October 11, 2017

Chair Shiner and members of the Planning and Growth Management Committee
City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Chair Shiner and members of the Planning and Growth Management Committee,

RE: PG 23.9 Toronto Green Standard Review and Update

With more than 1,450 member-companies, the BILD is the voice of the land development, home building and professional renovation industry in the Greater Toronto Area and Simcoe County. Our industry is essential to the City of Toronto’s long-term economic strength and prosperity. In 2016 alone, the residential construction industry in Toronto generated over 68,000 on-site and off-site jobs in new home building, renovation and repair – one of the City’s largest employers. These jobs paid $4 billion in wages and contributed $11.5 billion in investment value to the local economy.

In advance of the staff report entitled “Toronto Green Standard Review and Update” being heard at the October 12th Planning and Growth Management Committee meeting, BILD members met in consultation with City staff on September 6th and a few refinements were made based on the feedback from our membership. We thank you for the opportunity to submit this letter, which comprises of two recommendations and discussion on the outstanding and overarching comments of our membership.

BILD Recommendations:

- We would like to take this opportunity to reinforce the need for an incentive package, especially as it relates to the development charges credits and request consultation for the forthcoming incentives.

- In order to maintain service delivery timelines for approvals and avoid re-working development plans that have undergone significant review, we also request additional transition time for existing re-zoning applications that will need to submit site plan applications. For example, the TGS could apply to new re-zoning applications commencing in May 2018 and new site plan applications commencing in May 2019.

From the start of this review, our membership have expressed the importance and need of an “incentive package” that will be associated with the proposed tiers 3 and 4 and the continuation of the development charges credit for tier 2. It is imperative to note that an incentive package makes the program viable. Without it, the affordability of new homeownership would be further challenged. We acknowledge that this incentive package is not included in the current staff report, as the City is waiting on the results of the Green Ontario Fund, which is currently under development, and that this component of the work will continue into 2018.

Additionally, BILD continues to hear concerns from our membership regarding the impact of the May 2018 implementation date on existing re-zoning applications. Following lengthy negotiations with the City in obtaining a zoning approval, these new requirements could trigger costly changes through the site plan approval process.
The impact of these changes could result in new building elevations being required and subsequent impacts on black-line drawings and renderings used for sales, condo/lease docs, public consultations and non-residential lease agreements. Any major or minor adjustments to these plans will have a financial impact on the project, reduce the affordability of the end units, and may ultimately result in breach of contract for our members for sales/lease agreements.

We hope you will take our recommendations into consideration and we thank you again, for the opportunity to submit these comments. Should you have any questions, please contact the undersigned.

Sincerely,

Danielle Chin MCIP RPP
Senior Manager, Policy & Government Relations

Cc: Gary Switzer, BILD Toronto Chapter Chair
    BILD Toronto Chapter Members