



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

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25 March 2013

Submission to Planning Committee  
Agenda of 26 March 2013, item 14

### Building a Liveable Ottawa - Comprehensive Five-Year Review of the Official Plan - Public Meeting

The Greenspace Alliance has the following comments on the report and documents tabled under this agenda item:

1.

We are pleased to see that the "identification of **natural corridors**" now has made it to staff's formal work plan (page 19). We look forward, in the coming months, to working closely with City staff and the Nature Conservancy of Canada on the important work of identifying and mapping natural linkages in and around the city.

2.

As we have noted before, we are strongly supportive of the prohibition of future **country lot subdivisions** and plan to contribute to the discussion by expanding on what staff signalled in its report, namely that total prohibition is "an approach primarily used in Southern Ontario" (page 47).

Pages 16 to 19 of Document 5 (pages 46 to 49 in the staff report) are devoted to the idea of clustered country lot subdivisions and conclude that they hold no merit. We agree with that analysis and underline the nefarious cumulative impact of clusters of country lot subdivisions. Country lot subdivisions in general, and clusters of them in particular, are the antithesis of sustainable land use in complete communities.

There is, however, another definition of clustering -- which was discussed during the Rural Review leading up to OPA 76 -- namely the grouping close together of residences in a rural subdivision so that a larger part of the property remains unspoiled. (On an overall calculation, the minimum of 0.8 ha/unit could be maintained.) This configuration may make providing communal services easier and would conserve more of the area's natural features (often a designated Rural Natural Feature). Seeing that more than 1,200 lots have approval status and 1,600 more are in the pipeline (a 10-year supply; page 19/41), the City may want to promote, provide incentives for or even prescribe this type of "clustered" rural subdivision.

It is unfortunate that two definitions of "clustering" are being used. They should be clearly distinguished.

3.

We are supportive of relaxing the **severance policy** to allow one more severance, for a total of three lots, provided that the retained land is at least 10 ha.

4.

We repeat from our submission of 12 February to staff and Council that the following items should also be considered in this review:

- there should be a direction that the update of the Zoning By-law should include provision of an **overlay showing Rural Natural Feature designations**. This way, anyone examining the zoning of a particular parcel will be able to see immediately whether there is an RNF on or adjacent to the property;
- the definition of "**significant woodland**" should be reviewed as it does not appear to conform to the recommendations in MNR's Natural Heritage Reference Manual (2010); and
- **Schedules L1/L2/L3** should be better documented.

5.

With the conclusion about adequacy of land supply in the **Employment Lands** update (Document 2), it should now be an absolute certainty that the urban boundary will not change as part of this review. Still, we would be interested to hear staff's opinion on whether the current Official Plan review constitutes a "comprehensive review" as defined by the Provincial Policy Statement.

Missing from staff's report on page 8 under "main recommendations" from the Employment Lands update (though the point is mentioned later, on page 9) is the Danix report's recommendation that the three largest villages should achieve a 0.75 employment/households ratio before additional residential development is approved. We support such a policy as it will help avoid Richmond, Greely and Manotick becoming nothing but bedroom communities of urban Ottawa. It raises the question whether mid-sized villages should be subjected to a similar policy, for the same reason.

Staff's recommendation #2 includes the statement that "... the evaluation of certain employment lands be considered in the draft amendment;". The report does not make clear what this refers to and causes concern in light of Walton's desire to see certain of its rural holdings recognized as Employment Lands. If the reference is simply to the later statement (on page 9) that "Staff will also review the Employment Areas with a view to removing land with no development potential or removing remnant parcels that are too small to meet the criteria for designation in the Official Plan.", then we would appreciate seeing this clarified.

6.

The **LEAR review** appears to have run into a problem with Provincial soils data ("Staff has concerns about the new Provincial soils data" - page 16). Unfortunately, the staff report does not reveal in any way what the nature of the problem is or when and how it will be resolved. What is there to hide?

7.

The revision of the **Development Charges** by-law is mentioned just once in this report, on page 21, as the last item of "Next Steps." We look forward to learning how this process will be opened up to public consultation and scrutiny.

8.

Re Document 3: While we have no basis for contesting the conclusion that "the supply of land for other purposes (**non-residential uses and nonemployment uses**) is sufficient to at least 2031, and meets the requirements of the Provincial Policy Statement", we note that the 4-page document provides only impressionistic support for that conclusion. It is long on description, short on analysis. It also adopts an essentially status-quo stance for any demand for land. Specifically, with regard to parks, open spaces and recreational facilities, the report concludes that such uses "are not drivers of urban land requirements" (page 26). This is not a sustainable perspective, nor does it recognize some unique opportunities to save natural areas in Ottawa for posterity -- the South March Highlands and Carp Hills among them. (The NCC's proposal to re-incorporate Leitrim Wetland into the Greenbelt is a welcome development.) Such a static view also misses the point that denser housing patterns increase the demand for natural spaces both inside and outside the urban boundary.

9.

Re Document 4: These three pages on the **Mineral Aggregate Resources study** are very preliminary indeed. Still, we applaud the suggestion that it will be recommended that future applications for pits and quarries will have to include a cultural heritage and archaeological study, First Nations consultation, and a water budget, among other things. We also are pleased that it is finally being recognized that extraction below the water table is very different from extraction above it and will therefore require a new zoning application. We also applaud the intent to strengthen notification requirements and a sunset date for all mineral aggregate licenses.

10.

Comments on Document 1 (**Fiscal Impact Analysis**) and Document 6 & 7 (**Public Engagement**) follow in Appendix.

Submitted by:

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on behalf of the Greenspace Alliance of Canada's Capital

## Appendix

Comment on

### **"Update to Comparative Municipal Fiscal Impact Analysis - City of Ottawa" Hemson Consulting Ltd., March 14, 2013, 41 pp. & Appendices.**

This is a most interesting report that deserves the attention of elected officials as well as the general public. It is a bit puzzling that it is merely tabled as part of this agenda item, without discussion or reflection.

The report shows, on a long-term and all-inclusive basis of costs (both operating and capital) and revenues, considering both tax- and rate-supported services, that higher-density urban development generates a surplus for municipal coffers while three other forms of development (lower-density urban greenfield, low-density village and scattered low-density rural) all cost more than they generate in revenue. Greenfield subdivisions come out the worst, with a negative balance of \$409/year/pcapita, followed by scattered rural development at negative \$357 and village development negative \$199. Higher-density urban generates a surplus of \$455/year/pcapita. (The comparative numbers are more important than the specific amounts.)

Similarly, looking only at the long-term cost of capital expenditures that are initially financed by Development Charges (Table 14), the same pattern emerges: Least "underfunded" is higher-density urban, far more underfunded are lower-density greenfield and village development, and worst is scattered rural development. As the report notes, these comparative costs "represent the annual provision that would be required in order to fully fund the periodic replacement of the developer funded infrastructure" (page 33). If the municipality in fact does not fully fund such replacement, the result is deterioration of the asset (and concomitant reduction in residents' quality of life). That is not a basis for sound policy.

While these conclusions do not come as a surprise to anyone who has argued against urban and rural sprawl, it is good to see this quantified in as rigorous a manner as can probably be done.

Still, one should be aware that the analysis is based on four specific types of development, with just three or, in one case, four specific examples in each.

If this type of analysis were to be extended to one that asks which types of development are more sustainable (as opposed to what their comparative impact is on municipal finances), then it would be even more useful as a guide to citizens and government alike.

Even at the scope of analysis in this report, the conclusions are clear and underscore the "grow in, not out" development strategy that has been received wisdom for well over a decade, though in actual practice both urban and rural sprawl has continued. The report correctly highlights the conclusion that Development Charges should be raised to the maximum allowed by law.

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Comment on

**Document 6 and "Draft Online Questionnaire Report" - Thorney Fallis, March 8, 2013, 18 pp.**

The factual report of public consultation events and comments received to date contained in Document 6 is welcome. It demonstrates well how weak public engagement has been so far. At the same time, it demonstrates the hunger the residents of Ottawa have to become involved: A "community forum" announced at the last minute attracted 110 people.

Document 6 reveals nothing about what people actually said.

The on-line survey was very poorly designed and the report is even less satisfactory. The author correctly states that the survey did not sample public opinion but was only a "consultation tool." The results are not statistically representative of the population of Ottawa. Yet, the report displays percentage distributions with abandon. These have no information value whatsoever.

The flaws in the survey were legion. The opening question ("What is your favourite building") was silly and served no purpose. The large percentage of "Other" responses to some questions (pp. 6, 9-10) attests to bad design. Several questions failed to filter out respondents for whom the question is not relevant, driving them to provide false answers; for several questions, a "not applicable" option would have been an improvement. Very few questions solicited ideas, which is what a "consultation tool" could do.

The open questions generated a large number of responses (4,002 -- page 8; 3,134 -- page 15) but all that is reported from this potential motherlode of opinions is a random sample of 200 responses each.

The data in the Participation section of the report (pp. 4-6, on age, geographic distribution and mode of travel) should be put relative to the target population or known data from legitimate surveys.

In short, this report contains no statistically valid evidence and shortchanges us on any "opinion information" as well.