



June 25, 2021

Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2

RE: PH25.17 Toronto Green Standards Review and Update

Dear Chair Bailão and members of the Planning and Housing Committee,

The Residential Construction Council of Ontario (RESCON) represents over 200 residential builders of high-rise, mid-rise and low-rise buildings in the province, with a specific focus on the GTA. 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. RESCON understands that at the June 28th Planning and Housing Committee meeting, the Toronto Green Standards (TGS) Review and Update will be discussed under agenda item PH25.17.

RESCON has been collaborating with our industry partner, BILD, with respect to the TGS Review and Update. We would like to take this opportunity to formally echo the concerns noted in BILD's submission, dated June 24th, which provides industry feedback to specific requirements under the Toronto Green Standards and recommendations to the Committee going forward.

We have been having regular dialogue and meetings with BILD and support their position and concerns expressed in their letter. Specifically, we agree with BILD's recommendation that *the Committee does not endorse the Review and Update*.

While we are encouraged by recent engagement and discussions with City Planning, we would support the creation of a formal industry working group to ensure that proposed changes are feasible for developers, without hindering the ability of the building industry to deliver much needed housing. Moreover, we think more robust industry consultations would be beneficial and we encourage that going forward.

As stated in previous communications to staff within City Planning, there are TGS related costs that are of concern to the building industry as the tiers progress. For one, the associated additional costs of moving beyond the mandatory Tier 1 have prevented many builders from proceeding down the path of voluntarily attempting higher tiers, as evidenced by the fact that only 60 of the 2100+ building projects submitted since 2010 have achieved Tier 2.

While the City has provided costing analysis as part of the zero emission building framework, the analysis is not recent and pre-dates the current pandemic we are still working through. It is our view that the cost estimates prepared for the City in relation to the TGS do not adequately capture market costs that builders are facing and also do not take into account pandemic related challenges. Moreover, prior analyses do not consider COVID related labour disruptions and supply chain inconsistencies which have reduced overall industry capacity and productivity.

For these reasons, the costing analysis previously performed by the City is now out of date and no longer reflective of the current construction environment and therefore should not be taken as



sufficient cost-benefit analysis to move forward with advancing TGS tiers. Furthermore, without a more fulsome understanding of the cost implications attributed to the TGS requirements, the City cannot adequately develop and administer the affiliated TGS Development Charge Refund program, which again underscores why there has been very little voluntary uptake by the industry for Tier 2 and above projects.

To reiterate, we are supportive of all points raised in the BILD letter and encourage ongoing consultations and dialogue with members of the building industry on the TGS.

Sincerely,

Paul De Berardis
Director of Building Science and Innovation

Copy to:

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