

Submission by the Friends of the Greenspace Alliance.

The Friends of the Greenspace Alliance is an organization that joins individuals and citizens groups to protect significant greenspaces in the National Capital Area. We count several professionals among our members and friends. E.g., a statistician, an economist and a real estate broker have contributed to this submission. Because of our interest in protecting agricultural, wetlands and rural natural features we supported the retention of the 2003 Official Plan Urban Boundary (as adjusted by any successful OMB appeals of that Boundary) during the 2008-2009 review of the 2003 Official Plan. This position was expressed in our interventions in November 2008, May 2009 and finally to Council in June 2009.

For example, in May 2009 we stated to the Joint Agricultural and Rural Affairs Committee and Planning and Environment Committee the following (quoting from the Minutes):

“The Greenspace Alliance is in principle against the Urban Boundary Expansion. A great deal depends on the interpretation of data on household population projections and other assumptions. The City's OP objectives of arresting urban sprawl by promoting intensification within the urban area need to be supported by consistent policies in the OP and not undermined by other policies and contradictory ones such as expanding the Urban Boundary or allowing country lot subdivisions to continue.”

Our statements of November 2008 and June 2009 are available on our web site at http://greenspace-alliance.ca/files/imce_images/OP_Proposals_GA_Response.pdf and <http://www.greenspace-alliance.ca/node/472> respectively; excerpts from these submissions related to the Urban Boundary are also attached for your convenience.

Still, when Council decided on a relatively small 230 ha expansion, we did not appeal this part of OPA76, primarily because we felt we did not have sufficient resources to assist the OMB in arriving at a better decision.

The demonstration of a need for any expansion of the urban boundary requires the following information: population projections; the proportion of the population that will be in private households; the average number of persons in each private household; the expected numbers of the various types of dwelling required for this population and the land requirements for these types of dwellings.

Our comments are organized in accord with some of the Issues list agreed upon for the hearing.

Issue 3 : Did the City use appropriate population and housing growth projections for the residential land needs analysis? If not what are the appropriate projections?

Having reviewed the new evidence, we arrive at the same conclusion as does Dr. Doug Norris namely that, if anything, the City's projections for population and households are too high. By implication, the 18-year supply for low-density housing which 230 additional hectares is expected to make possible, may in fact perhaps suffice for the next 20.

There could be several reasons for the City's estimates of population to be slightly on the high side. (Starting with a 2006 estimate above the post- census estimate by almost 25,000 would tend to bring about such a result.) We note as well that in his witness statement, Mr. Cross states that he believes in the city figure but he gives no specific evidence for that belief. We know that the post-census estimate excludes the foreign population (embassy staff etc.) but that is unlikely to amount to more than a few hundred persons. On the other hand, some people may have more than one residence (within city limits); as well, counting residents in new dwellings may result in a slight bias upward as the residence left may not yet have been considered vacant.

Another contributing factor to an overestimate of the population in private households could be the growing share of the collective dwelling population. At the provincial level their share increased from 1.3% to 1.4% between 2001 and 2006, thus reducing the number in private households. The Ontario portion of the Ottawa- Gatineau CMA recorded 14,990 residents in collective dwellings. Mr. Cross has correctly excluded the population in collective dwellings in his estimates of housing types but we are uncertain to what extent he accounted in his projections for a probable increase in the proportion of residents in the collective dwellings. (Seniors' residences are considered collective dwellings.)

We therefore believe that if the City's position errs, it errs on the high side, not the low. Given the uncertainties in such projections this seems a reasonable conclusion as the provision for a review in five years allows for any necessary corrections.

With regard to overall housing growth estimates we also support the City, believing that it has made reasonable assumptions regarding the possible reductions in persons per household.

As an exercise, assuming a reduction every 5 years of just .02% in the average number of persons per household results in an estimate of 39,000 fewer new houses in 2031 than the City projects. This shows, as Dr. Norris pointed out, how sensitive the projections are to even slight changes in the assumptions.

We conclude that the City's estimate for new houses required may also be slightly on the high side. We therefore support the City's housing estimates as being appropriate for residential land needs analysis.

Issue 5 : Were the assumptions used by the City regarding the dwelling type propensities of residents over the projection period reasonable and defensible based on available research and empirical data?

Given the increasing availability of both upscale and moderate seniors' residences which are not considered as part of the private housing stock, one wonders if they may take in an ever increasing percent of the aging population (especially as the number of residents over 85 increases) and thus reduce the increase in one-person households that may have been projected in the City's estimates.

Thus we agree with the City's approach of deducting institutional residents before projecting housing needs by type, given that their number is expected to increase significantly over the planning horizon, from 11,425 in 2006 to 20,700 in 2031. We do not know however if this deduction included residents in seniors' residences, which are considered as collective dwellings but may not have been considered institutional residents.

A smaller but additional factor is the effect of conversions. They are not counted in the increase of the housing stock. Two conversions have occurred in the last year or two in the city, one from a hotel and one from an office building, both to senior residences. Between them they will likely house above 200 people. These conversions illustrate the growing popularity of this type of housing and suggest the increasing need to exclude this population when projecting private dwelling types. Other conversions from apartment buildings to seniors' residences have also been seen, thus directly reducing the private housing stock.

We note that the City has held extensive consultations with the GOHBA about these projections and as a result the City has adopted several assumptions in their projections which result in a larger projected need for new land. This includes acceptance of a 50% net-to-gross ratio compared to the historically used 60% (step 12 in the City's methodology).

Finally, we note that the PPS makes no prescriptions for making land available by housing type. An OMB decision (Del-Brookfield-Wetspark, 11 August 2005, #2092) turned on accepting such a compartmentalization. We submit that confining city policy to such an extent does not constitute good planning.

Issue 8: Is the proposed requirement in policy 3E in Section 2.2.1 that "an urban expansion will only be considered if the intensification target of this plan has been met"

consistent with the 2005 Provincial Policy Statement, in conformity with other policies in the City of Ottawa Official Plan, and does it represent good planning?

We agree with witness for the City Paul Stagl that such a policy is in conformity with the PPS. We note in particular these two policies (emphasis added):

“1.1.3.6 Planning authorities shall establish and implement phasing policies to ensure that specified targets for intensification and redevelopment are achieved prior to or concurrent with new development within designated areas.”

“1.1.3.9 A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only where it has been demonstrated that: a) sufficient opportunities for growth are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the planning horizon.”

These and other PPS policies clearly indicate that intensification must be considered first before considering the need for expansion of the urban area.

Finally we believe that, while the need for compact communities may need to be balanced with the need for green space, this can be achieved by good design and innovative efforts. As well, we find the increasing size of houses given the decreasing average number of occupants a trend which should be discouraged by planning policy based on environmental concerns.

Extract from Greenspace Alliance Comments to **Planning and Environment Committee, 24 November 2008**
Agriculture and Rural Affairs Committee, 27 November 2008

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.

Joint Submission of the Greenspace Alliance of Canada's Capital and the Friends of the Greenspace Alliance to Council on the Official Plan Amendment to be tabled June 10, 2009.

Extract:

2. Comment on Extending the Urban Boundary

We do not find the Staff's response to the questions regarding the expansion of the urban boundary convincing. As the Alliance stated in its earlier submission, a great deal depends on the interpretation of data on household and population projections that can lead to hasty decisions which result in the wasteful and irrevocable expenditure of valuable lands. We would point to an excellent analysis that was submitted by Paul Johanis during the March 31 – April 3 special joint meeting that provides a more detailed and alternative approach to the Staff's proposal.

Again, we ask what is wrong with a measured, prudent approach that the current procedural mechanism of five-year reviews of the Official Plan provides?

We repeat our previous arguments that City's Official Plan objectives of arresting urban sprawl and promoting intensification within the urban area need to be supported by consistent policies in the Official Plan.