

Application # D01-01-21-0019
Cavanagh West Carleton Quarry Expansion
Comments of the Greenspace Alliance of Canada's Capital

As a result of the approval of the City's new Official Plan, the proponent was asked to submit an addendum addressing the new provisions of the OP, notably those dealing with the protection of greenspace and natural areas.

In the submitted report, the proponent reviews the various new provisions, specifically 4.8 Natural Heritage, Greenspace and the Urban Forest, 5.6.4 Natural Heritage Overlays and 7 Greenspace Designation, and concludes that because of the eventual rehabilitation of the quarry extension, its development will have no negative impact on those areas subject to this test, and no net negative impact on the other areas subject to this less stringent test.

The proponent invokes the provision 5.6.4.6, which states that "for the establishment or expansion of mineral aggregate operations within or adjacent to the Natural Heritage System Overlay or the Natural Heritage Feature Overlay, the demonstration of no negative impact or no net negative impact may take into consideration final rehabilitation of the mineral aggregate operation." Note that this provision establishes that final rehabilitation may be taken under consideration. But should it in this case?

The proposed quarry extension is located in an area that enjoys the highest level of protection available under the policies of the new Official Plan. It is located within the Natural Heritage System, is a Natural Heritage System Core Area and is given a greenspace designation of Natural Environment Area. Let us review these relevant sections of the Official Plan.

4.8.1.2 The City shall seek to improve the long-term integrity and connectivity of the Natural Heritage System through land use planning, development processes, acquisition and conservation of land and support for voluntary, private land conservation and stewardship.

Does the expansion of this quarry "improve the long-term integrity and connectivity of the Natural Heritage System"? No, it does not.

5.6.4 a) In Natural Heritage System Core Areas, development or site alteration shall maintain or enhance the integrity, biodiversity and ecosystem services of the area; and, not compromise the potential for long term enhancement and restoration of the ecological integrity, biodiversity and ecosystem services of the area;

Note that this provision calls for both maintaining now, and not compromising future enhancement. Does the extension of the quarry "maintain or enhance the integrity, biodiversity and ecosystem services of the area; and, not compromise the potential for long term enhancement and restoration of the ecological integrity, biodiversity and ecosystem services of the area"? No, it does not.

7.3.3 b) Permitted uses in Natural Environment Areas are: passive open spaces; scientific, educational, or conservation uses associated with the natural features; agricultural operations established prior to May 2003; forestry as defined in the Forestry Act; and renewable energy

generation as outlined in Subsection 4.11, subject to demonstration that the use will not compromise the character, form and ecological functions of the area;

Is a quarry extension a permitted use in a Natural Environment Area? No, it is not.

So while provision 5.6.4.6 foresees that it may be possible to envisage the expansion of a quarry within or adjacent to the Natural Heritage Overlay, it by no means implies that it ought to be permitted in every case. Surely, in the case of a site such as this one, which enjoys the highest level of protection available under the Official Plan, an area of the highest ecological value recognized in the OP, the eventual rehabilitation of the proposed quarry expansion should not be taken into consideration. The loss of ecological integrity, biodiversity and ecosystem services of the area would essentially be irrecoverable.

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