

October 21, 2019

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**Re: Provincial Policy Statement Review – Proposed Policies ([ERO 019-0297](#))**

Thank you for the opportunity to comment on the proposed policies included in the Provincial Policy Statement review.

The Green Infrastructure Ontario (GIO) Coalition is a multi-sectoral alliance comprised of private sector companies, industry associations, municipal and regional governments, community groups, and not-for-profit organizations. Together, we promote the implementation of green infrastructure across Ontario by providing a united voice for this vital and growing sector.

Green infrastructure includes everything from tree-lined streets, wetlands, urban parks and gardens, to green roofs, meadows, woodlots, grassed areas, urban agriculture, soils, and bioswales. It provides a range of services that can make a substantial contribution towards addressing the impacts of a changing climate, as well as climate change mitigation and emissions reductions. Such practices are a 'win-win' approach to tackling climate change, in part because they also help deliver multiple other social, economic and environmental benefits.

Green infrastructure has also been shown to have a high return on investment, create jobs, and can be a cost-effective complement (or alternative) to traditional grey infrastructure. In fact, the green infrastructure sector is already an important source of jobs – it employs over 150,000 people across the country. This includes people who work at small and large businesses as designers, growers, landscape architects, manufacturers, contractors and maintenance professionals.

The public consultation posed a number of questions regarding the proposed policies. Please find GIO's responses to several of the questions below.

***Do the proposed policies effectively support goals related to increasing housing supply, creating and maintaining jobs, and red tape reduction while continuing to protect the environment, farmland, and public health and safety?***

As stated in the proposed policies, "The long-term prosperity and social well-being of Ontario depends upon planning for strong, sustainable and resilient communities for people of all ages, a clean and healthy

environment, and a strong and competitive economy.”<sup>1</sup> GIO supports this statement, and believes that green infrastructure has a key role to play both in protecting the environment and creating a healthy economy.

We are pleased to see continued support for green infrastructure in the proposed policies, including:

- Definitions of green infrastructure and several green infrastructure components, including natural heritage, wetlands, and woodlands in the Definitions section.
- Policy 1.1.4.1 “Healthy, integrated and vibrant rural areas should be supported by g) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets; h) conserving biodiversity and considering the ecological benefits provided by nature”
- Policy 1.6.2 “Planning authorities should promote *green infrastructure* to complement *infrastructure*.”
- Policy 1.6.6.7 on planning for stormwater management, all of the subsections of which support the use of green infrastructure.
- Policy 1.7.1 “Long term economic prosperity should be supported by k) minimizing negative impacts from a changing climate and considering the ecological benefits provided by nature.”
- Policy 1.8.1 “Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for impacts of a changing climate through land use and development patterns which f) promote design and orientation which maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; and g) maximize vegetation within settlement areas, where feasible.”
- Policies in section 2.1 Natural Heritage
- Policy 2.2.1 “Planning authorities shall protect, improve or restore the quality and quantity of water”, several subsections of which support green infrastructure.
- Policy 3.2.3 “Planning authorities should support, where feasible, on-site and local re-use of excess soil through planning and development approvals while protecting human health and the environment.”

GIO also supports the increased emphasis on preparing for the impacts of a changing climate – studies consistently show that investments in adaptation have a very high return<sup>2</sup>. Living green infrastructure can be a key tool for building low carbon resilience<sup>3</sup>, providing both climate change mitigation and adaptation benefits – wetlands for example sequester carbon while providing flood control and water quality benefits, and the urban forest sequesters carbon while reducing the impacts of extreme heat.

### ***Do the proposed policies strike the right balance? Why or why not?***

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<sup>1</sup> Provincial Policy Statement Review Proposed Policies, July 2019. Part IV: Vision for Ontario’s Land Use Planning System, page 6.

<sup>2</sup> See, for example, [Adapt now: A global call for leadership on climate resilience](#) which estimates that a \$1.8 trillion investment globally in adaptation would return \$7.1 trillion in net benefits.

<sup>3</sup> Low carbon resilience is defined by the [Adaptation to Climate Change Team](#) at Simon Fraser University as “an approach that focuses on integrating climate change strategies that reduce greenhouse gas emissions (mitigation) and reduce vulnerability to climate change impacts (adaptation)”.

The Provincial Policies must ensure that increasing housing supply and improving economic growth do not come at the expense of environmental degradation. While many of the policies make this clear, there are a few examples which may be open to different interpretations.

For example, Policy 2.5.2.2 states that mineral and aggregate extraction outside of the Greenbelt can occur in natural heritage features, providing that “the long-term rehabilitation can demonstrate no *negative impacts* on the natural features or their *ecological functions*”. Without a clear definition of what is meant by long-term rehabilitation, this could mean that the ecological functions of the natural features could be disrupted for decades before being restored, which could result in significant negative impacts in the intervening years.

The policies in section 3 on Protecting Public Health and Safety have not yet been updated, pending review by the province’s Special Advisor on Flooding. GIO and its members, in particular the Conservation Authorities, who have a key role in protecting communities from the impacts of flooding and other natural hazards, request the opportunity to consult on the advisor’s recommendations when they are available.

***Are there any other tools that are needed to help implement the proposed policies?***

GIO would like to highlight several tools that would support the implementation of the proposed policies.

- 1) Updated stormwater management guidance for municipalities to support implementation of Policy 1.6.6.7.

Policy 1.6.6.7 states that planning for stormwater management shall “minimize erosion and changes in water balance, and prepare for the *impacts of a changing climate* through the effective management of stormwater.” This is consistent with other direction from the Province on stormwater management.<sup>4</sup>

Municipalities need support and guidance in order to ensure that their new and redeveloped stormwater systems are meeting these goals.

For several years, the Province has been developing a Low Impact Development (LID) Stormwater Management Guidance manual, which clarifies previous policies and gives direction to municipalities on how to reduce runoff volumes with green infrastructure rather than solely taking an end of pipe approach. Significant time and resources have already been invested in the development of this manual (GIO has been sitting on an advisory committee since 2016). GIO recommends that this manual be released for implementation as soon as possible.

- 2) Watershed planning guidance to support implementation of Policy 2.2.1

Policy 2.2.1, directs planning authorities to use “the *watershed* as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development” in order to protect, restore or improve the quality and quantity of water.

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<sup>4</sup> See also, for example [Policy Review of Municipal Stormwater Management in Light of Climate Change, A place to grow: Growth Plan for the Greater Golden Horseshoe](#)

In early 2018, the Ontario Government solicited public comments on draft Watershed Planning Guidance. The final version of this guidance has yet to be released.

GIO recommends that this guidance be revised based on the feedback received in the public consultation, and released for implementation.

3) Guidance for municipalities managing wetlands not deemed Provincially Significant (Policy 2.1.10)

The Ontario Government has recognized the importance of wetlands in preventing flood damage, improving water quality, creating habitat for wildlife, and providing economic benefits<sup>[1]</sup>. Southern Ontario, in particular, has already lost the majority of its wetlands and the ecosystem services they provide. In Policy 2.1.10, municipalities are given the option to choose to manage wetlands not covered by policies 2.1.4 and 2.1.5 in accordance with guidance developed by the Province. GIO recommends that this policy provide more clarity about the government's intended direction, including specifying that, if municipalities choose to conserve these non-provincially significant wetlands, it should be done using a mitigation hierarchy approach that prioritizes the avoidance of wetland impacts and results in a net gain.

A multi-sectoral advisory panel, which included representatives from diverse groups such as Conservation Ontario and the Ontario Home Builders Association, provided recommendations in 2018 on the development of a wetland offsetting policy for Ontario<sup>5</sup>. GIO recommends that the provincial guidance be developed to align with the panel's advice.

Thank you again for the opportunity to comment.

We would be pleased to provide any additional information that may be required. Please contact Jennifer Court, Executive Director of the Green Infrastructure Ontario Coalition at [jcourt@greeninfrastructureontario.org](mailto:jcourt@greeninfrastructureontario.org) with any questions.

Sincerely,

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Green Infrastructure Ontario Coalition  
Coalition

Jennifer Court, Executive Director  
Green Infrastructure Ontario

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<sup>[1]</sup> See [Wetland Conservation](#).

<sup>5</sup> [Considerations for the development of a wetland offsetting policy for Ontario](#).