Green Infrastructure
ONTARIO COALITION

January 25, 2019

Rachel Simeon
Director, Market Housing Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 14th Floor
Toronto, Ontario M5G 2E5

Re: Increasing Housing Supply in Ontario

Dear Ms. Simeon,

Thank you for the opportunity to comment of the development of Ontario's Housing Supply Action Plan.

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 and rural agriculture, soils, and bioswales. It provides a range of services that can make a substantial contribution towards climate change adaptation, and important contributions towards 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.

As the province pursues opportunities to improve provincial policies and plans to address barriers to creating more housing, GIO strongly recommends that the Housing Supply Action Plan protect policies that support efforts to implement green infrastructure practices. We offer the following recommendations for the Ministry's consideration as it finalizes its Action Plan.

416-661-6600 x 5337 msawka@greeninfrastructureontario.org

Recommendation 1: Retain the 2014 PPS definition and policy directions related to green infrastructure

The Provincial Policy Statement (PPS) provides direction on matters of provincial interest related to land use planning and development. Currently, municipalities use the PPS to develop their official plans and to guide and inform decisions on other planning matters. The 2014 PPS included the first formal provincial definition of green infrastructure:

> "natural and human made elements that provide ecological and hydrological functions and processes. Green infrastructure can include components such as natural heritage features and systems, parklands, stormwater management systems, street trees, urban forests, natural channels, permeable surfaces, and green roofs."

The 2014 PPS also includes the following directions for policies to promote green infrastructure practices:

- "Planning authorities should promote green infrastructure to complement infrastructure" (Section 1.6.2);
- "Planning for stormwater management shall (d) maximize the extent and function of vegetative and pervious surfaces" (Section 1.6.6.7); and
- "Planning authorities shall protect, improve or restore the quality and quantity of water including subsections related to green infrastructure" (Section 2.2.1).

It is critical that the green infrastructure definition and policy directions remain part of the PPS. This is because green infrastructure is a cost-effective complement (or alternative) to grey infrastructure, as well as an important and underutilized tool for increasing community resilience to the effects of climate change.

A cost effective option

The adoption of green infrastructure practices where appropriate can help municipalities optimize investments that achieve proposed levels of service, while maintaining assets at the lowest lifecycle cost. Its cost-effectiveness and multi-benefit nature means that municipalities should regularly be considering green infrastructure when approaching infrastructure spending decisions and asset management. Properly scaled and sited green infrastructure can deliver equivalent hydrological management of runoff as conventional stormwater infrastructure at comparable or lower costs. It has been estimated that green infrastructure is 5%-30% less costly to construct and about 25% less costly over its life cycle than conventional infrastructure of comparable performance.[i]

Many cities in the US are taking a fully integrated approach to stormwater management by making long term investments in both green and grey infrastructure.[ii] For example, the New York City Green Infrastructure Plan is projected to save the city $1.5 billion over 20 years by including both grey and green investments.

Climate Change

Green infrastructure provides a range of services that can make a substantial contribution towards climate change adaptation, and an important contribution towards climate change mitigation and emissions reductions. These services include improving water quality, reducing stormwater runoff, flooding, and erosion, decreasing high urban temperatures, reducing energy use, and contributing to local food production. Combined with their potential cost savings, green infrastructure practices are increasingly recognized as a desirable 'win-win'

approach to tackling climate change, in part because they also help to deliver multiple other social, economic and environmental benefits.[iii] Green infrastructure practices are adaptable to a variety of conditions and help municipal governments make sensible infrastructure investments in the context of uncertainty and volatility of future climate conditions.

The benefits of green infrastructure also extend beyond the financial and climate change realm to include provision of many other social, health and environmental benefits to communities, including:

- Job creation
- Reduced stress
- Better atmosphere for learning
- Reduced road rage
- Shorter hospital stays
- Improved mental health and productivity
- Lower energy consumption and costs
- Improved air quality
- Additional recreational space
- Increased active transportation
- Increased sense of community

Recommendation 2: Integrate green infrastructure planning in to the housing development process

Green infrastructure, including parks and natural heritage areas, should be at the forefront of development considerations. Together with agricultural land, they should be managed as a connected, contiguous system (not fragmented and preserved in isolation). This can create housing that is more desirable for residents, contribute to improved health and wellbeing, and help build a more resilient and functioning green infrastructure system. For example, in Peterborough, UK, Land and Property development company O&H Hampton show how commercial developers can put green space at the heart of development plans. Their 2,500 acres brownfield site has fifty per cent of the area being developed as open space, to include parks, lakes, woodland and nature reserves. This will provide the framework for 7,000 new homes plus retail, commercial and industrial areas eventually providing 12,000 jobs (http://www.ohhampton.co.uk/)

We would be pleased to provide any additional information required. Please do not hesitate to contact Michelle Sawka with any questions (michelle.sawka@trca.on.ca, 647-287-6540).

Sincerely,

Deborah Martin-Downs
Chair, Green Infrastructure Ontario Coalition

www.greeninfrastructureontario.org

---

[i]Green Infrastructure and Issues in Managing Urban Stormwater. Congressional Research Service. Online: http://nationalaglawcenter.org/wp-content/uploads/assets/crs/R43131.pdf

[ii] U.S. EPA, Green Infrastructure Case Studies: Municipal Policies for Managing Stormwater with Green Infrastructure. Online at: http://www.sustainablecitiesinstitute.org/topics/water-and-green-infrastructure/stormwater-management/green-infrastructure-case-studies-municipal-policies-for-managing-stormwater-with-green-infrastructure

[iii] http://www.greeninfrastructurenw.co.uk/climatechange/