

November 22, 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 writing to express my concerns about the proposal to remove municipalities' ability to enforce enhanced development standards. While I appreciate the province's intent to reduce red tape and address housing affordability, eliminating these standards will create significant long-term financial burdens for municipalities, particularly in stormwater management, and will not achieve the effect the province aims for.

Enhanced Development Standards Reduce Municipal Costs

The Ontario Building Code (OBC) sets minimum requirements for construction, but it does not account for the costly stormwater challenges faced by urban municipalities. Enhanced development standards allow cities to integrate stormwater priorities directly into building requirements, ensuring that upfront investments reduce downstream costs. Without these standards, municipalities will face higher infrastructure costs for flood control, erosion repair, and water treatment.

Municipal Alignment on Stormwater Standards

Although enhanced development standards differ in detail, municipalities across Ontario have already aligned on key stormwater requirements. Toronto, Mississauga, Halton Hills, Aurora, East Gwillimbury, King, Vaughan, Richmond Hill, Markham, Clarington, Whitby, Ajax, and Pickering all mandate 5 mm of stormwater retention at the lot level. This shared baseline demonstrates a coordinated approach to reducing runoff, lowering flood risk, and avoiding costly infrastructure upgrades. By standardizing these common elements province-wide, Ontario can achieve the very goals it has set: streamlined, consistent construction standards, while ensuring municipalities are not left with escalating stormwater management costs.

Green Roofs and Green Infrastructure as Functional Stormwater Assets

Green infrastructure, such as green roofs, rain gardens, and bioswales, should be recognized as cost-effective lot-level stormwater management tools rather than optional amenities. They reduce runoff, slow peak flows, and improve water quality at a fraction of the cost of traditional underground tanks and oversized sewer pipes. Maintenance requirements are lower, and the avoided costs of flood damage and system upgrades are

substantial. For municipalities, every litre of stormwater diverted through green infrastructure represents savings in treatment, repair, and emergency response.

Cost Efficiency at the Building Level

The cost of a basic green roof system is approximately \$20 -30 per square foot. Spread across condominium units, this translates to less than \$1 per square foot compared to selling prices of \$1,000 per square foot or more. For developers, this is a negligible addition; for municipalities, it is a critical investment that reduces millions in future stormwater infrastructure expenses. Installation timelines are short, typically under two weeks, meaning these systems do not delay construction schedules.

Impact on Ontario's Economy and Jobs

As a business owner in Ontario's green roof industry, this proposal directly affects my livelihood and that of my employees. Cutting enhanced development standards threatens a \$75 million industry that contributes to Ontario's economy and supports approximately 1,600 jobs. These are skilled positions in design, manufacturing, installation, and maintenance, jobs that will be lost if municipalities are stripped of their ability to require stormwater-focused solutions.

The Risk of Removing Standards

Revoking municipalities' ability to enforce enhanced development standards will shift stormwater costs from developers to taxpayers. Municipalities will be forced to expand sewer capacity, repair erosion damage, and manage increased flood risks, all at public expense. A harmonized provincial standard could streamline regulations, but until such a framework is developed, municipalities must retain the authority to enforce their own stormwater-focused requirements.

Conclusion

Green infrastructure, including green roofs, is proven, cost-effective stormwater management. Enhanced development standards are not barriers to housing, instead they are financial safeguards that prevent municipalities from bearing escalating stormwater costs. They also sustain a vital Ontario industry and thousands of jobs. I urge the province to restore municipalities' authority to enforce these standards in the short term, and to work toward a harmonized provincial framework that recognizes stormwater management as essential infrastructure and economic opportunity.

Sincerely,



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