Agenda Item #	Page #

Planner: Eric Lalande

TO:	**CHAIR AND MEMBERS - PLANNING & ENVIRONMENT COMMITTEE**
FROM:	**JOHN M. FLEMING MANAGING DIRECTOR, PLANNING AND CITY PLANNER**
SUBJECT:	**PROVINCIAL POLICY STATEMENT 5 YEAR REVIEW CITY OF LONDON - RESPONSE MEETING ON NOVEMBER 26, 2012**

RECOMMENDATION

That on the recommendation of the Managing Director, Planning and City Planner, this report **BE RECEIVED** for information and **BE FORWARDED** to the Ministry of Municipal Affairs and Housing for their consideration.

PREVIOUS REPORTS PERTINENT TO THIS MATTER

"None."

BACKGROUND

PROVINCIAL POLICY STATEMENT

The Provincial Policy Statement is the tool under the Planning Act, which the Province, through the Ministry of Municipal Affairs and Housing, uses to set direction for all decisions affecting land use planning matters. Municipal land use decisions, policies and regulation "shall be consistent with" the Provincial Policy Statement.

As a key part of Ontario's policy-led planning system, the Provincial Policy Statement provides for a policy foundation, regulating the development and use of land. It also supports the provincial goal to enhance the quality of life for the citizens of Ontario.

The Provincial Policy Statement recognizes the links between economic, environmental and social factors in planning and represents good planning principles. It provides policy direction on land use planning to promote strong communities, a clean and healthy environment and a strong economy.

The current Provincial Policy Statement came into effect on March 1, 2005 and is subject to review every five years, to determine whether revisions are needed. The Province has started the review and is currently seeking comments from municipalities with respect to proposed changes to the Provincial Policy Statement.

REQUIRED REVIEW

The five-year review of the Provincial Policy Statement started in March, 2010 and has included extensive consultation across Ontario with members of the public, municipalities, Aboriginal communities and organizations, and stakeholders. The City of London is included in this review, and currently has the opportunity to provide comments as part of the Provincial review.

Staff is bringing this report forward as information to Council, regarding issues the City of London would like considered as part of the final update to the Provincial Policy Statement.

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PROPOSED CHANGES

The Province has provided draft changes contemplated as part of the five-year review process. The following is a summary provided by the Ministry of Municipal Affairs and housing regarding the effect of draft policies which build upon the existing policy framework of the Provincial Policy Statement, 2005. The draft policies are and are intended to provide stronger, clearer direction to support the following goals:

Building strong, healthy communities by:

- *Promoting greater coordination between municipalities and other levels of government, agencies and boards*
- *Strengthening linkages between land use planning and healthy, active communities*
- *Encouraging coordination and co-location of public facilities and coordination between municipalities and other levels of government*
- *Supporting active transportation and transit, and providing connectivity within and among transportation modes*
- *Recognizing the range and diversity of settlement areas across Ontario*
- *Recognizing that all areas experience land use change but not necessarily growth*
- *Clarifying that the requirements to support small expansions of settlements may be less than those for large expansions*
- *Allowing limited use of septic tanks and wells for minor infill development and rounding out of unserviced settlement areas*
- *Recognizing Aboriginal interests*
- *Encouraging planning authorities to coordinate planning with Aboriginal communities, where appropriate*
- *Acknowledging that the PPS is to be implemented in a manner consistent with Aboriginal and treaty rights in the Constitution Act, 1982*
- *Encouraging coordination of emergency management with other planning considerations*
- *Recognizing the importance of parks and recreation, green spaces, trails and trail linkages*
- *Requiring the consideration of potential impacts of climate change adaptation and mitigation*
- *Encouraging green infrastructure and strengthening stormwater management requirements*
- *Directing development away from areas of high to extreme risk of wildland fire unless the risk is mitigated*

Supporting a strong economy by:

- *Promoting investment-ready communities and opportunities for economic development*
- *Recognizing the importance of communication infrastructure*
- *Strengthening protection for major industries from incompatible uses*
- *Planning for and protecting corridors for goods movement and future employment along those corridors*
- *Protecting provincially planned corridors and promoting land use compatibility for lands adjacent to the planned and existing corridors*
- *Clarifying that planning for infrastructure can go beyond the 20 year time horizon*
- *Supporting long-term planning for employment areas*
- *Supporting the adaptive re-use of infrastructure*
- *Requiring consideration of the life-cycle cost of infrastructure*
- *Permitting additional uses on farms and providing flexibility for agricultural-related uses*

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- *Requiring agricultural areas to be designated in municipal official plans and impacts of non-farm development surrounding agricultural operations to be mitigated*

Protecting the environment and resources by:

- *Recognizing the importance of biodiversity*
- *Requiring identification of shoreline areas*
- *Requiring the identification of natural heritage systems in southern Ontario*
- *Recognizing the importance of the Great Lakes and expanding protection for Great Lakes coastal wetlands*
- *Refining the area of protection for significant woodlands and valleylands in southern Ontario*
- *Strengthening requirements for the rehabilitation of specialty crop areas that are subject to aggregate extraction*
- *Clarifying provisions for aggregate extraction within and adjacent to certain natural heritage features*
- *Encouraging comprehensive rehabilitation planning after aggregate extraction*
- *Supporting the conservation of aggregate resources, including recycling and reuse*
- *Promoting the conservation of cultural heritage and archaeological resources*
- *Requiring mineral deposits, petroleum resources and aggregate resources to be identified in municipal official plans*

The draft policies generally focus on outcomes, rather than the process. This protects provincial interests while considering unique local circumstances and providing an opportunity for approaches to be developed locally.

More specifically, some important changes identified by staff related to the City's Planning activities and are listed below:

1. The Settlement Areas section has been enhanced requiring the consideration of transit when planning for new residential areas, This is consistent with the City's recently consolidated Transportation Master Plan and South West Area Plan and that have been raised through ReThink in order to focus/encourage intensification to support the future rapid transit network.

2. Section 1.1.4.5 is a new Rural Areas in Municipalities policy, which requires the protection and promotion of agriculture uses and normal farm practices. This may have implications on the future expansion of the City's urban growth area, specifically for future industrial lands along the 401/402 corridor.

3. Section 1.2.6 Land Use Compatibility is a new policy section with regards to major facilities and sensitive land uses. This new policy may have implications for the City's W12A landfill (the planning requirements are consistent with what was completed for the W12A Area Study, but speaks to the need for similar studies for significant changes to the landfill in the future).

4. Section 1.3 is now "Employment" rather than "Employment Areas." Employment Areas has a dedicated section in 1.3.2, which implies that planning concerns are no longer limited to land use issues related to employment lands, but rather for employment in general with the consideration of employment implications for all land uses/planning efforts.

5. Section 1.3.1c) is a new Employment policy and encourages mixed use development that includes employment opportunities to promote "liveable and resilient communities".

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This is consistent with the approach for SWAP and what is being considered through ReThink London.

6. Section 1.3.2.4 states that "Planning authorities may plan for the long-term protection of employment areas provided lands are not designated beyond the planning horizon identified in policy 1.1.2 [the horizon is 20 years]." Allows for planning through the Official Plan areas of long-term economic development interest (e.g., the 401/402 corridor that would discourage large agriculture operations locating within this area to provide future flexibility without requiring the designation of the lands for industrial uses).

7. Section 1.6.2 outlines considerations for the optimization of existing infrastructure before developing new infrastructure. This encourages/supports intensification strategies, and would need to be considered when undertaking engineering master servicing studies and the Development Charges Study. There are also new policies to consider adaptive re-use and green infrastructure.

8. Section 1.6.4 encourages the location of public service facilities in community hubs for synergies and transit benefits. South West Area Plan has introduced "Neighbourhood Central Activity Nodes" which are locations in the South West Area Plan neighbourhoods where community facilities would be clustered for the benefits outlined in this new policy. This could further be introduced for other areas of the city via ReThink.

9. Section 1.6.5.3 requirements have been reduced from the current Provincial Policy Statement to permit private sewer/water systems where municipal services are not provided. This change is to provide greater clarity, but could have implications on restricting growth to areas with full municipal services.

10. Section 1.6.5.7 is a new set of policies for Storm Water Management (SWM). Planning for storm water management systems require consideration of quality and quantity implications, erosion, and risks to human health. These are current considerations used in planning SWM facilities in London and will now have support through the Provincial Policy Statement. The policies also encourage maintaining or increasing the extent of pervious surfaces, which may result in the need for new Official Plan and/or Site plan policies for enhanced vegetation/reduced parking areas.

11. Section 1.6.6.3 speaks to multi-modal transportation systems and to the need to enhance the transportation system. This is new, and supports the direction of the Transportation Master Plan.

12. Section 1.6.6.4 ties land use planning with transportation planning. The whole Transportation Systems section (1.6.6) is new and supports this overall goal. Previously, the transportation policies were auto-oriented and focused on protecting important transportation corridors. These polices support efforts through the South West Area Plan, the Transportation Master Plan and the direction heard to date through ReThink London process.

13. Section 1.6.8.1 now includes rail and marine facilities along with airports. The City of London now needs to protect rail corridors from future land use conflicts in the review of applications/planning.

14. Section 1.6.10 includes new policies regarding the municipality providing opportunities for new energy facilities to address projected needs.

15. Section 1.7.1d) now links cultural planning with planning efforts to define a sense of place, which is supportive of the work that the City has been doing with the Heritage Conservation Districts, the inventory of cultural heritage assets, etc.

16. Section 1.7.1e) adds that long-term economic prosperity is supported by promoting community investment-readiness. This is supportive of the City investments in the

Business Improvement Associations, incentive programs, and the recently approved "Four Pillars" strategy developed by the Investment and Economic Prosperity Committee.

17. Section 1.8 has been changed to Energy Conservation, Air Quality and Climate Change. The section builds upon the previous energy and air quality policies and now includes policies/recognition of climate change such as active transportation, increased vegetation within built areas. The new section removes policies regarding renewable energy systems as those responsibilities have been up-loaded to the Ministry of Energy.

18. Section 2.5.4 inserts new policies that emphasise the importance of mineral extraction. This section may have impactions on the overall quality of agricultural lands where extraction has occurred and restoration may not now be required.

19. Section 2.6 has been enhanced to promote cultural heritage planning and supports the City's development of a Cultural Plan. It provides requirements for archaeological and cultural heritage, and protection of Aboriginal communities.

PROVINCIAL REVIEW REQUEST FOR INPUT

The Ministry of Municipal Affairs and Housing, Provincial Planning Branch has sent a request to each municipality for input on changes they are contemplating. As part of this request, the Ministry posed five questions for response. Staff is generally supportive of the changes proposed through this review. However, staff has responded with items that are considered to be lacking from the draft policies provided in the Provincial Policy Statement update.

QUESTIONS AND RESPONSES

1. Do the draft policies provide sufficient direction to effectively protect provincial interests in land use planning?

Municipal Response:

- The promotion and conservation of cultural heritage and archaeological resources is clearly identified but it is within the environment and resources section. It should be noted or referenced as part of the Strong Healthy Communities section.

- While implied when reading the Provincial Policy Statement in its entirety, there are extensive references to intensification without recognition that intensification should respond to respect for heritage structures and landscapes or to the character of a neighbourhood. A statement should be included that makes this connection more explicit. There are concerns that the draft policies provide for intensification above all else, where in some instances this may be to the detriment of established areas. Issues such as compatibility and the character of built form in the area should also be considered. The policies for intensification leave little opportunity for consideration of local or unique characteristics as part of wise land use planning practices.

- Section 1.7 outlines the provincial policies for maintaining long-term economic prosperity. This section achieves municipal goals with its emphasis on promoting the long term viability of downtowns and the creation of a sense of place with respect to built form and cultural heritage resources. While noted in this section, it is expected that the importance of Downtowns be highlighted throughout the Provincial Policy Statement as employment, heritage, civic and entertainment centres which are critical to building healthy and strong communities.

- Section 2.1.7 of the draft policies remove the current prohibition on development and site alteration in significant habitat of threatened and endangered species. This section is replaced with a reference to Provincial and Federal requirements. Therefore, the Provincial Policy Statement defers to the provincial Endangered Species Act (ESA) and

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the federal Species at Risk Act (SARA). This a concern because of the ESA permitting process allows development to proceed in habitat of threatened and endangered species if an 'overall benefit' to the species can be achieved and would supersede the current PPS prohibition.

The ESA permitting process was not developed or intended to take the place of land use planning. The ESA process is limited to a technical review. The draft PPS 2.1.7 is based on the premise that ESA permits can serve as a surrogate for the consideration of endangered species habitat in land use decision-making, which may be inappropriate.

2. Are there additional land use planning matters that require provincial policy direction which are not included?

- There is no mention in the Provincial Policy Statement of the importance of Downtowns to a City's economic health and vibrancy and as an important place of employment

  London's Downtown currently contains 30,000+ office workers, plus retail/service workers and 5000+ residents. London's Downtown currently has 81% of the City's office space supply. Since the 1980's the City has strived through policies and actions to make Downtown the economic, educational and social centre of the community. From 1998-2011 the City has invested $174 M in the Downtown which has leveraged over $500 M in private investment, a 3:1 ratio. Recently we have started to quantify the importance of Downtown to the community. London's Downtown occupies 0.2% of it's land area but generates almost 10% of its tax assessment. The City was recently involved; along with other Ontario municipalities Toronto and Ottawa, in a national study of the importance of Downtown's (http://www.canurb.com/story/2012/10/10/new-cui-report-value-investing-canadian-downtowns) to a community. In addition, Downtown's serve as an important focus for intensification and as a focus for transit.

  Policies should be included under Section 1.0 (Building Strong Healthy Communities) , specifically Section 1.3 (Employment Areas), which specifically mentions Ontario municipalities Downtowns as important economic nodes, significant places of employment and future locations for intensification.

- A section should be added related to promoting sustainability and energy efficiency by encouraging adaptive reuse of existing structures.

- The addition of place-based planning is supportive of efforts made by the City of London with regards to urban design. The quality of the physical environment plays an important role in achieving the goal of enhancing Ontarians quality of life. However, there is a gap created by the Provincial Policy Statement with regards to urban design.

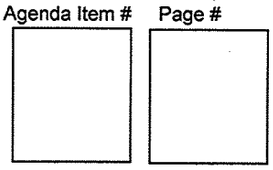
  The addition of policies related to the consideration or implementation of Urban Design as part of Building Strong and Health Communities would greatly enhance efforts made at the local level in achieving Provincial interests.

3. Do you foresee any implementation challenges with the draft policies?

Municipal Response:

- With regards to implementation of the importance of Downtowns, there are Provincial tax policies which hinder Downtown Revitalization efforts. While not specifically a Provincial Policy Statement issue, land use planning should take into consideration possible impacts as a result of the wider municipal framework.

  There are a number of issues with regards to Provincial tax policy which have a significant impact on the Downtown. One Provincial tax policy gives a 35% tax rebate for empty, rentable buildings which provides no incentive for landlords to rent buildings. In



addition, vacant commercial space is assessed as vacant residential, a lower rate, which is also a disincentive for commercial rentals. Occupied rental apartments are also considered a commercial use. In these cases the City gets less money and they all provide a disincentive for building owners to rent vacant space.

In addition, the current tax policies encourage the removal of buildings. In the U.S. tax changes have had a significant impact on the retention of buildings, especially heritage buildings. Current tax policies encourage the creation of surface parking lots because vacant lands are assessed at a lower rate than vacant built space. Another problem is that accessory parking lots and commercial parking lots are treated the same under Provincial tax policies. The former should be treated the same as the main use and as a possible expansion area whereas the latter is a commercial venture and should be treated as such. It has been suggested that one way to deal with the issue is to tax the value of the land, not the building.

Policies should be included in Section 4.0 (Implementation and Interpretation), which address the impact of other Provincial regulations and actions on Provincial Policy Statement directions.

- There should be greater clarity in the implementation of the Provincial Policy Statement as it relates to the Planning Act."

  There are concerns that variations in definitions under the Planning Act and the Provincial Policy Statement. For example, the definition of development varies between the act and the PPS, the lack of guidance on which definition takes precedence creates issues regarding implementation.

- The policy statement should include that municipalities may direct how intensification will be provided as part of a comprehensive plan."

  There is a reliance on the Provincial Policy Statement intensification policies quoted by applicants when submitting planning applications. The City of London is concerned that the Provincial Policy Statement provides no additional guidance or discretion for Municipal Council to discourage intensification in certain areas when, in the opinion of Council, a neighbourhood is facing negative pressures as a result of the cumulative impacts of intensification proposals that have occurred.

  A policy should be introduced that discourages continuous or fragmented intensification in the absence of a comprehensive plan.

- Policies should include a greater emphasize and support greater transit links to employment areas as part of transportation planning.

  While active transportation is encouraged, a policy should be included that supports the planning of public transportation connecting residential areas to employment areas. This is to encourage a healthy and strong community by providing stronger transportation alternatives.

- Section 1.7.1.(k) minimizing negative impacts from a changing climate and considering the ecological benefits provided by nature; lacks clarity around why this is specifically how this provides economic prosperity.

- Section 1.8.1.(g) should read maintain AND increase, as opposed to OR. Further, omit the words "where feasible". Where providing vegetation, increasing vegetation would include maintaining what is existing, therefore an OR statement is redundant.

- Include "trees" as part of the definition of infrastructure.

4. **Is additional support material needed to help implement the Provincial Policy**

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Statement?

Municipal Response:

- The Ministry currently provides information on a number implementation issues such as:
    - Comprehensive Reviews
    - Lot Creation in Prime Agricultural Areas
    - Energy Conservation, Efficiency and Supply
    - Improving Air Quality
    - Affordable Housing
    - Applying the Provincial Policy Statement (Implementation of the PPS).
    - Linkages with other Provincial Initiatives
    - Municipal Planning for Biodiversity, Natural Heritage Systems, Features and Areas –
    - Reserve Sewage System Capacity for Hauled Sewage
    - Heritage Resources in the Land Use Planning Process - Cultural Heritage and Archaeology Policies
    - Housing Data: Affordable House Prices and Rents, 2006
    - Comparison Chart of Selected Provincial Policy Statement, 2005 Policies to Former Policies in Key Areas
    - Transit-Supportive Guidelines - Ontario's Transit-Supportive Guidelines

- These are source reference materials for interpretation and implementation of the PPS. Additional information is suggested can be included in these documents particularly around the implementation implications of the 5-year review.

- The Provincial Policy Statement acts a comprehensive stand-alone document and functions as a broad based planning tool. Additional support materials are provided as reference only, for implementation and interpretation. The Ministry provide user reference material, which should be updated on an on-going and as needed basis. In some cases, existing documents should be made current. This approach should be continued to include clarity around the changes of this five-year review.

  Planning staff will continue to work with the Ministry of Municipal Affairs and Housing, as part of this review, and in the future to resolve any issues regarding the implementation of the PPS.

5. **Do you think that the legislated Provincial Policy Statement review cycle should be extended from the current 5 year period.**

Municipal Response:

There is no reason to adjust the review cycle for the Provincial Policy statement. Currently the five-year review process is in sync with local policy review time lines. The municipality is required to review its own policies on a five-year time table. Part of this review is to keep current with Provincial planning policy direction. The coordination of Provincial and Municipal policy should be maintained and responsive to each other. Having a review process occur in conjunction provides the opportunity for continued success. The frequency of the review is appropriate as Provincial and local issues may change quickly, where by policy development often lags behind emerging trends.

LOCAL POLICY IMPLICATIONS

The City of London will be required to update its Official Plan policies in response to changes made the Provincial Policy Statement. Currently, staff is undertaking a five-year Official Plan

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review process and efforts are being made to coordinate the City's plan with Provincial interests. It may be required to make additional changes in light of the Provincial Policy Statement updates. This is subject to timing by the Province and the final implementation of the Provincial Policy Statement.

CONCLUSION

On the direction of Council, staff will provide these comments related to the Provincial Policy Statement review to the Ministry of Municipal Affairs and Housing, Provincial Planning Policy Branch.

Planning staff generally agrees with the direction that the Province is contemplating with regard to enhancing its interests in climate change; affordable housing; enhanced transportation measures; and place based planning.

The municipality notes that some areas of the Provincial Policy Statement require additional direction for implementation mechanisms to fully implement the PPS. Affordable housing is an example of this, where, other than through Section 37 bonusing provisions of the Planning Act, there are no municipal mechanisms that can be used to require the provision of affordable housing.

The municipal response outlined in this report is centred on providing clarity for implementation. The municipal response relates to broad and specific issues that are essential to improving the focus and direction for land use planning in London. Further, the proposed changes to the Provincial Policy Statement are intended to provide a stronger basis for local decision making in short and long-term planning horizons.

PREPARED BY:	SUBMITTED BY:
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RECOMMENDED BY:
JOHN M. FLEMING, MCIP, RPP MANAGING DIRECTOR, PLANNING AND CITY PLANNER

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Review of: **Provincial Policy Statement Review**
dated September, 2012

Reviewer: G. Sass
November 13, 2012

EEPAC views the PPS as a very progressive document which if implemented as intended could lead to a future of resilient settlements and hinterlands that are ready for a low-carbon world and where natural and cultural features on the landscape are perpetuated on a sustainable basis. EEPAC has reviewed mostly the section on the Natural Heritage system and offers the following changes.

Changes suggested by EEPAC (changes highlighted in yellow):

Green infrastructure:

The language around green infrastructure needs to be tightened. While it is true that natural features like wetlands do provide services akin to human-made green infrastructure (e.g. SWM ponds) they cannot be equated. This ambiguity makes natural features the prime place to cite green infrastructure projects such as SWMs. Green infrastructure should never be placed within the natural heritage system.

> **Recommendation # 1: The green infrastructure definition on page 40 should be changed to:**
>
> **Green infrastructure:** means ~~natural and~~ human-made elements that provide ecological and hydrological benefits. *Green infrastructure* can include components such as ~~natural heritage features and systems,~~ parklands, stormwater management systems, ~~urban forests,~~ permeable surfaces, and green roofs.
>
> **Recommendation # 2: 1.6.2 (c) should be changed to:**
>
> 1.6.2 Before consideration is given to developing new *infrastructure* and *public service facilities*:
>
> c) the use of *green infrastructure* should be encouraged, where feasible, to augment *infrastructure*, and for other associated ecological and hydrological benefits, but should always be located outside of the natural heritage system.

Cross-jurisdictional considerations of hydrological and ecological significance:

2.1.2 has good language encouraging the protection of diversity and connectivity but EEPAC thinks it needs to be made explicit that jurisdictional neighbours need to consider cross-boundary features (e.g. significant natural features that cross a municipality boundary) as a matter of fact. Not only does water move across administrative boundaries but so do animals and plants. Regional-scale connectivity is key to the survival of many species (thus the preservation of biodiversity) and initiatives like the Carolinian Meta-corridors need to have some stronger policy backing. One idea is to rewrite 2.1.2 based on 2.2.1 which does explicitly urge planners to look beyond their boundaries. Instead of using the word watershed, bioregion or ecoregion could be the focus.

> **Recommendation # 3: Ecological connectivity needs to explicitly consider cross-jurisdictional impacts. Change 2.1.2 to:**
> 2.1.2 Planning authorities shall protect, improve or restore the *biodiversity* at local to regional scales by:

a) using the *ecoregion* as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering multi-scale impacts of development;
b) minimizing potential *negative impacts*, including cross-jurisdictional and cross-*ecoregion* impacts;

On-site recycling, treatment:

The modern solution to most environment-economy issues is very linear: "natural resources converted to stuff then converted to waste" is the general pathway. As ecologists as well as ecological economists have insisted for many years, we have to close the loops, since "nature does not generate waste", as the saying goes. We need to start treating our "wastes" on-site or close to site. This includes mundane things such as stormwater and organic wastes including leaves from trees, but in the future might even include human wastes.

Recommendation # 4: Explicitly encourage the treatment of water and organic "wastes" on-site.

2.2.1 Planning authorities shall protect, improve or restore the *quality and quantity of water* by:
g) ensuring stormwater management practices minimize stormwater volumes and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces.
h) where appropriate planning authorities should actively encourage the incorporation of technologies and processes that treat water (e.g. storm and grey water) on-site.

1.6.9.1 Waste management systems need to be provided that are of an appropriate size and type to accommodate present and future requirements, and facilitate, encourage and promote reduction, reuse and recycling objectives. Planning authorities should consider the implications of development and land use patterns on waste generation, management and diversion.
Waste management systems shall be located and designed in accordance with provincial legislation and standards. Where appropriate planning authorities should actively encourage the incorporation of technologies and processes that treat organic wastes such as organic kitchen wastes and yard wastes on-site.

Targets in setting policy:

If real progress is desired to a given outcome, planning authorities need to set targets which then need to be revisited and evaluated as time goes on. Like in 1.1.3.5 there is a push to implement minimum targets. The province in another legislation has a target to meet a given waste diversion target. The idea of setting targets needs to be implemented throughout the PPS document. One great need in terms of the natural heritage system is the setting of targets of minimum natural heritage feature cover (e.g. minimum woodland cover, tree cover, etc).

Recommendation # 5: Targets need to be explicitly built into the planning process, including targets for natural heritage features. The following should be added to Section 2.

2.1.9 Planning authorities shall establish and implement minimum targets for *woodland, wetland and tree cover* within built-up areas based on best available scientific evidence. However, where provincial targets are established through *provincial plans*, the provincial target shall represent the minimum target for affected areas.

Natural heritage, climate change, invasives and pests

Invasive plant species (e.g. buckthorn), insect infestation (e.g. emerald ash borer), in combination with changing weather patterns (warmer winters, more extreme storms) are combining to seriously impact the natural heritage system. In many parts of Ontario, large areas will lose tree cover which might prompt private landowners or even the municipalities to take down dead trees, clean out buckthorn, etc. Drastic land cover changes might embolden some people to encourage the development of lands that in their eyes are no longer ecologically significant. To stop this from happening, planning authorities need to actively encourage the incorporation of restoration plans whenever such actions are implemented. In addition, the idea of restoration and compensation needs to be really played up. Southern Ontario has already lost so much natural heritage, it is time to restore the land.

Recommendation # 6: The idea of restoration needs its own bullet. The following should be added to Section 2.

2.1.11 *Development* or *site alteration* shall always be accompanied with a plan of restoration if ecological function is going to be lost or has been lost as a result of climate change, invasive plants or pests and diseases.