

November 20, 2025

The Honourable Doug Ford
Premier of Ontario

The Honourable Rob Flack
Minister of Municipal Affairs and Housing

Re: ERO 025-1101: Enhanced development standards at the lot level (outside of buildings)

Dear Premier Ford and Minister Flack,

On behalf of the Canadian Society of Landscape Architects (CSLA) and the Ontario Association of Landscape Architects (OALA), we are writing to express our deep concern regarding the potential legislation and regulatory changes under **the *Fighting Delays, Building Faster Act, 2025 (Bill 60)***. With the recently passed Bill 17 and the repeal of Toronto's Green Roof By-law, these measures will significantly limit the ability of Ontario municipalities to continue to ask for requirements that support community resilience, public realm performance, and sustainable mobility. **This will:**

- **directly influence the health and safety of Ontario's residents;**
- **impact employment in a well-established natural infrastructure industry; and**
- **reduce Ontario's stature as a leader in green standards.**

Why We Are Writing

Landscape architects are deeply involved in the planning and design of Canadian cities, working at the interface of natural systems, built infrastructure, and community design. The expertise of our members includes implementing enhanced development standards, nature-based solutions, mobility corridors, stormwater management, green roofs, urban forests and climate-resilient community design, the very tools affected by the potential and proposed legislation and regulatory changes.

As such, the CSLA and OALA have direct interest in legislation that could affect new development and that hinders community standards and best practices for the health and safety of the people of Ontario. It is on this basis that we submit comments and concerns.

Proposed Changes Work Against Ontario's Priorities

The CSLA and OALA recognize and share the Government of Ontario's goals to address the housing crisis by improving regulatory efficiency and ensuring that public and private investments are cost-effective. However, based on established evidence and decades of professional experience, the proposed measures will:

1. **Increase long-term costs for developers/property owners and all levels of government.**
2. **Reduce livability, well being and health and safety of residents in cities, especially in densely populated areas.**
3. **Reduce employment in the well-regarded green infrastructure Industry in Ontario.**
4. **Impede efficient and effective planning that benefits all parties, including provincial, municipal, industry and the public.**

1. Increased long-term costs

Eliminating enhanced development standards may ultimately raise lifecycle costs, not reduce them. Economic data confirms that the green infrastructure sector delivers \$4.64 billion in direct GDP annually (GIOC, 2022). These systems lower peak stormwater flows, reduce energy use, avoid infrastructure repair costs, and support efficient municipal budgeting. International analysis shows that **every \$1 invested in nature-based adaptation yields approximately \$4 in avoided losses and economic, social, and environmental benefits (IUCN, 2025)**. This evidence reinforces that resilient site-level standards are fiscally responsible, reduce public costs, and align with Ontario's goals to support affordable development.

2. Reduced public health and safety

Green infrastructure and other enhanced development standards are not “high-cost premium time-wasting design demands” as referenced recently by the Minister. These features improve air and water quality, reduce heat-related illness and mortality, enhance pedestrian, cyclist, and roadway safety, and support healthier, more affordable and more accessible communities. The public health risks of removing these tools are well documented. Following the 2021 heat dome in British Columbia, The *BC Coroner's Death Review Panel* concluded that **extreme heat is now a mass-casualty natural hazard and that long-term risk mitigation must include expanding urban tree canopy, increasing permeable surfaces, improving shading, and reducing urban heat island effects**—precisely the types of standards affected by the proposed legislation. These findings underscore that these design features are **essential, evidence-based public health and safety measures**.

3. Reduced Employment in the Green Infrastructure Industry

Ontario's green infrastructure sector is a major employer and economic driver. An economic impact assessment prepared on behalf of the Green Infrastructure Ontario Coalition, estimates that, in 2018, **the sector supports over 84,000 direct jobs, expanding to more than 120,000 jobs** when indirect and induced employment are included (GIOC, 2022). These jobs span the full project lifecycle—from technical design and planning, manufacturing and supply, construction and installation, and operations, maintenance, and stewardship—and align with the types of work that will be eligible for support under the federal government's newly announced Youth Climate Corps, which will invest in training and employment for young Canadians to support resilient development, and to respond to Canada's growing green infrastructure needs (Budget 2025).

4. Impediments in efficient and effective planning

Ontario municipalities are facing escalating risks and have a responsibility to plan for public safety, infrastructure capacity, and long-term fiscal sustainability. They are already contending with a \$52-billion infrastructure deficit (AMO), much of it related to stormwater systems, roads, and climate-vulnerable public assets. Without the ability to require lot-level green infrastructure at the time of development, municipalities will be forced to rely on far more expensive retrofits, further widening this infrastructure gap and delaying implementation of cost-effective resilience measures. Limiting these planning tools creates uncertainty, fragments coordination across jurisdictions, and undermines the Province's stated goal of streamlining development processes.

Recommendations

The CSLA and OALA respectfully recommend that the Government of Ontario work with municipal authorities and Ontario's qualified professionals to:

1. **Develop and adopt harmonized, evidence-based development standards for lot-level measures** that benefit all parties, including provincial, municipal, industry, and the residents of Ontario.
2. **Establish streamlined and cost-effective administrative mechanisms** that provide clear, reasonable pathways for designers, developers, and approval authorities.
3. **Co-develop regulatory approaches that protect long-term sustainability and public safety**, ensuring that Ontario's planning framework continues to support climate resilience, efficient infrastructure, and affordable housing outcomes.
4. **Demonstrate continued leadership** by creating provincial guidelines that municipalities can use efficiently and effectively, while still enabling local, context-sensitive design solutions.

The CSLA and OALA would welcome the opportunity to assist in a technical working group or early scoping discussions in support of the provincial targets for housing while enhancing a system to better accommodate the infrastructure needs necessary for a healthy, safe community and city.

For over 90 years, landscape architects have been shaping Canada's built environment. We see firsthand how Green Development Standards can and do make communities safer, affordable, and more resilient. These tools are essential to delivering the healthy, climate-ready communities Ontarians seek.

Thank you for the opportunity to provide comments on this important issue.

Sincerely,



Matthew Mills APALA CSLA
President
Canadian Society of Landscape Architects
(CSLA)



Aaron Hirota OALA CSLA
President
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(OALA)

*The **Canadian Society of Landscape Architects (CSLA)** is the national voice of the landscape architecture profession. In 2024, the CSLA celebrated its 90th anniversary, marking nearly a century of leadership in community planning, green infrastructure, public realm design, and integrated development standards.*

*With more than 2,000 members, the **Ontario Association of Landscape Architects (OALA)** is a self-regulating professional association that has proudly served Ontario since 1968. As the provincial regulator of the landscape architect title, the OALA exists to serve the public interest by ensuring the competence, accountability, and ethical conduct of its members. The Association sets professional standards for licensure, promotes the value of the profession to government and the public, and provides resources and continuing education to its members.*