



1 Greenspace Alliance of Canada's Capital  
Alliance pour les espaces verts  
dans la capitale du Canada

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**Official Plan Review**  
**Comments by the Greenspace Alliance of Canada's Capital**  
**To the**  
**Planning and Environment Committee, 24 November 2008**  
**Agriculture and Rural Affairs Committee, 27 November 2008**

The Greenspace Alliance is submitting the following comments on the proposed amendments to the City's Official Plan as reported to the meetings of the Planning and Environment Committee, 24 November and of the Agriculture and Rural Affairs Committee on 27 November 2008. We thank the councilors in advance for considering the Alliance's comments regarding the OP review.

It is our hope that the policies to be included in the revised Official Plan (OP) will follow the following principles:

- that the Official Plan provides sufficient protection for greenspace and environmentally sensitive areas;
- that sustainable development should be promoted and that inefficient and wasteful urban sprawl be limited;
- that the policies follow and reinforce the stated strategic directions already agreed to in the Official Plan;
- that the policies conform to the letter and spirit of the Provincial Policy Statement (PPS); and
- that the interests of the community as a whole take precedence over vested or individual self-interest and not the other way around.

**Comments**

The Urban Boundary

**The Alliance supports a firm urban boundary for the City to last until at least 2031.**

- We feel that a firm boundary assists in focussing development efforts towards intensification and thus reducing sprawl. This sends a signal as to the seriousness of the City's intent to limit sprawl and promote intensification. Any expansion of the urban boundary should only be contemplated at each five-year interval after a set of rigorous criteria is met (specific intensification targets, etc.). Unfortunately, in discussions about the urban boundary, there appears to be an underlying assumption that there will always be an expansion at each review and it's only a question of

degree. Expansion should only be contemplated as a last resort and only when the need has been clearly demonstrated.

- We see the identification of areas for future urban growth as reasonable planning practice to be prepared for a possible expansion of the boundary after a 5 year review. An objective process and methodology for identifying these areas should be well established beforehand. It is important for good planning that the identification process be driven by the strategic growth policies of the OP and not by the desires of individual land speculators or by developers who seek their own self-interest. As always, we see the OP as a tool for promoting the best interests of the community as a whole; however, we wonder if the political “will” will be there to do so. There will always be strong pressure to expand even if the analytical data is not there to justify it.
- We would urge that any expansion of the urban boundary, or the identification of future growth areas, should avoid the inclusion of agricultural lands, and significant wetlands, forests and meadows.

### Rural Development

**The Alliance feels that villages should be the focus of rural development and that development in the general rural area be kept to a minimum.**

- The PPS allows for “limited residential development” outside of Villages but leaves it up to the municipality to define what this means. We can not find in the proposed amendments to the OP a policy statement that explicitly defines the “limits” of development or the criteria used for limiting rural residential development. For example, should the City limit rural residential development to 3% of the City’s total residential growth? Or, should it use some other measurement or criteria? It is therefore incumbent on the City to clarify its position on “limited residential development” so that it meets the intent of the PPS and at the same time provides practical guidelines for the extent and type of development that can take place.
- In our view, the current politically-driven policy of allowing country lot subdivisions does not follow the intent of the PPS regarding “limited residential development” in the rural area, and it undercuts all the fine arguments for preventing sprawl and designing sustainable communities as previously expressed by Staff (e.g., Document 10-1 – Country Lot Subdivisions, PDC Agenda 49, April 2003). As in our OP appeal, we still hold to the principle that allowing country lot subdivisions is a “bad” form of development. However, we recognize that there could be a need for some “limited” development. We would strongly suggest that this development be strictly constrained by the PPS’ stipulation that “development shall be appropriate to the infrastructure which is planned or available, and avoid the need for the unjustified and/or uneconomical expansion of this infrastructure”.

- If “limited” residential development is to take place in the general rural area, it should be in the form of “conservation subdivisions” as described in the new amendments.
- If it is a question of meeting population growth, it could be argued that intensification and the eventual expansion of the urban area should suffice, however, the provision of “choice” is brought into the discussion as a basis for considering other residential “opportunities such as country lot subdivisions”. The provision of “choice” has never been identified as one of the City’s guiding principles and, we doubt that it constitutes the basis for good planning. Indeed, allowing “choice” as exemplified by country lot subdivisions undermines the stated strategic intentions of the OP and the PPS.
- The Alliance maintains its constant position that lands designated as Rural Natural Features (RNF) should be exempt from development. If needed, there should be enough land outside of RNFs in the general rural area to accommodate any additional development. In short, we see no demonstrated need to touch these designated areas.

### Intensification

**The Alliance supports greater intensification and the setting of minimum intensification targets within built-up areas.**

- An overall target of 40% of all new urban dwellings to be achieved through intensification is a good base to work from, but there should not be anything stopping it from being higher if the assessments of individual urban areas indicate that this is feasible. In other words, 40% , as the starting point, should be the minimum.
- It should be noted, that with greater intensification, whatever greenspace is available takes on that much more importance for safeguarding the local quality of life of the community.

### Ottawa’s Natural Environment System

**The Alliance is happy to see that, in order to conform to the 2005 PPS, Ottawa’s natural environment will receive increased policy protection in the OP.**

- The Alliance agrees with the proposed direction of the amendments regarding the natural environment system but it is concerned about landowners altering their sites if they are in danger of being designated as environmentally “significant”. As already witnessed, some landowners have ravaged their wetlands to prevent them from being designated provincially significant. What measures can be placed in the OP to prevent this type of action? We would like to see the City being more proactive regarding this issue.
- We are particularly concerned about protecting the integrity of such significant natural areas such as the Goulbourn wetlands which were declared Provincially Significant Wetlands (PSW) by the Ministry of Natural Resources in 2005 and added

to in 2008. These wetlands need to be identified as PSW in the OP. This would also ensure adequate protection for species found there (plant and wildlife) under the Endangered Species Act.

#### Protection of Endangered Species

- With reference to OP 4.7.4 - Protection of Endangered Species, the Alliance believes that the current language is not sufficient in meeting the requirements of the Ontario Endangered Species Act (ESA) 2007. The new act prohibits damage or destruction of habitat for species at risk (those listed as endangered or threatened on the Species at Risk in Ontario (SARO) List). As well, recognizing that “Preventing Species becoming At Risk is key, Species of Concern will need to have a management plan to ensure their habitat is protected for future generations”. It would appear that the City should not only state that it needs to protect the habitat of endangered species but also explicitly indicate in the OP how it will go about doing so. We are particularly concerned about habitats that are small in area and not yet covered by rural/urban feature or NEA designations.
- Please note that the Transport Canada wetlands near the Ottawa International Airport contain Species At Risk – press release of Nov 5, 2006 by Dr. Schueler. In keeping with the land owner’s own policies and legislation these lands will require appropriate land use designations in the OP and zoning (EP) (see the Federal Species At Risk Act (2005) and the Federal Policy on Wetland Conservation (1991)).

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