



Greenspace Alliance of Canada's Capital

Dedicated to Preserving Greenspace Throughout the National Capital Area

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Membership

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Public participation

- **Meetings and events**
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Greenspace Preservation Files and Projects

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- Quarry Forest
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- Miscellaneous development files
- Earlier files and projects:
 - -300 Central Park
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 - -Others

City of Ottawa

- New Official Plan
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National Capital Commission

- Greenbelt and Parkways
- Land use and sales
- Current and emerging issues

Federal and Provincial issues

- Provincial Policy Statement review
- Canadian Environmental Assessment Act review

News and Updates

- Newsletter
- Greenspace Alliance in the news
- Newsfeeds ("clippings" file)
 - -National issues
 - -Global issues

Members' Forum (password restricted)

- Minutes of meetings
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Photo Gallery

- Natural spaces
- Urban parkland
- Development dos and don't's
- GACC activities
- Other

Planning and Development Committee, 2 April 2003

Comments on the City of Ottawa Draft Official Plan (March 2003)

Submitted by the Greenspace Alliance of Canada's Capital

240 Sparks Street, Ottawa, Ontario K1P 1A1

Despite the lack of sufficient time to examine the final Draft Official Plan in depth the Greenspace Alliance hereby submits (under protest) a number of recommendations and comments regarding that document.

We commend City Staff for the work it has done on preparing this final Official Plan draft under such onerous time constraints. The Draft is an improvement over the previous version; however, it is evident from a number of inconsistencies that the text needs a proper editing. For example, we have found inconsistencies with Glossary definitions in the staff report to Planning and Development Committee (PDC) (20 March 2003) and corresponding descriptions given in the main body of the Draft. With the little time available, it is understandable that such mistakes would occur; but, more importantly, we hope that this does not indicate more substantive lapses in the content of the document. We note that some of the comments we submitted were not addressed by staff. We are wary of modifiers such as "sensitive" and "significant" being used without such terms being properly defined.

The Greenspace Alliance supports many policies in the Plan. We especially want to emphasize our support for the following policies:

1. Maintaining the current urban and village boundaries;
2. Limiting estate-lot subdivisions;
3. The land acquisition policy;
4. Considering applications to amend the urban boundary only as part of the five-year assessment of the urban land supply;
5. The designation of lands in the vicinity of Terry Fox Drive as a Special Study Area, however we think the Area should be larger to permit the most comprehensive study;
6. Limiting the use of communal services in the rural areas; and
7. In general the designations outlined in the Plan; though we regret that the water areas designated in the Regional Official Plan are not included in this Plan, and we ask that the decision not to designate water areas be reconsidered.
8. Greenspace Master Plan
9. Integrated environmental review statement

GREENSPACES (Sec. 2.4.5, pages 39-43)

(1) Defining Greenspace (page 39, first paragraph, and Glossary)

We realize that it is especially difficult to define such a concept as Greenspace, but for the purposes of the Plan, a definition should be attempted that is inclusive of all areas that are normally considered to be greenspace, definitions and descriptions should be consistent throughout the document and possibly eventually amended when refined by the Greenspace Master Plan to come in 2004.

We thus note the inconsistency in the definition of "Greenspace" in the Glossary in the PDC report and the definition found in the first paragraph of Section 2.4.5 of the Draft. The definitions should be consistent and clear. We recommend the following definition for Greenspace: "For the purposes of the Plan, the concept of Greenspace includes but is not limited to natural features designated in the Plan in the urban and rural areas, large park and leisure areas designated as Major Open Space, smaller areas zoned for park and leisure but not shown in the Plan, the Rideau Canal area, cemeteries, the Central Experimental Farm, cultural heritage landscapes, creek and river corridors, recreational pathways, publicly-owned grasslands in the general urban area, and hydro corridors."

Greenspace Master Plan

We recommend the following changes to the policies in Section 2.4.5 regarding the Greenspace Master Plan, its scope and implementation:

- 1) Policy 1 (a)i (page 41) - amend to read: " To identify woodlands, wetlands, ravines and other natural areas in the urban area, in the area within 5 kilometres of the urban boundary, in villages and in areas within 1 kilometre of village boundaries that are worthy of protection based on their environmental values." Please see our rationale under 4) Policy 6 below.
- 2) Policy 1 (b) - add the sentence: "In the interim, maintain the forest cover target at 30%". This maintains the target of the former Region's Official Plan until new targets are established.

3) Policy 3 - change the last sentence to read: "The lifting of a holding zone provision on an area where a public special study has been conducted will be done by Council in a public process but will not be considered a zoning by-law amendment, for the purposes of this policy." Alternatively delete the sentence. As currently worded it would suggest that the requirement for a special study has been perhaps satisfied by the Greenspace Master Plan. If the NCC is however then willing to give up the rights covered by the exceptions to the zone then lifting of the h should not be a problem.

4) Policy 6 - Urban Natural Features Environmental Evaluation Study (pages 42, 66)

We recommend that the Urban Natural Features Environmental Evaluation Study not be limited to the Urban Area and propose instead that it extend 5 km beyond the urban boundary (Study might need to be renamed). We think it is important to identify the smaller natural sites meriting preservation in the areas likely to be developed in the future well in advance of the earliest stages of development. Sites like "Quarry Forest" should be identified before they appear on concept plans and certainly before they are surrounded by development. Expanding the proposed study would accomplish the identification of such sites in the most efficient and economical way.

We recommend amending the first sentence of Policy 6 to read: "An Urban Natural Features Environmental Evaluation Study will be completed in 2004 as part of the Greenspace Master Plan, to identify woodlands, wetlands, ravines and other natural areas throughout the urban area and the area within 5 kilometres of the urban boundary that are worthy of protection.". We have added the concept of within 5 km of the urban boundary and made the description consistent with the description in Policy 1.a)i) on page 41 except for including villages. Will those be considered in a separate study?

5) Policy 10 (page 43): add the following activity that was included in the January Draft: "continuing to naturalize City-owned greenspaces"

Minor Boundary Adjustments (pages 64, 66, 67, 67, 68)

The Greenspace Alliance is concerned that in policies:

Section 3.2.1 Significant Wetlands South and East of the Canadian Shield,
Policy 9

Section 3.2.2 Natural Environment Areas, Policy 7

Section 3.2.3 Urban Natural Features, Policy 4

Section 3.2.4 Rural Natural Features, Policy 2

Section 3.3.1 Major Open Space, Policy 2

undefined "minor" adjustments can be made to the boundaries without amendment to the Plan. We recommend that these policies specify that the public be notified of pending adjustments and that it has time to participate in any decision to adjust a boundary no matter how minor. For example, an additional statement can be added to the policies such as, "The public will be notified of any proposed minor adjustments and given an opportunity to comment."

Integrated Review to Support Development (page 134)

Both the Greenspace Alliance and the NCC, two organizations often not of a like mind, recommended that the Plan include reference to assessments carried out under the Federal Environmental Assessment Act. The NCC also recommended inclusion of Ontario's Environmental Assessment Act, with which we concur. Please add these as examples to be integrated and addressed as a complete package.

Protection of Endangered Species (page 138)

Section 4.7.4 Protection of Endangered Species refers to the regulations of the Ontario Endangered Species Act as its governing authority. We recommend that Plan also take into account the Federal endangered species list, and that the concept of protection of species be broadened to include regionally rare species, as was the case in the former Region's Official Plan which talked about "protecting endangered, threatened, vulnerable and regionally rare species" (page 63, dated April 1999).

We believe that an environmentally-sensitive City would use more than just the Provincial list in its decision-making processes concerning land use. We do not understand why the wording concerning regionally rare species from the former Region's Official Plan has not been included in this Plan.

Policy 1 - amend to delete "in significant portions of" or else define "significant" in the Glossary.

Other Recommendations

1) Section 2.1 (page 15), second bullet under Maintaining Environmental Integrity: remove "the most" so it reads "significant wetlands and forests will be conserved".

Add a new bullet point to read "the habitat of locally rare and endangered species will be conserved".

2) Section 3 (page 59), third paragraph, second sentence: amend to read "In areas, where little or no new development is desired".

3) Section 3.2.2 (1) (page 64): the first sentence should read "Natural Environment Areas are designated on Schedules A and B.".

4) Section 3.2.3 (2a) (page 66): amend the last part to read " which will establish the relative environmental values of natural features throughout the urban area and the adjacent area within five kilometres of the urban boundary." Please see our rationale under Section 2.4.5, Policy 6.

5) Section 3.5 (2b) (page 70): we question the addition of "new small-scale agricultural uses may be permitted within the Natural Environment Areas". This does not appear in the previous January Draft and no explanation is given for its inclusion here.

6) Section 3.7.2 (7) (page 100): the previous Draft's words "within 5 kilometres of the urban boundary" which were before "within 1 kilometre of a village boundary" have been removed in the current Draft. The Greenspace Alliance believes the review of developments in that area to ensure they do not put constraints on the possible future need to expand the urban boundary seems reasonable.

Development Approval vs. Development Review.

Though we are pleased to see that there has been some revision, we still see a few instances (for example, on page 38) where the development

review process is referred to as an "approval" process. A word search of the document should be done to make certain the change has been made wherever appropriate.

Glossary

The Glossary does not include many words that it should, such as biodiversity, environment, environmentally sensitive, ravine, significant, and wetlands.