

September 30, 2008

Greenbelt Coalition  
20 Camwood Crescent  
Ottawa, ON  
K2H 8P1

Mr. Ian Cross,  
Community Planning and Design Division  
Planning, Transit and the Environment Department  
110 Laurier Avenue West  
Ottawa, ON  
K1P 1J1

Dear Mr. Cross,

The following reflects the views of the Greenbelt Coalition, involving 14 environmental and community groups in the National Capital Region (see attached), including three City of Ottawa advisory committees. Some coalition member groups have already submitted additional comments and others will likely be doing so in the near future.

We have carefully reviewed the White Paper, Development in the Greenbelt, and offer the following general comments.

It is our assessment that the White Paper (WP) is seriously flawed because:

1. It is in conflict with the NCC's planned consultations on a review of the 1996 Master Plan for the Greenbelt;
2. It ventures into the NCC's mandate unilaterally and without obvious justification;
3. Even if the Greenbelt were the City's business, the WP appears based on dubious development scenarios that ignore the Provincial Policy Statement and also overlook the City's own core environmental and transportation goals detailed in key municipal land use documents;

4. The White Paper lacks :
  - a credible vision for a sustainable Ottawa/national capital area;
  - the research and scientific facts to present a comprehensive assessment of the current uses and future of the Greenbelt;
  - the requisite consideration of the need for the proposed development in the Greenbelt or a careful examination of obvious alternatives to such intrusions into the Greenbelt, such as intensification;
  - the required evaluation of the full range of adverse environmental, social, and economic impacts associated with development in the Greenbelt, or the status quo;
  - the rigorous analysis that would provide a balanced evaluation of a full range of future roles for the Greenbelt;
  - an appreciation of the specific concerns of key public groups, such as nearby farmers, about any development in the Greenbelt.
5. It ignores the strongly, repeatedly and clearly stated opposition to development in the Greenbelt by community leaders and a large majority of the citizens of Ottawa.
6. It runs the real risk of leading uninformed readers to believe that the WP is a thorough and fact-based analysis of development scenarios for the Greenbelt. The WP could prompt some people to support development without understanding the reasons why this could threaten the future integrity and viability of the Greenbelt.

In addition, we find that the questionnaire posted on the city's website for public comments is so highly biased that it invalidates any resulting analysis of the responses. In addition, at least two assumptions pervade virtually all the questions, namely that some development will take place and that all the costs are a result of the Greenbelt. The questionnaire ignores the possibility that if the communities beyond the Greenbelt were more self-sustaining many of these costs would disappear.

In conclusion, we question the quality, objectivity and legitimacy of this exercise and the related costs to Ottawa taxpayers. As this paper purports to represent the views of the City of Ottawa, we wonder what approvals were given to undertake this project. Furthermore, the prevailing view of coalition members is that this paper reinforces the widely held perception that City staff have a one-sided, pro-development agenda while only paying lip service to environmental issues, if at all.

Sincerely,

Sol Shuster  
Chair, Greenbelt Coalition

c.c. Coalition members  
Ottawa Council members  
National Capital Commission