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Response to Preliminary Draft Official Plan for City of Ottawa

A response by

The Ottawa Field-Naturalists' Club  
and  
The Greenspace Alliance of Canada's Capital

to  
Ottawa Mayor and Councillors

8 November 2002

## BACKGROUND

This is a joint submission of the Ottawa Field-Naturalists' Club (OFNC) and the Greenspace Alliance of Canada's Capital. The OFNC (incorporated 1879) is the oldest natural history club in Canada, with over 900 individual memberships. The Greenspace Alliance was founded in 1997 and is dedicated to preserving greenspace throughout the national capital area; it counts twelve local organizations and over thirty individuals among its membership. In accordance with the mandates of both our groups, these comments address natural environment issues.

## GENERAL COMMENTS

The City is commended for the inclusion of the principles with respect to "A Green and Environmentally Sensitive City". We agree with, and will be proud to share, the outlined vision of "A Green City", which acknowledges the virtue of: (1) the splendour of a green city; (2) recognizing and building a greenway network; (3) focusing on development in harmony with the environment; (4) collective action to protect groundwater and surface water; and (5) lifestyles supportive of clean air, water and earth.

We further applaud the intent expressed in the Vision on Compact Mixed Use Development (under section 2.2.4 - Liveable Communities) that "Outside the Greenbelt, urban sprawl will be contained by maintaining a firm boundary where urban development stops and the countryside begins. Any proposal to change the urban boundary must satisfy the criteria set out in the Official Plan."

As well, the City is applauded on the improvement of protection for Environmental Areas B, by removing estate lot development as a use, and for providing basically similar protection to Areas A and Significant Wetlands as that which is in the current Regional Official Plan. We commend the

inclusion of General Rural (Natural Feature) Areas along with policies for them similar to those in the Regional Official Plan.

Given the complexity of the Draft OP and its assertion that "This Preliminary Draft Official Plan is truly a 'work in progress,'" (Preface, 1a) the proposed timetable for adoption is too short and should be substantially lengthened.

The Official Plan would be improved by adding statistics where available.

In Section 8.4.3, on Criteria for the Development of Community Cores, there is no mention of natural areas, greenspace or open space. Granted that community cores are to be densely developed, there still should be some indication that greenspace will not be forgotten and that it will be considered as an element in the overall design of these communities. To this end, the statement \*\*\*"include green space, small parks, tree-lined streets, and other natural features where possible to preserve the green character of Ottawa"\*\*\* should be added to the criteria for core development.

## PROBLEMS WITH PROTECTION AND MAPS

An official plan should be prescriptive not descriptive, particularly with regard to natural areas and greenspaces. In this regard accurate and detailed maps (Schedules) are critical. Principles, no matter how fine, can not substitute for clear statements of policy and protection. As well, Community Design Plans (which would not require an Official Plan Amendment to be changed) would not as useful in protecting valued areas as are Secondary Policy Plans (which form part of an Official Plan).

We are concerned about the statement in Section 1(f) of the Preface that: "If a Zoning By-law amendment will achieve the same thing as an official plan amendment, the land use will not be designated in the Official Plan." The Official Plan will be greatly diminished in both value and prestige if it could be bypassed on critical land preservation issues by the use of Zoning By-law amendments.

## SPECIFIC REQUESTS REGARDING PROTECTION AND MAPS

1) Subsection 9.1.1 3. promises: "The City will undertake an in-depth inventory of existing and proposed open space components and supporting network requirements to ensure continuity of the system." It is urgent that this work be done as soon as possible. It should be based on the Natural and Open Spaces Study (NOSS) of the former City of Ottawa, but broadened not only to cover all the former municipalities, but also to include greenspace and open meadows as well as wetlands and woodlands (areas covered in the NOSS).

2) We are concerned that, while in Table 9.2 (page 117) Urban Environmental Features are quite well protected, very few are shown on the map, in spite of the

information available from NOSS. In general, in order to be acceptable, the new Official Plan for Ottawa needs to combine the strengths of the former Official Plan for the Region of Ottawa-Carleton and the Official Plans of the constituent municipalities into a coherent whole. The new Official Plan should reflect those natural areas and features protected by the former plans, or by amendments to them, as Urban Environmental Features.

3) Little protection is offered in Section 9.3.1 to Major Open Spaces (the combination of the former Waterfront Open Space and Regional Open Space categories). The omission of the qualifier **"small-scale"** with regard to recreational facilities, commercial activities and institutional uses under 2.e) lessens the protection available from the Regional Official Plan. We further suggest that Waterfront Open Space remain as a separate category because of the long history of these areas in the Regional Plans. We recommend that for both types of Major Open Spaces, amendments to the Plan and Environmental Impact Statements (with the emphasis on the social impacts) be required for any significant development of them.

4) We would like to see a map with the recreational pathways and would be particularly pleased if it could include at least at a conceptual level our proposal for a Poets' Pathway to honour Ottawa's Confederation Poets and Mouvement littéraire exponents.

5) We feel that a map showing Areas of Natural and Scientific Interest (ANSIs) should be included as well as specific policies regarding these areas.

6) We encourage the city to work with the National Capital Commission to protect valued Greenbelt and other natural or green NCC lands.

#### COMMENTS ON CHARTING A COURSE PRINCIPLES (Section 1.3 and 1.3.4)

The Charting a Course principles could be strengthened with regard to the treatment of the environment. First, natural areas and other greenspaces such as parks, pathway networks and other open spaces are essential to liveable communities and are key to an innovative, creative, caring, healthy and responsible city. This should be reflected in the principles dealing with those topics. The four principles listed in 1.3.4 – "A Green and Environmentally Sensitive City" should be enhanced to read as follows (changes bolded):

\* A Green City - Ottawa **\*\*protects\*\*** natural habitats and **\*\*thrives through them and its\*\*** network of green spaces. **\*\*Natural spaces are part of all neighbourhoods.\*\*** Trees **\*\*and other vegetation\*\*** are an important way of maintaining environmental integrity.

\* Development in Harmony with the Environment - Development **\*\*preserves**

valued ecosystem components\*\* (see "Plan for Canada's Capital which defines these as "\*\*woodlands, wetlands and wildlife habitats, rare or endangered plant and animal species\*\*"), respects the environment and uses land \*\*in complete harmony with it.\*\*

\* A Focus on Walking, Cycling, and Transit - Ottawa \*\*values\*\* walking, cycling and transit \*\*above use of the automobile and\*\* increases facilities for them. We strive to ensure a healthier environment and \*\*to minimize lands used for\*\* roads and parking.

\* Clean Air, Water and Earth - All people work to improve the quality of the natural environment; \*\*ensure that we reduce our contribution to global warming;\*\* limit air, noise and light pollution; and protect natural resources and agricultural lands.

\* "Natural areas" should be specifically mentioned in Table 2.1. by adding this item under the headings "Uniquely Ottawa" and "Liveable Communities", and again in Section 2.2.4 "Requiring Compact Mixed Use Development".

#### POLICIES FOR "A GREEN CITY" (Section 2.3.4)

The policy focus items for the five components of "A Green City" are all important to protect natural areas and maintain a green city but certain critical items are missing from each policy.

\* The policy focus of "The Splendour of a Green City" is too limited with respect to natural areas and features. Therefore, the second bullet should be amended to read: "Keeping \*\*and naturalizing, to the extent feasible,\*\* lands along our \*\*water courses and other green corridors\*\*". The following two bullets should be added: \*\*"Preserving natural areas of local significance"\*\* and \*\*"Increasing the biodiversity of all natural spaces."\*\*

\* The policy focus of "Recognizing and Building a Greenspace Network" is also incomplete. The means by which the roadway network will be developed as a greenspace network is not indicated. Thus, \*\*"through such means as naturalizing edges, adding trees, etc."\*\* should be added to the second bullet. Two additional bullets should be included with respect to city roofs and transit areas: \*\*"Encourage greening roofs to create green networks in denser areas"\*\* and \*\*"Retain and increase green corridors of the transitway and encourage greening of rail corridors between stations."\*\*

\* The policy focus of "Focusing on Development in Harmony with the Environment" is a critical area for clear statement of policy and protection, which is unfortunately lacking. This problem can be mitigated by adding \*\*"Significant natural areas including meadows will be protected from development"\*\* to the end of this policy focus.

\* The policy focus of "Collective Action to Protect Groundwater and Surface Water" lacks an action component in the first statement and therefore, the first bullet should end with \*\*"and implement recommendations, including amending the Official Plan or zoning as required."\*\* Wetlands (in addition to Significant Wetlands) and recharge areas are two types of areas critical

to the protection of groundwater and surface water resources that are not included. Two bullets should therefore be added: **“Work to ensure protection of wetlands in the Canadian shield”**; and **“Protect recharge areas from disturbance”**.

\* The policy focus of "Lifestyles supportive of Clean Air, Water and Earth" lacks a natural area component in the mixed-use community and does not address greenhouse gases. The first bullet should be amended to add **“and retain valued natural spaces”**. The following bullets should be included: **“Minimize the production of greenhouse gases through parking and other policies which discourage the use of single-occupant vehicles (e.g. taxes on individual parking spaces at central locations, etc)”**, and **“Discourage conversion of open space to surface parking”**.

## ENVIRONMENTAL PROTECTION AND GREENSPACE (Section 9)

### Commendable Components

Section 9 demonstrates the importance of protecting natural areas and greenspace for the City of Ottawa with the following commendable and appropriate components of the Official Plan:

\* The definition of a Greenspace Network as “a connected and protected network of natural environment areas and accessible open spaces” and recognition that the natural environmental aspect of the Network is “a system of natural areas and linkages intended to maintain natural features and ecological functions and aid the movement of wildlife.”

\* The intent to minimize adverse impacts upon Significant Wetlands south and east of the Canadian Shield and Natural Environment Areas by concentrating infrastructure.

\* The goal of 16-20% overall open space in new growth areas.

\* Support for the continuity of the trail system.

\* The intent to minimize negative impacts on water quality and on aquatic and shoreline habitats.

\* The intent to increase forest cover. **We recommend a target of at least 30% as in the current Regional Plan.**

\* Support of Conservation Authorities and others to minimize pesticide and nutrient contamination.

### Key weaknesses of Section 9

However, Section 9 suffers from some key weaknesses:

1. Definitions are often not provided nor consistently used which contributes to confusion. Terms should be defined when they are first used and there should be consistency in using the defined terms. We are glad to see trees mentioned in several areas of this plan but suggest broadening of the term to "trees \*\*and other vegetative cover\*\*" since grasses, shrubs and other plantings are also important.

2. The Section is poorly organized, further leading to confusion. The chapter needs to clarify from the outset that:

a) The objective is to protect significant woodlands, wetlands and wildlife habitat (as required by the Planning Act)

b) In line with the above objective, certain areas are being strongly protected (see Table 9.2):

\* Significant Wetlands (south and east of the Canadian Shield as identified by Ministry of Natural Resources); Natural Environment Areas A, and Urban Environmental Features.

Some are protected to a lesser extent:

\* Natural Environmental Areas B, General Rural (Natural Feature) Areas. Some areas are identified but without real Official Plan protection:

\* Major Open Space.

Some areas are not identified on maps at all and have only zoning or no protection:

\* ANSIs, and Parks and Other Open Spaces. These categories should be clarified and the protection for each type should be stated.

c) The Greenspace Network section can then discuss how these areas with different levels of protection fit into the greenspace network concept. Then should come the current section 9.2, followed by general policies such as those in Section 9.8; then the material in sections 9.6, 9.3 to 9.5 and 9.7 can follow.

## Open Space Areas

As noted earlier with regard to Major Open Space Areas, we prefer to keep the Waterfront Open Space group separately since these have been identified as such in previous Regional Plans. We would like to see those Major Open Space Areas which are now protected by local Official Plans or their Amendments transferred to the more protective Urban Environmental Feature category. We suggest that the remaining Major Open Space areas require an EIS and Official Plan Amendment for any significant development affecting these areas, to help ensure their retention.

This section should specify that most parks are not shown on the maps and are only protected by zoning (and City ownership in some cases). If parks or Major Open Spaces or Other Open Spaces are not in City ownership, the other public bodies who may own them could sell them. Thus, only parks in City ownership, or with a legal arrangement between the City and the other public body, or identified in the "Plan for Canada's Capital" as parks or protected areas can realistically be regarded as available to the public and included in the Recreation and Community Service Plan. The city should add a policy that the City will buy, at parkland prices, those areas now zoned as parks and declared surplus by other public bodies. As well, larger ones of these should be shown as major urban areas on the maps. Such measures would assist in protecting such areas. We suggest both measures, since some of those areas may be rather small. We also suggest working with the other public bodies, particularly the NCC, to try to retain as much NCC greenspace and natural area now zoned as parks or leisure areas as feasible. When at least minimal protection has been obtained, the areas can then be identified as part of the Greenway Network.

#### More Detailed Comments on Section 9

1. We approve the strong statement (Section 9.1, para. 2): "The pattern followed by increased urban expansion and growth in Ottawa must not result in the wholesale fragmentation of natural systems. Similarly, careful attention to community design and planning activity can realize numerous advantages by linking parks to one another and to surrounding residential neighbourhoods." This should be reflected in the criteria and requirements governing the plans.

2. Under 9.1.1, "Maintenance and Enhancement of the Greenspace Network", Point 1, the second line should include natural areas, and read: "connected \*\*natural areas and\*\* open spaces".

3. Again, in 9.1.1. Point 3, natural areas need to be included and the sentence should read: "The City will undertake an in-depth inventory of existing and proposed \*\*natural area and\*\* open space components and supporting network requirements to ensure continuity of the system."

4. Under 9.2.1, "The National Capital Greenbelt", third (unnumbered) paragraph, \*\*housing and industrial development\*\* should be included among "the greatest potential impacts on the integrity of this landscape". It is also stated that many residents enjoy the conservation, recreation, and camping facilities in the Greenbelt. Statistics on the proportion of Greenbelt dedicated to these facilities would assist in the evaluation of the protection of the Greenbelt.

5. Under 9.2.1 at the end of the fifth (unnumbered) paragraph that commences: "The Greenbelt contains significant natural areas ...", **\*\*natural resources/features\*\*** should be included as meriting protection in the Greenbelt.

6. Also under 9.2.1, the meaning of numbered point #7 is not clear. It states that "Lands designated Natural Environment Area (B) immediately south of the Ottawa Airport are intended to reflect a continuous open space corridor. The specific location, extent and nature of this corridor will be defined when proposals for any infrastructure in this area of the airport are being considered". Yet, Table 9.2 states that only residential development will be considered in a Natural Environment Area B.

7. Under 9.3.1, "Major Open Space", Point 3b reads "provide opportunities for recreational pathways and active and passive recreational activities in an attractive, green setting". The word **\*\*"natural"\*\*** should be added to, or should replace, the word "green".

8. Point 9.3.1.3.c should read: "maintain the open space **\*\*and natural\*\*** character of the land".

9. Under 9.6.1.5, para.1, the following statement should either be removed or clarified: "Those areas supporting significant natural environment features and functions will be protected, while recognizing that, subject to further study and definition of significant features and functions, some forms of rural development may be appropriate in some areas." Either these areas will be protected or not. As well, the meaning of "significant" should be clarified (see also below).

10. Under 9.8.1, "Protection of Vegetative Cover", Point 1a, should read: "Determine which stands of trees or individual trees **\*\*if any, warrant removal\*\*** rather than "warrant retention", since the intention would be to retain nearly all trees. Point 1e should read "Investigate the appropriateness of the use **\*\*if any, of non-native species\*\*** in tree planting strategies" rather than "investigate the appropriateness of the use of native species", since native species are more appropriate in order to preserve and protect native biodiversity. In Point 3, the sentence "It is not possible to preserve the forest in all situations" should be removed: Of course it is possible. The requirement for plantings and compensation on the property or when not feasible, elsewhere, should be enforced by fines, in order to enhance the effectiveness of this policy.

11. Under section 9.8.2, "Protection of Surface Water Resources and Erosion Prevention," the second bullet under the heading "Good Land Management Practices" (box p. 124) contradicts the protection defined in section 9.6.1, Table 9.2 "Natural Environment Designations" when it says: (the City) "will investigate means to control land alteration in significant wetlands...". The City does not need to "investigate means to control" because such alteration is prohibited as per Table 9.2. Furthermore, it should be made clear that "Good Land Management Practices" applies to not only provincially significant wetlands but also a) wetlands in the Canadian shield and b) any other wetlands which have not been designated by the Ministry of Natural Resources. Again, the



term "significant" requires precise definition wherever it is used within the Official Plan (i.e., provincially significant, regionally significant, or locally significant).

12. In Subsection 9.8.2 point 5: Protection of Fish Habitat, the restriction is weak unless the word "generally" is removed in the statement: "Development will not generally alter, disrupt or destroy fish habitat, and will respect the no net loss of productive capacity of fish habitat policy as required in the Fisheries Act."

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