

Town of East Gwillimbury Thinking Green Development Standards Update Report



Clean Air Partnership



Clean Air Partnership (CAP) is an environmental charity that works in partnership to promote and coordinate actions to reduce greenhouse gases for healthy communities. Our applied research on municipal policies strives to broaden and improve access to public policy debate on air pollution and climate change issues.

Clean Air Partnership's mission is to transform cities into more sustainable, resilient, and vibrant communities where resources are used efficiently, the air is clean to breathe, and greenhouse gas emissions are minimized.



ABOUT THIS REPORT

In January 2024, East Gwillimbury Development Services and Corporate Services initiated the process to update the Town's Thinking Green! Development Standards. Clean Air Partnership (CAP), an environmental charity based in Toronto, supported the Town by conducting three workshops from April - to July 2024 to engage staff from various departments and senior managers' working groups. CAP provided professional advice on the updates to the standards to align with other Greater Toronto and Hamilton Area (GTHA) municipalities and industry standards. This report summarizes key outcomes and recommendations from the workshops.



ABOUT GREEN DEVELOPMENT STANDARDS IN EAST GWILLIMBURY

In 2012, East Gwillimbury (EG) demonstrated leadership by becoming one of the first municipalities in the GTHA to advance the Thinking Green! Development Standards (TGDS). The standards were developed to support the Official Plan's vision for a complete, healthy, and sustainable community and to respond to the significant growth and development in EG. The TGDS program was last updated in May 2018 and addresses a variety of matters within the categories of protection and enhancement of the natural environment, conservation of energy and water, and designing for complete and connected communities.

The TGDS program encompasses a set of measures created for the purpose of evaluating the sustainable performance of new development in EG. Three levels of compliance with level 1 as a minimum requirement. Levels 2 and 3 allow for flexibility of measures best suited to each application. At a minimum, all Site Plan and Draft Plan applications are expected to achieve:

Level 1 (minimum) - All applicable Targets, AND EITHER

Level 2 (improved) - Two (2) Targets – under each Theme OR

Level 3 (excellent) - One (1) Target – under each Theme



EG is experiencing a period of significant growth. The Town topped the list of the fastest-growing municipalities in Canada from 2016 to 2021 with a record population growth of 44.4% (Statistics Canada, 2022). Furthermore, the Town's population is projected to grow nearly 3.5 times from 35,700 in 2021, to 128,600 in 2051 (YROP, 2022). To accommodate this growth, the Town will be planning for buildings and infrastructure patterns that will last decades (and even centuries) and that will directly impact the town's energy and greenhouse gas (GHG) footprint. Updated TGDS also demonstrates the EG's commitment to follow through on the council declared 2023 [Climate Emergency Declaration](#), and council approved 2024 [Environmental Strategy](#). It provides the Town with an opportunity to align TGDS with other GTHA municipalities and incorporate technological advancements in the development sector.

Updating the TGDS reflects a pivotal opportunity for EG to encourage new developments to embed sustainability, GHG emissions reductions and climate resilience at the centre of planning, design, construction, and operation of new development. This will advance the Town's vision to develop communities that are competitive, livable and resilient to climate impacts and provide additional benefits such as public health, social equity, local economic development, resource use, and enhance the overall liveability of EG's communities.

TGDS PROCESS

TGDS Approach

The current version of TGDS is a hybrid system with the mandatory and voluntary components where majority of minimum mandatory targets are provincial requirements. Beyond the minimum mandatory targets, the developers must achieve either two of Level 2 or one of Level 3 targets under each theme. Level 2 and Level 3 targets provide flexibility to applicants to choose which measures are best suited to their application. However, this approach leads to the development community often selecting easier targets or "low-hanging fruit" when it comes to choosing Level 2 or 3 targets.

By gathering feedback from over ten municipalities in the Greater Toronto and Hamilton Area who have successfully advanced Green Development Standards in their jurisdictions, a leading best practice that has emerged is advancing mandatory tiered standards. Currently, Toronto, Mississauga, Whitby, Ajax and Pickering are advancing mandatory tiered GDS. The tiered structure generally comprises three tiers: Tier 1, which would contain mandatory requirements, and Tiers 2 and 3, which would contain voluntary higher performance standards. Tier 1 requirements will be mandatory after council approval, while the voluntary tiers (2 & 3) will also be in effect. They will not become mandatory until the Town determines the timeline to move to the next tiers. Mandatory tiered standards can support the advancement of key sustainability targets to advance EG's sustainability goals and also prepare the market for future tier advancements. Appendix 1 demonstrates the pros and cons of different approaches to advance TGDS targets.



The Town can consider implementing a mechanism to track the uptake of voluntary higher tier targets to gather useful information on future updates to the targets. Should the Town decide to advance a points based or hybrid system, tracking which targets are getting maximum uptake can help the Town evaluate the uptake and ensure that that most impactful targets get achieved.

Archetype-specific Targets

In the current TGDS, two different sets of targets have been developed, one for the Site Plan and one for the Draft Plan of Subdivision applications. However, the current TGDS lack different targets for different development archetypes such as Low-Rise Residential Buildings (<4 storeys), Multi-Unit Residential Buildings (>4 storeys), Institutional, Commercial and Industrial Buildings. The TGDS update will provide an opportunity to address this and create different targets for different development archetypes.

Supporting the Development Community to Demonstrate Compliance

The current TGDS provides little information to the development community about where and how to demonstrate compliance with TGDS targets. TGDS update provides an opportunity to support the development community with additional information on the documentation they need to provide to demonstrate compliance.

For example –

Target: Rainwater Harvesting

Where to Demonstrate Compliance?

- Site Plan/Draft Plan
- Grading Plan
- Architectural Plans, including Roof Plans and/or Floor Plans
- Letter of Commitment/Intent prepared and signed by a qualified individual

How to Demonstrate Compliance: Confirm that the project will either be designed for rainwater re-use readiness or will re-use rainwater on-site.

- Identify the design measures (i.e., cistern location, size, site drainage, etc.) on a Site Plan or Grading Plan.
- For the Draft Plan of Subdivision Applications, set out an action plan in the Letter of Intent that identifies the Target Level proposed to be achieved. The action plan will become a Draft Plan Condition to be undertaken during the detailed design of the subdivision.
- All submission materials are to be prepared by a qualified individual



Application Review

All staff from municipal departments including Development Services, Engineering and Public Works, Parks, Recreation and Culture, and Corporate Services that have a role in the planning approvals process need to understand how the TGDS will be integrated into the development application approval process. The TGDS update provides an opportunity to review and update internal processes and policies for receiving and reviewing development applications, including the TGDS and the new associated requirements, and the departments responsible for reviewing each submission requirement. An integrated review process is recommended where staff from all relevant departments (Development Services, Engineering and Public Works, Parks, Recreation and Culture) jointly review development applications in person or online to ensure all the requirements are met to streamline and speed up the approval process.

Staff Training

Staff engagement, training, and education are essential to the successful development and implementation of TGDS. Interdepartmental training sessions led by the Development Services Department (Planning and Development Service Branch) and Corporate Services (Environmental Initiatives Service Branch) can be held periodically (biannually or annually) for staff who are involved with reviewing development applications. These training sessions can cover policy context, potential technical updates to targets, reinstate staff roles and responsibilities and also help identify and address challenges around compliance to certain targets. It is recommended to also have some online, on-demand training and resources available to ensure continuity and staff turnover.

Community Awareness

TGDS update provides an opportunity to engage with external parties of interest, including the development community, builders, NGOs Lake Simcoe Region Conservation Authority (LSRCA) and resident groups in order to seek feedback on the targets and secure early support. It is essential that these stakeholders are engaged early so that their questions can be answered and that there is ample time for them to become familiar with any new requirements and processes.

Several methods can be used to engage with the community groups to ensure that EG has ample of opportunities to collect feedback on the updated targets. CAP recommends engaging NGOs, community groups and LSRCA through online information sessions. Development community can be engaged through industry workshops, online information sessions and individual follow-up meetings to collect their feedback on draft targets. EG can also conduct extensive social media campaigns to generate interest in the TGDS update process and launch a "Have Your Say" portal on the Town's website to receive public comments.

Green Development Standards Harmonization

GDS Targets Harmonization - Harmonizing Green Development Standards (GDS) targets across municipalities in the GTHA offers several advantages, such as fostering region-wide cohesion and



consistency, which can streamline processes for developers and create efficiencies for municipalities in the development and update of targets. Harmonizing majority of TGDS targets with other leading municipalities can also facilitate the sharing of best practices and ensure that all municipalities are moving towards common sustainability goals. This will also enable EG to compare the Town's sustainability outcomes with their municipal peers, enabling regional benchmarking and performance tracking. EG can explore harmonizing GDS targets with leading municipalities such as Caledon, Pickering, Whitby and Mississauga.

GDS Program Harmonization CAP also explored the possibility of harmonizing EG's TGDS program development and implementation with the Towns of Newmarket and Aurora who are currently developing and updating their GDS programs. This approach similar to the Cities of Vaughan, Brampton, Markham and Richmond Hill who collaboratively developed a Sustainability Metrics Program. This approach offers several benefits:

- Consistency in targets and approach across municipalities.
- Efficient and effective use of staff and external resources.
- Support with communicating with council and staff.

However, the process is not without challenges. While the targets are consistent across the municipalities, the way that they are being used is not. Each of these municipalities have a different minimum threshold. Vaughan and Brampton apply GDS targets for draft Plan of Subdivision, Site Plan, and Block Plan applications, while Richmond Hill only uses it for Draft Plan of Subdivision and Site Plan applications. These differences may lead to confusion among the development community, particularly given that the programs are being presented as consistent with one another when in practice they are different. Similar challenges may arise for EG when jointly developing a GDS program with Newmarket as the Newmarket is considering advancing the GDS program for Site Plan applications only. Timing for council approvals, coordination with staff from multiple municipalities and varying bureaucratic processes can result in unforeseen delays. It is also worth noting that Vaughan, Brampton and Richmond Hill harmonized their GDS development because they were early on in the GDS uptake (early 2010s) and that joint development provided support for these early adopters. It is less necessary to undertake joint program development now that a critical mass of municipalities have already implemented GDS. Harmonization of the GDS program also may not fully capture the unique goals, elements, or conditions specific to a particular municipality, potentially limiting their ability to advance leading-edge targets and practices. Harmonizing GDS program is not recommended because of differing application thresholds causing confusion among the development community, bureaucratic challenges and limitations to advance unique and ambitious sustainability goals.

CAP recommends that EG harmonizes majority of TGDS targets with leading municipalities such as Whitby, Caledon and Mississauga while developing some targets unique to the Town's infrastructure, sustainability and environmental goals.



Flexibility

The Town's updated TGDS program must recognize that specific development constraints may exist preventing applicants from achieving all of the mandatory requirements. In recognition of this, a variation request process must be developed as part of the updated TGDS program. EG's General Manager of Development Services who has Site Plan delegated authority must be authorized to provide approval to waive or reduce the mandatory TGDS requirements in instances where a comprehensive assessment has been conducted.

Incentives

Updated TGDS targets with higher energy efficiency requirements and better resilience considerations may result in increased construction costs, also known as "green premium". Industry estimates suggest that this "green premium" ranges between 0% - 7%. The increased construction costs can vary for numerous reasons, such as building type and size, supply chain disruptions, geographical location, etc. This green premium does not account for anticipated cost savings for future residents related to building maintenance, operation, and utility costs. It is important to note that this green premium can be considered an investment as it will return many more operational savings than the upfront capital costs over the lifetime of these buildings. Incentives can support and encourage the uptake of voluntary higher-tier targets. Incentives are optional; they can be financial or non-financial, and it is recommended that stakeholders be engaged to determine what incentives might be desired by the local development community. Incentives must be predictable and simple, long-lasting, and easy to navigate with minimal administrative burden. EG can partner with local utilities, non-profits, and other industry actors to develop and administer incentives.

In order to offset a portion of the increased construction costs, some GTA municipalities have considered providing financial incentives to applicants in order to encourage them to adopt the voluntary higher performance standards. These incentives include development charge rebates, stormwater rebates, use of roof space for saleable units if mechanical system no longer needed on roof, servicing allocation, etc.

Other municipalities have explored some non-financial incentives to support and encourage the development community to uptake higher performance GDS targets. These include expedited reviews, recognition program - Sustainable Design Awards/Green Development Champion, etc.



FINANCIAL INCENTIVES	NON-FINANCIAL INCENTIVES
<p>Development charge (DC) rebates: DC rebates can be provided to projects that achieve higher performance standards. However, it should be noted that these rebates reduce municipal revenue and must be significant enough to encourage participation in the program.</p>	<p>Expedited approval process Expedited development approvals can be provided for exemplary sustainability projects that go above and beyond minimum mandatory target requirements.</p>
<p>Community improvement plans (CIPs) CIPs allow municipalities to direct funds (using DC rebates, loans, tax grants, etc.) to specific areas or the municipality as whole provided they have enabling policies in their Official Plan. Developing and managing CIPs, including reviewing grants and loans, requires staff time, and the financial commitment is up to the municipality.</p>	<p>Servicing allocation Allocation of additional water and wastewater servicing for higher-performing buildings. This incentive is only effective in municipalities with limited servicing capacity or restrictions on allocation.</p>
<p>Saleable roof space For Multi Unit Residential and Commercial Buildings - Use of roof space for saleable units (e.g. penthouses) if mechanical system is no longer needed on the roof.</p>	<p>Awards and recognition programs Providing awards to builders for projects that meet high standards is an easy and low-cost incentive for municipalities to manage. While awards programs are still seen as positive, developers tend to prefer financial and other types of incentives over them.</p>



TGDS TARGET IMPROVEMENTS

The minimum mandatory TGDS targets set in 2018 demonstrated EG's leadership and commitment to sustainability, however, they are in need of an update. An update to the minimum mandatory targets can align the TGDS to EG's updated sustainability goals and the latest advancements in building technology and market trends. If the Town does not choose to pursue a tiered system, at minimum it can revise and make all Level 2 targets mandatory. EG must also explore harmonizing TGDS targets with leading municipalities in the GTHA such as Whitby, Caledon and Mississauga to ensure regional consistency.

Potential mandatory targets that can be advanced include:

- Level 2 charging ready EV infrastructure - 100% for all residential units with a garage, driveway or adjacent parking; 25% for residential MURBs; 25% for non-residential parking
- For low rise residential, design and construct to a minimum ENERGY STAR for New Homes version 17.1 or R2000 and install a low carbon heating system (heat pump). For high rise buildings, meet TEUI targets of 135 kWh/m² or lower and TEDI targets of 60 kWh/m² or lower
- Solar readiness, opt-in for new owners to install solar PV or thermal systems at their expense
- Minimum of 5% of the total energy is generated on-site by renewable energy sources
- Provide direct, safe and accessible cycling routes on all streets and amenities to enable cycling to and from destinations

Prescriptive vs. Performance Targets

A Performance-Based Approach for targets does not provide any specific direction on how the applicant should achieve a certain metric as long as the end goal is achieved. E.g. using renewable sources to meet minimum 5% of the building's total energy consumption. Performance-based targets encourage innovation as the development community can utilize innovative approaches to achieve target requirements.

A Prescriptive approach provides specific actions to achieve target requirements. E.g. installing a low carbon heating system (heat pump) along with a fossil fuel back up for low-rise residential development.

CAP recommends providing a combination of prescriptive and performance-based approaches where possible to provide developers with the flexibility to advance targets according to their preference.



TGDS UPDATE PHASES

Phase 1 – Developing Tiered TGDS

Draft tiered TGDS with updated targets

Internal departmental review and consensus on draft targets

Phase 2 – Engagement with Parties of Interest

Building industry information sessions

Community information sessions

Council and staff engagement

Public engagement

Phase 3 - Final TGDS Development

Update draft TGDS to include feedback received from the engagement efforts

Create a TGDS User Guide

Council and staff review

SMWG review and feedback

Council report and approval

Phase 4 – Training and Education

Staff training

Training sessions for other stakeholders

SUMMARY OF RECOMMENDATIONS

- CAP recommends updating both process and targets to ensure EG is keeping pace with green standard leading practices and that there is a process for tracking and reporting on uptake of TGDS targets.
- TGDS Process: Implement a mandatory tiered approach, where the first tier is mandatory, with an option to voluntarily advance higher tier targets. This approach will provide industry clarity and transparency for tiers that will become mandatory over time and support the Town in achieving key sustainability goals while preparing the market for future advancements.



- **Archetype-specific Targets:** Update TGDS to include specific targets for different development archetypes (low-rise residential buildings, multi-unit residential buildings, industrial, commercial and institutional buildings) ensuring tailored targets for varying building types.
- **Supporting the Development Community to Demonstrate Compliance:** Provide clear guidelines and documentation requirements to help developers demonstrate compliance with TGDS targets effectively.
- **Application Review:** Integrate an interdepartmental application review process to streamline development application approvals and ensure compliance with new standards.
- **Staff Training:** Conduct regular training and provide on-demand resources for staff involved in TGDS implementation to ensure consistent and effective application of the standards and address staff turnover.
- **Community Awareness:** Engage external stakeholders early in the TGDS update process to gather feedback and secure support, ensuring familiarity with new requirements.
- **Harmonization:** Harmonize TGDS targets with leading municipalities such as Whitby, Caledon and Mississauga while also having some targets unique to the EG to advance unique needs related to Town's infrastructure, sustainability and environmental goals.
- **Flexibility:** Develop a variation request process within TGDS to accommodate specific development constraints, ensuring that mandatory requirements can be adjusted as needed on a case-by-case basis where local circumstances make certain targets unachievable.
- **Incentives:** Explore opportunities to offer predictable and simple incentives, both financial and non-financial, to encourage developers to adopt voluntary higher performance standards in TGDS. For applications that achieve voluntary higher tiers (above minimum mandatory requirements) EG can consider offering incentives such as: saleable roof space for residential and commercial highrise buildings, expedited application review and approval, development charge rebates and public recognition through sustainability awards.
- **TGDS Target Improvements:** Update mandatory TGDS targets to align with the latest sustainability goals and market trends, considering the advancement of key energy efficiency and renewable energy targets.
- **Prescriptive vs. Performance Targets:** Use a combination of prescriptive and performance-based targets in TGDS to provide flexibility for developers while encouraging innovation.



APPENDIX 1

Approach	Pros	Cons	Recommendation
Mandatory Tiered	<ul style="list-style-type: none"> · Most effective approach · Periodical improvements targets · Encourages the voluntary uptake of higher targets · Prepares market for tier advancements into the future · Easy to update targets when moving to next tier 	Developer pushback	#1 <ul style="list-style-type: none"> · Recommended approach to achieve EG's desired sustainability outcomes. · Identifying future mandatory tiers helps prepare local markets for what's to come.
Single Tier	<ul style="list-style-type: none"> · Like mandatory tiered approach with only one set of ambitious targets 	Developer pushback No information about future target updates	#2 <ul style="list-style-type: none"> · Recommended to advance if there is limited staff capacity to identify and consult on future tiers. · Must identify a tentative future date for tier update.
Points based	<ul style="list-style-type: none"> · Flexible - Developers have options to pick and choose targets to advance 	EG has no control over which targets get advanced Ambitious targets may not get significant uptake	#3 <ul style="list-style-type: none"> · Not recommended · If advanced, EG must carefully balance energy and emissions with other sustainability features to ensure desired targets are achieved.

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