



16 August 2023

To: Planning & Housing Committee

Sent via email to Kelly Crozier ([Kelly.Crozier@ottawa.ca](mailto:Kelly.Crozier@ottawa.ca)) for distribution to the members of Planning & Housing Committee, cc Colette Gorni [Colette.gorni@ottawa.ca](mailto:Colette.gorni@ottawa.ca)

**Re: Development Application # D02-02-21-0093 for Apartment Towers at 1081 Carling Avenue**

**Recommendation #1:**

*That Planning and Housing Committee not recommend for approval the proposed development at 1081 Carling Avenue, because its excessive height will significantly impact the heritage integrity and research capacity of the Central Experimental Farm.*

The staff report asserts that the proposed development does not negatively impact the heritage resources of the CEF. Heritage Ottawa disputes that assertion. The experimental plots are character defining elements of the National Historic Site as identified by the Parks Canada Statement of Significance. If they are overshadowed and rendered useless, they are indeed negatively impacted thereby damaging the integrity of this heritage property.

This is a rare site where the heritage value of the historic property meshes entirely with its functional, environmental and social values. I shall touch on them briefly here.

The staff report examines shadowing impact on the Farm as though it were impact to a green space, that is, lands that are freely available for the public to see and use. The research lands are not public lands in the understanding of the term: they are agricultural research lands (p. 14) not intended for public use. In other words, the city is using the wrong metric to assess impact: the Policy context within which this site is to be studied should be the City's own policies on climate change.

Agriculture and Agri-Food Canada has provided a robust and detailed study of the impact of shadowing of this proposal and their conclusions are irrefutable. The Staff Report should have included the full information provided by AAFC. Instead, the staff report asserts that the AAFC shadow study notes no negative impact to green space. Of course it doesn't. The AAFC shadow study is not about impact to green space but about research lands. Without the complete AAFC shadow study, this committee is being asked to make a decision based upon incomplete information.

The impacts of this proposal should be judged not against OP recommendations with respect to greenspace, but with respect to OP recommendations regarding Climate Change. The City of Ottawa has

an approved Climate Change Master Plan (CCMP), and the new Official Plan (OP) is being implemented accordingly. A recent update (April 2023) states that “Ottawa’s new Official Plan is based on a balanced growth management scenario in order to mitigate the effects of growth on land consumption, protect lands having **agricultural or ecological importance**, efficiently use public services; all of which contribute to reducing the city’s carbon footprint and building greater resilience to the effects of climate change” (page 8, CCMP Progress Report). Further, “The new OP includes climate resiliency policies to reduce the urban heat island effect, reduce risks from more severe flooding, and also protect trees, natural heritage and **food production**.” This is the metric by which impact of the proposed development should be measured, and it clearly will negatively impact the CEF’s research capacity and thus this country’s ability to address climate change.

Heritage Ottawa is fully cognizant of the need to build more housing. We are also fully cognizant of the impact of climate change and Canada’s critical need to adapt our agriculture to that challenge. AAFC has been studying the impact of climate change on agriculture at this site for over 40 years. Yes, we need more housing. But we also all need to eat.

**Recommendation #2:**

*Heritage Ottawa proposes that there be an Official Plan amendment to protect the CEF not just as a heritage site, but also as an agricultural research institution, from any potential negative impacts that might occur on or adjacent to the Farm.*

Heritage Ottawa would be happy to collaborate with greenspace advocates, agricultural research experts and others to create a positive outcome. A well-protected Central Experimental Farm is a key contributor to the welfare of all Canadians.

Leslie Maitland  
Volunteer, Advocacy Committee, Heritage Ottawa

Cc:

The Honourable Lawrence MacAulay, Minister of Agriculture and Agri-Food Canada c/o Michel Pascal,  
Director, Ontario and Quebec Region, AAFC; and Karen Durnford-McIntosh, Director General, Real  
Property and Asset Management, AAFC  
Mr. Yasir Naqvi, Member of Parliament, Ottawa Centre  
Mr. Steven Guilbeault, Minister of Environment and Climate Change with responsibility for national  
historic sites  
Tobi Nussbaum, National Capital Commission