



Greenspace Alliance of Canada's Capital
Alliance pour les espaces verts dans la capitale du Canada

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26 January 2014

To: Ministry of Municipal Affairs and Housing
Eastern Municipal Services Office
Rockwood House
8 Estate Lane
Kingston, Ontario K7M 9A8

Attention: Andrea Gummo

By E-mail - Andrea.Gummo@ontario.ca

Dear Ms. Gummo,

Re: Your file # 06-OP-131492

Further to the City of Ottawa's Notice of Adoption of Comprehensive Amendment No. 150 to the City's Official Plan, we hereby request to be notified of the Ministry's decision regarding this matter. Please write to the E-mail address above.

As well, we wish to draw your attention to two aspects of the Comprehensive Amendment that are of concern to us.

1.

We believe that the last-minute concession to Thomas Cavanagh Construction Limited, inserted in policy 8 of section 3.7.2, is without merit. As explained by legal counsel at the November 26 meeting of Council, this concession would result in Cavanagh withdrawing its pending appeal of the 5-year Moratorium on country lot subdivisions approved by Council in June 2009.

As you may know, Cavanagh obtained Leave to Appeal the OMB decision that upheld the moratorium. Details, including the Reasons for Decision by Annis J., are available on our web site at <http://www.greenspace-alliance.ca/node/541>.

Should the trial proceed and the City win its case, then this last-minute deal was unnecessary. Should the City lose, then the result should be without import since the moratorium would expire in June 2014 anyway. In fact, we would expect the City to argue in court that, for all practical purposes, the case is now moot.

The Alliance has consistently advocated and supported the end of rural development in the form of country lot subdivisions. These particular concessions are especially regrettable as the lands involved contain many natural heritage features and have recreational value as well. Further details, including

Natural Heritage System maps of the parcels involved, can be found on our web site at <http://www.greenspace-alliance.ca/node/622>.

We also note that, at Council on November 26, several Councillors dissented from this last-minute amendment to policy 8.

In conclusion, we suggest that policy 8(b) of section 3.7.2 be deleted.

2.

While we commend the City for its work on natural linkages (eco-corridors; please refer to <http://www.greenspace-alliance.ca/panel> which includes a link to the City's study), we believe that its implementation in this Official Plan Amendment falls short of what MNR's *Natural Heritage Reference Manual* (2nd. edition, 2010) advises, in particular in sections 3 (Natural Heritage Systems) and 12 (How To Protect: Municipal Planning Techniques and Tools).

The City's analysis identified 1-km wide corridors, based on a sophisticated least-cost analysis for movement of plants and animals. However, these corridors were then not transposed on the natural heritage system maps (the Schedules L1, L2 and L3). Instead, the Schedules were only amended to show woodlands or floodplains that are found within those corridors. As a result, the corridors -- and the natural linkage functions they represent -- are not visible and are not as such assisting the development review process.

Given that the Natural Heritage System components on Schedules L only serve as a trigger for the requirement of an environmental impact statement if any development in or near them is proposed, we believe that the corridors themselves should be identified as such a trigger and should be so marked on the Schedules.

We would appreciate acknowledgement of receipt of this letter and will be pleased to discuss our objections with you further or otherwise look forward to your Notice.

Sincerely,

Erwin Dreessen
Co-Chair
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