

November 5, 2010

Philip Parker
Local Government and Planning Policy Division
Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 14th Floor
Toronto ON M5G 2E5

**Re: Provincial Policy Statement, 2005 Review
Comments from the Greater Toronto Chapter of the Canada Green Building Council (CaGBC) –
Municipal Leaders Forum**

Dear Mr. Parker:

On behalf of the Greater Toronto Chapter (GTC) of the Canadian Green Building Council (CaGBC) we would like to thank the Ministry of Municipal Affairs and Housing (MMAH) for the opportunity to participate in the review of the Provincial Policy Statement, 2005 (PPS).

Established in 2003, The Canadian Green Building Council is a non-profit national organization dedicated to working with government and the private sector to accelerate the “mainstream adoption of green building principles, policies, practices, standards and tools”.

The GTC represents a vibrant community of over 3,000 building professionals, policy makers, suppliers, NGO's, educators and consumers interested in advancing sustainable building practices in Ontario. The GTC acts as a catalyst for green building across the Greater Golden Horseshoe of Ontario by facilitating market transformation.

As a vital and active part of the Chapter's activities, the Municipal Leaders Forum (MLF) was established in 2007 with the specific objective of providing a forum for information sharing, enhanced dialogue and networking between professionals involved in the green building and sustainable development sectors at the local municipal level. The MLF Group meets on a quarterly basis and involves a membership which extends broadly across the GTA.

We have identified several areas of intersection between the principles of sustainable building and the Provincial interests expressed with the PPS. The following discussion is a road map to the opportunities for advancing sustainable building practices within the policy framework of the PPS.

Summary of our Position

- The Province must play a leadership role in the promotion of sustainable building practices at the local level through the creation of a Provincial “sustainability code” supported by a standard set of key performance indicators.
- The PPS must adopt a systems approach that considers the environmental, economic and social impacts of community building.
- The PPS should support the adoption of green building practices as a method to implement affordable, resource efficient and healthy housing.
- Climate change adaptation strategies must be required and included in green building practices.
- The promotion of green building technology and products represents an opportunity to position Ontario at the forefront of an emerging business sector and is closely aligned with the Green Energy and Economy Act and the Water Conservation and Water Opportunities Acts.

Discussion

Building Strong Communities (Policy 1.0)

The first policy section of the PPS addresses building strong communities and the elements required to sustain a healthy and safe community. This section identifies efficient land use patterns, appropriate range and mix of land uses and environmental protection as important considerations in ensuring strong communities. However, we believe that these policies do not address the core principles of sustainability necessary to ensure that our communities remain strong in the face of growth pressures, climate change and the increasing scarcity of non-renewable resources.

We would strongly recommend that the PPS require an integrated approach to community planning, considering the systemic impacts of building design, transportation, roads, parks and utility infrastructure on municipal development and regional natural, economic and social resources

Housing (Policy 1.4)

This section of the PPS identifies the need to provide an appropriate range of housing types and densities to meet the needs of current and future residents. In particular, this section addresses the need to maintain an available supply of land to accommodate residential growth, affordable housing targets, and the promotion of housing densities that use land, resources and infrastructure efficiently.

Currently, the PPS has the sole focus on managing growth. This section must be updated to look at the social, economic and environmental impacts of housing our residents. The PPS should be updated to identify the need for housing that contributes to the health of the occupants is, affordable to build and operate over the life of a building, has a small carbon footprint and is resilient to climate change.

Long-Term Economic Prosperity (Policy 1.7)

The Province has already shown leadership in the promotion and advocacy of the clean technology sectors in Ontario, as expressed in the Green Energy Act, the Water Opportunities and Water Conservation Acts. The PPS should be updated to provide policy direction to promote clean technology within the Province of Ontario and to reflect and align with these new pieces of legislation. Early adaptation of green building technologies into the Ontario Building Code Act will assist in the advancement of green building practices within the Province. Further, inclusion in the Ontario Building Code will create a consistent set of requirements and a level playing field for the development industry.

We are also calling on the Province to show similar leadership in the promotion of green building technologies by including direction in the PPS which would:

- remove obstacles to bringing reliable green and clean technologies and practices to the market in an economical and timely fashion; and
- provide subsidies to new technologies developed in Canada until they have become established in the marketplace.

Energy and Air Quality (Policy 1.8)

This Section of the PPS currently addresses energy efficiency and improved air quality through land use and development patterns. It is our position that the scope of this section should be expanded beyond energy and air quality to encourage reduced resource consumption on the building, neighbourhood and community scale. We recommend that fundamental to this section is the promotion of the integrated design/systems approach to planning and design. The goal of this section is to achieve significant reductions in resource inputs and outputs throughout the full lifecycle of the communities we build. Specifically, this section should address the elements required to build, live in and sustain an entire communities such as non-renewable energy, renewable energy, air quality, water consumption, waste generation, waste diversion, water production and waste water production. To reflect the update to this section we would suggest that it be entitled “Reduced Resource Consumption”.

Climate Change

Ever increasingly, municipalities are considering climate change impacts in their land use and infrastructure planning considerations to increase resiliency to extreme weather including heat events, storms and flooding. Climate change mitigation and adoption policies should be incorporated into the PPS in such a way that the Provincial Policy would provide support for municipalities with which to prepare climate change adaptation strategies and incorporate green building practices into their policy documents.

Implementation (Policy 4.0)

In the absence of Provincial direction and leadership, many municipalities are developing and implementing individual sustainable development policies, plans and programs creating lack of consistency between jurisdictions for the development industry.

We believe it is fundamental that the Province establish leadership and strong guidance on sustainable development through the creation of a province-wide “sustainability code”.

The “sustainability code” should establish a regulatory set of minimum key performance indicators, applicable province-wide, which are complimentary to the Ontario Building Code, that address the environmental, social and economic impacts of sustainable development. Initially, we envision that the “Sustainability code” would take a similar form as the Natural Heritage Reference Manual (NHRM) and over time would include more performance metrics as modeling is completed. This would ensure that the Ontario approach to green building is truly balanced between environmental, social and economic considerations.

By getting into the “green building business” the Province can demonstrate a leadership role and ensure that a consistent approach and level playing field exists within the Province of Ontario. Further, by enshrining the principles of green building principles in the PPS, the Province can provide Ontario municipalities with a planning policy framework from which to implement green building strategies.

We look forward to future opportunities to participate in the PPS review and help improve land use planning in Ontario. To schedule a meeting or for further information, please have your staff contact Dan Stone, Chair of the Municipal Leaders Forum on Green Building, at 416-214-1344 or by e-mail dstone@waterfrontoronto.ca.

Yours Truly,



Susan Lewin Spencer
Chair of the Board of Directors
Greater Toronto Chapter – CaGBC



Lyle Shipley
Executive Director
Greater Toronto Chapter – CaGBC