



Dear Halton Hills Council, Staff and Residents,

Thank for providing me time on your busy agenda to speak to the Halton Hills Green Standards update. Clean Air Partnership has been working with Ontario municipalities to advance green standards for over a decade and were so pleased when Halton Hills put their green standard in place in 2010.

Clean Air Partnership is a charitable environmental organization that enables municipalities to take bold climate action through network facilitation, research, and action implementation. We have supported many other Ontario municipalities with their green standards, including Toronto, Vaughan, Brampton, Richmond Hill, and Whitby, among others.

Green standards for new developments are a critical implementation and policy tool for municipalities. By using Green Development Standards, municipalities can more effectively achieve their Official Plan objectives, their GHG reduction targets, their health and affordability goals, all while stimulating the local economy. These standards are also well aligned with recently declared climate emergencies.



At present there are two different types of green standards in place in Ontario. One we called the prescriptive tiered approach: which requires a list of metrics that need to be incorporated into all developments and sets out a timeframe for moving up the tiers. The other type we call the menu approach to green development standards. The metrics within those green standards are very similar, it is just that with the menu approach, developers get to identify which of the metrics (with each of the metrics allocated a certain number of points) they will incorporate into their developments. But they need to achieve a minimum threshold score to proceed through the development application process. Results thus far have shown that there is no doubt that the prescriptive tiered approach gets increased uptake of metrics in comparison to the menu approach. This is particularly evident in the energy metrics where sadly, uptake via the menu approach has been rather dismal.

While I will admit, Clean Air Partnership was hoping that Halton Hills would move towards a prescriptive tiered approach like that used by the Toronto and Whitby Green Standard, all we really care about is uptake to the metrics. In this update to the Halton Hills Green Standard there is a much stronger emphasis within the points system on the



energy/GHG performance of new development as well as advancement of low carbon transportation options metrics and this is most definitely an improvement. We only ask Halton Hills to please place a strong emphasis on tracking uptake to the metrics and ideally reviewing on an annual basis if this approach is achieving the uptake you seek? If it is, then that is fabulous (as I said all we all care about is uptake), if not then I think you know what you need to do to ensure that your green standard is achieving the required uptake you seek.

I did want to address common concerns often raised related to Green Standards, such as affordability and competitiveness. The perception that Green Standards will harm affordability is often raised. But it is important for us to ask affordability for whom? For low rise new developments, some of the home builders that participated in CMHC's Equilibrium Program found they were able to get the cost of getting to Net Zero Ready to about 20Kⁱ. At that cost that would mean a payback of about 10 years (for a building that will be functioning for at least 50 years). based on an average direct energy costs (not including delivery costs) of \$2,000 per household per yearⁱⁱ. It is expected that these costs of building to a higher standard will reduce significantly as the market advances. These Green Development Standards are critical for advancing the market. In addition, we know that every building built to



OBC will need to be retrofitted within 10 – 15 years at a much higher cost than if they had been built with energy efficiency as a goal at the time of construction. That is what Green Standards help achieve, motivating the development community to think about lifecycle costs of property owners rather than simply focusing on the up-front capital costs. For addressing any potential up front capital costs concerns, there are financial mechanisms that can address purchase price differentials such as Community Improvement Loans, on-bill financing, local improvement charges, and a number of other options that can be paid back through operational savings over time.

There is also a growing trend towards the achievement of low emission buildings at present without any differential in price between conventional natural gas buildings, especially for higher density properties through green loans, or utility type models that use operational savings to pay back the higher up front costs.

Regarding the competitiveness concern often raised, I understand that it is a very competitive market and that developers would want to ensure they are not undersold by neighbouring developments. With the increasing number of green standards being enacted and the National Model Building Code helping to identify the road map to net zero developments and with new low carbon utilities and financial models



that help address up front costs. Green standards help us achieve our affordability goals.

We thank the Town of Halton Hills for your continued work and leadership advancing green standards and improving housing and the sustainability of your new developments for years to come. We look forward to tracking the results of this update and sharing the lessons learned with other Ontario municipalities developing their Green Standards.

Kind regards,

Gabriella Kalapos, Executive Director

ⁱ <http://cleanairpartnership.org/cac/meetings/net-zero-energy-nze-housings-role-in-getting-us-to-net-zero-communities/>

ⁱⁱ <https://www.ivey.uwo.ca/energycentre/blog/2019/06/a-closer-look-at-hydro-quebecs-electricity-price-advantage-over-ontario/>