

**PH15.1 - Official Plan Policy Amendments for Infrastructure Projects in Parks and Open Space Areas - Decision - Lenka Holubec submission**

October 10, 2024

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**RE: PH15.1 - Official Plan Policy Amendments for Infrastructure Projects in Parks and Open Space Areas - Decision - Lenka Holubec submission**

Dear Mayor Olivia Chow and Members of City Council,

Thank you for this opportunity to comment on PH15.1 - Official Plan Policy Amendments for Infrastructure Projects in Parks and Open Space Areas - Decision

*"This report recommends that Council adopt Official Plan Amendment 528 (OPA 528), which amends the City's Official Plan policies to specify limited exemptions when the sale or disposal of City-owned lands in Parks and Open Space Areas, within or outside of the Green Space System, may be permitted without the requirement of an Official Plan Amendment (OPA). The purpose and intent of Official Plan Amendment 528 is to facilitate conservation projects and essential public works and utilities that support Toronto's development and growth, provided certain criteria are met."*

This comment is to join concerns expressed aptly by CORRA's chair William H. Roberts at the Planning and Housing Committee on September 26 and be *"another voice from the wilderness"* saying that this item should be re-considered. (September 20, 2024) Letter from William H. Roberts, Confederation of Resident and Ratepayer Associations (CORRA) (PH.New) <https://www.toronto.ca/legdocs/mmis/2024/ph/comm/communicationfile-182784.pdf>

A view of Toronto as a city with abundance of green spaces, ravines and nature is increasingly challenged as in daily reality nature is under a frontal attack in our fast growing city struggling to increase housing supply, build transit, infrastructure, utilities, etc., while our goals related to addressing the dual crisis of climate change and biodiversity decline are not pursued with the same vigour.

- *"By using satellite data to track urban greenness over time, Statistics Canada found that Toronto's green space has shrunk significantly over the past two decades. As the region faces pressure to create much-needed housing, city reports warn that the amount of parkland per person risks falling further. Unpalatable land covered by concrete and other impervious surfaces is expanding, a change that is often permanent."* [Children need more green time](#)

- *“According to the World Cities Culture Forum report, Toronto ranks 31st, with 13% of total green space in a list of 41 cities. The areas with the most green space are Oslo, Singapore, and Sydney with 68%, 47%, and 46% green space, respectively”.* [Data Investigation: How Green is Toronto? Is Toronto as 'green' as we claim?](#)
- *“Canada biggest cities have lost their green spaces at staggering rates over the past two decades, new data from Statistics Canada suggests.”* [Canada biggest cities have lost their green spaces at staggering rates over the past two decades, new data from Statistics Canada has revealed](#)

#### Recommendation:

That City Council Defer making a decision on the item and request re-considering of the implications of the proposed changes in relation to how this may affect supporting future green spaces and sustainability in respect to rapidly growing population and biodiversity goals in the City including: sustaining, restoring and enhancing the health and integrity of the natural ecosystem, and **targeting population mental health** and ecological improvements 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:

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

The City of Toronto has a strong legacy of introducing leading-edge policies that protect the natural environment, support and enhance biodiversity, and address climate change.

-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

-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);

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[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.