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NATIONAL CAPITAL COMMISSION/COMMISSION DE LA CAPITALE NATIONALE CAPITAL PLANNING / AMÉNAGEMENT DE LA CAPITALE

202-40 rue Elgin Street Ottawa, Ontario, K1P 1C7

August 12, 2011

Mr. John Moser General Manager, Planning and Growth Management Department City of Ottawa 110 Laurier Avenue West Ottawa, ON, K1P 1J1

Re: Second phase - urban expansion candidate areas Official Plan Amendment No 76 (OPA 76).

NCC File No. CP2157-500-04

City File No. L03-01-10-0031

Dear Mr. Moser:

We acknowledge that as part of the Official Plan review, completed in June 2009, Council decided to add lands to the urban boundary. That decision was appealed to the Ontario Municipal Board (OMB) and the OMB will be dealing with the urban expansion decision in two phases; Phase 1 dealing with "how much land" concluded that a total of 850 hectares of land should be added to the urban area and Phase 2 dealing with "where" lands to be added should be located is on-going.

Previously, Council added 230 hectares of urban land through OPA 76, which was adopted in June 2009. Of that land 163 hectares were subsequently confirmed through Official Plan Amendment 77, which is now in effect. Consequently, the OMB decision requires the City to provide a position as to what land it believes should make up the balance of the total 850 hectares.

The National Capital Commission (NCC) has land responsibilities and ownership for recognized National Interest Land Mass, or NILM, in proximity to some of these candidate urban expansion sites. NILM lands are considered to be of national importance based on their significance to federal needs and Capital functions. These NILM lands include both the Greenbelt as a whole, and specific components within it, such as the Mer Bleue bog ecosystem in the east urban community. As stewards of NILM lands, we have developed and approved federal policy plans which are also intended to be guiding

documents to support principles expressed in the *Plan for Canada's Capital*, 1999 and the *Greenbelt Master Plan*, 1996 (presently under review).

The current master plan does reflect policy direction that the Greenbelt is a key component of a regional environmental system. Within this larger region, the Greenbelt provides a series of connected natural areas that strengthen both local and regional ecological areas and act as the "hub" of a larger network extending to Constance Bay, the Marlborough, Larose and Cumberland forests and beyond.

These natural areas are protected and sheltered by adjacent buffer zones and are connected to each other, and areas beyond the Greenbelt, by natural and ecological links. By allowing for the free movement of animals and the continuity of plant life, these buffers and links enhance the ecological health and resilience of individual natural areas and of the region as a whole. The concept for a continuous natural environment extends past the delineated boundary of the Greenbelt; the health of watercourses, fish habitats, plant and animal life within, is also dependant on the health and resilience of the linkages beyond the ownership limits via external natural links.

It is not our intention to comment directly on specific locations within the candidate expansion areas being considered by the City of Ottawa, however, we do wish to raise our position with regards to the need for the development of additional strategic policies for lands which may either directly abut, or have an impact on the health and viability of watercourses and eco-systems which form part of the Greenbelt. The Greenbelt is an integral part of the extended natural environment, and therefore we do not suggest that the entirety of these corridors needs to be within a single ownership. The NCC is not in a position to formally identify lands which may be designated for future acquisitions at this time, however also firmly support that the protection of such abutting lands and corridors should be viewed as a regional responsibility and this stewardship and protection may be achieved with varied ownership (public and privately lands). The NCC does not need to be the owner of lands to support the concept of preserving and protecting regional ecological linkages.

Since June 2009, the NCC has been advancing in the review process for the Greenbelt Master Plan. At this time, the visioning stage is complete and we are working in the concept stage. This current concept stage identifies various scenarios, and the identification of eco-corridor linkages beyond the Greenbelt lands is consistent in all concepts. Although the master plan has not yet reached the stage of identifying potential land additions, we re-iterate that retaining linkages into lands held by others remains an important issue of sustainability. Subsequent stages of the review may identify further strategic policy directions for NCC Greenbelt lands and eco-corridors which interact with it.

With any of the additional urban expansion lands abutting the Greenbelt, or other federal partner greenspace land holdings, we support the in-tandem development of more detailed strategic policies in the Official Plan (OP) which will better guide the implementation and subsequent urban development abutting important ecosystems.

Policies which would provide clarity on any required studies, and requirements to preserve ecological connectivity within the region. These policy directions may also require additional guidelines for developers for implementation.

Lands identified for future urban development which abut Greenbelt eco-systems, or where we are the stewards of downstream watercourses (candidate expansion Areas 1, 8, 9, 10), may also presently fulfill an important ecological/corridor linkage. Any of these future urban development areas must be permitted (or even required) to fulfill a dual role with regards to a natural environment linkage. Depending on the location, implementation policies for urban development should also establish policies related to storm water management, density thresholds in key areas, floodplain and ecological linkage preservation. Given the unique nature of the various sectors of the Greenbelt, not all geographic sectors have uniform policy requirements (i.e.; development lands abutting Mer Bleue vs Bank Street) and we would encourage the City to consider area specific directions for storm water, overall density, greenspace preservation, existing floodplains or eco-linkages. We acknowledge it is possible to have urban development abutting the Greenbelt, if specific implementation policies are available for addressing issues where conflicting issues arise.

We encourage and support the City, in the next stage of urban boundary expansions, to develop further policy directions which will not compromise these regional linkages which are important to the sustainability of the Greenbelt and the areas beyond it.

Thank you in advance for your time and attention with our comments.

Yours truly.

Sandra Candow, MCIP, RPP

Principal Planner

Capital Planning Branch

cc. Sylvie Lalonde- Capital Planning, NCC Lucie Bureau-Capital Planning, NCC Bruce Finlay- City of Ottawa