastructure combined with ecology objectives for trees, addresses GHG reductions and climate impacts is underestimated in the proposed standard. Expanded tree canopy contributes to reduced urban heat island effect, boosts biodiversity and supports stormwater retention. Overall, this benefits the health of the community.

Although LID requirements are addressed in Resiliency, there is a co-benefit to managing water and the ecology for communities. Given the intent of this area, the standard should focus on areas within the community where the best opportunities for soil volumes and additional trees and native landscapes can be achieved. Where possible, this should be combined with LID as a priority, supporting natural asset-based infrastructure and balancing infrastructure benefit and cost. Opportunity areas need to align with operational effectiveness to ensure adverse impacts do not result. Prior to finalizing the standard, the Town needs to review best practice and experience where other infrastructure has been undermined by such changes.

Additional points should be considered where these combined benefits can be established. Additional points (2-3) should be included:

- Maximizing tree canopy through strategic plantings, and programs to provide homeowners trees for lots, where possible.
- Integration of natural assets community wide, including the public realm.

## Resiliency

Resiliency has been defined specifically around stormwater, with an intent to *“adequately prepare infrastructure for changing climate conditions.”* This is defined as taking the form of stormwater management, preparedness planning and other design considerations. The expectations and benefits for this standard exceed the one (1) point allocation provided.



The standard as intended to maintain water on-site is largely urban in nature. It contemplates use of Low Impact Design (LID) but does not address the greatest potential for this, which would see wider application of LID throughout the neighbourhood. This would include lands to be transferred to the Town and used as public space.

To truly advance a resiliency approach to stormwater solutions, the application of this intended standard would provide flexibility and maximize the design opportunity to include widespread LID. This would fully incorporate a natural asset approach and consider reduced infrastructure needs including credit towards reduction in overall SWM pond size requirements. Such consideration would modernize the Town's infrastructure needs and address the cost-benefit of implementation.

Additional points should be considered for:

- Approaches to resiliency, (3-4 points) for alignment creating a neighbourhood resilient to flood and storm protection.
- Stormwater quantity (2-5 points) with broad LID application on sites including public space and private property, where appropriate.
- The Resiliency Checklist (2 points min). This provides a broad expectation for measures to be reported on with 1-point allocation.
- Social and health objectives aligned with reduction in GHG. This includes the opportunity for local food and the provision of space for community-based garden initiatives in public spaces.

## Transportation

The Transportation intent is that *“the transportation demand management (“TDM”) plan is used to establish estimated baseline trip generation statistics and then demonstrate a reduction in single occupancy vehicle (“SOV”) trips using various TDM measures. Reducing SOVs and the associated GHG emissions is essential for the ultimate goal of reducing overall Town GHGs towards net-zero.”*

The Town will need to resolve the potentially conflicting objectives of the GDS with it's recent parking needs assessment study. The draft recommendations of that study support longer driveways and bigger garages to accommodate more, and larger vehicles. It appears that the Town wishes to de-emphasize SOV use in the GDS while making greater accommodate for it in its parking standards. That conflict needs to be resolved.

Application of a TDM has not included an allocation of points. A range of points should be considered where developments have incorporated the range of expectations noted in this section.



Additional points for the TDM needs to consider:

- The sophistication of new neighbourhoods with fibre and home designs that include work-based spaces,
- Recognition of a new balance in work-based travel post COVID 19.

## **Innovation**

The intent for Innovation *“recognizes that development opportunities are constantly evolving, this category offers some additional flexibility for accommodating new and emerging ideas and technology that may not have been contemplated for GDS v3.”*

Innovation has been left open-ended but with minimal points potentially allocated. The expectation that innovative solutions, which may require change in operations expectations by the Town, will be proposed needs have a clear path and incentive. Without this, there is little for the homebuilder to gain by spending the time and effort to pursue new technologies and methods that may go a long way towards supporting the Town's objectives, but realize few points towards the overall development score. The points system needs to reflect this potential. If the Town wants to be at the leading edge of GHG reduction it should be offering greater incentives for innovation, not minimizing them. It will also require a commitment to open innovation by all departments at the Town and a process to support and encourage innovation. Increasing points for innovation and offering expedited approvals for innovative approaches will encourage greater participation by homebuilders.

Once you have had a chance to review our initial input, we would be pleased to set up another meeting with you and your team to discuss these comments in further detail. We look forward to continuing to work with the Town to develop implementable Green Development Standards that complement the objectives of Vision Georgetown.

Please contact the undersigned if you have any questions or require any additional information.

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