

**Comments of the Greenspace Alliance of Canada's Capital for the 25 January 2021
Joint meeting of Planning Committee and Agriculture and Rural Affairs Committee**

Summary:

1. We see the value of the Gold Belt being proposed with the intent to contain future urban expansion in the City of Ottawa until the end of the century. We call on the City to establish strong measures that will guarantee its effectiveness over the long term.
2. After the urban boundary is definitively established in this comprehensive review, there will remain gaps at various points between the urban boundary and the Gold Belt. These lands could be exposed to future urban expansion. We call on the City to take measures to forestall urban expansion in these gap lands until at least 2046 while we deal with the climate emergency.
3. To complete the growth management plan in the current comprehensive review, we call on the City to consider increasing intensification targets as an option alongside the 270 ha urban expansion options that have been proposed and which will be reported on by 2026.

Our detailed comments are presented under recommendations 1 through 6, 8 and 9 of the staff report. The text of the recommendations is in italics. Our comments follow, in plain font.

1. Direct staff to include mapping and policies to establish a Gold Belt in the new Official Plan, as described in this report, such that the Gold Belt be primarily composed of Agricultural Resource lands, aggregate resource areas and natural areas and with the intent that this Belt be established to contain future urban expansion in the City of Ottawa until the end of the century;

We see value in the concept of the Gold Belt as an ultimate brake on urban expansion and the achievement of a static urban boundary in the future. But we have many questions and doubts about how and when.

- Using the City's typology, what type of natural areas would be included in the Gold Belt?
- How will areas that are not Agricultural Resource Areas, natural areas or resource extraction areas, but are totally surrounded by such areas, be treated? So co-called doughnut holes? We see such areas west of South March/Huntley on the Gold Belt map. What is their status in regards to future urban development?
- Has any consideration been given to the potential of increasing pressure on village boundaries through the establishment of the Gold Belt?
- By what policy means will the Gold Belt be protected? The report talks about "to the end of the century". What kind of status or designation would guarantee that these lands would not be exposed to future urban expansion over such a long period? If it is implemented simply by OP policy, could it not be reversed in the next comprehensive review, or any of the quinquennial reviews thereafter through to 2100? Or is this just a shiny object?

- It appears that there will remain gaps between the urban boundary eventually established in this OP review and the inner boundary of the Gold Belt as proposed. The lands located in this gap could therefore be exposed to urban expansion in the future. The draft Official Plan suggests that no further expansion will likely be required through to 2046. We maintain our view that there should be no urban expansion while we face this climate emergency, which at a minimum will last until 2050. How can these “gap lands” be kept in contingency until then?
- On page 9 of the report, staff envisage a potential future where there is a static urban boundary and all growth is accommodated through regeneration. This was the position we took for this comprehensive review, advocating for a no expansion scenario. Could this future state not be achieved as early as 2026 rather than in the far future?

2. Direct staff to submit to Council amending by-laws to the Tree Protection and Site Alteration By-laws to apply the relevant provisions of each by-law to protect trees and natural features on any land areas evaluated in Documents 2 or 3 until such time as the new Official Plan is approved by the Minister of Municipal Affairs and Housing, and the appropriate limits of each by-law's protections are finalised in accordance with that decision;

We fully support and thank City for including this measure, which should guard against pre-emptive tree clearing on expansion candidate lands.

3. Approve the Category 1 lands identified in Appendix A and described in Document 2, representing land clusters of 1,011 hectares that best meet the evaluation criteria and the Five Big Moves, as candidate areas to be added to the urban boundary in the new Official Plan, and direct staff to insert this Appendix into the draft Official Plan for technical circulation purposes;

We acknowledge and commend the City for upholding its commitment to exclude Agriculture Resources Areas and Natural Environment Areas from consideration as expansion lands.

We take no position on which parcels are selected.

4. Direct staff to include gating policies for mobility and infrastructure upgrades that are required before development can take place as part of the recommended urban expansion of Category 1 lands in Appendices A and B that will be recommended to Council in the draft Official Plan;

We fully support not releasing expansion lands to development until transportation and physical infrastructure meet prescribed thresholds.

5. Direct staff to identify an additional 270 hectares to be added to the urban boundary for future neighbourhoods under the approved Growth Management Strategy, and to report back to Council with informed recommendations, no later than Q4 2026, on one of these options:

i) Distributed option: An analysis of Category 2 lands identified in Appendix B and described in Document 2 which represent parcels distributed around and contiguous to the existing urban boundary and/or to lands recommended for inclusion under Recommendation 2, and prepare necessary gating policies for mobility and infrastructure upgrades that are required before development can take place; OR

ii) An analysis of three possible concentrated options: An analysis of all Category 3 lands identified in Appendix C and described in Document 3, and outline the financial, planning, infrastructure, transit, transportation, geotechnical and environmental considerations necessary to be analyzed as listed in Appendix D, following Council approval of the Transportation Master Plan; OR

iii) A focused analysis of a single concentrated option: An analysis of Category 3 lands identified in Appendix C and described in Document 3 only for a single concentrated option at a location that has the largest amount of available land, and outline the financial, planning, infrastructure, transit, transportation, geotechnical, hydrological, environmental and ecological considerations and proponent-financed studies necessary to be analyzed as listed in Appendix D, following Council approval of the Transportation Master Plan;

The Residential Growth Management Strategy Report submitted for the May 11 2020 meeting of Planning and ARAC and for Council approval on May 27 ((File Number: ACS2020-PIE-EDP-0012), on page 38, provided this direction regarding scoring and selecting land for urban expansion:

"The first evaluation will likely identify lands that readily complete existing communities in a logical and efficient manner. If insufficient land is identified to meet the expansion area required, a second evaluation may be required as detailed in the (sic) to Council approved official Plan Policy Directions report (ACS2019-PIE-EDP-0046) that set out three possibilities, as follows:

If an urban area expansion is deemed necessary and there is insufficient General Rural land to meet the required urban land budget, there are three possible directions that the City may have to consider in response to a shortfall in suitable General Rural land, and they all have significant implications. They are:

- 1. Consider increasing the amount of intensification required to reduce the demand for new urban land after 2036; or*
 - 2. Consider committing to bringing transit and other services to rural lands that are more remote and which require higher public costs for those services. This may also necessitate phasing of future development of the land pending the City's commitment of funds; or*
 - 3. Consider lands in the Agricultural Resource Area that are close to existing communities and committed transit and piped services. The Provincial Policy Statement provides for this course of action, where there are no reasonable alternatives that avoid agricultural land.*
- A hybrid of all three may also be considered if appropriate. Staff will advise if it is necessary to consider one or a combination of these three options [...] when the draft Official Plan is tabled."*

Council anticipated the exact situation we are now in. One of the three options, considering Agricultural Resource Areas, was taken off the table by Council on May 27, but the other two options remain valid. Staff are now proposing to only look at expansion options, disregarding the option to consider increasing the amount of intensification required to reduce the demand for new urban land after 2036, as per Council direction.

The cost and complexity of bringing category 2 and 3 lands into the urban area should be weighed against achieving 270 hectares equivalent growth through increased intensification. This would require

a modest increase of intensification targets but this implication was surely known when these options were proposed.

Our request is to include in the report to be delivered by Q4 2026 the cost benefit of achieving the remaining projected growth via regeneration versus the first best of the three expansion options outlined. The following option should therefore be added to Recommendation:

iv) Consider increasing the amount of intensification required to reduce the demand for new urban land after 2036;

6. Direct staff to monitor the uptake of identified growth lands, and the number of units created through intensification against the growth management strategy adopted by Council in May 2020, and report back to Council on the City's compliance with the Provincial Policy Statement's requirement for a 15-year land supply no later than Q4 2026;

We support this monitoring and propose that its results be used to inform added option iv in Recommendation 5 above.

8. Approve the lands identified in Appendix D, representing land clusters of 140 net hectares, for inclusion in the urban boundary as new Traditional Industrial, Freight and Storage lands and direct staff to insert this Appendix into the draft Official Plan for technical circulation purposes;

For the sake of clarity, transparency and coherence, express this requirement in gross hectares as in recommendations 3 and 5.

9. Approve the lands identified in Appendix E, representing land clusters of 20 net hectares, as new Rural Industrial, Freight and Storage lands and direct staff to insert this Appendix into the draft Official Plan for technical circulation purposes;

For the sake of clarity, transparency and coherence, express this requirement in gross hectares as in recommendations 3 and 5.