

PH12.3 - Expanding Housing Options in Neighbourhoods: Major Streets Study - Final Report - Lenka Holubec submission

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RE: PH12.3 - Expanding Housing Options in Neighbourhoods: Major Streets Study - Final Report

Dear Mayor Olivia Chow and Members of City Council,

Thank you for this opportunity to comment on PH12.3 - Expanding Housing Options in Neighbourhoods: Major Streets.

Toronto needs more housing options and the Major Streets initiative, as part of the EHON program, attempts to add density in the form of townhouses and six storey apartment buildings, subject to appropriate setbacks.

My concern is that any potential effects on biodiversity in the city were not addressed/evaluated throughout consultations [The Major Streets Public Survey](#) so far in the process leading to the proposed Official Plan Amendment 727.

Toronto is not only endowed by the significant natural heritage protected in the Official Plan as the Environmentally Significant Areas but *"The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem."* CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-45

Recommendation:

That City Council Defer making a decision on the item and request the four Community Councils to consider the implications of the proposed changes in relation to how this may affect supporting biodiversity in the City including: sustaining, restoring and enhancing the health and integrity of the natural ecosystem, and targeting ecological improvements, the native species on at risk list (e.g. Chimney Swifts) providing for migratory birds, land use changes in the adjacency to protected natural heritage (the ESA/ANSI/PSWs), requirements of a proper Natural Heritage Impact Study for any negative impacts, natural linkages between the natural heritage system and other green spaces, opportunities for additional habitat provided by the built environment, etc.

Addressing the dual crisis of climate change and biodiversity decline is urgent and every and all changes dealing with the land use change in the city and beyond must support fully this urgency.

Yours sincerely,

Lenka Holubec, member [ProtectNatureTO](#)

Background:

[Toronto Official Plan, CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO, December 2023 Consolidation](#)

“The natural heritage system is important to the City, both within and beyond our boundaries, and needs to be protected for the long term.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-43

“Protecting Toronto’s natural environment and urban forest should not be compromised by growth, insensitivity to the needs of the environment, or neglect. To this end, proposals for new development may need to be accompanied by a study assessing their impact on the natural environment.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-44

“Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. **Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto. The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem.”** CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-45

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[OPA 262](#) was approved by the Province in May 2016. The OPA is in full force and effect

OPA 262, BY-LAW No. -2015 To adopt Amendment No. 262 to the Official Plan of the City of Toronto with respect to the Environmental Policies and Designation of Environmentally Significant Areas.

3.2.3 PARKS AND OPEN SPACES 3-28

Our exceptional system of green spaces helps make Toronto a healthy and livable City. The City’s Green Space System, made up of parks and open spaces, the natural heritage system and a variety of privately managed but publicly accessible spaces, is an integral part of our quality of life and social well-being. It provides opportunities for recreation, relaxation and experiencing nature in peace and quiet and contributes to Toronto’s competitive advantage as a place to invest.

The Green Space System provides many benefits for the City. These lands:

- form the core of the City’s natural ecosystems providing habitat for flora and fauna and including most of our significant natural heritage features and functions;
- help sustain our natural environment by cleaning the air, recharging groundwater, cleaning our watercourses and limiting damage that might arise from flooding and soil erosion;
- include natural and hydrological connections that link Lake Ontario to the larger biophysical region and its ecological systems;
- provide a variety of landscapes for reflection, contemplation and appreciation of nature;
- improve human health by offering opportunities for passive and active recreation, community gardens and environmental education; and
- offer unique tourism and entertainment destinations attracting visitors from across the region and elsewhere."

[PH32.6 - Our Plan Toronto: Draft Environment and Climate Change Official Plan Policy Updates](#)

This Official Plan update emphasizes achieving net zero emissions and climate adaptation and reliance. Protection and enhancement of the City's natural heritage system and water resource systems is a key element of climate adaptation and resilience. Proposed changes include new maps to identify the water resource systems, an update of Map 9 Natural Heritage System to include water resource features and to align with the Ravine and Natural Feature Protection bylaw regulated area and a new layer that identifies areas that contribute to resilience of the natural heritage system. Four new Environmentally Significant Areas and additions to two existing Environmentally Significant Areas are proposed for designation bringing the total number of Environmentally Significant Areas to 90. A new Provincially Significant Wetlands (PSW) are proposed to be added to Map 12b.

[OPA 583 Official Plan Amendment 583, Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates Date: May 11, 2022](#)

- New policy encouraging development adjacent to the Natural Heritage System to provide natural landscaped surfaces that increase the ecological function and/or biodiversity (2.3.1 Healthy Neighbourhoods)

- New policy in to minimize hazards to local and migratory birds (3.4 The Natural Environment);

- Updated policies to enhance the urban forest and ensure adequate soil for new trees, protect mature and native trees, and support the health of street trees (3.4 The Natural Environment);

- Addressing the dual crisis of climate change and biodiversity decline, along with other environmental concerns extend beyond this Official Plan update