

Comment on Conserving Ontario's Natural Heritage policy

<https://ero.ontario.ca/notice/019-6161>

Greenspace Alliance of Canada's Capital

These comments are in response to the discussion paper seeking feedback on how Ontario could offset development pressures on wetlands, woodlands, and other natural wildlife habitat. We agree that offset policies that would require a net positive impact or at minimum no net loss for these features could help staunch and reverse the decades-long trend of natural heritage loss in Ontario.

We would offer as an example to follow in this regard the greenspace protection regime introduced in the City of Ottawa's new Official Plan. The various types of greenspace to be protected are enumerated and defined in Policy 7 of the OP. The relevant protection policies are found in Policy 4.8.1, which sets strategic directions, and Policy 5.6.4, which describes the Natural Heritage overlay and the protections afforded to the areas so covered. These policies were not modified by the Minister in approving the OP.

These protections can be summarized as a hierarchy of protections arranged in descending order from a positive obligation **to maintain and improve** ecological function, where development and site alteration is prohibited and a wide buffer required in the case of adjacent development, down through **no negative impact** and finally to **no net loss**. It is in this latter category of protection that offsetting is considered as a means of achieving no net loss in ecological function.

In general, offsetting is not an option for "higher value" greenspace, such as Provincially Significant Wetlands and other features that are part of the City's Natural Heritage System. For "lower value" greenspace, such as evaluated wetlands that are not provincially significant or rural forest cover that is not part of a significant woodland, the no net loss regime applies, meaning that offsetting can be used to compensate for loss due to development.

Appendix 1 contains a table providing more detail on the full hierarchy of protections in the Official Plan, while the table in Appendix 2 itemizes all the greenspace types, the cross-references to the Official Plan policies in which they are defined and the associated protections. These were submitted as separate additional documents.