

Ministry of Municipal Affairs and Housing
Planning and Housing Policy Branch
777 Bay St
Toronto, Ontario
M7A 2J3

May 13, 2026

**RE: Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and
Municipal Act, 2001 Changes. Bill 98, Building Homes and Improving
Transportation Infrastructure Act, 2026**

The Toronto Society of Architects (TSA) has long played an advocacy role in Toronto and the surrounding region, speaking up on issues related to the built environment and its impact on the life and wellbeing of Ontarians. It is in this role that we welcome the opportunity to comment on the proposed legislative changes under Bill 98, the *Building Homes and Improving Transportation Infrastructure Act, 2026*.

While the TSA supports the premise of faster and more efficient construction—including the harmonization of sustainability standards and the streamlining of approval processes—we are concerned that the changes as proposed prioritize speed at the expense of quality, and will result in long term liabilities, financial and environmental, that will become a burden for future Ontarians. In particular, removing the authority of municipalities to require Green Development Standards (GDS) without introducing an equivalent provincial replacement program, risks losing many of the gains made by these standards in areas like energy efficiency, sustainability and resiliency—all critical to the long-term durability and usability of our building stock.

In the absence of meaningful energy efficiency updates to the Ontario Building Code—something that has not happened since 2017—municipalities, and the millions of Ontarians who live in them, have had to rely on GDS to address the gaps between code minimums and current best practices. These standards have resulted in buildings that are easier to maintain, cost less to operate, and are better equipped to deal with our changing climate. Feedback from our membership, including a recent roundtable with member practices on Municipal GDS, confirms that programs like the Toronto Green Standards have had a positive impact on the quality of our built environment and the health of our cities.

While we recognize that there is room to improve current GDS programs, we strongly believe the principles and goals behind these programs are of significant benefit to all Ontarians.

Should there be a desire to pursue an Ontario-wide approach to sustainability standards, we urge that this change is carried out only after the development of a robust, equivalent replacement framework with a clear transition strategy that safeguards the quality of the built environment. This framework should be jointly developed by all key stakeholders, including design professionals, developers, municipalities and the Province, and it should uphold the advances achieved by current municipal GDS programs.


There is much that needs to get built in Ontario, and how we decide to build it will have ramifications for many generations to come. While the need for efficiency and speed are undeniable, it is equally important that we prioritize sustainability, resilience and durability in the buildings and landscapes we deliver.

As always, we make ourselves available to work together for a better Toronto and Ontario.

On behalf of the Toronto Society of Architects Executive,



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