



Greenspace Alliance of Canada's Capital

Dedicated to Preserving Greenspace Throughout the National Capital Area

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COMMENTS FROM THE GREENSPACE ALLIANCE ON THE JANUARY DRAFT OFFICIAL PLAN - CITY OF OTTAWA

14 February 2003

GENERAL COMMENTS

Community and the Environment

The Greenspace Alliance, by advocating for the protection of greenspace, supports a fundamental shift in perspective in how the human community deals

with the environment in which it finds itself. Up to now the emphasis has been on growth and development with little regard for the environment. With an increasing awareness of its vulnerability and our role in it, there is the realization that the community has to adjust its approach to its surroundings - in effect, not changing the environment to accommodate development, but arranging development to accommodate the environment.

There is an aesthetic value in preserving and encouraging greenspace and there are also important issues which go beyond making the City look "pretty". These touch upon environmental degradation and pollution that have very serious effects on the physical and mental health of the community and on the ecological balance of the Ottawa region. The presence and the extent of greenspace, a concept which includes a wide range of environmentally sensitive areas, open, natural spaces, and also parks and leisure areas, is a visible sign of the state of the environment in a community and the community's attitude towards it. It is thus unfortunate that the urban boundary in Kanata is moved by the draft to encompass a natural area which should be protected. We hope that the boundary will be kept as in the Kanata Official Plan

For the Greenspace Alliance the state of the environment is a vital issue. It is encouraging that the City is at least recognizing the importance of the environment and the need to redirect development from such phenomena as urban sprawl and over-dependency on the car to policies that are environmentally sane.

Importance of the Official Plan

Because of the legal nature of the Official Plan in indicating land use, it should be direct and state its objectives clearly and forcefully. Thus if the vision is "a green and environmentally friendly city" perhaps one

objective might be: "to protect significant natural areas, ensure there are parks in every community and thus maintain the greenspace character of Ottawa." or alternatively use goals 7 & 8 from the Regional Official Plan.

We support the Plan's focus on compact development but the City may have a real challenge in achieving this goal and at the same time preserving greenspace. These two objectives, while they can be mutually achieved, might lead to a damaging rivalry with a resultant loss of greenspace, if the Official Plan is not definite in its intent and language.

With the above in mind, the Greenspace Alliance submits its comments with the intention of assisting the City in producing as good a Official Plan as possible.

Overall Style

It would help if the Plan presented a picture or pictures of what it is aiming at: what should Ottawa look like in twenty years time? Clear objectives or goals as well as the 2020 principles would help. The language used needs more attention-to ensure clarity and consistency. Consider the use of "shall" instead of "will" in many instances, since shall indicates COMMITMENT and will intent. We also note there are few "requires" or "ensures" but a lot of "mays". ("May" may be appropriate, in the context of an option; if so, the text should make clear that it is an option, and what the other options are should be spelled out.)

The term "approval process", which is referred to throughout the text, signals a predefined outcome and leaves the unfortunate impression that the process is only to facilitate development. It suggests that amendments and development plans will always be approved and never rejected. A more neutral wording would be "review process" where applications are reviewed according to the requirements laid out in the Official Plan.

Other wording that consistently needs to be changed are expressions with the word "respect" (e.g., respect for the environment) - in many instances in the text, this should be replaced with "protect" or "conserve" which are more proactive and the intent made clearer.

Citations should be given for all figures, statistics, etc. stated in the document.

Role of Experts/Consultants

We would like to see in the Plan, some policy statement regarding the appointment of scientific experts/consultants to carry out the studies and environmental assessments as required in the various provisions of the Plan. At the moment, it is the responsibility of the developer/proponent to hire the appropriate expertise - we see this as conducive to bias in the report. Due to the shortage of time or its own expertise, staff basically does not have much choice but to accept the conclusions of these assessments, which, quite predictably, tend to be skewed in favour of the developer. We recommend that while the developer should pay, the developer should not hire the consultant. The City should do so, if it does not have the capacity itself to carry out the assessment. There should be a process (through the courts as last resort) to ensure that the work is pertinent to the development proposal and its cost is reasonable. The current policy of "developer-hired experts" (the same holds for Transportation Impact Studies) is, in our view, one of the key structural flaws in the system.

Community Involvement and Public Consultation

The Greenspace Alliance would again emphasize that the Official Plan review process should include the full participation of the community and the City should provide sufficient time for this to happen. Similarly this should be the case in all subsequent policy making and reviews, Although the City has made an effort to reach out to the public, and we commend this, we feel that the process has been deficient. The public consultation process has been rushed and it has made it difficult to review properly the draft Official Plan especially since the supporting Master Plans are still to be completed. We refer to the public consultation process that was used for the former Regional Plan review as an example we wish the City had followed.

The NCC

The Plan should recognize the importance of the NCC as the major owner/planner of federal lands and that there is a need for cooperation by

and with this organization.

SPECIFIC COMMENTS

1. Introduction

The Plan should state the City's vision for the future in more concrete terms. What does a "green and open character" mean in real terms? More protected natural areas and parks than now? Certainly in new communities that is possible. In sections 1.5 and 1.6, the "guiding principles" that will guide the municipality's decision-making are elaborated on. These are on the whole worthwhile but they are insufficient in making the Plan an effective document to be used in achieving the City's stated visions.

page 1. Municipal activity 4: delete all words after "development applications" and amend to read "The review of development applications and their approval, revision or rejection." The existing wording suggests that all are approved and that the staff's purpose is to help developers alter existing land uses in all cases.

1.2 Structure of the Official Plan

Page 2: fourth sentence mentions only approval of development applications. Change "approval" to "review". Check for other instances in all other portions of the plan..

1.3 Ottawa's Growth Management Plans

Wording such as "the Official Plan is one among five growth management plans to be completed by the spring" and "the five plans complement each other and will work together towards the same goals" leave the impression that all these plans are on the same authoritative level. The true interrelationship of these plans should be spelled out and the omission of the sixth plan, the Environmental Strategy, should be corrected.. The statement on page 2, "The development of each growth management plan [the list of 5] has been associated with a consultation process, during which public comments were gathered as a basis for refining the plan" is in part misleading. The

Corporate Strategic Plan has not yet surfaced, public consultation on the Economic Strategy has just begun, and the Environmental Strategy will not be available for some time.

1.4 Supporting Plans

The Greenspace Alliance officially voices its dismay at the planning process which allows the Official Plan to be approved whereas the Master Plans from which certain elements are to be fitted into the Official Plan, are still being drafted and unavailable to the public for scrutiny.

The first sentence should read "several supporting plans have been or are being developed .." to correct for the fact that the Greenspace Master Plan for one will not be available until sometime in 2004. This date should be noted in the Plan.

Add a statement that after the completion of these plans, and especially the Greenspace Master Plan, the Official Plan will be amended as required. For example, see the Transportation Master Plan (page 21- Policy 1).

1.5 The Guiding Principles

The third principle: "Green and Environmentally Sensitive City", we suggest changing the wording "developments that respect the environment and use land wisely" to read "development that preserves valued ecosystem components, respects the environment and uses land in complete harmony with it." Using land wisely could easily be interpreted as generating the greatest profit from it.

1.6 How the Guiding Principles are addressed in the Official Plan

It is recommended that "Policies to protect natural diversity (e.g., urban woodlands and rural forests, trees, and wildlife habitat) are provided for;" should include wetlands and grasslands/meadows as examples of natural diversity. The examples given emphasize trees but neglect other areas of diversity.

Section 2: Strategic Directions

2.1 The Challenge Ahead

We have concerns about the population projections presented in the Draft

Plan. The Greenspace Alliance earlier reviewed the analysis prepared by the Centre for Spatial Economics and had concluded that the projections were too high. Prudence calls for avoiding the adoption of inflated projections, and for conserving land and financial resources so the City has room to adjust should the need arise. Any need to re-adjust the amount of land available can be done during the five-year assessment of land needs that is required by the Province. Though it is easy to increase the supply of land, it would be surprising if a review would recommend that the supply of land be reduced!

Page 13, third bullet: replace "Respect for" with "Protection of". In the second sentence delete "The most". We wish to do more than respect, we want protection, and of all significant wetlands and forests. We suggest adding as well "and the most significant non-agricultural meadow areas".

2.2 Managing Growth

2.2.1 Urban Boundary Policy 4 b) The change in the boundary in the Kanata area into the shield environmental area shown in this plan does not meet this criterion since no alternative locations to extend the boundary have been considered.

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2.2.3 Managing Growth Within the Urban Area

Policy 3(b): delete "abandoned transportation corridors". Such areas are usually valuable greenspaces and intensification may not be desirable. We suggest "abandoned transportation corridors not required for the Greenway network". This allows some leeway for retaining greenspace and pathways etc., in these corridors.

2.3 Providing Infrastructure

Page 19, second bullet under City Initiative: change "review the use of municipally-owned lands" to " municipally-owned lands that do not have natural value". We would disagree with the intensification of municipally owned natural areas.

2.3.1 Transportation

Policy 4: a walking plan is mentioned but no date is indicated as to when it will be done.

2.3.3 Drainage and Stormwater Management Services

Policy statement: add to the end "and the recommendations of any watershed or sub-watershed plans covering the area." This ensures such studies get implemented.

2.4 Maintaining Environmental Integrity

Page 30: one of the four municipal plans listed, refers to an Environmental Strategy - what exactly is this plan, and when will it be available? Date should be given.

2.4.1 Air Quality and Greenhouse Gas Emissions

Fourth bullet: change to read: "Maintaining and enhancing forest cover and other natural and treed areas, including street trees" in order to include other types of vegetative cover.

2.4.2 Natural Areas

It is unclear what is meant by "natural areas". Nevertheless, if this includes areas beyond those already officially designated, we are glad to see this initiative which promotes such measures as the retention of vegetation, consideration of wildlife habitats, and respect for natural drainage patterns. However, policy statement one is particularly weak from the point of view of how the City intends to protect identified natural areas. "Designating" such areas and "how best to manage them" do not imply protection but can

only be seen as preliminary steps for establishing protection. Referral to policies about acquisition would give more teeth to the policy. What can the City realistically do to protect these areas? As far as we can see, the preservation of these areas will be subject to the vagaries of the development review process as indicated in section 4.7.1 Integrated Review to Support Development (see that section for further comments).

Here as in other sections such as 2.4.5. Greenspaces, there should be some reference to the NOSS study done for the former City of Ottawa to show how

the Official Plan has, or is going to, utilize the findings and recommendations of the previous study.

We prefer that the Plan use stronger language - replace "will" in the two policy statements with "shall"

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2.4.3 Watershed and Sub-watershed Plans

Policy 11(b): add the protection of creeks. Too many creeks are disappearing under subdivisions.

2.4.5 Greenspaces

The last sentence of the third paragraph on page 35 reads "Altogether, about 28 percent of the city is forested". This statement obscures the fact that, according to the city's own records, the urban section of the city has less than 15% forest cover. The 28% figure for the city as a whole derives from the existence of community forests and other forests in the rural area (the larger portion of the city) that provide that part of the city with over 40% forest cover. This should be made clear. This would then provide the basis for setting a target for forest cover in the statement of policy on page 38. Item 6 on that page should read "With a target of 35 percent for the city as a whole, the City will enhance forest cover by designating environmental areas in the Plan, by emphasizing tree planting and landscaping in the requirements for road corridors, public works and private development, and by encouraging private landowners throughout the city to maintain and expand tree cover on their properties." The value of woodlands and wetlands as "carbon sinks" should be brought out here and in other appropriate places in the text such as in Section 2.4.2 Natural Areas. Huge amounts of carbon dioxide are tied up in peat, for example.

With respect to surplus lands, add a policy that lands given up by developers as part of parkland requirements do not become surplus. As well, any current parkland on a surplus list should be taken off that list and not used for housing or any purpose other than parkland, trade for other parkland, or sold and the money used to purchase other park land.

Policy 1(a): given the fact that the Greenspace Master Plan will not be available before this plan is approved, the sentence should read 'as a basis

for amending this plan as required for organizing the physical development pattern of the city".

Policy 2: amend to read "premature any application to amend any open space or similar designation, environmental designations, parks, or other such recreational, conservation or non-development uses in current Official plans or zoning". In addition, we would strongly recommend that an Annex be included listing the zoning classifications in each of the former municipality's by-laws to which this policy applies. A similar provision should apply to the sale of any City-owned properties currently declared surplus. Their potential for enhancing the Greenspace Master Plan should be evaluated before they can be sold. (For example, the City owns 200 acres of environmentally important lands in the South Gloucester Area, all or some of which, are on the surplus list and should be preserved for their rich biodiversity.)

Policy 4: should read "woodlands, wetlands, ravines and meadow areas, particularly those in public ownership". We would also recommend that the Study's scope cover not only the environmental but also the social value of these areas.

2.5 Building Liveable Communities

2.5.1 Affordable Housing

Policy 5: amend to read "All land that is surplus to the City's needs and suitable for residential development will be considered for sale or lease for the development of affordable housing after a review to determine its environmental and social value to nearby communities".

2.5.3 Parks and Leisure Areas

Policy 2 is a rare instance where specific targets are given in the Plan. In light of the fact that these targets exceed what the Planning Act requires (5% of residential areas, 2% for commercial areas), we commend the targets and hope that they can be achieved

2.5.4 Cultural Heritage Resources

We commend the City on the policies in this section, particularly policies on acquisition (11), enhancing the environs (12) and commemorating cultural heritage resources (15.b). We add that we hope the suggestion by our Poets'

Pathway Committee for a Pathway to commemorate the Confederation poets will be reflected in the plans for these resources.

Page 43, second bullet point: add to read "or a larger landscape such as the Ottawa and Rideau river corridors".

2.5.6 Collaborative Community Building and Community Design Plans

While the collaborative planning concept is appealing, one of its practical problems is that some new subdivisions are in places where few people may live in the immediately affected community. In the past, proponents and planners have largely been involved in the planning of some subdivisions with very little input from anyone else. Change is needed. Perhaps it is changing with the Kanata West Concept Plan, but there needs to be similar activity at Leitrim, which essentially lacks an "immediately affected community."

Section 3: Designations

Page.51, third paragraph: the third sentence should read: "In areas where no growth is desired ...". We do not wish growth to occur in environmentally - sensitive areas.

Paragraph 5: the third sentence again talks of review and approval. It should only refer to review (the process also includes rejection).

3.1 Generally Permitted Uses

Policy 7: amend to read "but should avoid environmental areas, unless there are no or feasible alternatives.". Presumably the Environmental Assessment they would undergo would require that such areas be avoided, so why not indicate this fact up front?

Policy 8: add urban and rural natural feature areas to the list. As well, add "and avoid major open space areas to the extent feasible" to avoid impinging on open space without due regard to their environmental value. Similar changes should also be made to policies 10 and 11.

Policy 8(d): we find the wording "the construction of permanent buildings is discouraged" too weak. We would rather read that " the construction of permanent buildings should be avoided in almost all instances in all areas that have been identified as environmentally sensitive". Similar changes

should be made
to policies 10 and 11.

3.2 Natural Environment

3.2.1 Significant Wetlands South and East of the Canadian Shield

In regards to this section and the following section 3.2.2 Natural Environment Areas, the original Regional Official Plan had somewhat more detailed policies for Adjacent Lands (pp. 87-88) than we find in the table in Section 4.2 (p. 101) for these environmentally sensitive areas. Could Policy 7. be expanded by adding after Environmental Impact Statement in brackets the following "(which must evaluate if the proposed severance or development will have any negative impacts on the natural features or functions for which the area was identified)"

Policy 9: It is not be clear whether an amendment to the Plan would be required when the Ministry complexes additional wetland with existing Significant Wetland. Wetland that is not immediately adjacent to an existing Significant Wetland may be complexed with an existing Significant Wetland..

3.2.2 Natural Environment Areas

Page 56, line 2: what is the explanation for the phrase "for the most part"?

Policy 5: Boundary changes should not be made without public notification. We are uncertain how to ensure that very minor changes could be made without

amendment to the Plan (e.g. as a result of a survey) while requiring public consultation through an amendment for larger changes. Perhaps the best suggestion is as follows: "Boundary changes of a minor nature will not require an amendment to the Plan. The public should, however, be notified of such changes and given 30 days to respond before they are made. If there is disagreement then an amendment should be required". Note as well that the scale of the maps is a problem in regard to boundaries.

3.2.3 Urban Natural Features

Line 2: add after ravines "significant non-agricultural meadows and grasslands". We feel that grasslands are an important type of ecosystem that demands the same consideration as forest lands for example. Third line: the text "federal, provincial and" should be inserted before privately-owned lands.

Policy 3: we insist that meadows/grasslands be included here as well. We are glad to see the requirement for environmental impact statements but would like to add after required; "and should be made available for public comment prior to formal consideration."

Policy 7: we have the same concern over the interpretation of boundaries as in our comment on policy 5 of section 3.2.2 above. We would maintain that public notification is essential and where studies indicate major changes an amendment to the Plan will be required.

3.2.4 Rural Natural Features

Policy 2: we suggest rewording it as follows: "Uses that are permitted in the general Rural Area in Section 3.6 are also permitted in areas with rural natural features but should avoid

significant impingements on the features for which the area has been designated.. An Environmental Impact Statement is required for Zoning Amendments or variances to expand or change an existing use. This is more protective of the natural features.

Policy 4: our comments on the interpretation of boundaries found under sections 3.2.2 and 3.2.3 are also relevant here.

3.3 Open Space

3.3.1 Major Open Space

Policy 2: again the question of minor revisions to boundaries - where an amendment to the Plan may not be necessary, we still feel on principle, that the public still should have some opportunity to comment.

Policy 3(c): delete "and institutional uses" and add the modifier "small-scale" in front of commercial. The latter ensures clarity in interpretation and since institutional uses tend to be large-scale, their exclusion makes sense if the areas are to be truly protected.. Replace the and after leisure with a comma and the semi-colon after facilities with and, so the last clause is seen to apply to all uses listed.

Policy 4: replace "other partners" with "neighbourhoods and communities along the river and other partners". It is important that the people on both sides of the river be involved not just the bureaucrats and politicians.

3.5 Urban Designations

3.5.1 General Urban Area

Policy 1: change to read "... leisure, park and natural areas not otherwise identified in the Plan" .

3.5.4 Developing Community

Policy 1: the wording in this policy statement is incoherent in the general statement, and the two conditions regarding the existence of secondary plans are confusing. Suggest that they be preceded by "both"..

3.6.2 General Rural Area

Policy 7(f): clarify Minimum Distance Separation. As far as we can see, this is not defined in the document.

Section 4: Review of Development Applications

4.2 Adjacent to Land Use Designations

We believe an Environmental Impact Statement should be required for Rural Natural Features Areas or within 30 metres of them.

Page 102: the reference to an "Environmental Evaluation Study" for Urban Natural features in the table, should probably be changed to "Environmental Impact Statement".

4.6 Cultural Heritage Resources

The Greenspace Alliance is pleased that a number of passages in the Draft Plan support the planned Greenspace Network and other open spaces for interpretative or education purposes. We are particularly pleased to see explicit reference to the Poets' Pathway initiative in the Draft Heritage

Plan (pp. 34 and 48) as a representative example of a potential land-use partnership with the National Capital Commission, a fact that is indicative of the City's recent leadership in matters pertaining to Ottawa's heritage, history and culture.

Please include the Ottawa River between the Chaudiere Falls and Deschenes Rapids as a Cultural Heritage Resource.

4.6.3 River Corridors

Policy 1(a): In the case of Cultural Landscapes e.g. River Corridors it is fine to require a Cultural Heritage Impact Statement, but surely there should also be an Environmental Impact Statement?

4.6.5 Major Recreational Pathways

Policy 2: is to be commended but is weakened by limiting its application to "where there are opportunities." Here or elsewhere, there should be more pro-active policies, seeking out opportunities.

4.7 Environmental Protection

The Greenspace Alliance recommends that the objective (page 113) of increasing forest cover across the City include the target of 35%.

In reference to the table on page 113, listing the different environmental assessments, we would draw attention to the last sentence before the table which states that "environmental protection may be required to assess a development application", whereas the table itself seems to indicate the conditions where an assessment is required. To be consistent with the table requirements, "may be required" should be changed to "are required". Item 4.7.4 Add after species "(including rare flora)".

4.7.1 Integrated Review to Support Development

It is stated that developers "will be expected to use 'design with nature' principles". This statement should be strengthened by replacing "will be expected to use" with "shall". What exactly are these "principles"? Are they everything that follows in Section 4 pertaining to the environment? We recommend that the "principles" to be followed should be clearly identified.

Compounding the confusion is that the accompanying policy statement that refers to "design with nature policies". Which is it to be - policies or principles?

4.7.2 Protection of Vegetation Cover

Page 115: we recommend that stronger language about using native plant species in landscape design be used as was the case in the original Regional Plan .We also suggest a policy here about protection of rarer flora.

4.7.3 Erosion Prevention and Protection of Surface Water

Policy 8: sounds like an excellent policy but the wording "if this is feasible" strikes us as too vague and open to abuse. Here is a good example, where the wording in the plan lacks precision or specificity, allowing the eventual outcome typically to depend upon a report prepared by a consultant hired by the developer. What, specifically, are the circumstances when it is and isn't feasible to protect creeks? Currently too many creeks and tributaries have been obliterated or turned into piped storm sewers and are built over rather than built around. Examples of creeks no longer visible on the surface of the land are McEwan Creek in Greenboro and the proposals for the tributaries of Findlay Creek at Leitrim.

We recommend that existing creeks and their tributaries should be defined to be significant features in subwatersheds and in Developing Communities. The land use policy for creeks should be the preservation of all existing creeks and tributaries.

4.7.6 Stormwater Management (SWM)

There should be an additional policy that SWM facilities be located on the development site, with exceptions allowed only under very strict conditions. Loss of area to build houses should not be an allowable reason. (The case in point is the Heron-Walkley Plan of Subdivision.) Furthermore, we would recommend that any construction of stormwater ponds on environmentally sensitive lands should be prohibited unless a comprehensive environmental assessment is done which finds no significant degradation of any kind to the natural area.

4.7.8 Environmental Impact Statement

The scope of applicability for an EIS should go well beyond the designations stated: any development anywhere that has a potential environmental impact should require an impact statement.

Page 120, opening statement: insert after Canadian Shield "Urban Natural features", and after Rural Natural Features "Canadian Shield lands".

Policy 2(e): amend the statement to read "A description of flora and fauna present on the site in all four seasons and how the development may impact on these and proposed mitigation measures to be taken before, during and after construction". This ensures that migratory stops for birds are protected to some extent and that flora as well as wildlife are considered.

Section 5: Implementation

5.1.10 Conveyance of Land for Park Purposes and Alternative Requirements

In principle, the Greenspace Alliance is not in favour of cash-in-lieu for parkland and that exceptions should be spelled out. Moreover, while the law permits use of the funds for life-cycle maintenance of parks, there is no reason why the City could not have a policy saying that it will use any proceeds from cash-in-lieu only for land acquisition. We like to bring to the City's attention the fact that the Greenspace Alliance obtained the data for the last 10 years of the former City of Ottawa on this account and found that the proceeds of about 1 million per year have not resulted in a single piece of land acquisition. Ottawa simply used this provision as a convenient additional source of funds for its capital budget. We should demand that this practice stop.

Policies 1 and 2: we recommend that, in principle, no cash-in-lieu shall be approved, except where it is physically impossible for a development project to provide parkland to its residents. No land shall be considered parkland, if it is not of a reasonable size to allow for safe recreational use by persons of all ages. The policy should require a minimum of 5% and 2% or equivalent cash-in-lieu. We also suggest that reference be made to the policy for parks in Developing Communities and Villages on page 42.

5.4 Interpretation

Policy 5: the wording about boundary changes without amending the Official Plan is vague and of concern to us. This has already been remarked upon in the various sections. "Minor" has different meanings to different people. It would be good if this could be tightened up so that greenspace will not

be lost through "minor" boundary changes without amending the O.P. The problem is that the boundaries could become defined by studies of consultants hired by developers with no adequate peer review of those studies. A good example of this was a change in Significant Wetland boundaries in the Stittsville area when the findings of a developer's consultant were corrected by a qualified expert.

The Official Plan should provide or reference the specific documents, surveys, maps or studies on which it bases the boundaries of designated areas. As well, the maps found in the various schedules are not detailed enough to delimit boundaries in an accurate way, thus it is necessary to

refer to the source documents to gage the boundaries location and the source's legal authority.

5.5 Monitoring and Measuring

The fact that this section is now part of the Plan is an improvement over the Regional Official Plan where it was in an Appendix and not explicitly part of the Plan. We welcome this step, but it is only the first step in a process that demands established indicators, benchmarks and schedules; in short, a well-designed program for monitoring and evaluation of the Plan's effectiveness and the City's performance. When will this happen?

Schedules

We repeat our comment in Section 5.4 Interpretation on the need to indicate the official source of the information and boundaries found on the maps. The maps themselves are not sufficient to withstand any legal scrutiny.

We commend Schedule I for incorporating the 1994 tri-level plan which includes the Poets' Pathway.

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Designations on Schedule B.

A. Urban Boundary: In Kanata the urban boundary should follow the hydro line

and not the proposed Terry Fox extension in order to exclude more of the Canadian shield lands in the Natural Environment Area. Including these within the boundary will make it more difficult to protect these lands.

B. Areas omitted or shown as Major Open Space which should be Urban Natural Features.(zoned ES)

1. Britannia Bay (NOSS Area 0102)
2. Cunningham & Riopelle islands (Champlain Bridge area) (NOSS Area 0701)
3. Deschenes Rapids (Woodroffe bay and peninsula) (NOSS Area 0402)
4. Aviation Parkway woods. (NOSS Area 2301).

5. Leopold Woodlot (NOSS Area 2701).

6. Ramsey Creek woods (NOSS Area 4201)

C: Areas identified in NOSS as to be protected but NCC has not yet agreed.

Suggest these areas be shown as Urban Natural Features:

1. Wooded portion of Hampton Park (NOSS area 0703)

2. Wooded portion of Victoria Island (also Amelia)(NOSS Area 1301)

3. Brown's Inlet (NOSS Area 1601)

4. Patterson's Creek (NOSS Area 1602)

5. Montfort Hospital woods (NOSS Area 2402) (Note: OMB case pending.)

6. CNR line (NOSS Area 2901)

7. RA Centre woods (NOSS Area 3103)

8. Rideau River Park woods (NOSS Area 3201)

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