

Trees & Forests Advisory Committee – Comments on The London Plan - DRAFT

Draft Date: September 21, 2014

TFAC is overall very supportive of the new draft Official Plan for London, and would offer the following feedback and suggestions for improvement:

Urban Forest Sections (Sec. 471-484):

- 1) Several of our members have noted that there seems to be some inconsistency between the wording in the proposed Official Plan and the Urban Forest Strategy (possibly as the result of both being in development simultaneously).

We would recommend there be more consistency in the definition of the urban forest (sec. 471) between the Official Plan and the UFS, and in some of the “preamble” items (sec. 472-3 and 472-4). The section on the Urban Forest (pages 128-133) should also do more to make it clear that the Urban Forest Strategy is front-and-centre in terms of how these goals will be achieved.

- 2) Although the Urban Forest section of the Plan (Sec. 471 - 484) does a good job recognizing that trees can help mitigate climate change, the section could do more to explicitly state the anticipated impacts climate change will likely have on the Urban Forest and the need for management strategies which take this into account (esp. with regards to issues such as increased impacts from storms, drought, invasive species and pests, and likely range migrations).
- 3) We would recommend adding the word “healthy” before safe in Sec. 474 (“*A thriving Urban Forest, such as that which we envision in 2035, will provide residents a safe and secure environment while preserving and enhancing environmental, aesthetic, economic, social, cultural, and recreational values.*”)
- 4) Sec. 475 could use some rewording, and establish “what are we trying to achieve”, particularly with regards to sustainability, growth (sec. 475-4) and targets (esp. sec. 475-3 which only says “*Our canopy cover increases over time*”, which could prove to be setting the bar quite low – is this a 0.1% increase in canopy or a 10% increase in canopy? A specific target, higher than our current canopy cover and in line with the Urban Forest Strategy, is desirable).
- 5) Much of TFAC’s work on the Urban Forest Strategy has focused on the need to have clear woodland targets to communicate to Londoners *how* the City envisions canopy targets being achieved (if it means expanding or protecting forests, replacing them with standalone shade trees, or a combination of both), and to ensure that the protection of forests is, quantifiably, recognized as an important goal in London.

Given the 20 year time frame for the London Plan, we would like to see an item which says “Our woodland cover increases over time” added immediately after Sec. 475.3 (“*Our tree canopy cover increases over time*”), as per the Urban Forest Strategy (item 1.1.9 on p. 26). Along these lines, we would also recommend:

- Expanding Sec. 477.3 (*“Plant more - enhance the structure, function and value through planting and rehabilitation of sites.”*) to include *“so as to increase our canopy and woodland cover”* (thus making it clear that this item extends to both types of plantings, as seen in 477.1 (*“Protect more - protect existing trees, woodland ecosystems and other vegetation”*)).
 - Referencing woodland cover along with tree canopy cover in Sec. 481 (*“Specific tree canopy cover and other targets for specific Place Types will be developed as a condition of the Urban Forest Strategy Implementation Plan.”*) and Sec. 482 (*“Progress towards meeting these targets will be monitored as follows : 1. A tree canopy cover analysis will be prepared every five years to determine if tree canopy targets are being achieved in conformity with the Implementation policies of this Plan.”*)
 - We would also recommend adding *“and woodland cover”* after *“tree canopy cover”* in Sec. 492.12 (*“Parks and open spaces shall be utilized to increase tree canopy cover in the city.”*)
 - Similarly, Sec. 254 of the Natural Heritage System portion of the plan says that *“We will plan for our city to ensure that London’s Natural Heritage System is protected, conserved, enhanced and managed for present and for future generations”* and that this will be done in part by item 8 (*“Develop targets for tree canopy cover through the preparation and implementation of an Urban Forest Strategy.”*) There is a logical inconsistency here: canopy cover targets do not necessarily affect the Natural Heritage System, as canopy cover targets could be achieved solely through extensive use of stand-alone shade trees in yards and landscaped parks (which would generally not be seen as part of the Natural Heritage System), without ever creating a *“forest”*. Consequently, we would stress the need for woodland cover targets (as per the Urban Forest Strategy), and that in this particular case (when talking about the Natural Heritage System) it should replace the Canopy Cover target item (#8), which suffers a logical disconnect with specific regards to the NHS.
- 6) We are glad to see mention made of the Urban Forest as infrastructure. Sec. 475-5 (managing the Urban Forest as infrastructure) should be expanded to explicitly say something along the lines of *“and give it similar consideration to what is given to grey infrastructure during construction and other projects within the City”*.
 - 7) Sec. 475.5 (*“We manage and invest in our Urban Forest as infrastructure and assets that appreciate in value over time.”*) – we would recommend adding the word *“important”* before *“assets”*.
 - 8) Sec. 475-6 (*“We establish policies that clearly define what trees will be preserved and what trees may be removed and replaced in favour of change and development”*) needs clarification. Are the policies they refer to contained within the OP, or yet to come in the new ZBA or are they already in place in the form of guideline documents?
 - 9) Sec. 476-8 (*“Good forestry and arboriculture management practices are employed”*) – where, and by who?
 - 10) Sec. 476 - Says a UFS and UFS Implementation Plan will be established. It should say we have a UFS already, and from that the Implementation Plan will be crafted.

- 11) Sec. 477 – The first 3 points (“Protect More”, “Maintain and Monitor” and “Plant More”) are largely consistent with what section 11 of the UFS outlines, but why not change section 478 (engagement) into the 4th point? This would be more consistent with the UFS itself.
- 12) Sec. 478 suggests that the private-sector side of achieving these targets will be achieved through education and policies (ordinances, standards, and guidelines, etc.). Since most land in London is private, there will need to be a tremendous level of private-sector engagement in order to achieve the targets set out in sec. 480. Consequently, “planting programs” should be added to this list (education and policy on their own will not be enough).
- 13) Sec. 480 (canopy cover targets) – Correct year 2100 with 2065, and the target percentage (currently written in at 32%) confirmed (as it was recently under review at PEC).
- 14) Sec. 481 – There is a disconnect with table #1 on page 20 of the UFS and this paragraph. Recall that in the place types, there is no longer differentiation between low medium and high density, it is just neighbourhood.
- 15) Sec. 482 (plans for analyzing data) –The 3 points here are consistent with what is shown in section 11 (pg 35) of the UFS. Would this be better contained within the strategic approach section (#484)? Or is there a reason why these points have been selected to be brought out?
- 16) Sec. 482: In addition to the “Tree canopy cover analysis”, the “woodland canopy” measurement and analysis referred to in the Urban Forest Strategy (item 1.1.9 on p. 26) should also be mentioned, as it is not just the *quantity* of tree cover, but also its *quality*, that Londoners are concerned about.
- 17) With regards to Sec. 482.3 (“*An inventory update and analysis of trees in boulevards, rural streets, manicured portions of parks and municipal properties, will be completed at least once every ten years, in support of the policies of this Plan.*”) – we do not see why this should not be completed every 5 years as well, as this is already data the City collects (given that it is responsible for the purchase of all such trees).
- 18) Sec. 484 (“Protect More”, “Maintain and Monitor” and “Plant More”) – As it stands now, there is some correlation to this section and the UFS, but it is confusing. For example, in the Protect More section of the UFS, there are 6 strategic goals, and 19 action items, but in the OP, there are 10 separate points. We would suggest that the OP either simply list the strategic goals as they appear in the UFS, or perhaps better yet, delete this section entirely and make direct reference to the UFS itself, unless it is felt that there are some points here not currently contained in the UFS which are important to the Official Plan.
- 19) Sec. 484 – Protect More - 2b does a good job of detailing a strong tree replacement policy, but how will the City ensure the survival of these replacement trees? (A lack of watering is an ongoing problem, and we would strongly suggest a watering contract separate from the planting one to ensure the trees are watered).
- 20) We are very supportive of a bonusing system for tree preservation and planting (Sec. 484 – Protect More - 9), but would want to see the bar for this set high enough so as to ensure it has real impact where such bonuses are allowed.

(We would also note the current structure of Sec. 484 makes citing different points therein difficult, and may be worth revising, especially the way "Protect More" sits above "484", but the other sub-headings ("Maintain Better and Monitor" and "Plant More" fall under it).

- 21) TFAC strongly supports Sec. 484 – Maintain Better and Monitor - 4 (*"Park woodlands will be managed for long-term sustainability and multiple woodland benefits, goods and services. Public access and recreation may not always have priority."*) This idea that access and recreational uses may not always have priority should be reiterated in Sec. 500 on Woodland Parks, especially where those parks contain sensitive ecological features.
- 22) We strongly support Sec. 484 – Maintain Better and Monitor - 12, which identifies invasion by such pests as EAB and ALB as emergencies for funding and treatment purposes.
- 23) We would recommend adding "Additional watering" to the list of possible techniques to improve tree survival in hardscape areas in Sec. 484 – Maintain Better and Monitor - 15.
- 24) Sec. 484 – Plant More - 1 states that *"The principle of planting the right tree in the right place will guide all municipal and private development-related tree planting."* Who will define what constitutes "the right tree in the right place"? What will the priorities be? Will the City be defining its own priorities, or deferring to someone else's? Where this will be laid out (and how) should be made clear within the Official Plan, it being noted that how this is defined will have major implications for London's Urban Forest.
- 25) The lack of mention of the issues concerning invasive species is a substantial omission from the Urban Forest Section of the current draft of the Plan, most notable in Sec. 484 – Plant More - 3 (*"Native species trees will be preferred for planting by the municipality, recognizing that non-native species play an important role where native species do not survive and grow well in urban conditions or for specific landscape objectives."*) There should be a clearly stated short-term goal of minimizing the use of invasive species in the Urban Forest, with a long-term goal of ultimately eliminating their use.
- 26) The phrasing in Sec. 484 – Plant More – 4 (*"All street cross-sections will be designed to accommodate mature trees and allow for their long-term survival, growth and health through below and above-grade infrastructure"*) does not specify the size of tree to be designed for: there is a big difference in designing streetscapes to accommodate lilacs versus maples. Is it allowable for all streets to be designed solely to accommodate lilacs? Similarly, Sec. 484 – Plant More – 7 states that (*"Shade trees will be established and maintained to achieve an effective tree canopy cover along non-motorized mobility routes, such as sidewalks, bicycle lanes and pathways (...)"*) – what constitutes a shade tree? We would suggest it should be of a minimum "medium" height (for example, we would not see lilac bushes nor callery pears as "shade trees"), and that it be so defined within the Official Plan.
- 27) We strongly support Sec. 484 - Plant More - 12, which requires the planting of trees on private properties where there are street tree deficiencies.
- 28) For Sec. 484 - Plant More - 13 and 14 (dealing with the preservation of neighbourhood and street character and heritage landscapes through planting of specific tree species), we would

recommend adding a caveat that where past plantings have made use of invasive species, these gradually be phased out to be replaced with the next closest non-invasive substitute species. (For example, replacing Norway Maples with native Sugar Maples or Red Maples over time).

Other Sections:

- 29) We strongly support Sec. 264 (which recognizes that not all components of the Natural Heritage System may yet have been mapped on Map 6, and requires a review of lands to confirm the presence or absence of natural features as a part of the planning application process).
- 30) We would like to see stronger wording in Sec. 313, to go beyond simply saying opportunities for revegetating areas in the Natural Heritage System *"may be identified"* to saying that replanting shall be aggressively pursued in order to help the City reach its canopy targets and environmental goals.
- 31) Sec. 320.2 (*"Recreational uses associated with the passive enjoyment of natural features including pathways and trails provided that such uses are designed, constructed and managed to minimize their impact on the natural heritage area"* – emphasis added) – There may be some areas where the construction of trails within a natural heritage area is simply too damaging to the natural ecosystem and should not be allowed. The current wording puts recreation above environmental protection in (all) OS lands, which is inappropriate given that our ESAs are typically zoned OS-5. The wording should be changed to reflect the fact that there may be sensitive open space lands where even *"minimized"* damage may be too much.
- 32) Sec. 320.4 *"The harvesting of trees in accordance with good forestry management practices."* – Should this not be forestry *"best"* management practices?
- 33) With regards to Sec. 321 (*"It is the preference of Municipal Council that infrastructure not be located within the Natural Heritage System."*) - in keeping with the growing recognition of the importance of green infrastructure in municipal policies and documents, this section should specify *"grey"* infrastructure so as to avoid suggesting that the NHS isn't already a form of infrastructure itself. This would be consistent with the 2014 PPS: *"1.6.2 Planning authorities should promote green infrastructure to complement infrastructure."*
- 34) The phrasing in Sec. 322 seems strange (*"New or expanded infrastructure shall be permitted within the Natural Heritage System only where it is clearly demonstrated through an environmental assessment process under the Environmental Assessment Act, including an environmental impact study, that it is the preferred location for the infrastructure"*). What constitutes preferred? Does it mean ecologically preferred, or just preferred in terms of cost or other criteria? Are trails considered infrastructure under this section, and if so, will there be any limits placed to the maximum length of trails through a natural area?
- 35) Sec. 331. (*"The City shall develop a program for the long-term acquisition of natural heritage areas."*) – Does such a program not exist already? And if it does, is there something more detailed about that program that could be included in here instead. (For example, specific targets for acquisition, etc.?)

- 36) Has any thought been given as to how appropriate guidelines built around the hundred year storm (or storm's floodplain) will be given that a dramatic increase in such storms is expected to result from climate change? (For example, if what is currently a hundred year storm becomes a 10-year storm, should we be planning development based on our new "10-year storm" instead?) (See Sec. 382, 384, etc.). It would be good for the text to reflect any way in which such changing storm frequency (and damage) is being taken into consideration in the Plan.
- 37) We strongly support Sec. 786, 787, 790 and 791, which provide some local context and a base framework for looking at environmental issues and sustainability in London (particularly with regards to climate change adaptation).
- 38) The idea of "Future Readiness" (with regards to solar energy) expressed in Sec. 802 is excellent, and should be extended to other areas if possible. In the case of the Urban Forest, this idea could be related to species selection based on ice storm events, acknowledgement of shifting species ranges, etc.
- 39) We would recommend consideration be given to the idea of the Urban Forest serving as an "alternative energy system" in the Official Plan (by providing cooling through solar energy), as per the definition set out within the 2014 PPS (*"A system that uses sources of energy or energy conversion processes to produce power, heat and/or cooling that significantly reduces the amount of harmful emissions to the environment (air, earth and water) when compared to conventional energy systems."*)

In keeping with this idea, strategic tree planting to maximize cooling should be added to the list of activities which could potentially be incorporated as a part of a Community Energy Action Plan in Sec. 810

- 40) We support the integration of climate change throughout the Official Plan document, but would like to see it even more strongly emphasized, as both the direct impacts (more frequent storms, heat waves, etc.) and indirect impacts (e.g. loss of international food security, increased armed conflict, climate refugees, etc.) will likely be the greatest challenge faced by most, if not all, communities across the world over the next fifty years.

For example, with regards to the infographics used in the online video about the plan, some of the statistics shared at the recent Middlesex-London Health Unit workshop would be especially appropriate, for example, how we expect the number of extreme heat days to increase, or the number of severe storms, or droughts. Given that one of the Official Plans "Big Moves" is specifically to make London one of the greenest cities in, having at least one important fact related to the environment being included in presentations (and other media wherever possible) would be beneficial.