

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

As ontario.ca puts it concisely “Ontario is a study in contrasts”. Ontario spans 5 National Energy Code Climate Zones, each with different energy efficiency requirements for their buildings. A multitude of watersheds that all have their unique features and varying levels of development impact including the over 100 combined sewer systems in the province. Its economy is a combination of agriculture, forestry, mining, manufacturing and service industry, with varied and often conflicting issues regarding growth, development and environmental impacts. The people, culture, language, demographic and education vary widely across the province’s rural areas, suburban communities and urban centres. The contrasts and diversity across the province create local challenges that require unique approaches when it comes to building construction and development standard.

The goal of the Ontario Building Code (OBC) is to establish a bare minimum standard for building design and construction, not to address the diverse needs across the province. For example, ~50% of Ontario’s population lives in the Greater Toronto Region, and Toronto is one of the most densely populated cities in Canada. Torontonians are facing very different challenges compared to their rural counterparts such as flash floods, urban heat island, biodiversity decline, lack of green space and poor livability in a concrete jungle. Naturally, they demand their municipal government to set a higher bar in building construction and enhanced development standards (Toronto Green Standard) to maintain livability in the city.

The 36 conservation authorities work with the municipalities to create enhanced development standards such that they will not only meet the current but **future** needs of their citizens. These requirements often incur upfront costs that will be amortized through operational savings throughout the lifetime of the building, from tangible benefits such as improved energy efficiency and reduced flood damage to intangible benefits such as improved health and well-being, cleaner air/water and enhanced biodiversity. These are directly and indirectly related to health and safety of the public (e.g. flood damage to our infrastructure). To encourage developers to build to the higher bar, municipalities often offer incentives such as development charge rebates to offset the higher upfront costs.

Essentially, enhanced development standards and site plan control answer Ontarians’ demand for better buildings and higher livability. As each region and each municipality faces different challenges, it is necessary for the local authorities to develop their unique solutions. This is NOT about “consistency” across the province because there is no one-size-fits-all solution. For example, while stormwater ponds work well in managing stormwater in rural/suburban communities, they are not feasible in urban centres where land value is at a premium, where green roofs are a cost-effective solution. This for example

led to the Toronto Green Roof Bylaw that came into effect in 2010 to address Toronto's own unique needs.

I have been working in the green roof industry for almost 19 years in Ontario. The cost of a basic green roof system supplied and installed is \$20-30 per square foot, which can be cheaper than some flooring or patio stone options. In addition, this cost is shared among ALL the condo units in the building, which adds less than \$1 per square foot to the selling price of each unit, yet the green roof provides so many environmental, economical and social benefits to the residents of the building, the community and the environment.

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 in the future. As a province, we need to build to higher standard, not status quo. Prohibiting municipalities for demanding enhanced development standards will weaken our resilience to climate change, an extremely dangerous step backward that we sets us up for multiple health and safety concerns going forward

The provincial government should, on the contrary, encourage enhanced development standards across Ontario. It should 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 solutions that address the housing issues while futureproofing Ontario.

Municipalities should be empowered to require lot-level standards that address

- **Stormwater retention through green infrastructure like green roofs, bioswales, soft landscaping:** Prevents flooding and reduces strain on municipal infrastructure.
- **Tree planting:** Improves air quality and reduces temperature at the street level.
- **Soil volume standards:** Ensure healthy tree growth and long-term canopy cover.
- **Bicycle parking:** Encourages active transportation and reduces emissions.
- **Resilient landscaping:** Reduces potable irrigation needs and maintenance costs.

These are not luxuries. They are *public health and safety tools* that help cities adapt to weather extremes, reduce smog, and prevent raw sewage overflows into our lakes.

I strongly believe that enhanced development standards are necessary in setting a higher bar to construction practice in the province, to create greener, safer and more livable cities that Ontarians will be proud to call home and attract foreign businesses to invest in our province. Nobody wants to live in a shoebox in a concrete jungle. Enhanced development standards are key to ensure that our housing stock will be resilient to climate change and will not only meet our current but also our future needs.