

City Planning

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Provincial Land Use Plans Branch
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Re: Comments on Natural Heritage Policies – ERO 019-6813
Review of Proposed Policies Adapted from A Place to Grow and Provincial Policy
Statement to form a New Provincial Planning Policy Instrument

On behalf of the City of Toronto, I am pleased to submit supplementary staff comments regarding ERO 019-6813. The comments below focus exclusively on the natural heritage policies released on June 16, 2023, and are submitted in addition to the City of Toronto's comments on ERO 019-6813, dated June 26, 2023, submitted previously.

The draft natural heritage policies presented in the proposed Provincial Planning Statement closely match that of the Provincial Policy Statement, although changes were made to definitions in the proposed Provincial Planning Statement and the Growth Plan's natural heritage policies were eliminated.

COMMENTS

As previously stated in the City's June 26, 2023 comments, the proposed Provincial Planning Statement introduces policy changes that are likely to have negative impacts on the natural heritage systems. The removal of infill development as an explicit priority over settlement area expansions will lead to a loss in permeable lands, natural spaces and productive agricultural lands. The removal of key environmental themes (e.g., biodiversity) from the vision statement is concerning, as land use change and habitat loss are major drivers of biodiversity loss and species decline.

Change To the Proposed Definition of Natural Heritage Feature and Area

The proposed Provincial Planning Statement removed reference to "habitat of threatened species and endangered species" from the definition of natural heritage feature and area. This proposed change will remove key criterion such as 1) identifying what areas receive policy protection from development and site alteration; and 2) identifying elements of the natural heritage system. The habitat of threatened and endangered species has long been a key consideration for identifying Environmentally Significant Areas and natural areas where site development would not be permitted in Toronto. Land use planning is an important tool for the protection of the region's most vulnerable species and key habitat.

Removing “habitat of threatened species and endangered species” from the definition of natural heritage feature and areas would limit a municipality’s ability to protect key habitats as an element of the natural heritage system.

Recommendation

- Reintroduce habitat of endangered species and threatened species into the definition of *Natural heritage features and areas*.

Change to the Proposed Definition of Significant Wetlands

In alignment with recent changes to the Ontario Wetlands Evaluation System (OWES), the proposed Provincial Planning Statement has removed reference to the Ministry of Natural Resources and Forestry’s role in identifying wetlands as significant. This change was considered in the Environmental Registry posting 019-6160, with a decision posted on December 22, 2022. City Planning continues to have concerns related to the removal of Provincial oversight of identification or re-evaluation of Provincially Significant Wetlands. This change in oversight, alongside the changes in wetland criteria in OWES, are expected to decrease the level of protection for some significant wetlands across the province where re-designation occurs.

Recommendation

- Develop and implement, in collaboration with municipal partners, a public reporting tool to track the status of Significant Wetlands in Ontario, including any re-evaluations.

Loss of Growth Plan’s Natural Heritage Policies

The Growth Plan’s Natural Heritage System (NHS) policies included an important regional consideration and enhanced protection for the NHS within the rapidly urbanizing context of the Greater Golden Horseshoe. This includes requirements for new development and site alteration to: demonstrate that connectivity along the system will be maintained; avoid removal of natural features; limit the disturbed area and impervious surfaces within developable areas in the NHS; and require space within the developable area be returned to natural self-sustaining vegetation. In practice, these policies elevate protection for the Greater Golden Horseshoe’s NHS beyond the Province-wide policies in the proposed Provincial Planning Statement.

While these Growth Plan policies did not apply within the City of Toronto, Toronto is functionally connected to the Growth Plan’s NHS as a downstream community. The proposed deletion of the Growth Plan’s NHS policies will impact land use patterns upstream from Toronto, which may influence the City’s overall ecological health and resilience. Within this rapidly urbanizing region, it is vital to maintain policies that promote natural connectivity and limit the conversion of land from pervious to urban and impervious.

Recommendation

- Request the Province introduce the Growth Plan's natural heritage system policies into the proposed Provincial Planning Statement to apply to development within any municipally identified natural heritage system.

CONCLUSION

The City of Toronto supports effective regional planning that prioritizes intensification over urban expansion. A focus on increasing density coupled with adequate protection for the region's natural heritage system is vital to maintaining the long-term livability of the region. The downstream impacts of increased urbanization and loss of natural connectivity will be felt in Toronto through increased vulnerability to extreme weather, a decline in biodiversity and a decrease in ecological functioning.

City Planning staff always welcome the opportunity to work with provincial staff to effectively implement the provincial policy-led planning system, drawing on each of our strengths to protect essential ecological features and create sustainable, healthy, complete communities.

Thank you for the opportunity to provide these comments. If you would like to discuss these policies further please contact either Kerri Voumvakis at kerri.voumvakis@toronto.ca or Jane Welsh at jane.welsh@toronto.ca.

Regards,



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