

June 15, 2015

Chair and Members  
Planning and Environment Committee  
City of London

Re: London Plan - Preliminary submission of the London Plan working group of your Environmental and Ecological Planning Advisory Committee (EEPAC)

Your staff will receive a further submission directly after review by the full EEPAC.

Sincerely,

Sandy Levin  
Chair  
59 Longbow Road  
London, ON

#### SUMMARY

Request Staff to meet again with the "ESA Group" to review policies related to the Natural Heritage System.

WANTED: A clear statement that the priority is to protect and enhance the Natural Heritage System

WANTED: To distinguish the Natural Heritage System from parkland even when city owned.

WANTED: Edits to provide clarity and to "clean up"

#### A WAY TO GET THERE:

1. Separate Place Type – Green Space Place Type is the same for everything from an Environmentally Significant Area to a golf course. Is it enough that they are separated on Map 4?
2. Clear up the sections of "language confusion" (an example is in the Parks and Regulation chapter on Woodlands).

## GREEN SPACE PLACE TYPE (from the Plan, page 181)

### 2.0 Role Within the City Structure

704\_ The Green Space Place Type is composed of five major components:

Natural Heritage **Land** (only time this term is used)

Natural and Human-made Hazard Land

Natural Resource Land

Public Parkland

Private lands – relating to such things as cemeteries, outdoor recreational centres and golf courses

### 1.0 Our Vision for the Green Space Place Type

701\_ The Green Space Place Type is made up of a system of public parks and recreational areas, private open spaces, and our most cherished **natural areas**. It encompasses a linear corridor along the Thames River, which represents the natural heritage and recreational spine of our city. It also encompasses our hazard lands, including our valleylands and ravines, and the floodplains associated with our river system.

702\_ The Green Space Place Type is comprised of public and private open space; flood plain lands; lands susceptible to erosion and unstable slopes; **natural heritage areas** recognized by Council as having city - wide, regional, or provincial significance; lands that contribute to important ecological functions; and lands containing other natural physical features which are desirable for open space use or preservation in a natural state. These features may include areas of rough or hilly topography, organic soils, poor drainage, natural vegetation, steep slopes, woodlots, or ravines.

703\_ Our vision is to protect the Green Space Place Type, **create new green linkages** throughout the city and increase our tree cover. Our Green Space system will **protect and conserve our natural areas** and their delicate ecosystems, keep development an appropriate distance from our hazard lands, and offer a variety of parks that contribute significantly to the quality of life for Londoners. The components of the Natural Heritage System that are included in the Green Space Place Type on Map 1 – Place Types, are identified or delineated on Map 4 - Natural Heritage. Hazard lands and natural resource lands that are included in the Green Space Place Type on Map 1 are identified or delineated on Map 5 – Hazards and Natural Resources.

#### **But wait:**

326\_ **Our parks include** our trails and pathways, city-wide gathering places like Victoria Park and Springbank Park, sports fields, neighbourhood parks, **natural areas**, larger district parks and smaller civic spaces. Our recreational facilities include community centres, arenas, indoor and outdoor pools, and seniors' centres. Combined, these are the places where we come together as Londoners, for city festivals, sports activities, all forms of leisure and recreation, and to meet our neighbours.

**What is a natural area? Not defined, but used in various places.**

## PARKS AND RECREATION (p. 105)

**Still not clear why components of the Natural Heritage System are included here.**

### 4.1 Park Classifications

— 334\_ Within our city, parks will be designed for a diversity of facilities, services, and programming that enables and attracts residents of different cultures, ages, and abilities to access and participate in an active lifestyle. The park system will be designed to present opportunities for people to utilize parks in a variety of ways, with amenities that support everything from casual unprogrammed activities, to specialized recreational amenities, to high-level sports tournaments. To support a broad array of recreational amenities across the city, parks have been categorized into the following classifications:

— Neighbourhood Parks

— District Parks

— Sports Parks

— Urban Parks

— City-wide Parks

— Civic Spaces

— **Natural Features**

— **a. Woodlands**

— **b. Open Spaces**

## What are Open Spaces? Not sure. Let's review the groupings.

### 4.1.7 Natural Features

341\_ There are natural features that are in **City or public ownership** that are part of the City's park system. These are further described below as Woodlands and Open Spaces. These areas are managed to **protect, preserve and maintain their ecological function**. These **types of parks** have been established in recognition of both their ecological and community value, and are not intended for active recreation use, but may contain trails and pathways. While these areas are included in the City's parkland inventory, they are often subject to specific management plans to guide their protection, management, and enhancement. These management plans determine the appropriate level of use for the specific park. **These parks are within the Green Space Place Type on Map 4 – Place Types. (Map 1?)**

**Why does city ownership make a difference? Lands are not distinguished by ownership in any of the Maps.**

**Minimally, should say something about that the Natural Heritage Policies of this Plan (see 344) apply. Or is the intent to distinguish between those areas that are and are not subject to the Natural Heritage Policies?**

#### 4.1.7.2 Open Spaces

343\_ Open Spaces **may** include natural features and are often linear in nature following tributaries of the Thames River, upland corridors, or utility easements. Open Spaces typically include multi-use pathways systems that link neighbourhoods to surrounding parks and community amenities such as schools, business areas, shopping areas and transit corridors and villages, greatly improving active transportation and active living opportunities. Through development approval processes, all or portions of Open Spaces that are acquired for their mobility role are dedicated above the normal parkland requirements as per the *Planning Act*.

**Not sure what this section adds to the Plan. Is it the same as an open space area? It is not shown on any Map so what is included or excluded?**

**If the goal is mobility, then it should be clear that this classification does not include components of the Natural Heritage System because:**

**The concern is that the Natural Heritage System should not be for traveling thru but travelling to.**

To further the confusion:

705\_4 Provide for **open space areas** in all parts of the city to allow for a balanced distribution of locations for both active and passive recreational pursuits.

705\_5 Enhance the accessibility of publicly-owned **open space areas** where there is no danger to public safety and where significant natural features and ecological functions can be protected.

**Passive recreation is not defined in the London Plan (despite being used 7 times) and means different things in different cities. In London passive includes bikes (that is the meaning of pathways- paved). The issue is post installation impacts and the conflict between bicycles and natural areas from creating wider trails (if you go around mud, you widen the trail, break up and loosen soil, making it more prone to washing away in melting snow and rain events), to disruption of the natural experience (bike whizzing by or denaturalization thru paving).**

**RECOMMENDATION: More clarity is needed to provide intent, direction, and meaning.**

#### 4.1.7.1 Woodlands

342\_ Woodlands have **been identified and protected for their environmental significance** by the City through a previous study or have a development-related environmental impact statement with recommendations for their protection, management, and enhancement. **Smaller woodlands may not meet the test for significance, but are retained for their aesthetics and as a recreational amenity.** Woodlands often include a managed trail system that serves the surrounding neighbourhood and consists of woodchip trails and boardwalks with occasional pathways where appropriate for accessibility and active

living connections to local facilities. Woodlands do not include the woodland areas that may be found in other park categories.

**On Map 4, there are Significant Woodlands and Woodlands. Which are included in 342? Shouldn't they be treated differently? Both a component of the Natural Heritage System according to Policy 1226? So what is 342 trying to say?**

**With a few exceptions such as Clara Brenton Woods in Oakridge, most Significant Woodlands are in the areas annexed in 1996.**

**Overall, there aren't a lot of Woodlands compared to Significant Woodlands on Map 4. Woodlands include publicly owned sites such as Huron Street Woods in Ward 6, Beaverbrook Woods in Oakridge Crossing, Egleton Woods in Whitehills and Berkshire Park.**

**Importantly, some or all Woodlands would be considered Significant Woodlands today under the evaluation criteria approved by the OMB and defended by the City all the way to the Supreme Court.**

Further to the point

In the Urban Forest portion of the Plan

324\_2 Woodland management plans will be prepared for various **municipal woodlands** to establish goals for each woodland and determine how they will be maintained for their sustainability and long-term health. Activities such as harvesting, burning, site preparation, pest management, juvenile spacing, brushing and/ or planting may be required to ensure long-term sustainability or restoration of the woodlands.

324\_3 **Woodlands in parks** will be managed for long-term sustainability and multiple woodland benefits, goods, and services. Public access and recreation may not always have priority.

**So which Woodlands are include in which policy – the ones identified as significant? The ones that don't meet the test of significance? Both? It is unclear. It is unclear if this means woodlands that are part of the Natural Heritage System or not? If not, and not on Map 4, they aren't part of the NHS (Woodlands in parks?). But if significant, that are suppose to be in the NHS and on Map 4. In fact:**

**On Map 4, Woodlands and Significant Woodlands are both shown. Is the intent that Woodlands are parks yet part of the NHS? If so, how do we clarify that Significant Woodlands are part of the NHS, but NOT parks?**

**It gets more confusing when the Natural Heritage Policies are read**

1226\_ The **natural heritage features and areas** found in London include environmentally significant areas, provincially significant wetlands and wetlands, fish habitat, **significant woodlands and woodlands**, significant valleylands, the habitat of endangered and threatened species, significant wildlife habitat, and significant areas of natural and scientific interest, which are all important for their environmental and social values as a legacy of the natural landscapes of the City of London and the surrounding area.

1269\_ A woodland will be considered "significant" if it achieves a minimum of one High or five Medium criteria scores as determined by application of the *Guideline Document for the Evaluation of Ecologically Significant Woodlands*. A significant woodland will be included in the Green Space Place Type on Map 1 and identified as significant woodlands on Map 4.

**If the Plan intent is to have non significant woodlands as parks, it should say so clearly, perhaps **Woodlands that are not significant often include.....** and clearly explain in policy which are which so there is no confusion on the part of the public.**

**RECOMMENDATION: Don't mix up Significant and Woodlands in the same Parks policy. Improve clarity so there is understanding by the public.**

#### 4.2 City-owned Lands in the Green Space Place Type

**In the Parks and Recreation Policies, the Plan returns to the Green Space Place Type to list two elements. Publicly owned golf courses (345) and ESAs (344).**

ESAs are included in the Natural Heritage Policies, and are a mix of City ownership, and private lands which are currently, the majority of ESAs. However, Woodlands, which are part of the Natural Heritage System, and Significant Woodlands, are not singled out here. Nor are wetlands. They can be city owned as well.

**Most of this is a holdover from an amendment to the Official Plan that was to clarify that ESAs and not Parks. That was fine then, but this is now.**

344\_ Environmentally significant areas (ESAs) identified as components of the Natural Heritage System include lands that are to be maintained in their natural state through appropriate management for the purposes for which they have been recognized. These lands will be subject to the Natural Heritage policies of this Plan. Details of the management and use of ESAs may be contained within a conservation master plan as provided for in the Natural Heritage policies of this Plan. City-owned and/or managed ESAs are included in the City's green space inventory, however they are not programmed or managed as parkland. ESAs are within the Green Space Place Type on Map 1.

**Should also say something about Map 4. Also, this section from 1315 should be repeated:**

**Where necessary, public access to identified environmentally significant areas within public ownership will be controlled such that access will not be detrimental to the significant features of the property.**

**Add "...and ecological functions of the property.**

**It is also unclear is the meaning of "not programmed or managed as parkland" when there is no one place where this is defined? Does it mean other components of the Natural Heritage System (Significant Woodlands for ex) ARE managed as parkland?**

Here is the crux of our view

**All components of the Natural Heritage System must be subject to the Natural Heritage Policies regardless of ownership.**

Suggest that a separate policy section be included that will clarify this:

**Components of the Natural Heritage System that are city owned or managed, while considered part of the City's green space inventory, are governed by the policies of the Natural Heritage section of this Plan.**

**By putting the Natural Heritage System in the Parks and Recreation hierarchy, it diminishes its significance and makes it hard to sort out the intent of the London Plan:**

**RECOMMENDATION: More work is needed with the "ESA Group" and City staff.**

## ENVIRONMENTAL POLICIES

### 3.0 What are We Trying to Achieve?

1222\_ Our Environmental Policies will ensure that decisions on how we grow and develop will have clear direction regarding the long-term protection and conservation of our Natural Heritage System and our Natural Resources, and that development is directed away from natural and human-made hazards.

**Like this. Let's explore to see if it does**

### 4.0 How are We Going to Achieve This?

1223\_ These policies must be read and considered in the review and evaluation of all planning and development applications, public projects, public works, or any other activity within or adjacent to any component of the Natural Heritage System, or on or within any lands identified as Natural and Human-made Hazards or Natural Resources. All applications, works and activities **shall** conform with these policies. Map 4 - Natural Heritage and Map 5 – Hazards and Natural Resources are to be used in conjunction with these policies.

### **Shall is good!**

1231\_ One of the many things that Londoners say makes London such a great city is the Thames River Valley and its tributaries, and our unique natural environment that is found within the urban fabric of the city. Our Natural Heritage System contributes to both our high quality of life and our image as The Forest City. The significant valleylands of the Thames River Valley, the provincially significant wetlands of Westminster Ponds and Sifton Bog, and the significant woodlands of Warbler Woods, Meadowlily Woods and the Medway Valley are just some of the significant natural heritage features and areas that help to define London. These places are also key components of the City's Natural Heritage System, and, like the many other natural heritage features and areas that form the Natural Heritage System, **are to be protected and managed to improve their ecological integrity and to provide opportunities for public use where appropriate.**

1225\_ The City's Natural Heritage System is a system of natural heritage features and areas and linkages intended to provide connectivity at the regional or site level and supports natural processes. Natural Heritage Systems maintain biological and geological diversity, natural functions, viable populations of native species, and ecosystems. In London this includes natural heritage features and areas, provincial parks, other natural heritage features, lands that have been restored or have the potential to be restored to a natural state, areas that support hydrologic functions and working landscapes that enable ecological functions to continue. The City's Natural Heritage System is shown on Map 4 – Natural Heritage.

### **Note this has nothing to do with ownership! Ownership comes up later:**

1315\_ Some lands within environmentally significant areas are privately-owned, and this categorization of the lands is not to be interpreted as permitting access or use by the general public. Permission for public access to privately-owned lands in environmentally significant areas shall be at the discretion of the property owner. Where necessary, public access to identified environmentally significant areas within **public ownership** will be controlled such that access will not be detrimental to the **significant features** of the property.

**Add "... features and ecological functions of the property. It should also be separated into two policies to distinguish between publicly and privately owned ESAs**

### **RECOMMENDATION: (ADD POLICY)**

**Protecting the Natural Heritage System against damaging or excessive visitor use requires that the types of recreational activities permitted be generally restricted to nature-based uses and that visitor impacts are managed through appropriate placement of trails, signs and facilities to maintain the natural features and ecological functions that characterize the System.**

### MISSING STUFF – MONITORING AND EVALUATION

64\_ A London Plan Monitoring Program will be created to establish key performance measures and to report on our progress relating to our directions a minimum of once every two years.

**Monitoring, whether in policy or in Tools, is not well established for the NHS. There is for Urban Forest (320). Where is this on staff's work plan? Not optimistic as the targets in the Subwatershed Studies have largely been ignored.**

320\_ Progress toward meeting these targets will be monitored as follows: A tree canopy cover analysis will be prepared every five years to determine if tree canopy targets are being achieved.

An analysis of the structure, function, and value of the Urban Forest will be prepared at least once every ten years.

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.



**A similar program should be put in place to determine the health of the NHS in particular the implementation of Conservation Master Plan outcomes, not just whether or not tasks were carried out.**

## MITIGATION? BETTER TO AVOID

### 4.1.1 Reports/Studies to Address Environmental and Natural Heritage Matters

1487\_ The submission of reports and studies related to environmental and natural heritage matters is to identify and assess the significance and boundaries of natural features and areas and their ecological functions related to the subject site, including surface and subsurface features, and to ensure that **any potential** impacts resulting from a proposed development and/or change in land use on the identified natural features and areas and their ecological functions are **mitigated**, and to demonstrate consistency with the policies of this Plan.

**Why isn't avoidance primary? Definition of mitigation is:** the action of **reducing** the severity, seriousness, or painfulness of something. "the emphasis is on the identification and mitigation of pollution"

1488\_ The required reports/studies are to identify the environmental and natural features and areas and their ecological functions which may be affected by the proposed development and/or change in land use; identify the areas that are to be employed as a buffer to protect the environmental and/or natural features and areas and their ecological functions from the proposed development and/or change in land use; and identify any other **mitigative** measures to be undertaken to protect the environmental and natural features and functions from any potential impacts associated with the proposed development and/or change in land use.

## **RECOMMENDATION add**

**Mitigation measures if required must include a timeline with the preference being that mitigation measures begin immediately so that the mitigation can mature prior to the development.**

**This is because mitigation should be pre-emptive and always greater than 1:1, so that when a project requiring mitigation comes to fruition, net effects are actually zero. Currently, with mitigation measures occurring during or after projects, net effects are *always* negative, since the mitigation measures may take several years to decades to replace what was lost, there is a time period during which carbon sink capacity and native habitat are reduced.**

From the Natural Heritage Reference Manual, 2005, page 119:

*To determine negative impacts on a significant natural heritage feature or area, the cumulative negative impacts from development or site alteration activities (e.g., impacts that adversely affect the stability of the feature and its ability to continue) must be considered against the integrity of the feature. The current and future ecological functions of the natural feature or area as they relate to the surrounding natural heritage system (e.g., connectivity) must be considered as well. The PPS definition for "negative impacts" does not state that all impacts are negative, nor does it preclude the use of mitigation to prevent, modify or alleviate the impacts to the significant natural heritage feature or area. For example, demonstration of no negative impacts on a significant woodland through mitigation measures may be contemplated, provided that factors such as the successional status and replaceability of the woodland components and functions within a reasonable time frame (e.g., 20 years) are considered.*

**EEPAC would also recommend incorporating the following into the Plan:**

- 1) Avoidance (High risk, High loss)**
- 2) Avoidance + Mitigation (Moderate risk, moderate loss)**
- 3) Avoidance + Mitigation + Restoration (Low risk, low loss)**

**If we simply developed a matrix based on typology, biodiversity, and connectivity we could see the potential for change. This could be developed in partnership with Western University.**

## THE GREENEST CITY – TRY GRASSLANDS

**Consider revisions to 251, 325\_11 and 325\_12, and 933 to plant Carolinian /tallgrass prairie and savannah ecosystems.**

**EEPAC notes that the MNRF, in its comments on the London Plan, considers ecosystem restoration important:**

*At the same time, creating and improving natural heritage features and areas through restoration and stewardship is also important to facilitate maintenance of ecological function and biodiversity, but also the restoration and improvement of these features in the City of London.*

### **Tallgrass ecosystems and the London Plan**

The London Plan makes extensive reference to reforestation and restoration of natural ecosystems, which deserves recognition. However, there is a lack of emphasis on restoration of non-forest ecosystems, namely the Carolinian/tallgrass prairie and savannah ecosystems. The historical extent of these tallgrass ecosystems included substantial habitat in London and the surrounding area (Tallgrass Ontario, 2013). These ecosystems are important pollinator habitat and strong carbon sinks. The London Plan should include a focus on restoring the historical range (or an area equivalent in size) for several very important reasons: 1) given the continuing collapse of pollinators due to neonicotinoid use, restoration of tallgrass ecosystems would create a refuge for native pollinators as neonicotinoid use is phased out. The consequences will be two-fold, a) increasing the security and sustainability of London's food systems in the face of climate change (a goal of the London Plan), and b) enhancing the resilience of native ecosystems, and therefore London's Natural Heritage System, to human disturbance and climate change. 2) Tallgrass ecosystems are particularly effective carbon sinks, more-so than forests. Globally, grassland ecosystems became prominent only in the last 40 million years, and the rise in grassland ecosystems is associated with a reduction in atmospheric carbon dioxide from over 1000 ppm to less than 300 ppm (pre-industrial levels). Given the goal in the London Plan of making London one of Canada's greenest cities, including restoration of tallgrass ecosystems should be a high priority, due to their carbon sink capacity. Combining restoration of tallgrass ecosystems with other green initiatives outlined in the London Plan to reduce carbon emissions would make London a national or even global leader in the fight to mitigate climate change.