



Kanata Greenspace Protection Coalition

A Not-for-Profit Corporation established in 2019

August 5, 2021

City of Ottawa, Planning Services

110 Laurier Avenue West, Ottawa, ON K1P 1J1

Attention: Laurel McCreight

Via Email: kanatalakes@ottawa.ca

Dear Ms. McCreight,

Re: 7000 Campeau Drive – ClubLink Development Applications

Rezoning File #D02-02-19-0123 Subdivision Application #D07-16-19-0026

The Kanata Greenspace Protection Coalition (KGPC) writes to your team today for the third time in less than two years, to reiterate our complete opposition to the applications and resubmissions for development of the Kanata Golf Club (KGC) lands by ClubLink and its development partners Minto Communities and Richcraft Homes.

We have completed a review of this most recent resubmission dated June 23, 2021 and are appalled to find that they have yet again failed to address much of the Technical Comments previously distributed by the city. We submit their reasons are three fold. First, their resubmission remains inappropriate from the perspective of planning policy. Second, its environmental site assessments (ESA) fail to adequately research and assess the environmental risks of development of the lands and, in the third, are fatally flawed as a sustainable stormwater management (SWM) proposal. We reference the opinions of our retained experts whose submissions you have received under separate cover.

Planning Issues

The proponents have not significantly amended their land use assumptions or plans since the project outset despite fulsome community opposition and substantial negative city feedback. In fact, any changes contained in this second resubmission are token – the swap of townhouse blocks for single detached homes to minimally address inappropriate density at an infill site; a failure to modify the plan to address the significance or sustainability of green buffer zones in



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answer to overall design incompatibility; the audacious claims of increased greenspace through the addition of incremental area in small parkettes and dry ponds while failing at the outset, to acknowledge the cost of lost use to the community and city resulting from the wholesale destruction of 175 acres of open recreational space and, likewise, the proposal of a widened road rights-of-way to 18 metres, the minimum acceptable within the city today.

We highlight the following key planning issues which warranted rejection of these applications over 2 years ago and continue to do so today.

- **The functional design of the 175 acres of golf course lands are integral to the original Kanata community masterplan both as a shared access natural recreational environment and as key sub watershed infrastructure for stormwater management.** This development will permanently destroy these community assets and decrease community physical and mental health outcomes in the process while increasing homeowner risk and city and taxpayer financial burden.
- **This is an infill development proposal beyond appropriate scale which is neither Official Plan compatible in design, density or zoning nor does it meet infill development criteria.** ClubLink's proponents continue to posture that this is a greenfield development in order to seek cover and approval under the latter's less strident development standards.
- **The development misapplies planning criteria related to rapid transit and community hub proximity to provide false justification for its level of intensification including the inflation of building heights and overall site density.**
- **ClubLink continues to avoid community engagement, choosing the fast lane of planning process manipulation over community relationship building .** The City must be aware that our community and the KGPC, as the leading community voice with over 2000 supporters, have had no discussion with these proponents. The use of the provincial LPAT/OLT process to move this development beyond the scope of city decision-taking and out of reach of community opposition should be challenged at the provincial level by city representatives.



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We note the important conclusion of our planning expert Dennis Jacobs of Momentum Planning and Communications in his July 29, 2021 commentary on this latest resubmission.

“It is my opinion that these applications would permit a scale and intensity of infill development that has never been contemplated by the Official Plan or any predecessor secondary plans for the subject property so it cannot be considered orderly development. It is not in my opinion, good planning or compatible development given the neighbourhood context and, creates the potential for causing undue adverse effects on adjacent properties, the overall built community as well as the natural environment.”
[emphasis added]

Environmental Site Assessment – Site Contamination Issues

Mercury contamination of this site beyond residential use standards was confirmed in 2019 despite a substandard Phase 1 and 2 Environmental Site Assessment (ESA). The KGPC was disappointed to read that the repeated Phase 1 study included in this resubmission as requested by the city is simply more of the same.

The KGPC retained an environmental engineering expert to unravel what ClubLink does not appear to want plainly exposed. On August 3, 2021, Steven Quigley P.Eng., an expert from Blue Cay Consulting of Waterloo, ON submitted his expert opinion to you. He specifically cited the failure of this second requested Phase 1 Environmental Site Assessment (ESA) report to meet the appropriate Ontario regulation 153/04 and CSA Z768-01 standard and notes,

“My comments focus on an underlying scoping concern. It is my opinion that the Phase 1 ESA does not meet the requirements of the regulation and relevant standards because the historical use and development of the property was neither properly considered nor investigated.” [emphasis added]

And further for clarity,

It is important to capture this historic lens or potential environmental impacts could go unidentified and potentially become significant issues at a later date. The impact of this information gap is that potentially contaminating activities and areas of potential environmental concern may not be identified and may not be addressed in the assessment when in reality they need to be considered in order for the characterization of the site to be complete. In other words, this information is necessary



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to properly scope the Phase II ESA and to properly complete the conceptual model that is an essential component of the ESA.” [emphasis added]

The KGPC knows it is time for city staff and our elected representatives to prioritize the important public health and safety risk associated with redevelopment of this site. Any development of this land will involve extensive grading manipulation as well as extensive bedrock blasting. This will disturb and potentially aerosolize the heavy metal contaminants collecting in unknown quantities, patterns and locations across the site secondary to the development of the 18 hole golf course and residential neighbourhoods in the 1980s to 1990s and, put at risk the health of thousands of neighbouring residents. Leaving the size and scope of this issue under-identified benefits only the developer. We ask the city staff to immediately join the KGPC to forcefully call out the ongoing failure by these proponents to provide assessment and documentation that meets all safety standards and regulations.

Stormwater Management (SWM) Issues

The KGPC took no comfort with the latest SWM models and design assessments submitted in June by the ClubLink consultants. As a result, we retained Douglas Nuttall P. Eng., an SWM expert with HDR, whose experience offers substantial insight into the workings of the Kizell watershed specifically. On August 4, 2021, he provided you a high level overview and opinion on the proposed SWM system and its newest modifications. We offer the following comments-

- **It is not evident that the SWM design proposal meets applicable legal constraints.** A restrictive covenant assumed by ClubLink in 1996 places limits on the impact(s) of land regrading as related to its central function in area stormwater management. The proposal does not show that it is able to function within such constraints. Secondly, identified negative repercussions to the riparian rights of the National Capital Commission (NCC) and other downstream landowners remain unaddressed.
- **A consensus based model on the functional viability of the proposed SWM system has not been produced.** Missing at the outset of this process was a definition of the SWM performance criteria required by the various approval authorities (e.g. Ministry of Environment, City of Ottawa). In this vacuum, ClubLink’s consultants take ongoing free rein to design, redesign and tinker again using a piecemeal approach, modifying



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individual segments of the system to generate onside results without fully integrating the performance of the entire system (e.g. LID changes without reassessing the impacts of the proposed changes downstream). In the end, they expect both the community and the authorities to trust that the sum of the parts will deliver a sustainable whole.

Unfortunately, calibration, modelling and model extrapolation to assess future system demands including the fully undescribed impact of climate change fail to clearly demonstrate the function of the proposed post-development sub watershed as sustainable. Adjacent Kanata residential and downstream landowners along with the City of Ottawa, as approving authority, will be left holding the proverbial wet bag after ClubLink and its partners have moved on.

- **The model as proposed fails to ensure post-development water flows do not exceed pre-development flows through the Kizell Drain.** The impact and loss to use of 70.8 hectares of permeable golf course land as well as the undefined contribution of the estimated 72000 metres³ of underground water storage to post event water flows are incompletely defined. Post development system performance and sustainability cannot be reasonably projected.
- **The proposal does not address existing technical issues within the Kizell Drain downstream of the Beaver Pond which will be exacerbated by this development.** The National Capital Commission (NCC), a substantial downstream landowner, continues to oppose this development based on unacceptable impacts on temperature and flow rate. Furthermore, the City of Ottawa has previously stated that it will not fund the redesign of the Kizell SWM system to support new development. Resubmitting dysfunctional proposals will not resolve the components of this juggernaut.

In conclusion, Mr. Nuttall notes:

“SWM systems designed for infill development must demonstrate two functionalities. They can neither introduce new problems to an existing system nor can they exacerbate existing problems. In this case, I am of the opinion that the proposed works have the potential to increase water levels in the receiving water body (downstream Kizell Drain) and negatively impact unstable soils. No development proposal should be considered for the 7000 Campeau site unless the proponents can adequately address these concerns.” [emphasis added]



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Since 2019, in unrelenting vocal opposition to these applications, the KGPC has identified a multitude of concerns from the destruction of a natural environmental open space which includes the loss of animal, fowl and bird habitats and forested woodlots to the complete lack of social and community services and access to nearby education and transportation links. Please review our August 2020 commentary for these details which remain unchanged by this submission.

With this third submission, ClubLink, Minto and Richcraft have again failed to provide a legitimate redevelopment proposal that conforms to planning policy or environmental and SWM development standards for the KGC lands. Simply put, the geological, hydrological and environmental characteristics of the site cannot legitimately support urban residential development. There is no workaround that is acceptable to the community.

We recommend the City planning team continue to reject these applications and call for reengagement on a new field by involving Mayor Jim Watson to lead other opposition. It is clear to all that the lands, a shared open greenspace, as presently used and originally envisioned improve vital health outcomes and recreational options for our community.

While not the perfect urban greenspace design in the minds of some today, the KGC lands are much more than adequate in the collective mind of Kanata's residents and, most important, very deserving of your professional efforts to ensure their protection as the 'green heart' of our Kanata community.

Sincerely,

Barbara Ramsay

Chair, Kanata Greenspace Protection Coalition

chair@ourkanatagreenspace.ca

cc Jenna Suds, Ward 4 Councillor