

November 21, 2025

Hon. Rob Flack  
Minister of Municipal Affairs and Housing  
Government of Ontario

**Re: ERO 025-1101 Consultation on Enhanced Development Standards – Lot Level (outside of buildings)**

Dear Minister Flack,

I am working in Ontario's green roof industry, and I am writing to express my concerns about the above proposal. While I appreciate the province's goals to address housing crisis by removing red tape and reducing costs and delays, I am deeply concerned that revoking the Toronto Green Roof Bylaw and removing municipalities' abilities to enforce enhanced development standards on lot levels will have devastating consequences.

**Enhanced Development Standards Reduce Life-Cycle Costs**

The Ontario Building Code (OBC) establishes minimum standards for building design and construction. It does not address the diverse needs and priorities of different municipalities across the province, e.g. our urban centres face very different challenges compared to the rural areas such as flash floods, urban heat island, biodiversity decline, lack of green space and poor livability in a concrete jungle. Enhanced or green development standards combine OBC and municipal priorities into a streamlined document to set sustainability goals that not only address their residents' current but also future needs.

These enhanced requirements often incur upfront costs that will be amortized through operational efficiency/savings throughout the lifetime of the building. On a building level, for example, a green roof will increase the service life of the roof membrane by 2-3 times thus reducing waste and saving re-roofing costs, while increased energy efficiency will lower energy bills every year. On a city's level, for instance, green infrastructure can reduce flood risks, erosion downstream and improve water quality. **Eliminating enhanced development standards will increase the long-term costs for Ontarians and the municipalities.**

**Green Roofs and Green Infrastructure are Cost Effective Functional Infrastructure**

**Green infrastructure such as green roofs, rain gardens, bioswales are not amenities, they are nature-based stormwater management tools that are proven to reduce runoff, attenuate peak flow and clean the water.** They are cost-effective and require less maintenance than traditional tanks and underground sewer network. In addition to managing stormwater, green infrastructure offers other ecosystem services such as mitigating urban heat island and supporting biodiversity.

I have been working in the green roof industry for over 20 years, many of those in Ontario. The cost of a basic green roof system is \$20-30 per square foot, which as one of my customers aptly commented “cheaper than bamboo flooring”. Moreover, this cost is shared by ALL the condo units in the building, which converts to less than \$1 per square foot to the upwards of \$1,000 per square foot selling price of each unit. Yet the green roof provides so many environmental, economical and social benefits to the residents of the building and beyond to the community and the environment. These are detailed in the [Report on the Environmental Benefits and Costs of Green Roof Technology for the City of Toronto](#) that was prepared by Ryerson University (now Toronto Metropolitan University) for the City of Toronto in 2005 that provided quantitative evidence to support the launch of the Toronto Green Roof Bylaw in 2010. In addition, it normally takes less than 2 weeks to install a typical green roof as per the Toronto Green Roof Bylaw. This hardly registers in the enormous Gantt chart of a construction project.

### **Prohibiting Enhanced Development Standards Endangers Ontarians**

Climate change is affecting our communities and environment with record-breaking temperatures, heatwaves and floods that threaten the health and well-being of Ontarians. We need to better adapt and prepare for more frequent, severe and unpredictable climate-related disasters that we are facing today and even more so in the future. Enhanced development standard is a critical policy tool for municipalities to increase climate resilience, achieve Green House Gases (GHG) reduction targets and align with Federal government’s National Adaptation Strategy.

**Prohibiting municipalities to enforce enhanced development standards will reduce climate resilience in our community, an extremely dangerous step backward that Ontarians cannot afford in a climate emergency.** The provincial government could, on the contrary, take the leadership in spearheading a province-wide harmonized enhanced development standard that improves regulatory efficiency. It could invite stakeholders in the construction industry including not only developers but municipalities, conservation authorities, engineers, building scientists, planners, architects, landscape architects, contractors, manufacturers, suppliers, users...etc. to the table so all voices are heard, initiate honest dialogues to come up with effective solutions that actually address the housing issues while climate-proofing Ontario.

### **Restoring Enhanced Development Standards in the Short Term**

The announcement of Bill 60 has already created confusion and uncertainties in the construction sector in the past 4 weeks. Developers and municipalities are putting a pause as the bill is being debated at Queen’s Park. Since it will take time to for the province to develop a harmonized enhanced development standard, it is critical to have a transition plan ready in the short term to provide some clarity in the industry. I would respectfully urge the province to **restore the municipalities’ abilities to enforce their enhanced development standards while the harmonized province-wide standard is being developed.**

In conclusion, I respectfully ask the province to recognize green infrastructure, including green roofs, as cost-effective tools in climate change adaptation and mitigation, and enhanced development standards can reduce life-cycle costs in the long term. The province has the opportunity to demonstrate its leadership by working with the construction industry to develop a province-wide harmonized green development standard that will streamline regulatory process across different municipalities. In the meantime, I would urge the province to restore municipalities' abilities to enforce enhanced development standards at the lot level outside the buildings to avoid uncertainties and confusion that can cause unintentional delays.

Sincerely,



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