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Re: Zoning for Low-Carbon Technologies - Electric Vehicle (EV) Charging

Recommended Zoning By-law 569-2013 Amendment

We are writing today to express our support for (1) s.38 of the above-referenced proposed zoning by-law amendment, namely the introduction of new regulation 200.5.10.1(13) to permit EV charging equipment to be installed in certain lawful parking spaces (the “Proposed Amendment”) and (2) further efforts by the City of Toronto to review Toronto’s zoning by-law with a focus on climate action and Toronto’s 2040 net zero goal.

Many municipalities across North America have reviewed parking minima in commercial contexts and concluded that modifications are required to ensure that parking spaces can be converted to allow for dedicated EV charging. The Proposed Amendment is important to help ensure that commercial parking lot owners are not prevented from making investments that are critically required to help more Torontonians and visitors drive electric. The City has a major charging gap to close. While charging can be provided on city-owned lands, realistically, the only way to achieve widespread charging coverage within a reasonable time will be to also leverage private investment and private lands. Private sector investment tends to be more likely in situations where there is a clear, predictable, and streamlined regulatory approval process.

As a matter of next steps, CCIC suggests a no-permit approach for public EV charging deployment on all existing parking lots. As a general matter, best practice for municipalities in



Canada is to confirm that no permit is required in situations where a parking space is already in use for parking purposes (see infographic below). BC Hydro commissioned [a guide regarding streamlining public EV charging regulations and approvals](#) from Dunsky that is particularly useful for municipalities seeking to capture EV charging investment and support their residents and businesses in reducing what is often the first- or, in the case of Toronto, [second-largest](#) source of greenhouse gas emissions within their borders (transportation).

	OPTION 1 No Permit/As-Rights Public EV Charging Permit	OPTION 2 Standalone Public EV Charging Permit
Description	<ul style="list-style-type: none"> ▶ No permit (1A): establish criteria (Toolkit Section 4.2) that are enforced on the basis of complaints or audits, as is common for many local bylaws. ▶ As-rights permit (1B): applicants are automatically issued a permit provided they attest that they meet certain criteria (Toolkit Section 4.2). This approach could allow local governments to track EV charging deployment while offering fast approvals. 	<ul style="list-style-type: none"> ▶ To be used if Option 1 is not meeting needs or is otherwise considered insufficient. ▶ One-window application. ▶ A dedicated local government team coordinates review, establishes clear criteria for approval (Toolkit Section 4.2), and clear service standards and timeline commitments. ▶ Depending on the local government's context and practices, the standalone permit could be a new unique Public EV Charging Permit, or created as a sub-type of development permit (DP) or other existing permit.
Process & Review	<p>No Permit (1A):</p> <ul style="list-style-type: none"> ▶ No submission by EV charging developer ▶ No review by staff <p>As-Rights Permit (1B):</p> <ul style="list-style-type: none"> ▶ Developer submits attestation confirming that they conform to defined criteria. ▶ Attestation form reviewed by staff OR automatically (via electronic submission). If attestation is complete, permit is issued. 	<p>Standalone Permit Process & Review</p> <ul style="list-style-type: none"> ▶ Developer submits completed application checklist. ▶ Reviewed by staff for completion. If complete, permit is approved. ▶ The defined criteria for a streamlined approval would not require any civil or mechanical drawings to be reviewed.

Option 1 is preferred. If your community is weighing the two Options presented here, consider that it is always possible to begin with a No Permit/As-Rights Permit system (Option 1). Both Option 1 variations (1A and 1B) are strong choices, though Option 1A is the most streamlined. More staff-intensive permitting processes for public EV charging (Option 2) can be adopted in the future if necessary.



CCIC thanks you for your important work on this matter. We would be pleased to discuss our recommendations or any other topics that may support you in your work.

Sincerely,

A handwritten signature in black ink, appearing to read 'Travis Allan', written over a light blue rectangular background.

Travis Allan
President and CEO, CCIC
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Canadian Charging Infrastructure Council (CCIC)

The CCIC seeks to achieve a comprehensive and economically sustainable electric vehicle (EV) charging ecosystem across Canada. CCIC members represent over 50% of public charging sites in Canada.

CCIC members believe that this mission can be supported by providing governments and stakeholders with trustworthy, economically and technically sound advice and advocacy leveraging the expertise and experience of its members.

CCIC is open to members that are involved in the EV charging industry including station owners, network and station operators from the public and private sectors, charging technology providers and suppliers, charging installers and maintainers and related infrastructure service providers and entities providing financing for charging station deployment and operation, including via credit transactions and project financing.