

Technical Report on the City of Ottawa Draft Official Plan

Produced by

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People's Official Plan Technical Report on the City of Ottawa Draft Official Plan

*The following groups have collaborated on this document.
A full list of People's Official Plan co-convenors are listed in Annex 1*



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Introduction

Land use plans cannot be made without appropriate consultation with the Indigenous communities that live on this land. We urge the City of Ottawa, as represented by its Mayor and Council, to undertake meaningful engagement with Algonquin political leaders to facilitate knowledge-sharing in land use planning processes, inform decision making, and build reconciled, constructive, and cooperative relations based on mutually accepted protocols and milestones.

This document shows how Ottawa's new Official Plan can go further and faster on the land use changes needed to build a more livable, inclusive and sustainable city. In our view, much more work is needed to strengthen and bring coherence to positive guiding principles in the draft such as neighbourhoods, walkability, health equity and economic inclusion.

A high level summary is forthcoming of our feedback on four key themes:

- Healthy and Inclusive Communities
- Neighbourhood Regeneration
- Energy and Climate Change
- Inclusive Community Economic Development

While we support various aspects of the draft Official Plan, the City's approach to neighbourhood regeneration is of immediate and urgent concern. The City's draft calls for 15 minute neighbourhoods consisting of hubs and corridors and parts of neighbourhoods within a 15 minute walk of hubs and corridors. In our view, this approach confounds two fundamentally different processes: the development or redevelopment of hubs, and the regeneration of existing neighbourhoods. You will therefore see throughout the document proposed policy changes based on this important distinction. Concerns regarding the other themes listed above are also reflected in this report, and summarized in forthcoming submissions.

Part I of this document outlines 12 targets we think can provide the Official Plan with clear and measurable goalposts for the future growth and development of Ottawa.

Part II contains proposals for changes in policy language throughout the document, from the Introduction through to Schedules and Annexes, and almost every policy section in between. Many of these deal with strengthening targets, protections and commitments. Some of the text details significant policy changes while others deal with clarity and consistency of language in an effort to avoid potential conflict and misinterpretation. It also contains statements of support for many of the policies as they are stated in the draft.

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This feedback has been prepared by co-convenors of a People's Official Plan (POP), an informal alliance of individuals and organizations focused on bringing greater urgency and ambition on climate and social justice issues to the development of Ottawa's Official Plan (see Annex I for a list of the organizations involved).

We support the high level policy directions that guide the draft Official Plan, and support the vast majority of the high level policy statements of the November 20, 2020 draft Official Plan. We support the vision and direction of regeneration, the healthy walkable 15-minute neighbourhoods and the shift from a car-centric to a community-centric development vision. However, we are equally clear in our assessment that this draft fails to get us to where we need to go, and lacks the readability required of a foundational policy document designed to respond to public needs. We need an Official Plan that will clearly set us on the road to both positive change and public accountability. Make no mistake - the POP alliance is ready to embrace and grapple with the new vision presented in the draft for a sustainable, livable, affordable, equitable, diverse and inclusive city and healthy, resilient and walkable 15-minute neighbourhoods. Our fear is that this vision is still a mirage, and key elements in the draft Official Plan support a mere overlay on business-as-usual practice.

We believe that the improvements we suggest have the potential to bring greater harmony among the conflicting interests at play in city-building. They can also save the City time, resources and strife as it moves on to creating a new zoning bylaw and sector-based master plans. We hope you take the time needed to carefully consider what we have to say.

Part I: Twelve High-Level Targets

In planning our most livable city, we must ask ourselves what we are aiming for, how we will know in 10 years that we are moving in the right direction, and in 35 years that we have succeeded. We propose the following 12 high-level targets (Table 1), and some first thoughts on indicators. We suggest that the targets be embedded in the Official Plan, be subject to consultations around the 2nd version of the draft Official Plan, and then applied to the performance monitoring framework as per sections 4.8 and 4.9 of the Provincial Policy Statement (2020).

Table 1: High-level Targets and Indicators for Major Domains of the Official Plan

Target Domain	High-level Targets	Indicators
1. Reconciliation & Meaningful Consultation	Agreed protocol and milestones for consultations with Algonquin communities	Protocol is acknowledged by political leaders of Ottawa and Algonquin people
2. Community & Neighbourhood Engagement	A community development process towards achieving walkable 15 minute neighbourhoods	The process path is published on Engage Ottawa (may be community self-guided, using digital toolkit)
3. Regeneration	<p>Most growth in the existing built up area to occur in current and prospective 15 minute neighbourhoods</p> <p>15 minute neighbourhoods as complete walkable communities</p>	<p>A measure of the proportion of new builds and conversions in the existing built up area occurring in hubs, and in regenerating neighbourhoods</p> <p>A measure of the extent to which hubs, and regenerating neighbourhoods, have achieved target walkability</p>

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<p>4. Financial sustainability</p>	<p>Ottawa's plan to transition from a car-dependent suburban model to an active & public-transit-based community regeneration model is financially sustainable.</p> <p>Net zero carbon and HPDS-compliant growth to pay for growth</p>	<p>Suburban expansion financial implementation plans and enhanced public transit costs multi-year estimates, capital plus operating, 5 and 10 year.</p> <p>Development charges from suburban expansion, annual</p> <p>Community regeneration financial estimates from infrastructure & transportation and enhanced public transit costs, capital plus operating, 5 and 10 year.</p> <p>Development charges from regeneration, annual.</p> <p>Ridership and fare revenue, annual.</p>
<p>5. Affordable Housing</p>	<p>Reducing homelessness by 50% by 2030</p> <p>Reducing housing stress by 50% by 2030 *housing stress is defined as households paying more than 30% of their income on housing costs</p>	<p>-- Number/proportion of very low/low/moderate income households who are in housing stress, by household size</p> <p>-- Number of units renting at \$500/mo or less</p>
<p>6. Equity of Social Outcomes</p>	<p>Physical and Mental health outcomes across low, middle and high incomes are converging over time</p> <p>Physical and Mental health outcomes of Indigenous, Black People of Color (BIPOC) individuals are improved over time</p>	<ul style="list-style-type: none"> - Reduction in chronic conditions among BIPOC individuals. - Equity of distribution for social services and recreation services in relation to population. - Increase access to health services for all.

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		- Incorporate race-based health analysis into relevant city policies, processes and planning.
7. Climate (Mitigation)	<p>Ottawa is on-track to meet or exceed community and corporate emissions reduction targets in Energy Evolution</p> <p>Greenfield developments are net carbon neutral</p> <p>Ottawa's growth and land use is energy efficient</p>	<p>-- Reduction in community emissions 43% by 2025, 68% by 2030, 96% by 2040, 100% by 2050</p> <p>-- 100% of new homes are net zero emission by 2030</p> <p>-- 100% of new commercial buildings are near net zero emission-ready after 2030</p> <p>-- 98% of residential & small commercial existing buildings and 95% of large commercial and industrial buildings are retrofitted for 70% heat savings and 30% electrical savings by 2040</p> <p>-- % application of HPDS for new builds</p> <p>-- local renewable energy generation will reach 190MW and energy storage 20MW by 2050</p> <p>- estimate of embodied carbon from greenfield and boundary expansion builds</p>
8. Mobility	<p>Reduce car dependence</p> <p>Affordable, frequent and reliable public transit networks</p>	<p>A measure of what % of intra-city trips are taken by car</p> <p>A measure of the proportion of all</p>

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	<p>Eliminate mandatory parking minimum requirements city-wide</p>	<p>neighborhoods that can be considered walkable neighbourhoods, by transect</p> <ul style="list-style-type: none"> - Ridership: By 2030, 30% of commutes made on public transit - No more than 5.0% of monthly income spent on transit - By 2048, over 75% of OC Transpo routes run every 15 minutes
<p>9. Trees & Greenspace</p>	<p>Equitable distribution of trees and access to greenspace in all neighbourhoods</p> <p>A commitment to 40% tree canopy for each residential neighbourhood over the life of the OP</p> <p>4 ha of greenspace per 1000 population</p> <p>No net loss of wetlands in the rural area</p> <p>No net loss of woodlands in the rural area</p>	<p>Minimum 40% tree canopy cover by neighbourhood, city-wide</p> <ul style="list-style-type: none"> -- 40% tree canopy for urban areas inside and outside of the Greenbelt -- a measure of the equity of distribution of greenspace by neighbourhood across the urban area -- annual area measure of wetlands -- annual area measure of woodlands <p>Metric: location of and \$ spent annually by city on trees for climate resilience (planting and maintenance); location of and \$ spent on wetland protection; location of and \$ spent annually on other nature-based solutions.</p>

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<p>10. Community Economic Development</p>	<p>Greater regional autonomy in strategic sectors of food, building materials, energy and recreation:</p> <p>Full shift to net-zero carbon economy by 2046</p>	<p>% of renewable energy from regional sources;</p> <p>% of food supply from regional sources;</p> <p>% of building materials from regional sources;</p> <p>Spending on regional recreation as a percentage of all recreational spending</p> <p>Number of jobs in building retrofit industry</p> <p>Youth unemployment rate</p>
<p>11. Food & Agriculture</p>	<p>The new Official Plan will not only protect but actively strengthen Ottawa's agricultural sector and additionally enable efficient and sustainable local food production throughout the city, to build resilience to fluctuating availability and price of food in Ottawa.</p>	<p>20% of foods eaten in Ottawa are produced within the Buy/Grow Local region.</p> <p># of farmers with Farm Business Registration Numbers increases, representing support for both new, and small to medium sized farm operations, to balance the trend that we are seeing with declining number of farmers and increase in land holdings per farmer.</p> <p>Demonstration of no further incursions onto farmland from further urban boundary expansion nor development.</p> <p>Requirement of baseline measures for the above, including % of local foods eaten, # of farmers, # of hectares of farmland, # of farmland hectares being agriculturally used, divided by production type and commodity, etc.</p>

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		<p>Metric: number of farmers (divided as urban, suburban, greenbelt, rural), number of community gardens, number of greenhouses, number of beekeepers, # of hectares of farmland no longer in production (including class soils beyond 1-3 used for livestock, etc.)</p>
<p>12. Resilience (Climate Adaptation)</p>	<p>Emergency Preparedness: The New Official Plan will support Ottawa’s ability to adapt to future climate conditions and reduce the disruption to people’s lives due to weather events and cost.</p> <p>Heat: The urban heat island effect will be reduced and the vulnerable more protected from extreme heat through the provision of more shade, urban greening and light-coloured (reflective) roofs.</p> <p>Flooding: Reduced flooding risks and flooding damages by avoiding building in flood plains, mitigating risks in areas vulnerable to flooding under future climate conditions, adopting stormwater management practices that consider future precipitation, and using low impact development.</p>	<p>Metric: Number of people affected by significant power outages; number of people affected by flooding; and estimated cost of private property damage from extreme weather events (insurance info).</p> <p>Metric: number of days of heat warnings in urban vs rural, average day and night temperatures in urban transects vs rural for heat warning days; # people using cooling shelters, hospital admissions and death due to heat</p> <p>Metric: location and duration of flooding annually vs 100 and 350 year flood vulnerability zones (mapped); estimated cost of flood damage to private and City property; City resources (\$ and personnel) spent annually responding to flooding</p> <p>Metric: annual proportion of infrastructure investment on green infrastructure (i.e., living and built systems that slow down, soak up and filter rainwater) versus conventional ("grey") infrastructure</p>

Part II: Analysis of Selected Policies

Following are specific proposals for changes in policies and policy language throughout the draft Official Plan, from the Introduction through to Schedules and Annexes, and almost every policy section in between. Many of these suggestions seek to strengthen targets, protections and commitments. Some detail significant policy changes while other suggestions address clarity and consistency of language in an effort to avoid potential conflict and misinterpretation. We have also made statements of support for some of the policies as they are currently drafted.

Readers Note: The analysis is organized in a table format with three columns (Table 2). **Column one** is the section number directly from the draft Official Plan. **Column two** contains the verbatim text of the section policy, shown in plain text. Proposed changes to verbatim text are shown using **bold font** for new or modified content and ~~strike through~~ for words we suggest be removed. Column three outlines the rationale for the proposed policy changes. While each row in the table refers to a distinct policy, the analysis should be read in relation to all of the policies in each section of the draft Official Plan.

Table 2: People’s Official Plan Analysis of Official Plan Policies

Section 1: Introduction

Policy #	Verbatim draft OP policies in plain text, with POP proposed changes in bold or strike through	POP rationale for policy changes
1.2	Role of the Official Plan Ottawa’s Official Plan is a legal document, adopted under the authority of the Ontario Planning Act. It contains the City’s goals, objectives, and policies to guide growth and manage physical change to 2046. It also implements the priorities	

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	<p>identified in the City’s Strategic Plan as they relate to land use. Land use direction is both driven by, and has an impact on, Ottawa’s health, economy, environment, and sense of community. As such, this Plan provides direction to other city plans such as the Transportation Master Plan and the <u>Parks and Greenspace Master Plan</u>. Official Plan policies are often implemented through these related plans.</p>	<p>Address inconsistency in use of name and scope of the Urban Forest and Greenspace Master Plan</p>
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Section 2: Strategic Directions

Policy #	Verbatim draft OP policies in plain text, with POP proposed changes in bold or strike through	POP rationale for policy changes
2.1	<p>Big Policy Move 2 (p. 14)</p> <p>The overarching mobility goal of the Official Plan is that by the end of its planning horizon, more than half of all trips will be made by sustainable transportation such as walking, cycling, or transit or carpooling.</p> <p>A dramatic shift in patterns of residential and mixed use development in regenerating neighbourhoods, combined with infrastructure upgrades, calculated to trigger a modal shift to a culture of walking.</p>	<p>Car pooling is not conventionally understood as “sustainable transportation.” By eliminating this murky definition, we can better set and work to attain ambitious modal split targets that prioritize walking, biking and transit over private vehicle use.</p> <p>Place the highest priority on the modal shift of neighbourhoods from car-culture to a culture of walking, cycling and active transportation. This is the dramatic shift in our patterns of neighbourhood redevelopment.</p>
2.1	<p>Big Policy Move 3</p>	

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	<p>Transects also define and maintain the existing development patterns wherever there is no overlay.</p> <p>Overlays: identified where specific policy direction is needed beyond those contained in land use designations to guide growth are tools to sort and regulate areas that will be subject to regeneration.</p> <p>Adopt a new approach to zoning in regenerating neighbourhoods, using form based zoning and departing from both traditional lot patterns and zoning housing topologically</p> <p>Before being enacted, new regulations will be modeled to anticipate their effects on housing supply, housing cost, geographic distribution of new developments, cost or saving to the City, health impacts, and much more. Modeling must also use an equity lens to anticipate the impacts on all members of our diverse community.</p>	<p>Add reference to the value or role of transects in existing fully built up areas.</p> <p>Define overlays distinctly here (currently buried in section 5.6.1.3.2.b). Note for Section 6.3: The introductory paragraph needs to be reworded with a similar level of clarity about what changes are planned for existing neighbourhoods inside and outside of overlays.</p> <p>Big Policy Move 3 must describe the proposed zoning direction.</p> <p>Modelling is needed to substantiate targets. For example, the draft Official Plan proposes, without the benefit of modelling, a target of 47% of new homes within existing urban areas in new apartment buildings at Hubs and along Corridors, when currently it is about 29%. Modeling of proposed policies and regulations will allow us to test and find those that are robust, teaching us to regulate in balance with real estate market realities, provincially mandated building codes and construction economies. A commitment to modelling is also necessary given the broad extent of proposed changes to development patterns and to regulations.</p>
<p>2.1</p>	<p>Big Policy Move 4: Embed environmental, climate and health resiliency and energy into the framework of our planning policies.</p>	<p>Strongly support how this big move has been applied throughout the draft OP. Contradictions with this policy should be removed (eg. 4.2.3.3 reflects an outdated planning paradigm).</p>

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	<p>The Official Plan contains bold policies to encourage the evolution of communities into healthy, inclusive and walkable 15-minute neighbourhoods...It also includes policies to help the city achieve its target of 100% greenhouse gas emissions reduction by 2050, its target of a 40% urban forest canopy cover and to increase the city’s resiliency to the effects of climate change including much warmer temperatures, more rain, and more extreme weather such as heat waves, floods and storms.</p> <p>Policies to welcome and promote the most environmentally responsible forms of housing, such as wood frame multi-unit buildings, sharing insulation/heat/cooling in shared walls/floors/roofs.</p> <p>Policies to locate new homes in existing neighbourhoods close to existing transit and to regenerate these evolving car-dependant areas to become so delightfully walkable that there is a cultural shift to active forms of transportation.</p>	<p>Examples of “bold” policies are provided in bold (left)</p>
<p>2.2.1</p>	<p>[INTRODUCTORY TEXT, p.18]</p> <p>It also presents incredible opportunities to Regeneration will shape Ottawa in a way that promotes healthy, vibrant and walkable 15-minute neighbourhoods.</p> <p>Definition of Regeneration:</p> <p>A regenerating neighbourhood is an existing neighbourhood where residents are increasingly less dependent on their</p>	<p>“It also presents incredible opportunities” is not policy language.</p> <p>The existing text of the definition of regeneration (in the text box on page 18) is actually the definition of intensification, not regeneration.</p>

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	<p>cars, as they become able to conveniently, safely and dependably walk (year-round) to most weekly destinations and to rapid transit stops, along routes that are enjoyable.</p> <p>Evolution into complete 15-minute neighbourhoods which include services, parks, recreational facilities, public spaces, and other elements of complete neighbourhoods, in keeping with increases in population.</p>	<p>Regeneration is a subset of intensification and should have its own definition, proposed at left. Confused use of the word regeneration will erode trust as it suggests that the idea of regeneration is not to be taken seriously and is purely word-craft to ease the sting of intensification without any community upgrades.</p> <p>In the Official Plan, the word 'regeneration' should be used only as per this definition and otherwise replaced with the words 'infill housing'. For example, in Sections 3.2.16, 3.2, 3.2.3, 3.2.4-9 and 4.6.6 the word 'regeneration' should be replaced with the words 'infill housing' as it is clearly infill housing and density increase that is the subject, and not the larger concept of a complete and walkable neighbourhood.</p> <p>Further, this definition should clearly apply to existing established neighbourhood fabric, and not to Hubs, which will not regenerate so much as they will be reinvented or completely rebuilt. The stated Policy Intent for Regeneration vaguely applies to both existing neighbourhoods and future Hubs, whereas these two scenarios are so different that they must be considered separately and 2.2.1 Policy Intents should distinguish accordingly.</p> <p>The word “existing” has created confusion in communities as it can be read as directing growth exclusively to areas that are now 15 minute neighbourhoods, i.e. Glebe, Centretown, Hintonburg.</p>
<p>2.2.1</p>	<p>Policy intent 1 Direct residential growth within the built-up urban area to 15-minute neighbourhoods</p>	<p>Policy Intent 1 should be revised to note that, of the population increases targeted for existing urban areas, about 70% will be absorbed into existing neighbourhood fabric.</p>

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	<p>This Plan envisions directing residential regeneration towards existing locations in the existing built up area where daily and weekly needs can, now or within the planning horizon of this Plan, be accessed within a 15-minute walk, otherwise known as 15-minute neighbourhoods. This direction will increase the number of transportation options and convenience to access services, amenities, and schools. This direction will also contribute to the needs of an aging population by enhancing accessibility to more vibrant areas with social interaction, health services, and community facilities.</p> <p>This density increase is key to neighbourhood regeneration, to increase commercial demand and attract small shops and services at walking distance to homes.</p>	
<p>2.2.1</p>	<p>Policy Intent 2 (page 19): DELETE THE STATEMENT IN ITS ENTIRETY.</p>	<p>Policy intent 2 must be deleted as it would prevent the construction of desired forms of housing in neighbourhoods, including multi unit buildings ideal for right-sizing seniors or smaller households. Assumptions regarding future housing demand need to be actively reviewed in light of new information and changing drivers such as post-pandemic scenarios.</p>
<p>2.2.1</p>	<p>Policy intent 3 Improve public amenities and services within 15-minute neighbourhoods (p. 19)</p> <p>Direct residential regeneration to 15-minute neighbourhoods;</p>	<p>No need to repeat this policy. Already made clear in 2.2.1.1 Repetition in slightly different formulation opens the door to misinterpretation.</p>

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<p>Help neighbourhoods evolve towards being inclusive, walkable, 15-minute neighbourhoods that will provide the public and private amenities that will attract new residents;</p> <p>Require the production of denser, small-scale, low-rise infill housing of generally three or more units per existing lot that will increase the supply of growth allocated for the built-up area;</p> <p>Provide housing on neighbourhood streets for all sizes of households from single person to multi-generational, and for right-sizing seniors;</p> <p>Protect the urban tree canopy and provide equitable access to greenspace, with a canopy cover of at least 40% by neighbourhood, that will provide shade and opportunities to promote mental and physical health and well-being;</p> <p>Ensure that the development and redevelopment of transit, road and active transportation infrastructure supports the City's regeneration targets; Neighbourhood infrastructure includes underground services, storm water management, public transit, parks, recreational facilities, sidewalks, bike lanes, trees, social services, cultural activity spaces, and those elements that signify or celebrate neighbourhood identity and build a sense of belonging.</p>	<p>What does "help" mean? What does this policy enable? How will it help? Clarify or use another verb.</p> <p>Adding density is essential to meeting Ottawa's climate and greenspace protection goals, so avoid limiting density with qualifiers such as "small-scale," "low-rise" or "generally three or more units."</p> <p>Broaden to allow for mix of dwelling units and household sizes.</p> <p>Strongly support the statements "Protect and Provide" in this section on regeneration. Adding tree cover is essential for community livability, health and biodiversity. Supporting policies need to be consistent with these goals.</p> <p>The definition of neighbourhood 'infrastructure' must include more than just water and sewage. When neighbourhood infrastructure is established and maintained in proportion to population density, a neighbourhood is well positioned to facilitate the cultural shift from car-dependence to a culture of walking and biking.</p> <p>Ontario Regulation O. Reg. 588/17: Asset Management Planning for Municipal Infrastructure under the Infrastructure for Jobs and Prosperity Act, 2015, S.O. 2015, c. 15 compels Ontario municipalities to recognize trees and urban forests as vital infrastructure assets managed in ways similar to human-constructed municipal infrastructure.</p>
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	<p>Provide guidance on the compatibility of ensuring that new housing in existing neighbourhoods complements with the desirable character of the surrounding these neighbourhoods so that development opportunities are is more welcoming to the existing neighbourhood local residents;</p>	<p>“Desirable” in this statement has created confusion among communities. Does it mean “new housing in existing neighbourhoods complements the character of these neighbourhoods” as per 2.1 Big Move 1, or some future “desirable” state? Suggest that “complements the character of the neighbourhood” be used consistently throughout the text whenever referring to this notion (instead of “context” for example) to avoid misinterpretation.</p>
<p>2.2.1</p>	<p>Policy intent 4</p> <p>Guide regeneration of neighbourhoods that are walkable, with delightful, engaging, safe, year round walking routes from all homes to most daily destinations and transit.</p> <p>Significant community and stakeholder involvement including housing industry members, residents and small business owners can allow efficient gathering of information necessary to problem solve, and can build momentum and support for neighbourhood change and upgrades.</p> <p>Infill in regenerating neighbourhoods will be zoned to fit well within the existing context, to animate the street with windows, doors, porches and low balconies, to make streets more enjoyable to walk along.</p> <p>Office space over small shops will provide desired locations for employment and enliven communities during the day. New car-centric shops and offices will not be permitted in regenerating neighbourhoods.</p>	<p>Add Policy intent 4</p> <p>Appreciation of the inter-dependence of walkable, mixed uses and increases in residential density must permeate the Official Plan. The draft Official Plan does not currently provide a vision for regenerating neighbourhoods to become delightful places to walk. This may seem trivial, or assumed, but it is vital to the successful transition away from car dependent culture. This concept should be added to the explanation of regeneration in Section 2.2.1.</p> <p>The Policy Intent behind the regeneration of existing neighbourhoods into complete 15-minute communities must be more fully expanded on pg 19, to capture the extraordinary benefits anticipated in this transformative policy direction. Shaded walks are important in regenerating neighbourhoods in order to make walking enjoyable. Cycling paths are included too.</p> <p>Public Health studies show that walkable neighbourhoods are more healthy neighbourhoods. People in walkable neighbourhoods are healthier and happier – they walk and bike rather than drive and experience more social interactions and connections. Reduced reliance on cars is quite possibly the most</p>

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In neighbourhoods targeted for regeneration, but where there are a new few or no small shops, pop up shops and markets will be promoted in veins or nodes zoned to attract future small shops and office spaces. These temporary activities will begin to establish these places within the neighbourhood as places that are desirable walking destinations and important to the dynamic and identity of the neighbourhood. In this way, this temporary use will generate an urban context in which small business development is much more viable, and stimulate regeneration.

A neighbourhood's targeted locations for future small shops and services will receive upgrades to hard and soft landscaping, and the addition of street furniture and other elements, to carve out space for activities and growing community identity.

significant change that Ottawa can make to reduce our greenhouse gas emissions. The second would be to build new homes (the gentle density needed in walkable neighbourhoods) predominantly in the form that is the most environmentally efficient; wood frame multi-unit buildings where residents share walls, floor, and ceilings to reduce heat and cooling needs.

An ecosystems approach must be implemented during the design of regulations, appreciating the inter-dependencies involved: fine grain commercial cannot thrive without density, density will overwhelm without green space, sidewalks will remain empty without destination. Transitional solutions are critical to avoid 'chicken-and-egg' barriers to progress, and must include temporary parking, and sidewalks, as well as pop-up stores and outdoor markets.

The new Official Plan must herald a new, simple but nuanced approach to regulating redevelopment and infill in our existing neighbourhoods, grounded in analytical modeling. This must include an ecosystem approach in appreciation of the inter-dependencies involved. Other elements of neighbourhood completeness that must be mapped to identify challenge and opportunity, and inform decision making include sidewalks, bike lanes, trees and outdoor cultural activity spaces. And although this would be a more abstract exercise, it is also important to identify those elements within communities that signify or celebrate neighbourhood identity and build a sense of belonging.

We continue to develop ideas and solutions through direct collaboration and constructive dialogue between a broad range of

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		<p>stakeholders. Our ideas to transition neighbourhoods to walkability are broadly supported by our collaborators. This collaborative work must be continued by City staff, as it is key to the successful enactment of regulatory tools to see this vision to reality. There are statements about compatibility of infill in regenerating neighbourhoods buried in Sections 5 and 6. But a clear vision and intent must be stated in Section 2.2.1</p> <p>A regenerating walkable neighbourhood requires businesses and work places animating walkable shopping streets, providing daily necessities as well as leisure and non-essential goods and services.</p> <p>A new section should be added setting out the vital importance of transitional commercial spaces to stimulate regeneration.</p>
<p>2.2.2</p>	<p>Section 2.2.2 What we Want to Achieve and Policy Intent</p> <p>... life science and clean energy technology are a major employer and economic engine in Ottawa. Health workers, the food industry and recreational services are also important economic sectors in Ottawa, and strategic to health and food security outcomes.</p> <p>ADD Policy Intent 0.5: Enhance regional production, circulation and consumption of strategic goods and services including food, energy, building materials and recreation needed to enhance regional economic security.</p>	<p>Municipal governments in Canada are empowered to promote cleaner, safer, and more prosperous economies and enhance employment and new careers through a wide range and mix of policy measures. Government and conventional knowledge-based industries are not the only drivers of economic activity in Ottawa. The new Official Plan for the City of Ottawa provides an opportunity to innovate in this role by enhancing regional supply and demand chains, especially in strategic sectors (food, energy, building materials and recreation/leisure). A greater degree of import-substitution and self-provisioning locally and regionally in these sectors is justified in the face of disruptions to economic networks, whether the disruptions are due to the climate crisis, unstable global economic forces or health crises such as the current pandemic.</p>

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	<p>Policy Intent 2): Direct major employment to Hubs. and Corridors Direct smaller office employers to regenerating neighbourhoods.</p> <p>Policy Intent 6): ... The Kanata North Economic District is a and the Macdonald-Cartier International Airport Economic District are major economic engines for the City and will continue to play an important role in the future. Kanata North is a nationally significant technology cluster and a major contributor to Ottawa’s metropolitan economy. It is a large area of 450 hectares with, as of 2020, more than 23,000 tech jobs and 300 companies. The MacDonald-Cartier International Airport plays an important role in mega-region as part of the transportation network providing connections nationally and internationally. Each year, more than 5 million travellers pass through the airport and more than \$2 billion in economic activity takes place in the vicinity.</p>	<p>High traffic corridors must not receive employment or commercial uses as this will perpetuate the car culture. Employment in regenerating neighbourhoods is critical to regeneration, providing day time shoppers to support small businesses. All regenerating neighbourhoods will need streets that are ideal walking destinations with small shops and office spaces, not on high traffic streets such as corridors. The draft Official Plan seems to assume that office spaces are generally too large to suit neighbourhoods, but in fact most businesses in Ottawa have fewer than 50 employees and would fit in offices above shops on neighbourhood shopping streets.</p> <p>Eliminate <u>all</u> references to expanding the airport because expansion is incompatible with action on climate change, and would contradict federal and provincial plans for rail corridors between Ottawa, Toronto and Montreal.</p>
<p>2.2.3</p>	<p>Energy and Climate Change</p> <p>Introduction and WHAT WE WANT TO ACHIEVE [TEXT BOX]</p>	<p>Integrate approved EE targets into the introductory text.</p>

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	<p>The City of Ottawa targets a reduction in community GHG (from a baseline in 2012) as follows:</p> <ul style="list-style-type: none"> ● 43% reduction by 2025 ● 68% reduction by 2030 ● 96% reduction by 2040 ● 100% reduction by 2050 	
<p>2.2.3</p>	<p>Policy Intent 2): Apply sustainable and resilient site and building design as part of new construction, to ensure that 100% of new homes are net zero emissions by 2030 and 100% of new commercial buildings are near net zero emission ready after 2030.</p> <ul style="list-style-type: none"> ● Encourage multi-unit buildings in which insulation is shared by sharing walls, floors and ceiling 	<p>Add this bullet to emphasize shared insulation as the most significant and most affordable feature of sustainable building design.</p>
<p>2.2.3</p>	<p>Policy Intent 3): Prioritize a shift to energy efficient transportation modes.</p> <p>The second highest source of emissions in Ottawa is transportation. The City will target:</p> <ul style="list-style-type: none"> · Active transportation mode share is 21% by 2030 · Electric vehicles comprise 90% of new personal vehicles by 2030 (policies, locations and plans for charging stations will be needed) · 100% of the transit fleet is zero emission by 2030. · Bus rapid transit and light rail transit increase in frequency by 2030. 	<p>Integrate these approved Energy Evolution targets.</p>

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<p>2.2.3</p>	<p>Policy Intent 4): Enable the use of local renewable energy sources.</p> <p>Only 5% of the city’s total energy consumption is currently generated or supplied from local, renewable sources. Ottawa will need to transition quickly to the use of energy supplied from green renewable sources over fossil fuels in order to achieve its established GHG reduction targets. Ottawa’s renewable energy generation targets are 150 MW solar; 20 MW wind; 20 MW hydro, 20 MW electricity storage By 2050.</p>	<p>Integrate these approved Energy Evolution targets.</p>
<p>2.2.3</p>	<p>Policy Intent 6): Build resilience to future flood risks.</p> <p>Avoiding Prohibiting building in flood plains and mitigating risks in areas vulnerable to flooding</p>	<p>There should be <u>no exceptions</u> made to allow building in flood plains.</p>
<p>2.2.3</p>	<p>Policy Intent 7): Protect trees, wetlands, and other natural areas and use nature-based solutions to meet urban infrastructure and energy needs.</p> <p>[add bullet]</p> <ul style="list-style-type: none"> ● Protecting riverbanks, shorelines and wetlands 	<p>We strongly support the inclusion of this policy in the Climate change section</p>
<p>2.2.3</p>	<p>Add Policy Intent 9): Promote energy conservation and efficiency in new buildings and developments and by energy retrofitting existing buildings.</p>	<p>The PPS 1.7.1 says “Long Term Economic prosperity should be supported by:...j) promoting energy conservation PPS 1.8.1 states that Planning authorities shall support energy conservation and efficiency,...reduced GHGs...through development</p>

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		patterns which:...f) promotes design and orientation which maximizes energy efficiency and conservation.”
2.2.3	Add Policy Intent 10): Ensure that a minimum threshold of infill intensification is realized as a pre-condition for any development of greenfields.	Despite council’s May 2020 decision on urban expansion, the City of Ottawa should still work to delay expansion until absolutely necessary, and to limit its range and impact if possible.
2.2.4	<p>Healthy and Inclusive Communities</p> <p>Policy Intent 1): ...</p> <p>Healthy, walkable, 15-minute neighbourhoods must evolve to:</p> <ul style="list-style-type: none"> ● Provide walking paths that are safe and always clear of snow. ● Reduce hard surface for cars. ● Enable pop-up stores and outdoor markets in locations zoned for small shops, services and office space, to establish these special economic zones within neighbourhoods. 	<p>This section continues the explanation of Regeneration and should be combined with 2.2.1. This combined section must be clear about qualities of regenerating neighbourhoods vs hubs, and should clearly state that this good stuff is not planned for existing neighbourhoods outside of overlays or hub designations.</p> <p>Snow-free paths are critical for equitable access to sidewalks and underpin the entire concept of complete walkable neighbourhoods.</p> <p>In order to move away from car-dependence and to make a neighbourhood walkable, it must include tree-lined streets, new homes in buildings that compliment our neighbourhoods, welcoming shopping streets, beautiful parks, less paving and more benches</p> <p>The new Official Plan must herald a new, simple but nuanced approach to regulating redevelopment and infill in our existing neighbourhoods, grounded in analytical modeling. This must include an ecosystem approach in appreciation of the inter-dependencies involved.</p>
2.2.5	Gender Equity	

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	<p>Policy Intent 3):</p> <ul style="list-style-type: none"> ● Proposed regulations must be modeled and analyzed with a gender and equity lens to understand and anticipate the impact of any proposed housing or neighbourhood regulation on women and gender diverse persons. 	<p>Section 2.2.5 proposes housing for single mothers and their children in regenerating neighbourhoods, but the addition in the left column on modelling should be made to the bullet point list in 2.2.5.3. Preliminary modeling of 613 Flats in market conditions shows that they will price out people of middle and lower income, entrenching the inequities of our existing urban neighbourhoods.</p>
<p>2.2.6</p>	<p>Culture</p> <p>Policy Intent 3): Promote the arts as an important element of placemaking</p>	<p>We strongly support section 2.2.6.3 reference to the enhancement of urban fabric with cultural landmarks and cultural expression. This is an important element of regeneration, but requires collaborative engagement and community consultation requirements should apply.</p>
<p>2</p>	<p>General</p> <ol style="list-style-type: none"> 1. Hubs 2. Regenerating Neighbourhoods 3. Small Commercial Veins (walkable mixed use streets or nodes in regenerating neighbourhoods with small shops, services and office space) 4. Corridors 5. Existing neighbourhoods not targeted for regeneration (infill as per existing transect characteristics) 6. New Suburban Neighbourhoods (with some walkable features) 7. Rural Development. 	<p>Immediately following Section 2’s description of policy intent, the reader needs a clear and concise explanation of the urban forms listed on the left.</p> <p>The draft OP is confusing in it's repetition. One option would be to expand and move Section 6 up to immediately follow Section 2. Sections 3, 4 & 5 must be refined and simplified such that they do not repeat any content from previous sections. This restructuring would shorten the text and add much needed clarity.</p>

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Section 3: Growth Management Framework

Reference #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
3	<p>Growth Management Framework (pp. 42-43)</p> <p>Paragraph 1: All proposed intensification has or will be modeled in 3D, as well as numerically to provide projections regarding density increases, housing types, housing costs, emissions reductions, City cost savings, health impacts, etc., so that the effects of proposed regulations can be anticipated.</p> <p>Paragraph 4, page 42 Most growth will occur within the urban area of the city, with a majority of residential growth to be within the built-up area</p>	<p>Along with context mapping, proposed density increases must be modeled and mapped. It is necessary to model new development patterns in the context of real estate and construction economies, to ensure that modeling is robust and realistic. Development pattern and density maps should be layered onto infrastructure and community infrastructure modeling and mapping. This composite tool will allow informed decision making, allowing identification of the 'sweet spots' for regeneration. They can become the basis for an informed public consultation process that guides decision making, build consensus, and unifies communities around a shared vision for their future upgrades and density increases. Section 2 should include this outline for implementation of a multi layered mapping and modeling exercise for regenerating neighbourhoods. This road map must be a key part of our vision, not an after-thought in a process clause later in the document. It has become very clear through ongoing consultation and collaboration that neighbourhoods and community groups need to see this kind of mapping and modeling in order to feel included, informed, and in order to have confidence that decision making for their neighbourhoods is fact-based.</p>

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through regeneration **in neighbourhoods and through redevelopment at hubs**, increasing over time during the planning horizon.

Paragraph 7 (p. 43):

Within the Greenbelt, where most of the housing growth in the built-up area is expected to occur, ~~most new housing development will be in the form of apartments~~ **70% of new housing development will be in the form of multi-unit buildings of shape and size to fit into existing neighbourhood context. 30% in higher density redevelopments at hubs.** All of the greenfield dwellings will be located in the Suburban Transect. ~~Many of the new dwellings there will be in the form of ground-oriented units, but at least 10 per cent will be apartments.~~

Housing densities in these areas must be sufficient to create walkable 15-minute neighbourhoods.

Policy Intent (p. 44)

To provide a transportation network that prioritizes sustainable modes **(i.e., walking, cycling, or transit)** over private vehicles **in all Transects.** ~~based on the opportunities for mode shifts presented by each Transect area context;~~

The use of cars is not conventionally understood as “sustainable transportation.” As noted above, a limited and consistent definition of sustainable modes will allay confusion and help foster ambitious modal share targets.

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<p>3.1</p>	<p>4) The City will allocate household growth targets as follows:</p> <p>d) 2 per cent outside of villages in the rural area</p> <p>5) f) That lands designated as part of a natural heritage system are excluded from consideration unless the features are isolated or poorly connected to the larger natural heritage system, or the feature will be maintained if the lands are developed for urban uses. The land containing the natural heritage system feature will not be considered as contributing to developable area;</p>	<p>Presumably, the 2% under d) refers to Country Lot Estates. This is a surprisingly high percentage, given that only CLEs that are ""in the pipe"" can still be built. Or is the City proposing to relax the current prohibition? The status of CLE is not clear. See comment on 9.2.3 below (p. 208).</p> <p>The Natural Heritage System should be considered on par with Agricultural Resource Areas and be excluded from consideration for possible urban expansion.</p>
<p>3.2</p>	<p>Delete Table 3.</p> <p>References to “Hubs” and “Corridors” must be changed to “Hubs” and “Overlays”</p>	<p>To increase densities we do not need to regulate or require density, rather we need to remove the present limits on density that result from existing zoning. Density requirements may be appropriate at redevelopment sites in hubs, but are out of place in the regulation of regeneration in neighbourhoods, where market demand will maximize density increases within the limits imposed by form based zoning, and to meet real estate expectations. What is the intent and value added by Table 3 and the minimum densities it proposes? At a minimum, Column 4 in Table 3 should be deleted. It seems to propose to 'fix what ain't broke'. Section 3.2.3 and Table 3 should be revised to apply only to hubs.</p> <p>The purpose and value of infill is that increased residential density is one of the tools necessary to achieve regeneration. This concept should replace Table 3.</p>

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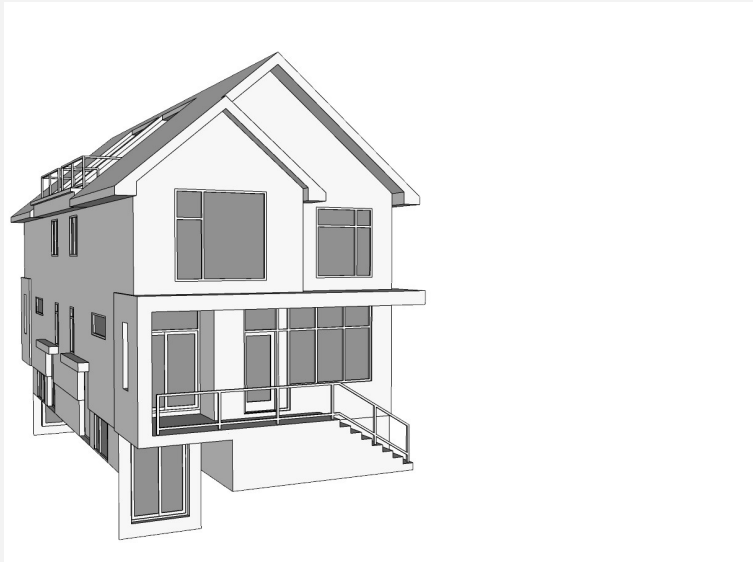
	<p>Section 3.2 should speak to regeneration in “Hubs and Neighbourhoods”, not “Corridors”.</p>	<p>Neighbourhoods in Outer Urban and Suburban transects may be selected for regeneration on a strategic basis and become denser, but just enough to achieve complete, walkable community status.</p> <p>The draft Official Plan focuses the geographic extent of intensification to Hubs and Overlays. The Official Plan must be systematic and clear in its language: existing neighbourhoods 'regenerate', while Hubs 'redevelop'. These two processes are very different, and the results envisioned are very different. It is evident elsewhere in the draft OP that this is in fact what is intended and because car-centric developments along corridors are counter to the walkable vision of a 15 minute neighbourhood.</p> <p>Corridors now dominated by vehicular traffic, running through overlays, should not be targeted for regeneration as these streets perpetuate car culture. These locations are not enjoyable for walking. But more importantly, if permitted, they will attract car-centric commercial and office spaces and perpetuate car culture. They will absorb new commercial demand, leaving no openings in the market for small business. The Official Plan must be edited throughout to remove the concept of regeneration along corridors.</p> <p>In Section 4.2.1.2 references to “Hubs and Corridors” must also be changed to “Hubs and Overlays”.</p> <p>Sections 3.2.8 and 3.2.9 should be labelled “Redevelopment in Hubs”.</p>
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	<p>Neighbourhoods should be assessed to ensure that it is possible to upgrade parks, walking paths/sidewalks, and recreational facilities in proportion to population density, before being zoned for increased intensification, and before being included in an overlay.</p>	<p>Section 2.2.1 on page 18 in the draft Official Plan states that the City must ensure that “the services, parks, recreational facilities, public spaces, and other elements of a complete neighbourhood are keeping up with the increases in population”. This does not appear again in the document. This oversight could be corrected by adding to section 3.2. This important concept that in regenerating neighbourhoods, community upgrades must keep up with population growth should be carried throughout the Official Plan.</p>
<p>3.2.2</p>	<p>Section 3.2.2 must be revised to eliminate this idea of segregation.</p> <p>2) Dwellings that are institutional or collective in nature, such as long-term care facilities, residences for senior citizens, and student residences, are anticipated to occur through regeneration primarily within Hubs and Corridors.</p> <p>Housing ideal for right-sizing seniors to live independently or collectively, located in neighbourhoods on neighbourhood streets in regenerating areas within the overlays.</p>	<p>We see the importance of extending the vision of inclusion and diversity onto our neighbourhood streets, rather than assigning some demographics (seniors, small households and students) to the edges of our neighbourhoods on busy streets. We envision neighbourhoods that include right-sizing older adults, and households of diverse size and income. We do not support the exclusion of seniors, single person households, smaller or less affluent households from regenerating neighbourhoods, in favour of larger households in expensive '613 Flats'. Our vision for regenerating neighbourhoods diverges from the vision described in the draft OP in this significant respect: we believe that a complete neighbourhood includes seniors aging in place, and that seniors must be provided with right-sizing options on neighbourhood streets rather than on busy corridors at the edges of communities.</p>

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3.2.3



This building could contain 1 very large dwelling, or 6 one bedroom units, or a combination of units of varying size. Each unit could have its own entry door. If it contains 1 dwelling it is a density of 35du/ha. If it contains 6 dwelling units it is a density of 215du/ha.

This image should be added to Section 3 to illustrate density figures more concretely in the context of form based regulations.

3.2.4

The majority of residential regeneration shall be located in 15-minute neighbourhoods, which are comprised of Hubs, Corridors, and adjacent regenerating Neighbourhoods ~~designations that are within a 15-minute walk to a Hub or Corridor designation as shown on Schedules B1 through B7. Hubs and Corridors designations are intended to be diverse concentrations of commercial, community, and transportation~~

A prohibition of car-centric new commercial and office space development is necessary. There is no benefit to promoting residential developments ideal for walking while at the same time permitting commercial and office space developments ideal for drivers. In fact this will undermine our progress to becoming walkable. The draft Official Plan's emphasis on development along corridors is therefore counter to the vision for walkability and should be replaced with a focus on neighbourhood regeneration.

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	<p>services that are accessible to adjacent Neighbourhood designations on a daily and weekly basis:</p>	
3.2.6-9		<p>Hubs are generally areas of major redevelopment, and are not now built up residential neighbourhoods. We support the draft OP proposal for them to be rebuilt as complete walkable communities. This reconstruction is very different than regeneration in existing neighbourhoods, and should be dealt with separately in the draft OP to provide clarity.</p> <p>Section 3.2.6-9 should be revised to provide clarity – are these statements for the reconstruction of Hubs only, or are they intended for other areas as well?</p>
3.2.6	<p>Regeneration is permitted and encouraged on former industrial or commercial sites, including brownfield sites where feasible in order to collectively achieve regeneration and sustainable and resilient design goals and targets. Former industrial sites do not have the Traditional, Industrial, Freight and Storage or the Non-Traditional Industrial Mixed designations as shown on Schedules B1 through B7, or a corresponding Industrial designation with a Village Plan or Village Secondary Plan. Full infrastructure costs for redevelopment must be borne by developers.</p>	
3.2.8	<p>To reduce greenhouse gas emissions through land-use, transportation, and energy planning consistent with Council approved GHG emission targets in the Energy Evolution Strategy, regeneration will be aligned with all of the following principles:</p>	<p>Must state what the “review” is tied to.</p>

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	<p>c) Maximizing the energy and emission performance as part of the site plan review and approval of new or modification to existing development</p>	
<p>3.2.9</p>	<p>Regeneration shall occur in a variety of dwelling unit floorspace sizes to provide housing choices within 15-minute neighbourhoods. Dwelling sizes are categorized into two broad categories, with a range of floorspaces occurring within each category:</p> <p>a) Small dwellings are units with up to two bedrooms and are typically within apartment built forms; and</p> <p>b) Large dwellings are units with three or more bedrooms and are typically within ground-oriented built forms.</p>	<p>Section 3.2.9 undermines the values and intent stated in Section 2, and instead proposes social sorting of smaller and less wealthy households out of regenerating neighbourhoods. This is unacceptable and should be deleted. Note: it is perfectly possible and reasonable to provide smaller units in ground oriented multi unit buildings that fit well in existing neighbourhood fabric. Also, allowing all unit sizes and tenures would open up the potential for developments that suit right-sizing older adults. This would free up larger homes at much more affordable price points than new home construction in urban neighbourhoods.</p> <p>All references to typology within overlay areas including 'large dwelling' should be deleted. What if some seniors want to live together in smaller units? Also, we should promote right-sizing to free up larger units.</p>
<p>3.2.10</p>	<p>Table 2 (page 49)</p>	<p>Existing market absorption rates for apartment style living (in buildings over 3 storeys and taller than tree canopy) are not likely to change dramatically in coming years. We therefore believe that the draft Official Plan's intent for 47% (extrapolated from Table 2, pg 49) of new units in existing urban areas to be built in taller buildings is fundamentally flawed. Based on census data it is realistic to anticipate that about 30% of new homes will be in taller apartments. Table 2 must be revised to reflect this more realistic 30/70 split (as per new text in Section 3 intro, paragraph 7) and Section 4.2 paragraph 2 should also be re-written, given that the</p>

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		<p>majority of new housing should instead be anticipated to be in small multi-unit developments.</p>
<p>3.2.16</p>	<p>The City must model and project patterns and amounts of residential infill, new small shops and services in neighbourhoods, and the % modal shift to active transportation. In addition, the City shall must monitor and report annually on the pattern and amount of residential regeneration achieved</p>	<p>The key to triggering successful regeneration (and a modal shift to a culture of walking) and the key to escaping of old patterns, is in a holistic and collaborative approach. Zoning must open up business opportunities for developers to build just the kind of infill housing, small shops and offices, that make existing streets more animated, walkable and green; infill that is sensitive in scale and proportion and improves the street. Upgrades to infrastructure, paths, trees, parks and recreational facilities must be scheduled such that regenerating communities embrace change with confidence that their neighbourhood is becoming complete and wonderful. All changes must be modeled in advance, and monitored as they unfold. Section 3.2.16 should be revised.</p>
<p>3.2.18</p>	<p>To implement the minimum density requirements within 15-minute neighbourhoods, the City shall must consider the application of a number of alternative measures to provide water, wastewater and stormwater capacity, including risk management and/or infrastructure system upgrades in conjunction with its Asset Management Strategy and other City programs where opportunities for regeneration are limited because of the cumulative impact of regeneration projects on infrastructure system capacity.</p>	<p>Section 3.2.18 proposes expensive upgrades to infrastructure to facilitate regeneration, and seems to assume that these are necessary to meet density targets. However multi-unit infill is the most cost effective form of new density in terms of infrastructure costs. We must direct regeneration away from any areas where infrastructure upgrades are unusually expensive.</p> <p>The City's Infrastructure department is modeling our existing underground water supply system, as well as our storm water and waste water collection systems. As a result they will be able to identify areas that have capacity to receive infill, areas that can more easily be upgraded to meet increased need, and areas of the City where upgrades are prohibitively expensive or disruptive.</p>

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		<p>The Infrastructure Department is also able to identify the kinds of infill that increase the burden on these systems, and the kinds of infill that present opportunities to lighten the burden on these systems.</p>
<p>3.2.19</p>	<p>Where this Plan refers to the walking distance from a rapid transit station or a transit priority corridor, the walking distance shall be measured from the centre point of the station, or the centreline of a corridor, using the most direct route along public streets or public pathways. Where there is no existing or planned road network, a radius equal to ¾ of the required walking distance will be measured from the centre point of the station or centreline of a corridor.</p>	<p>The draft OP contains many complicated statements about proximity to transit and abutting geographic conditions, using radii to prescribe the extent of certain upgrades. Overlays are a much better tool for this. Moreover, most of these identified upgrades are effective only when they are contiguous throughout a regenerating neighbourhood, sidewalks being the best example.</p> <p>The following sections should be re-written to apply their respective upgrades <u>throughout</u> an overlay, rather than by measured radii; Sections 3.2.19, 4.1.3.2, 4.1.2.7, 6.3.1.4.</p>
<p>3.3</p>	<p>Design new communities to be 15-minute neighbourhoods (p. 51)</p> <p>4) New greenfield communities shall must be designed to include and if necessary, reserve land for a mix of uses that ensures their development into 15-minute neighbourhoods. A mix of residential Higher-density dwellings types and sizes shall must also be provided and if necessary, reserved to provide a range of housing over time.</p>	<p>“Mix” of residential dwelling types implies the use of low-density housing typologies such as R1, which impede ambitious action on climate change. Note that “prohibiting lower-density typologies” is referenced on p. 72.</p>

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<p>3.4</p>	<p>Focus rural growth in villages</p> <p>8) Where a country lot subdivision is registered or draft approved, but development of any kind or local street construction has not yet occurred, a number of lots and land area equivalent to or lesser than those approved in such a subdivision may be transferred to a different location within the Rural Countryside area provided all of the following conditions are met:</p> <p>b) Development shall must be serviced by adequate water quality and quantity and shall not adversely affect the water and wastewater systems of nearby development;</p>	<p>Policy 8) is a welcome incentive for lessening the detrimental effect of Country Lot Estates on the rural landscape by reducing their size. But does condition b) not contradict Policy 7)? The exceptions to not extending or creating new Public Service Areas listed in Policy 4) of section 4.7.2 (p. 108) do not mention this incentive to relocate part of draft approved CLEs.</p>
<p>3.5</p>	<p>2) Employment uses within Neighbourhoods are service oriented and are limited in size or area. These uses tend to be office-based, institutional or in the retail sector.</p> <p>Offices are critical to the success of regenerating neighbourhoods because small shops depend on office workers as lunchtime shoppers.</p>	<p>Mixed Use Form Based Zoning will be needed for small shops, services and office space.</p> <p>Should include mention of working from home structural shift.</p>

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Section 4: City-Wide Policies

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
4.1	<p>What we want to achieve (p. 58)</p> <p>(8) Use congestion pricing, surface parking lot tax rates, road diets, vehicle registration taxes and other policy tools to create incentives for sustainable transportation.</p>	<p>Recommend that the City insert a reference to traffic reduction measures as part of its transportation strategy, with more detail to be added in the upcoming Transportation Master Plan.</p>
4.1.1	<p>7) Provide safe and convenient pedestrian routes and facilities, facilities in Hubs and Corridors and, within the following distances from transit:</p> <ul style="list-style-type: none"> a) 600 m radius or 800 m walking distance, whichever is greatest, to existing or planned rapid transit stations; and b) 300 m radius or 400 m walking distance, whichever is greatest, to existing or planned street transit stops along a transit priority network <p>8) Beyond the 600 m radius or 800 m walking distance specified in Policy 7, pedestrian facilities may still be required, including traffic calming measures as identified in the TMP and associated plans, and other City documents.</p>	<p>Strike “radius” from the OP. The problem with transit planners using the radius as a benchmark is that it doesn’t take into account walkability to those stations. Look at the current issues with the walkability radius around Blair LRT station, or with the proposed Montreal Rd. and Moodie LRT station, for example. Far better to concentrate on actual walkable distances when trying to grow public transit. Our suggestion would be for the OP to focus on actual walkability distance, not an artificial radius.</p>
4.1.2	<p>18) Where a development proposal is located within a 600-metre radius of a rapid transit station or 300-metre radius of a street transit stop on the transit priority network, proponents shall must demonstrate how the development proposal meets the</p>	<p>Replace “shall” with “must” to impose requirements. Shall is ambiguous, and the legal community is moving to a strong preference for “must” as the clearest way to express a requirement or obligation.</p>

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<p>City's Transit-Orientated Development Guidelines, TIA guidelines and the TMP and associated plans.</p> <p>20) Require that the timing and phasing of new subdivisions and major development is dependent on the timing and provision of sufficient frequent street transit or rapid transit service capacity. The timing of City-funded transit infrastructure improvements shall must be based on funding and affordability. Where a new subdivision or a major development is proposed to be occupied before frequent street transit or rapid transit service is in place, the City <u>must</u> require development proponents to enter into early service agreements to implement the transit service improvements, ahead of its City-scheduled implementation, to coincide with early stages of occupancy.</p> <p>Transitional paint strip sidewalks are quick and affordable, limit parking to the other side of the street, and are snow cleared at no additional cost to the city as they would be cleared with the street.</p> <p>Tree canopy to shade sidewalks and transitional sidewalks should be increased to 40% as quickly as possible in regenerating neighbourhoods. Community groups and stakeholders must work with Forestry Ottawa to take advantage of all possible tree planting opportunities including planting trees on front lawns or on city property between front yard and edge of street, in forgotten spaces around boulevards and buildings.</p>	<p>This point needs to be made explicitly - we call this the "Tewin scenario." The city should not approve any new subdivisions or major developments without ensuring that there is a comprehensive and funded plan for frequent street transit/rapid transit. If we don't make this explicit, then we will end up with subdivisions and developments that don't have access to affordable and reliable public transit. Let's not repeat the mistakes of Barrhaven and Orleans.</p> <p>Add to Section 4.1.2.</p> <p>Add to Section 4.1.2, or elsewhere in Section 4.</p>
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Work Plan for Triggering Regeneration	Transforming Overlay	Evolving Overlay	<p>Neighbourhoods within Transforming and Evolving Overlays will transition differently. Evolving Neighbourhoods will require a greater density increase over a longer period of time, before there is enough population to attract small shops. Consultations, analysis, regulations and upgrades are needed at different times. This chart should replace Sections 4.1.2. Readers of the draft Official Plan seem to unanimously object to its complexity. This chart is simple and clear. After including the chart, all other recurrences of the same information must be deleted from the text, to shorten it and make it more readable.</p> <p>Section 2.2.1.3 refers to secondary plans and area specific policies, but not to simpler forms of collaborative engagement that are necessary for regeneration to succeed. Section 11 should include this concept for Community Workshops.</p>
<p>Community Workshops to:</p> <ul style="list-style-type: none"> • understand current status re overlay designation and regeneration targets, • build awareness and support for regeneration, • identify barriers to walkability and the kinds of solutions appropriate to each neighbourhood, • identify ideal locations for small shops, services and office space, • identify parks and recreational needs unique to a neighbourhood, • consider cultural enhancements and/or landmarks, • review modeling of anticipated 'gentle-density', how it would look, and it's anticipated cumulative effect. 	Now	Now	
Identify streets or nodes ideal for small shops, services and office space	Now	Now	
Construction of sidewalks two sides of the street in high foot traffic routes including near transit stops	Now	Now	
Construction of sidewalks on at least one side of each street	Later	Later	

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Construction of transitional sidewalks on one side of each street	Now	Soon
Construction of sidewalks on two sides of each street designated to receive small shops, services and office space	Now	Now
Reconstruction of roads to include dedicated bike lanes and trees on streets designated to receive small shops, services and office space	Now	Soon
Construction of pedestrian links (foot bridges, crosswalks, linear parks)	Now	Soon
First priority snow clearing of sidewalks and bike paths	Now	Now
First priority snow clearing of transitional sidewalks	Now	Later
Assessment of neighbourhood parks, benches, and recreational facilities, compared to anticipated population growth	Now	Later
Upgrades to underground services, roads, infrastructure, as necessary to support anticipated intensification	Start Now	Later
Parks and Recreational Upgrade Plan	Now	Later
Parks and Recreational acquisitions and Upgrades	Start Now	Later

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Street Tree Planting	Now	Now
Zoning for tree roots	Now	Now
Parks on Private Properties and neighbourhood benches	Now	Now
Residential Form Based Zoning	Now	Now
Mixed Use Form Based Zoning for small shops, services and office space	Now	Now
Zoning for temporary or pop-up shops (in locations identified for future small shops, services and office space)	Now	Now
In the same locations as the above item; Upgrades to hard and soft landscaping, and the addition of street furniture and other elements, to carve out space for activities and growing community identity	Now	Now
Zoning to prohibit new car-centric commercial / office / educational facilities, including stores of more than 25m street frontage, stores with more than a few parking spaces and stores fronting onto streets with high traffic flow	Now	Now
Eliminate lengthy and expensive applications processes for desired neighbourhood infill and for small shops, services and office spaces	Now	Now

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	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Adjust regulations and fees to support business models for development of desirable residential and mixed use infill</td> <td style="text-align: center; padding: 5px;">Now</td> <td style="text-align: center; padding: 5px;">Now</td> </tr> <tr> <td style="padding: 5px;">Modeling of proposed zoning and regulations</td> <td style="text-align: center; padding: 5px;">Now</td> <td style="text-align: center; padding: 5px;">Now</td> </tr> </table>	Adjust regulations and fees to support business models for development of desirable residential and mixed use infill	Now	Now	Modeling of proposed zoning and regulations	Now	Now	
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<p>4.1.2.1</p>	<p>f) Winter maintenance standards shall must support the priority of active transportation networks and the achievement of active transportation mode share targets set out in the TMP and associated plans.</p> <p>Winter maintenance of walking and biking infrastructure within regenerating neighbourhoods must be prioritized at the same level as street snow clearing.</p> <p>Winter maintenance of transitional walking paths within regenerating neighbourhoods must be prioritized and undertaken at the same level as street snow clearing.</p>	<p>Section 4.1.2.1.f speaks to winter maintenance standards prioritizing active transportation, however it needs to be much more explicit, and should also apply to transitional walking paths.</p>						
<p>4.1.2.9</p>	<p>Provide safe and convenient cycling routes and facilities, as defined in the Active Transportation Plan in Hubs and Corridors and within 1.9 km radius or 2.5 km cycling distance, whichever is</p>	<p>This passing reference (along with 4.1.2.13) to reconstruction of roads to include dedicated bike lanes and trees on streets</p>						

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	<p>greatest, to existing or planned rapid transit stations and street transit stops on the Transit Priority network.</p>	<p>designated to receive small shops, services and office space should be highlighted in the Official Plan.</p>
<p>4.1.2.13</p>		<p>Section 4.1.2.13 proposes that upgrades for complete streets would be for Corridors, and only as streets come due for reconstruction. This must be revised to give priority to neighbourhood streets ideal for building a walking culture and zoned to receive small shops and offices.</p>
<p>4.1.3</p>	<p>1) The street and road network shall must support multi-modal travel, the movement of goods and services, access to properties, public space functions, <u>street trees and/or shade corridors</u>, and contribute to the overall quality of the urban environment.</p> <p>2) The City recognizes that the parkway network is a multi-modal corridor, primarily developed by the National Capital Commission, that <u>contributes significantly to the urban greenspace network</u> while providing access to major capital and civic destinations.</p> <p>6) New and reconstructed streets shall must include street trees that contribute to the urban forest and streetscaping elements appropriate for its context.</p> <p>7) Parts of the street and road network may be repurposed and dedicated to certain modes of transportation, uses of land, or</p>	<p>Support for this statement in the Mobility section</p> <p>Support for this statement in the Mobility section</p> <p>Support for this statement in the Mobility section</p> <p>In policies 6, 7c and 7d, streetscaping is not defined, here or in the Definition section. It should be explicitly stated that creating new urban greenspace is a permissible land use.</p>

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	<p>streetscaping if it contributes to the implementation of transportation and land-use objectives of this Plan, including:</p> <p>c) <u>Conversion of a portion of a right-of-way to a public space, including a car-free zone, as part of a road closure application;</u> and</p> <p>d) <u>Dedication of a portion of a right-of-way to street trees or low impact development (LID) stormwater features and related infrastructure, such as curb extensions, soil structures and landscaping.</u></p> <p>6) New and reconstructed streets shall include street trees that contribute to the urban forest and streetscaping elements appropriate for its context.</p> <p>9) The City shall must support wildlife crossings where:</p> <p>a) City freeways and arterials cross through the natural heritage system; or</p> <p>b) Studies have identified an elevated risk of hazardous wildlife collisions or elevated mortality of species at risk.</p>	<p>Strongly support</p> <p>Agree. But what are the standards? A tree at each end of a block is inadequate for shade, heat protection and walkability. Minimum metrics need to be defined for tree planting for shade and there must be adequate space for setbacks and below ground for tree roots to flourish. These metrics also need to be defined.</p> <p>For the OP to provide a framework for subsequent transportation plans, there need to be minimum standards/metrics for the amount of public space and active transport routes/space, and connectivity needed by neighbourhoods, hubs and corridors. Under implementation tools include the Transportation Master Plan.</p>
<p>4.1.4.2</p>	<p>Support the shift towards sustainable modes of transportation (pp. 65-66)</p>	<p>Minimum parking requirements impede the transition to walkable neighbourhoods</p>

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	<p>The City shall must manage the supply of parking to minimize and to gradually quickly reduce the total land area in the city consumed to provide surface parking. Minimum parking requirements may be reduced or must be eliminated, and maximum parking limits may be introduced, in all the following locations:</p>	
4.1.4.9	<p>a) Minimizing the number and width of vehicle entrances that interrupt pedestrian movement;</p>	<p>Zoning based on existing patterns of car infrastructure is clumsy and ineffective. Sections 4.1.4.9.a, 5.1.1.6, 5.6.1.3.3 must be deleted, to remove future zoning based on existing curb cuts.</p>
4.1.4.10	<p>Large areas of surface parking are to be designed to meet all of the following:..</p> <p>f) Review the feasibility of incorporating low impact development measures for stormwater management;</p> <p>Parking lots for more than 6 cars will not be permitted in overlays, either on the surface or underground, except temporary parking lots, parking below residential uses, or parking dedicated for the use of neighbourhood residents.</p>	<p>Support this but stronger wording. Where feasible needs to change to must be required and expected except for special circumstances that are listed eg surfaces must still allow access for wheelchairs, etc.</p> <p>As part of the transition to walkable neighbourhoods, zoning must prohibit new car-centric commercial, office, educational facilities, including stores of more than 25m street frontage, stores with more than a few parking spaces and stores fronting onto streets with high traffic flow.</p>
4.1.4.11	<p>Transitional parking rights will be revoked and curbs reinstated when an area becomes part of the regenerated neighbourhood overlay.</p>	<p>Add a Section 4.1.4.11 to address parking developments once a neighbourhood has regenerated.</p>
4.1.6	<p>Guide the inter-urban flow of people and goods (p. 68):</p>	<p>Municipal governments in Canada are empowered to promote cleaner, safer, and more prosperous economies and enhance</p>

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	<p>1) The City shall foster the inter-city and inter-regional flow of people and goods by continuing to work with the City of Gatineau, the Provinces of Ontario and Québec and the federal government to: a), b), c),</p> <p>d) Support regional production, circulation and consumption of strategic goods and services including food, energy, building materials and recreation needed to enhance regional economic security.</p> <p>e) Direct City procurement of strategic goods including food, energy and building materials to regional suppliers (buy local)</p> <p>4) For facilities with a sub-regional catchment area, such as major employers, major public facilities like hospitals or stadia, or post-secondary institutions, the preferred location is with walking distance of a rapid transit station, and the City must work with proponents to provide safe, reliable, and convenient access by frequent public transit.</p> <p>7) The City shall not pursue or support further widenings of Highway 417 within the urban area, beyond the works that are approved as of the date of the adoption of this Plan. The City acknowledges that all road widenings and expansions pose a threat to the realization of a 15-minute vision for Ottawa.</p>	<p>employment and new careers through a wide range and mix of policy measures. The new Official Plan for the City of Ottawa provides an opportunity to innovate in this role by guiding the inter-urban flow of people and goods (supply and demand chains) in strategic sectors (food, energy, building materials and recreation/leisure). A greater degree of import-substitution and self-provisioning locally and regionally in these sectors is justified in the face of disruptions to economic networks, whether the disruptions are due to the climate crisis, unstable global economic forces or health crises such as the current pandemic.</p> <p>Ottawa has a poor record of developing public transit to complement catchment areas--look at public transit access to Lansdowne, or the new Amazon fulfillment centre. This needs to be made explicit in the OP</p> <p>Highway expansion is detrimental to a range of sustainable mobility and climate goals. If we should stop highway widening in the urban area, we should also stop it in other areas of the city.</p>
4.1.7	8) The City will not dispose of, sell, or open road allowances that would create new legal access to landlocked parcels in core areas	Why even allow this exception?

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	<p>of the natural heritage system, except through an environmental assessment.</p>									
<p>4.2.1</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;"><u>Regulatory framework needed for Regeneration:</u></td> </tr> <tr> <td style="padding: 5px;">Simple zoning with more maps and fewer words</td> </tr> <tr> <td style="padding: 5px;">Form based zoning that regulates the outside form of buildings to 'fit' their context, regulating their spacing and setbacks, as per existing patterns (regardless of the number, size or distribution of units within)</td> </tr> <tr> <td style="padding: 5px;">Form based zoning that regulates height and roof lines to compliment existing buildings or to match existing zoning for singles and semi's (regardless of the number, size or distribution of units within)</td> </tr> <tr> <td style="padding: 5px;">Form based zoning that regulates height and roof line in areas designated for mixed uses in neighbourhoods to be 1/2 storey taller than existing buildings or existing zoning for singles and semi's</td> </tr> <tr> <td style="padding: 5px;">Zoning that limits most neighbourhood streets to residential uses, home businesses, schools, daycares and temporary surface parking.</td> </tr> <tr> <td style="padding: 5px;">Zoning that does not limit uses along areas ideal for small shops, services and office spaces, and instead of zoning-in desired uses, just zones-out nuisance, like noisy or smelly activities</td> </tr> <tr> <td style="padding: 5px;">Simply defined zoned areas for unobstructed tree root and</td> </tr> </table>	<u>Regulatory framework needed for Regeneration:</u>	Simple zoning with more maps and fewer words	Form based zoning that regulates the outside form of buildings to 'fit' their context, regulating their spacing and setbacks, as per existing patterns (regardless of the number, size or distribution of units within)	Form based zoning that regulates height and roof lines to compliment existing buildings or to match existing zoning for singles and semi's (regardless of the number, size or distribution of units within)	Form based zoning that regulates height and roof line in areas designated for mixed uses in neighbourhoods to be 1/2 storey taller than existing buildings or existing zoning for singles and semi's	Zoning that limits most neighbourhood streets to residential uses, home businesses, schools, daycares and temporary surface parking.	Zoning that does not limit uses along areas ideal for small shops, services and office spaces, and instead of zoning-in desired uses, just zones-out nuisance, like noisy or smelly activities	Simply defined zoned areas for unobstructed tree root and	<p>There is a significant amount of language dedicated in the draft Official Plan toward new ways to regulate through zoning (4.2.1, 4.2.a,b,c, 4.6.6.7, 5.1.5, 5.2.4, 5.3.4, 5.6.1.1, 6.3.2).</p> <p>These references and statements need to be consolidated to one place in the document, with some statements much reduced in detail (leaving out zoning language which does not belong in an Official Plan), and others with detail added to clarify intent. This material should not repeat elsewhere.</p> <p>Because zoning language does not belong in an Official Plan, sections 4.2.1.3,4,5 and others like them must be deleted.</p> <p>There are a number of new regulatory approaches that are critical and absolutely must be outlined in our Official Plan. These must apply only to areas undergoing regeneration.</p> <p>Form based zoning must be implemented to regulate building heights to 2.5 or 3.5 storeys as per existing neighbourhood zoning, and to regulate building width and street facing features so that our streets are delightful. Walkable Ottawa has modeled and verified that these multi-unit buildings are a good fit, and generate densities of anywhere from 80 to 300 du/ha (dwelling units/hectare). But this simple solution only works in the context of walkable neighbourhoods, because our communities would have to be paved over and treeless, if each new household required a parking space or two. In the context of a walkable neighbourhood, this solution is easy, lovely, simple. And it's an</p>
<u>Regulatory framework needed for Regeneration:</u>										
Simple zoning with more maps and fewer words										
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<p>canopy located between front facades and the edge of the street</p>	<p>opportunity to breath new vitality into our neighbourhoods, allowing existing residents the benefits of density: regeneration and walkability.</p>
<p>No regulations of minimum unit or room sizes except for the continuation of existing prohibitions of student dormitories, rooming houses and short term rentals, except on corridors</p>	<p>Standards for other dimensions of walkability besides density, building height and mass also need to be defined and part of zoning by-law, site plan and new mechanism for small infills with tree canopy, set-back to allow mature trees, parking, proximity to park, shopping and office, green infrastructure (roofs, planting), bike/walking lanes, etc.</p>
<p>Zoning of building shapes and sizes, not lot (property) shapes or sizes</p>	
<p>Zoning-out street facing features that do not animate the street, including car ports and garage doors</p>	
<p>Zoning to permit transitional parking for new residents and those driving to new small shops and offices using the least amount of pavement possible, including temporary short driveway parking, street permit parking, temporary private surface parking, new underground parking that can transition to become long term community parking</p>	
<p>Zoning to permit / promote bay windows and architectural features and to require people spaces between front facades and the street, including porches, balconies and terraces</p>	
<p>Form based zoning that regulates the street facing articulation of buildings, requiring semi private spaces between buildings and streets, and regulating dedicated entrances</p>	
<p>Zoning to complement and coordinate with market forces, designed to open up business opportunities for development of the infill we want</p>	
<p>Regulations and application processes designed to streamline</p>	

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the infill development we want

Regenerated Overlay regulations so that qualifying neighbourhoods (that meet the definition of 'regenerated and complete') become subject to development application review to ensure proposed developments benefit the community and do not over burden community infrastructure

Zoning to prohibit new car-centric commercial and office space developments within 10 minutes drive of residential neighbourhoods

Zoning clauses to grandfather existing conditions when renovating to add dwelling units into existing buildings

Clear, simple, affordable garbage storage requirements in zoning for multi-unit buildings of 12 units or less

New form based zoning must include required areas for root space, under soft surface landscaping and free of underground services, with language designed to allow infill development to be designed around existing tree roots without reducing the permitted build-able area. Zoning must balance permissions and limitations to incentivize tree preservation.

Underground services from the street to dwelling units must be located to give first priority to tree roots, despite the inconvenience and added costs associated with locating services below driveways and sleeved under floor slabs.

A new consolidated section on zoning should include text to eliminate some existing economic incentives for tree removal.

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<p>Applications and approvals processes for desired residential and mixed use development in regenerating neighbourhoods must be newly designed specifically to be low in cost and such that all site plan related elements can be reviewed, revised and approved concurrently with a permit application.</p>	<p>A new consolidated section on zoning should include text to prioritize tree roots.</p>
<p>Applications and approvals processes and fees for desired residential and mixed use development in regenerating neighbourhoods must be considered in the context of the business models that generate desired development, to ensure that approvals and fees are not prohibitive.</p>	<p>This will eliminate lengthy and expensive applications processes for desired neighbourhood infill and for small shops, services and office spaces.</p>
<p>Enable greater flexibility and an adequate supply and diversity of housing options throughout the city (p. 72)</p>	<p>It is necessary to adjust regulations and fees to support business models for development of desirable residential and mixed use infill.</p>
<p>1) A diverse range of flexible and context-sensitive housing options in all areas of the City shall must be provided through the Zoning By-law, by:</p> <ul style="list-style-type: none">a) Primarily regulating the density, built form, height, massing and design of residential development, rather than regulating through in addition to some restrictions on building typology;b) Promoting diversity in unit sizes, densities and tenure options within neighbourhoods including diversity in bedroom count availability;c) Permitting a range of housing options across all neighbourhoods to suit the widest possible range of price, occupancy arrangements and tenure; and	<p>“Diverse range” of residential dwelling types implies the use of low-density housing typologies such as R1, which impede ambitious action on climate change. Note that “prohibiting lower-density typologies” is referenced on p. 72.</p>

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<p>2) The City shall must support the production of a missing middle range of mid-density, low-rise multi- unit housing in both higher performance new buildings and deep energy retrofits of existing buildings, in order to support the evolution of healthy walkable 15-minute neighbourhoods and corresponding 15-minute neighbourhoods around key hubs and corridors, by:</p> <p>...</p> <p>Definition of Missing Middle (on page 72): In Ottawa's context and for the purposes of this Plan, the missing middle generally refers to low-rise, multiple unit infill residential development of between three and sixteen units, or more in the case of unusually large lots and for the lower density types is typically ground-oriented dedicated entrances.</p> <p>3) Accessory Dwelling units, including coach houses, secondary dwelling units and garden suites are recognized as key components of the affordable housing stock and shall must be protected for long-term residential purposes. The Zoning By-law shall permit these uses on residential lots with one principal dwelling unit in all areas of the City and shall must establish criteria to govern compatibility of these units with the main dwelling and surrounding context. Furthermore, the following criteria and limitations apply:</p>	<p>Delete maximum or minimum unit count references in 4.2.1.2.a & b and 2.2.1.3 and density requirements in Table 3, or specify that this table does not apply to regeneration, only to redevelopment in hubs.</p> <p>The draft Official Plan's definition of Missing Middle uses the undefined term 'ground oriented'. A clearer term is 'dedicated entrances'.</p> <p>Section 4.2.1.3 & 4 includes zoning language that does not belong in an Official Plan, and that uses the term “primary unit” which should no longer be used if form based zoning is enacted. If these sections are retained, the highlighted changes and comments below apply.</p> <p>Generally support liberalization on accessory dwelling units. However, there should be better definitions of what this means. Accessory dwelling unit is only defined by inclusions: coach houses, secondary dwelling units and garden suites. It is implied from a) that a secondary dwelling unit is contained within the “primary home”, a garden suite is not defined, and, although several limitations are enumerated regarding coach houses, there is no actual definition of what is meant by a coach house. We are left to assume that it is a structure detached from the “primary</p>
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<p>a) A coach house is permitted on a lot in which the primary home also contains a secondary dwelling unit;</p> <p>b) A coach house shall must be smaller than the primary home and the Zoning By-law shall must set forth the appropriate maximum permitted size;</p> <p>c) The size, floor area, function and occupancy of a dwelling unit in a coach house in the urban area is not intended to exceed that of a typical two-bedroom apartment;</p> <p>d) A coach house may not be severed from the lot accommodating the primary dwelling;</p> <p>e) Applications for minor variances with respect to coach houses shall have regard for all applicable policies of this Plan, as well as the following considerations:</p> <ul style="list-style-type: none">i. The proponent can demonstrate that the privacy of the adjoining properties is maintained;ii. The siting and scale of the coach house does not negatively impact abutting properties; andiii. Distinctive trees and plantings are preserved on the subject property. <p>f) The Zoning By-law shall must limit the coach house to a height of one storey for lots in the urban area. An application to allow a height of up to two storeys through a minor variance may be</p>	<p>home”, which is itself an unclear concept, with “main dwelling” and “primary dwelling” also used in the same policy.</p> <p>“shall have regard” to distinctive trees may not be sufficient protection. As desirable as greater urban density is, sacrificing a distinctive tree to a coach house does not seem a commensurate trade-off.</p>
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	<p>considered where the considerations noted in Section 4.2, Policy 3 e) above can be satisfied.</p>	
<p>4.2.3</p>	<p>Protect existing rental housing stock and support the production of more rental units in higher performance new buildings and through deep energy retrofits of existing buildings</p> <p>3) The Committee of Adjustment shall must, in addition to all other policies in this Plan, have regard for the following when evaluating minor variances to permit low-rise infill apartment dwellings:</p> <p>a) Variances to increase permitted unit counts should generally be proportional to the size of the lot, such that the effective unit density permitted by the zoning is not significantly increased;</p> <p>c) Variances to alter exterior design requirements such as balconies or facade articulation may be considered where, in the opinion of the Committee of Adjustment, the proposal serves the goals of context sensitive design complements the character of the neighbourhood and urban design as well or better than would compliance with the relevant zoning standard.</p> <p>e) Variances to reduce the required area of soft landscaping</p>	<p>Section 4.2.3.3.a should be deleted as this is obsolete if unit numbers are not regulated.</p> <p>c) Does “context sensitive design” have the same meaning as “complements the character of the neighbourhood” as per 2.1 Big Move 1? If so consistent wording should be used throughout the plan to convey this meaning.</p> <p>e)ii If a variance to reduce soft landscaping primarily to enable motor vehicle parking or driveways is not consistent with the OP, should this not be written as a proscription? Would the City appeal such a variance if it is contrary to the intent of this Plan?</p>

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	<p>i. may be tied to requirements for more intensive plantings such as trees or shrubs, so that the volume of vegetation compensates for reduced horizontal area; however,</p> <p>ii. despite (i), where the purpose or effect is primarily to enable motor vehicle parking or driveways, variances to reduce the required soft landscaping are contrary to the intent of this Plan. prohibited.</p> <p>g) Distinctive trees are preserved on the subject property as green infrastructure assets</p>	<p>Consideration similar to “Distinctive trees and plantings are preserved on the subject property” in 4.2.1.3 iii should be included in this policy.</p> <p>Ontario Regulation O. Reg. 588/17: Asset Management Planning for Municipal Infrastructure under the Infrastructure for Jobs and Prosperity Act, 2015, S.O. 2015, c. 15 defines a green infrastructure asset as:</p> <p>“an infrastructure asset consisting of natural or human-made elements that provide ecological and hydrological functions and processes and includes natural heritage features and systems, parklands, stormwater management systems, street trees, urban forests, natural channels, permeable surfaces and green roofs.”</p> <p>The regulation compels Ontario municipalities to recognize trees and urban forests as vital community infrastructure assets managed in ways similar to human-constructed municipal infrastructure. See York Region’s Green Asset Management Plan, and to the Green Infrastructure Ontario Coalition’s Urban Forest Asset Management Primer here.</p>
<p>4.3.2</p>	<p>(1)(ii) Large buildings are recognized as priority locations in support of their rooftop photovoltaic electricity potential to generate local renewable energy while reducing greenhouse gas</p>	

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	<p>emissions. All municipal buildings should have roof assessments to see if they are suitable for roof-top solar:</p>	
<p>4.4</p>	<p>Parks and Recreation Facilities</p> <p>Parks are one component of the city’s greenspace and are important for our quality of life, active recreation and health.</p> <p>The City of Ottawa has created a classification system to define park typologies, outline standards related to park size, location, configuration, management and amenities in order to inform the selection and design of park blocks. Parks should be of a shape and size that provide appropriate access and visibility and suit the scale and fabric of the surrounding community. <u>Community design that connects sidewalks and linear corridors featuring multi-use pathways, living streets, woonerfs, canopy trees and vegetated areas to parks is essential.</u> Parks are distributed throughout a community, and across the City, to enable residents to easily access parks and fulfill a range of municipal recreational needs.</p>	<p>Glad to see parks identified as a component of the city’s greenspace.</p> <p>Important statement in regard to access to greenspace.</p>
<p>4.4.1</p>	<p>Identify park priorities within Ottawa’s growth areas</p>	<p>Does growth areas mean all greenfield developments? This needs better definition.</p> <p>Neighbourhoods must be mapped and modeled in terms of their infrastructure of parks, recreational and social facilities. These can</p>

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	<p>6) Consistent with Section 4.8, Section 4.9 and Section 7, the following lands and features shall must not be considered as part of the parkland dedication, at the discretion of the Department responsible for recreation: Natural Heritage Features as defined by the City's Environmental Impact Study Guidelines, the minimum setback from surface water features, Natural Environment Areas, Significant Wetlands, Open Spaces, Urban Natural Features and Conservation Areas.</p> <p>9) Council may, and in cases of those considered for disposal shall, consider City-owned properties, including parking facilities, those being considered for disposal, as a location to build a new park. Parking facilities are a notable example.</p>	<p>only be understood in proportion to existing population density, so this mapping must be hybrid mapping that shows where needs are being met in proportion to population, and areas that are under-served. It must also identify areas where upgrades are prohibitively expensive.</p> <p>The Department responsible for recreation should not have the discretion to overturn environmental protections set out in other parts of the OP that state that such areas shall not form part of parkland dedication.</p> <p>No reason not to have a right of first refusal on disposal of municipal properties for parks and greenspace purposes.</p>
<p>4.4.1.4</p>	<p>d) Where cash-in-lieu is taken, it shall be principally for the acquisition of new parkland or the improvement of existing local, park and recreational facilities accessible to the area being developed. However, in most cases, the City's Parkland Dedication By-law or any successor By-law shall provide for a portion of these funds to be used for park and recreation purposes that are city-wide in scale.</p>	<p>Section 4.4.1.4.d should be changed.</p>

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	<p>Where infill redevelopment occurs in regenerating neighbourhoods (within an overlay area) and the existing neighbourhood parks do not meet proximity requirements set out in Section 4.8.3, or requirements for parks in proportion to population densities (to be added to Section 4.8.3), all cash-in-lieu collected will remain in the neighbourhood and used within 5 years of collection.</p>	
4.4.2	<p>The completeness of a neighbourhood in terms of parks and recreational facilities in proportion to population is critical to successful modal transition to walking culture.</p>	<p>A regenerating and walkable neighbourhood must have a variety of options for places to live and places to go. Vibrant shops and services, infrastructure, parks and recreation in proportion to population need.</p>
4.4.2.2	<p>For large development areas, a cost sharing agreement and area parks plan among all landowners may be required to coordinate several developers to collaborate and to allocate parkland dedication towards one larger park, to obtain the most optimal park locations for these areas.</p>	<p>Section 4.4.2.2 refers to the range of park typologies and recreational amenities to be identified in secondary and local plans. But community members should be solicited for insights regarding neighbourhood needs well in advance of lengthy planning exercises, so that acquisitions can be strategized.</p>
4.4.3	<p>Modeling of infill in regenerating areas will allow population increases to be anticipated, and parks and recreational facility upgrades to be paced accordingly.</p> <p>e) If land is of sufficient size and shape to accommodate recreational amenities, linear parks may be considered can be a significant addition to regenerating neighbourhoods, providing critical pedestrian links;</p>	<p>Section 4.4.3 must commit to timelines for assessing each neighbourhood's need for these elements. Timelines should be set for upgrades to neighbourhood park and greenspace/ facilities, to avoid unreasonable lags following intensification that is a strong contributor to resistance regarding intensification.</p> <p>Section 4.4.3.e should be revised.</p>

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<p>4.4.6</p> <p>Design parks that contribute to quality of life and respond to climate change satisfaction of the Department responsible for recreation (p. 85)</p> <p>1) The design of parks should meet each of the following criteria:</p> <p>e) While taking into account the benefits of shade as an adaptation to climate change, the City may establish minimum standards on adjacent properties to avoid shadow and wind impacts from adjacent properties and ensure a minimum number of hours of sunlight in parks, and protect for sky views. Additional shadow, noise, traffic and wind on parks will be minimized as necessary to preserve their utility;</p> <p>g) Parks have a preferred tree canopy target of 40% in all areas of the City, or the maximum compatible with its use. Existing mature trees shall must be preserved and incorporated into landscape designs where possible. Additional tree cover requires can be added only in accordance with detailed landscape plans in relation to that take into account impact of additional trees</p>	<p>The determination of whether a park responds appropriately to the mitigation or adaptation to climate change should not be made solely by the Department responsible for recreation. If parks are indeed an important component of the city's greenspace network, park design needs to respond to climate change to the satisfaction of the Department responsible for climate change as well.</p> <p>Of the 9 listed design criteria, only two deal with climate change.</p> <p>Buildings may provide welcome shading in the context of adaptation to climate change.</p> <p>g) what is a preferred target? Is it different from a plain target? Why say "shall be preserved" if followed by "where possible" Observing that "impact of tree cover on sports fields requires forethought" is not a policy statement.</p>
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	<p>on servicing and on hard and programmed assets, and impact of tree cover on in particular sports fields; requires forethought;</p> <p>h) New park space shall should be located in priority where they are needed to meet access to greenspace requirements of 4.8.3. Where these needs are met, they may be co-located with an existing or proposed park or another element of urban or rural greenspace, where possible; and</p> <p>i) To adapt to climate change, provide cooling amenities in park design such as shade structures, splash pads or wading pools. where possible.</p> <p>j) to adapt to climate change, provide emergency water capabilities needed to protect Park trees from fatal drought stress.</p> <p>2) b) Privately owned public spaces shall have a minimum area of 200 m²; There shall be no limit on how small a Park on Private Property can be. Parks no larger than a bench are a welcome addition to regenerating neighbourhoods.</p>	<p>h) if parks are an important component of the city's greenspace they should be located in priority to satisfy the requirement for residents to have access to quality greenspace within 400 metres of their home. Why next to an existing greenspace if that greenspace satisfies the access to greenspace policy for that area?</p> <p>A few wading pools and splash pads is not an adequate response to adaptation to climate change. Parks policy should provide a set minimum shaded surface.</p> <p>Section 4.4.6.2 on Privately-owned Public Spaces should be adjusted to allow for spaces as small as a bench. A simple process should be set in place to easily establish POP's with benches.</p>
<p>4.6.3</p>	<p>Ensure capital investments enhance the city's streets, sidewalks, parks, and other public spaces supporting a healthy lifestyle</p>	<p>How will this be implemented? Development review process is too vague. Is a climate lens to be applied to development applications and capital budgets? Any specific by-laws to be created? How will these requirements be applied in</p>

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		<p>neighbourhoods that are regenerating and don't need site plans? Must secondary plans be developed for regenerating neighbourhoods that allow infill development without any site plans?</p>
<p>4.6.4</p>	<p>Apply innovative design practices and technologies in site planning and building design</p> <p>1) In order to meet the target that all new homes shall be 100% net zero emission by 2030 and all new commercial buildings be near net zero, tThe High-performance Development Standard shall be applied to development and local plans in accordance with the thresholds listed in the Standard. In addition, the HPDS shall be a trigger for application priority processing ('Green Fast Lane'). The Standard shall must apply innovative sustainable and resilient design practices and technologies in site planning and building design in order to ensure that high quality urban design is aligned <u>with climate change mitigation and adaptation goals</u> and objectives, as follows:</p> <p>c) Reducing emissions from building materials especially cement</p> <p>e) <u>Protecting and enhancing natural systems and increase biodiversity:</u></p> <p>i) <u>Enabling waste separation, recycling and organic stream diversion</u></p>	<p>Support including these considerations under site planning and building design policies. In addition, and separately, HPDC should be incentivized through creation of a Green Fast Lane that applies to all construction projects, including building permits.</p> <p>Concern that the High-Performance Development Standard is unknown to us and perhaps not sufficiently high performing.</p> <p>No HPDS coverage of urban design and mitigation for developments built without site plans. Why is this only for big buildings and district energy for commercial and institutions? This should also apply to residential and will be essential for greenfield developments and small infill in regenerating neighbourhoods. Lots of residential rooftops for solar installations. This is a gap that needs to be fixed. OP must explain how this gap will be filled. In inclusionary zoning, specific by-law or secondary plans? It isn't good enough to say City doesn't have authority for building codes or developments without site plans - include energy efficiency standards in tools that City does have and to expedite process (and reduce costs) consider fast approvals for developments that</p>

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	<p>3) <u>The installation of photovoltaic panels on residential, commercial and expansive roof structures, such as large format retail buildings and large-scale institutions and facilities must be encouraged. Roof designs should include strength for carrying of solar thermal and electricity generating panels).</u></p>	<p>conform to green standards city includes in by-laws and inclusionary zoning.</p>
<p>4.6.5</p>	<p>1) Development in Hubs and along Corridors shall respond to context, Transect area and Overlay policies, and shall must be organized to meet all of the following:</p> <p>a) Generally, locate buildings to frame the adjacent street, parks and greenspaces;</p> <p>3) Development of mid-rise and high-rise buildings, shall be organized to minimize the impacts on the safety and attractiveness of the public realm, and minimize conflict between vehicles and pedestrians, to the extent possible through means such as:</p> <p>b) Providing underground parking while accommodating space on the site for tree retention and planting;</p> <p>c) Ensure main building entrances front a public street or park, are visible and directly accessible from a public street and conveniently and safely connect to a transit stop if applicable;</p> <p>d) Include adequate space and soil volume to accommodate tree planting including within the street right of way;</p>	<p>a) Support this siting policy in relation to parks and greenspaces.</p> <p>d) strongly support this policy in relation to soil volumes for tree planting in hubs and corridors</p>

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	<p>3) Development of mid-rise and high-rise buildings, shall must be organized to minimize the impacts on the safety and attractiveness of the public realm, and minimize conflict between vehicles and pedestrians, to the extent possible through means such as:</p> <p>b) Providing underground parking while accommodating space and soil volume on the site for tree retention and planting, including within the street right of way;</p>	<p>Strongly support providing space on site of mid and high rise projects for tree retention and planting. Similar provisions as 4.6.5.1d) regarding soil volume should be added.</p>
<p>4.6.6</p>	<p>Enable the compatible development of low-rise, mid-rise and high-rise buildings to ensure Ottawa meets its regeneration targets while considering livability for all (p. 99)</p> <p>2) In order to ensure that impacts on neighbouring properties and on the public realm are minimized, some transition in building heights shall must be required where different building height categories abut.</p> <p>6) Shopping centres shall must be designed in accordance with applicable Transect and Overlay policies. Their site layout shall must support walkable 15-minute neighbourhoods, sustainable modes of transportation, and help to achieve the environmental, economic development, and the climate and health resiliency goals of the Official Plan by:</p>	<p>Recommend that the city seek to reduce impediments to achieving well-distributed, walkable density levels city-wide.</p> <p>Recommend that the city provide additional enhancements to walkability-focused planning.</p> <p>Shopping centers promote car usage and will undermine any efforts to have walkable neighbourhoods. This policy needs to be revised. There is no way shopping center "site layout shall support walkable 15 minute neighbourhoods". Shopping centers and big box stores with big parking lots must not be allowed in neighbourhoods, corridors or hubs if the City is serious about changing urban form to walkable. Innovative design for scaling stores to walkable size has been successfully applied in Europe and Vancouver. Ottawa needs to look at other examples and revise this policy. Also, policy needs to consider repurposing of existing shopping malls, as many are not viable.</p>

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<p>e) Pursuing sustainability and resiliency by meeting or exceeding the requirements of the High performance Development Standards, particularly with respect to the mitigation of the urban heat island effect the use of low impact development, and the provision of soil volume for large trees, energy conservation, and sustainable expansive rooftop designs (including the carrying of solar thermal and electricity generating panels), use of limited parking areas for solar generation, and provision of electric vehicle charging infrastructure; and</p> <p>(f) Allocating space for temporary or permanent visual or performance art, and opportunities for cultural animation; and</p> <p>(g) Enacting a city-wide moratorium on new big box and strip mall development, and working to retrofit existing malls where possible in order to foster pedestrian and cycling access.</p> <p>7) Low-rise buildings shall must be designed to respond to context, Transect area and Overlay policies, and the following objectives, the standards for which shall must be set out in the Zoning By-law: Include areas on the property for soft landscaping in order to provide opportunities for tree retention and tree planting to meet health and tree canopy target and climate change objectives;</p> <p>8) Mid-rise buildings shall must be designed to frame the street block and provide mid-block connections to help break up large</p>	<p>e) Strongly support, especially provision of soil volumes for large trees.</p> <p>Support this direction for zoning by-law regarding soft landscaping and reference to canopy targets for low rise buildings</p> <p>Support this policy regarding mid-rises and reference to canopy targets</p>
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	<p>blocks, and shall must include: A base that provides active frontages, as well as landscaping and tree planting that support the Official Plan's tree canopy target and climate change goals;</p> <p>9) High-rise buildings and skyscrapers shall must be composed of a well-defined base, middle, and top, and shall must ensure a high quality of life for their residents while mitigating impacts to adjacent or nearby properties:</p> <p>a) The bases shall must respect the scale, proportion, and character of the surrounding buildings, adjacent public rights-of-way, parks, and public or private amenity spaces and shall must provide active frontages. Microclimate impacts shall must be mitigated through design to ensure a comfortable pedestrian environment that includes trees and soft landscaping which also support the Plan's tree canopy target and climate change goals;</p>	<p>Support this policy regarding high-rises and reference to canopy targets</p> <p>How will this be enforced for infill that doesn't require site plans? New by-laws - eg green roofs, landscaping, etc? Or will this be included in inclusionary (form based) zoning?</p>
<p>4.7</p>		<p>How will alignment of the OP with the electricity strategy, transportation and infrastructure master plans be carried out? The OP must include a framework for integrating greenhouse gas emission reductions (using a climate lens) in these later plans. But how can urban form that is defined in the OP be aligned with greenhouse gas emission reduction policies? There is a gap between the sequencing and work plan. Changes to implement this will also need to be made to Section 11 on Implementation.</p>
<p>4.7.1</p>	<p>2) In order to mitigate the impacts of development and climate change on drainage systems, the City shall:</p>	<p>Ontario Regulation O. Reg. 588/17: Asset Management Planning for Municipal Infrastructure under the Infrastructure for Jobs and</p>

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	<p>-0) Recognize trees and urban forests as vital community infrastructure assets managed in ways similar to human-constructed municipal infrastructure.</p> <p>a) Require the integration of receiving watercourse assessments and required mitigating works with the development of Local Plans, Master Drainage Plans, Environmental Management Plans and Master Servicing Studies;</p> <p>11) Unless identified in the Infrastructure Master Plan, stormwater and wastewater infrastructure to support new development (such as stormwater management systems and sewer pumping stations) shall must not be permitted outside the settlement area. Where infrastructure must be located outside the settlement areas to support development, a no-net gain boundary adjustment adjacent to the urban expansion area shall be considered through an Official Plan amendment and supported by a Master Servicing Study.</p>	<p>Prosperity Act, 2015, S.O. 2015, c. 15 defines a green infrastructure asset as:</p> <p>“an infrastructure asset consisting of natural or human-made elements that provide ecological and hydrological functions and processes and includes natural heritage features and systems, parklands, stormwater management systems, street trees, urban forests, natural channels, permeable surfaces and green roofs.”</p> <p>The regulation compels Ontario municipalities to recognize trees and urban forests as vital community infrastructure assets managed in ways similar to human-constructed municipal infrastructure. See York Region’s Green Asset Management Plan, and to the Green Infrastructure Ontario Coalition’s Urban Forest Asset Management Primer here.</p> <p>One wonders under what circumstances a stormwater pond would have to be ("must") be located outside the subdivision area. In any case, if there is no other option (perhaps because of the lay of the land), then a no-net-gain boundary adjustment should be a "must" (not "may"), otherwise the developer gets land for nothing!</p>
<p>4.8</p>	<p>Table X Summary of greenspace protection policies</p>	<p>See Annex 2</p>

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<p>4.8.1</p>	<p>Protect the City’s natural environment through identification of a Natural Heritage System, natural heritage features, and related policies</p> <p>3) The City recognizes the following natural heritage features, as defined in Ottawa’s Environmental Impact Study Guidelines:</p> <p>4) The natural heritage overlay policies in 5.6.3 apply to all features in Policy 3 regardless of whether they appear on Schedules to the Official Plan. These features could also be found in Schedule B, Secondary Plans and the Urban Forest and Greenspace Masterplan.</p> <p>5) The City prohibits development and site alteration within natural features or natural areas identified under Section 4.8.1, Policy 3(m) without the consent of the Algonquin Anishnabe Host Nation.</p> <p>6) Development or site alteration shall must take a no net loss approach with respect to wetlands and forest cover in the rural area. Mechanisms for achieving no net loss include land use planning, development processes, acquisition and conservation</p>	<p>Support and commend the City on this entire policy section.</p> <p>The list of what comprises Ottawa's Natural Heritage System in Policy 3) is somewhat more comprehensive than the list in the current Plan's section 2.4.2 Policy 1, and uses far fewer words. A real improvement.</p> <p>Strongly support. Could reference the overlay policy number and itemize the other sources where these features might be found.</p> <p>The Algonquin of Quebec claim to have never been consulted about the Tewin area. What about other areas - were appropriate consultations conducted for any areas? The release of the OP was delayed several months to allow consultations with indigenous host nations in mandatory consultations under the Provincial Policy Statement. Evidence of the extent and adequacy of consultations with Algonquins and their consent must be provided.</p> <p>Fully support this policy in the expectation that it covers all wetlands and woodlands in the rural area. Details must be provided in the OP for how this mandatory policy will be enforced for wetlands and forest cover in Tewin development area? Section 4.8.6 speaks of “no net loss” of wetlands along watersheds. No explanation of how loss of</p>
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	<p>of land, and support for voluntary, private land conservation and stewardship.</p> <p>7) The City shall identify municipal nature reserves in the Tree Protection by-law as those lands that require special restrictions on access and use to protect their natural values or ecosystems services. These will typically be lands supporting endangered species, threatened or endangered habitats, or other sensitive values for which normal restrictions on use do not suffice for protection.</p> <p>9) Where feasible, The City will must manage City-owned forests and natural lands to maximize carbon storage and sequestration in vegetation and soils, except when (list conditions...).</p>	<p>species at risk, natural diversity, reduction of flooding in one area can be replaced elsewhere.</p> <p>Pleased to see the intent expressed in Policy 7) and we look forward to seeing it implemented.</p> <p>This commitment should not be open ended. Known conditions where the City would not manage its forests to maximize carbons sequestration and storage should be listed. Later additions to the list should be by OPA.</p>
<p>4.8.2</p>	<p>Provide residents with equitable access to an urban forest canopy (p. 113)</p>	<p>Other than 4.8.2.2, strong support for all of the policies in this section. However, there is a glaring omission. Equitable access is not defined, there are no specific provisions to achieve it and no measurement of progress toward the goal of equitable access. In a manner similar to access to greenspace policies, there needs to be some kind of local measurement, based on proximity to canopy if the realization of the intent of this policy is ever to be ascertained.</p> <p>Recommend that the city meets minimum canopy cover requirements for all neighbourhoods, rather than for the city as a</p>

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<p>2) The City shall must pursue an urban forest canopy cover target of at least 40% by neighbourhood.</p> <p>2) The City must set an overall urban forest canopy target and local targets for access to canopy by residents.</p> <p>a) The City must take steps to achieve an urban canopy cover of 40% by 2046.</p> <p>b) Local canopy cover targets must be set at 40% or such targets that significantly increase canopy cover for neighbourhoods currently below this threshold.</p> <p>c) Development and site alteration in neighbourhoods currently below the 40% target must take a no net loss approach regarding canopy cover.</p> <p>d) Urban forest management measures will be taken to improve the equity of canopy distribution by xx% by 2046</p>	<p>whole. The city-wide target should not include the greenbelt. Removal of mature trees shall conform to tree by-law and tree by-law needs to extend coverage to all of urban and suburban areas. OP must set out a framework for achieving this target by neighbourhood and require Greenspace and Parks Master Plans to specify tree planting and maintenance strategy, timetable and budget for achieving the 40% target. Maintenance is essential to ensure trees survive (watering, protection from salt, snowplough, car damage, infestations, inappropriate trimming (by hydro), etc.)</p> <p>The City could be pursuing a target of 40% indefinitely without ever achieving it and it would meet the test of this policy as written. This is not a meaningful measure of outcome. Some kind of graduated achievement level by five year periods from where we are now to the target, analogous to how intensification is planned and reported against, belongs in the Official Plan.</p> <p>There can be no equitable access to a minimum urban canopy without breaking the overall target down to the neighbourhood level. A 40% minimum is supported by science and is therefore a welcome improvement over the current Plan's 30% aspirational target. While recognizing that the land base for the 40% goal includes the Greenbelt, 40% should also be the goal for the urban area minus the Greenbelt. The direct health benefits of canopy cover are very local in nature and targets should be pushed down as locally as possible, ideally to the neighbourhood level</p>
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<p>e) Progress toward achieving these targets must be reported on a five year or term of council basis.</p> <p>3) Growth, development, and regeneration shall must not compromise the urban forest canopy or its ecosystem services, in accordance with the following:</p> <p>a) Preserve and provide space for mature, healthy trees on private and public property, including the provision of adequate volumes of high-quality soil;</p> <p>b) On urban properties subject to site plan control or community planning permits, development shall create tree planting areas within the site and in the adjacent boulevard, as applicable, that meet the soil volume requirements in any applicable City standards or best management practices;</p> <p>c) Planning and development decisions, including Committee of Adjustment decisions, shall must have regard for short-term, long-term, and cumulative impacts on the urban forest at the neighbourhood and urban-wide scale, as prescribed in the Canopy Impact Assessment Guidelines;</p> <p>d) When considering impacts on individual trees, planning and development decisions shall have regard for the mitigation hierarchy and the greater ecosystem services provided by large, healthy trees; and</p> <p>Between d and e: must have regard for impacts on green infrastructure assets; and</p>	<p>identified in conjunction with the 15 minute neighbourhood policies.</p> <p>Policy 3) is welcome with the promise that "Growth, development, and regeneration <u>shall not compromise</u> the urban forest canopy" but how will this work in practice, especially in light of the "cumulative impacts" mentioned in c)?</p> <p>Requests to remove trees should be evaluated in light of the relative deficiency in cover for the area. Similarly, requirements to plant new trees should be more stringent as the existing tree canopy in the area is more deficient. In theory, the area considered could be the actual or prospective 15-minute neighbourhood. There is much information about canopy cover at the Ward and neighbourhood level (ref. NCC, Gatineau, Ottawa, Tree Canopy Assessment: National Capital Region, 2019, and interactive maps). More explicit guidance on how short term, long term and cumulative impact shall be taken in regard at the neighbourhood scale should be provided in a new set of guidelines on the matter.</p> <p>Ontario Regulation O. Reg. 588/17: Asset Management Planning for Municipal Infrastructure under the Infrastructure for Jobs and Prosperity Act, 2015, S.O. 2015, c. 15 compels Ontario</p>
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e) Planning and development review processes ~~shall~~ **must** support the goals and effective implementation of the Tree Protection By-law, including early consideration of trees in application and business processes.

6) ~~When considering impacts on the urban forest and trees, approvals and Tree Permits shall not be denied for development that conforms to Zoning By-law.~~ Council or the Committee of Adjustment may object to an amendment to the Zoning By-law which does not otherwise conform to the Official Plan, or a variance to either By-law, as the case may be, if the proposed development impacts the retention of tree(s) that are protected by the City's Tree Protection By-law, or if it fails to consider the planting of new tree(s). Approvals granted by Council or Committee of Adjustment may include conditions to support tree protection, removal, and replanting. The City and the Committee of Adjustment may object to an application where it deems the loss of a tree(s) avoidable. This policy ~~shall~~ **must** also apply to a Community Planning Permit approved through delegated authority or Council.

Walking routes, particularly in regenerating neighbourhoods, must be shaded with tree canopy, therefore tree planting bounding these routes must be prioritized by making full use of City rights-of-way.

municipalities to recognize trees and urban forests as vital community infrastructure assets managed in ways similar to human-constructed municipal infrastructure. See York Region's Green Asset Management Plan, and to the Green Infrastructure Ontario Coalition's Urban Forest Asset Management Primer [here](#).

We are pleased to see the Tree Protection By-law referenced here but are very concerned that it lacks any reference to impact on canopy cover.

The conditions under which tree permits can be issued or denied are specified in the Tree Protection By-law. There is no need to repeat this in the first sentence of this policy, where it may be misused and misinterpreted. It reduces the thrust of the policy, which is to provide mechanisms to extend the protections of the Tree Protection Bylaw in the planning approval process, which we support.

Tree-lined streets are an integral part of regenerating walkable neighbourhoods. This should be set out in the Official Plan.

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<p>4.8.3</p> <p>Provide residents with equitable access to an inclusive urban greenspace network.</p> <p>1) The City shall protect all of its various types of Greenspaces as described in Section 7 for their ecosystem services and their contributions to healthy, active communities.</p> <p>a) The City shall maintain a minimum greenspace surface coverage of 4 ha per 1,000 population.</p> <p>2) In general, and To support health, climate resiliency, accessibility, and gender and social equity, the City shall must, seek to by 2046, provide all urban residents with the following minimum access to high quality greenspace:</p> <p>a) Within a 5-minute safe walking distance (400 metres), a public greenspace providing space for passive or active recreation;</p> <p>b) Within a 10-minute safe walking distance (800 metres), two green public spaces; and</p> <p>c) Within a 15-minute trip by transit, a publicly owned Urban Natural Feature or Natural Environment Area.</p>	<p>There is a critical mass of greenspace for provision of ecosystem services under which threshold the city must not fall.</p> <p>The City could be seeking to provide the described access to greenspace without ever achieving it and it would meet the test of this policy as written. This is not a meaningful measure of outcome.</p> <p>This is a welcome enhancement of the policy in the current Plan.</p> <p>Section 4.8.3 identifies the desired distances from homes to parks, but should be revised to also define the size or quality of parks in relation to population and projected population increases.</p> <p>Baseline of greenspace needs to be mapped and provided by neighbourhood for the minimum access standards in policy 4.8.3 2). The OP must place priority on fixing the inequality gap in</p>
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	<p>3) Development and site alteration in neighbourhoods where this level of access is not currently achieved shall take a no net loss approach regarding greenspace.</p> <p>4) Greenspace management measures will be taken to improve the equity of accessible greenspace distribution by xx% by 2046</p> <p>a) Progress toward achieving these targets must be reported on a five year or term of council basis.</p> <p>5) Where lands identified as Greenspaces in this Plan are in private ownership, this Plan shall not be construed as implying that such areas are open to the general public, nor that any such lands shall be purchased by the municipality except in accordance with the City’s policies.</p>	<p>greenspace access in neighbourhoods of minority, low income and underprivileged residents.</p> <p>Some kind of graduated achievement level by five year periods from where we are now to the target, analogous to how intensification is planned and reported against, belongs in the Official Plan.</p>
<p>4.9</p>	<p>4) Where development or site alteration is proposed in adjacent to headwater drainage features, the proposal and supporting studies must address the following:</p> <p>a) Evaluation and description of the project site, sensitivity of the headwater drainage features and sampling methods;</p> <p>b) Assessment and classification of hydrological function, riparian conditions, fish and fish habitat and terrestrial habitat; and</p>	<p>Policy 4) is very weak, requiring only that supporting studies "address" what follows. After the studies have evaluated, assessed and made recommendations, what will the City do? This policy should state that the proposed development or site alteration will be prohibited if specified standards are not met.</p>

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	<p>c) Approval is contingent upon satisfying City management recommendations conditions regarding the need to protect, conserve, mitigate and maintain recharge or maintain/replicate terrestrial linkages of the headwater drainage features.</p> <p>5) No site alteration or development is permitted within the minimum setback, except as otherwise provided for in this section. Exceptions to this policy are: ...</p>	<p>The exceptions specified in Policy 5) are reasonable.</p>
<p>4.9.1</p>	<p>4) The City shall must lead the development of subwatershed plans using Terms of Reference developed in accordance with Council-approved guidance documents. Sub-watershed terms of reference must include consideration of future climate conditions.</p>	<p>Policy 4.9.1 does not have any words in it that say planning will consider future climate conditions.</p>
<p>4.10.3</p>	<p>Make trees, shade and permeable grounds an important component of a school’s outdoor space</p>	<p>Policies 4.10.3 1-2 require school board involvement. State in the OP how school board and school administrators will be involved (consultations?, joint planning?, etc.)</p>
<p>4.11</p>	<p>Generally Permitted Uses - Renewable Energy Generation</p> <p>3) Renewable energy generation facilities including large scale wind, solar, and hydroelectric projects as well as smaller scale bioenergy, hydroelectric, wind, ground-mounted or rooftop solar and energy storage projects provided such proposals fulfil all applicable provincial requirements and siting criteria. Renewable</p>	<p>The PPS asks that planning authorities provide opportunities for renewable energy to meet “projected needs”. The projections for Ottawa are found in Energy Evolution. We feel that the current draft OP neither reflects the PPS forward looking call to make opportunities for renewable energy available (i.e. encourage), nor is aligned with EE targets which will require significant expansion</p>

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	<p>energy generation facilities are permitted in prime agricultural areas, including specialty crop areas, only as on-farm diversified uses. The City of Ottawa has adopted targets for renewable energy generation as part of its Energy Evolution Strategy. Council will adopt bylaws and policies needed to achieve these City targets. A Council-directed in-depth analysis of appropriate zones and locations for such facilities may further define where these may be permitted.</p>	<p>(land and roofs). We strongly recommend therefore that the OP should have an additional proactive section as outlined below (proposed section 4.12)</p> <p>It is inappropriate that the OP with its long term mandate and a mandate to increase renewable energy generation should contain reference to a study that will limit where renewable energy generation will be permitted.</p>
<p>4.12</p>	<p>Renewable Energy Generation</p> <p>The City of Ottawa has adopted targets for renewable energy generation as part of its Energy Evolution Strategy. Meeting these targets will require considerable land and roof space, long term sustainable finance, innovation and perseverance. It is also a considerable economic development opportunity for the region. Council will adopt bylaws and policies needed to achieve these City targets.</p> <p>Only 5% of the city’s total energy consumption is currently generated or supplied from local, renewable sources. Ottawa must transition quickly to the use of local renewable energy sources over fossil fuels in order to achieve its established emission targets. Locally generated renewable energy will play an increasingly important role to support current and future housing, transportation, and employment, protect long-term energy security and stimulate the local economy.</p> <p>4.12.1 Residential Buildings</p>	<p>Please note that PPS 1.6.11.1 asks that planning authorities should provide for opportunities for the development of energy supply including renewable and alternative energy systems to accommodate current and projected needs.</p> <p>Small scale renewable generation needs to be encouraged for residential buildings. There is a gap here and the City needs to encourage small scale renewable energy generation in zoning by-laws for residential and if applicable high performance standards.</p> <p>Note that presently there is no separate or special building permit required for the installation of residential solar panels -- and we want to keep it that way.</p> <p>Note that the PPS makes reference to transmission, distribution and district energy.</p>

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The City will promote the installation of residential solar and energy storage systems, contributing to local renewable generation capacity for current and projected needs.

4.12.2 Commercial and Institutional Buildings

The City will encourage the installation of energy storage to contribute to resiliency, and solar panels on roofs and ground contributing to local renewable generation capacity for current and projected needs.

4.12.3 All expansive roof designs must include strength to carry rooftop solar PV.

4.12.4 Compensation for shade cast

Where the City issues permits for tall buildings that cast shade on residential or commercial solar installations, so that the solar generation of these installations is reduced, the City shall pay fair market value for these losses using reasonable costing estimates. This is understood as a measure to de-risk investments in roof-top solar.

4.12.5 Transmission and Distribution

(1) The City must direct its wholly owned subsidiary Ottawa Hydro to enable, facilitate, encourage, prioritize and promote the local generation of all forms of renewable energy, both by its own subsidiaries, as well as by private residential,

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commercial and community coops by providing public services for connections, transmission and distribution.

(2) The City must promote resiliency and innovation through development of micro-grids, smart features, district energy systems, interplay between storage and use systems, and other opportunities as may arise over time.

4.12.6 Use of land

The City must encourage renewable energy generation facilities including large scale wind, solar, and hydroelectric projects as well as smaller scale bioenergy, hydroelectric, wind, ground-mounted or rooftop solar and energy storage projects provided such proposals fulfil all applicable provincial requirements and siting criteria.

Renewable energy generation facilities are permitted in prime agricultural areas, including specialty crop areas, only as on-farm diversified uses.

Production of biogas and use of anaerobic digesters shall be encouraged.

4.12.7 Use of public lands

(1) The City will explore partnerships with renewable energy proponents, and other groups and including Indigenous stakeholders on the Algonquin territory, other levels of government and community groups and coops) to develop

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capital projects for the generation of renewable energy on public lands.

(2) The City must enable and encourage the development of underground infrastructures related to renewable energy generation and energy conservation, including,

(a) access to public land for district heating systems

(b) access to public land and drilling permits for ground source heat systems or seasonal energy storage systems

c) heat recovery from sewage systems

4.12.8 Use of water resources

The City will explore partnerships with renewable energy proponents, and other groups and including Indigenous stakeholders on the Algonquin territory, other levels of government and community groups and coops to develop capital projects for the generation of renewable energy on the region's waterways.

4.12.9 Sustainable Finance

The City's participation must include consideration of using its leverage for sustainable finance, green bonds, etc. towards the long-term capitalization of these renewable energy assets. These investments shall be duly reflected in the City's long term financial plan.

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	<p>4.12.10 Providing Opportunity</p> <p>The City must approach issues related to renewable energy pro-actively, and with the intent of providing new opportunities for increased renewable energy generation.</p>	
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Section 5: Transects

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
5	<p>Table 6 (page 126)</p> <p>Table 7 page 127: Inner & Outer Urban & Suburban Transect Neighbourhoods Low-rise: no minimum, maximum to complement existing or match existing zoning for singles or semis two storeys, zoning will permit at least three storeys but no more than four storeys</p>	<p>In order to pepper our streets with more porches and people spaces, in order to have new buildings that 'fit' but are not all the same, in order to house all varieties of households, in order for our existing neighbourhoods to regenerate, we must embrace a new pattern of development with multi-unit housing, and a new way of regulating. Table 6 on page 126 should be deleted.</p> <p>Form based zoning must be implemented to regulate building heights to 2.5 or 3.5 storeys as per existing neighbourhood zoning, and to regulate building width and street facing features so that our streets are delightful. Rows 9, 13 & 17 should be replaced.</p>

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<p>5.1.1</p>	<p>5) To offset its inherently dense built environment and the high proportion of built-up and hardscaped land, particular measures to ensure climate resilience in the Downtown Core transect shall must include:</p> <p>a) Reducing the urban heat island effect through cool or green roofs, light coloured reflective materials, retention of mature trees, tree planting, and other urban greening;</p> <p>b) Shaded sidewalks, streets, transit stops, bike lanes and paths to support active mobility and transit during extreme heat through using trees or structures for transit stops;</p> <p>c) High-quality and intensive urban greenspace, such as parks, shaded public realm and access to cooling amenities to provide relief from the heat, especially for those without air conditioning;</p> <p>d) Innovative stormwater management approaches such as low impact development with regeneration to address increased imperviousness; and</p> <p>e) Alignment with other climate adaptation policies and procedures identified in this Plan.</p>	<p>More specification of implementation tools needed for policies 5.1.1 5) a) to e)</p> <p>a) include green roof by-law (look at Montreal's for help)</p> <p>b) include active transportation in Transportation Master Plan and zoning</p> <p>c) include these measures in Park and Greenspace Master Plans and tree protection by-law</p> <p>d) include in stormwater by-law</p> <p>e) develop a comprehensive plan that shows the links between OP policies and other plans and policies under development by the City.</p>
<p>5.1.2</p>	<p>Prioritize walking, cycling and transit within, and to and from, the Downtown Core (p. 130)</p> <p>2) The transportation network for the Downtown Core shall prioritize walking and cycling for short trips, and cycling and transit for longer trips, such that convenience and safety for pedestrians, cyclists and transit users shall must take absolute priority over private motor vehicle access and movement in the Downtown Core city-wide</p>	<p>Recommend using language that supports robust implementation of existing Complete Streets policy.</p> <p>Minimum parking requirements impede the transition to walkable neighbourhoods; no need to indicate parking exception 3 a) as there may be large-scale residential developments where not necessary.</p>

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	<p>3) Motor vehicle parking in the Downtown Core shallmust be managed as follows:</p> <p>a) Motor vehicle parking shall not be required in new development, other than visitor parking for large scale residential development;</p> <p>b) New surface parking lots, and expansions to existing surface parking lots, shallmust be prohibited in the Downtown Core;</p>	<p>The OP needs to provide a framework for how these policies will be implemented. If the OP cannot provide such a framework then secondary plans must be developed for all downtown transects that include active transportation requirements and prohibitions.</p>
<p>5.1.5.1</p>		<p>Overlays are a powerful and important planning tool for regeneration. Transects are useful in understanding our City as it is today, in varied degrees of urbanity. But overlays are a tool that help us move forward. The following sections of the draft OP, about neighbourhood regeneration, are repetitive and confusing. 5.1.5.1, 5.2.1.4, 5.2.4.1, 5.3.4.1, 5.6.1, 5.6.1.2., 2.2.1.3, 2.2.4.1&2, They should be deleted, and replaced with only one section about regenerating neighbourhoods within overlays.</p>
<p>5.2.1.4</p>	<p>e) Increases in existing residential densities are supported to sustain the full range of services noted in (a).</p>	<p>Increased population densities are required for a transition from car-centric to walkable neighbourhoods, in order to support shops within walking distance of all homes. This explanation of the importance and value of density increases in a regenerating neighbourhood is buried in Section 5.2.1.4.e of the draft OP, and should be elevated to Section 2.2.1, as it is a critical part of the narrative about regeneration.</p>

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<p>5.2.3.2</p>	<p>a) Generally, up to nine storeys except where a secondary plan or area-specific policy specifies greater heights; however: Areas along veins or at nodes identified to be ideal for small shops and office spaces, must be zoned to permit building heights that are 1/2 a storey taller than the zoned height permitted in the surrounding residential neighbourhood.</p>	<p>Section 5.2.3.2.a must include provision for small shops and offices.</p>
<p>5.2.4.1</p>	<p>b) Provides flexibility in lot area and configuration including permission for as-of-right severances to create small-sized lots with unconventional and irregular lot sizes and patterns including flag lots with minimal lot widths and lots with lot lines that jog;</p>	<p>Lot shape and size clauses in 5.2.4.1.b and 5.3.4.1.b should be consolidated, and any contradictions to this elsewhere in the draft Official Plan must be removed, including any statements about lot size or area. We must zone the form of the building to fit in, not the lot. We can't see lot lines when we walk down the street. We see buildings, spaces between buildings, sky over buildings, features of buildings and trees.</p>
<p>5.3</p>	<p>Table 8: Suburban Built Form and Land-use Characteristics: (p. 139)</p> <p>Smaller proportion of detached housing, with no minimum requirement for construction of single detached homes in greenfield areas. Replaced with multi-unit housing the same height as existing surrounding neighbourhood</p>	<p>Recommend that the city seek to reduce impediments to achieving well-distributed, walkable density levels city-wide.</p>
<p>5.3.1</p>	<p>Recognize a suburban pattern of built form and site design (p. 139)</p> <p>d) Proposals for high-rise development shall not be supported except within 400 m walking distance of a rapid transit station; in those cases, developments shall conform with Section 12.1, Policy 11 and 12 requiring an area-specific policy and concurrent</p>	<p>Recommend that the city seek to reduce impediments to achieving well-distributed, walkable density levels city-wide.</p>

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	<p>rezoning, unless a local plan provides otherwise. The Zoning By-law shall establish separation distances for tower elements.</p> <p>3) In the Outer Urban Transect, the City shall must support the rapid transit system and begin to introduce urban environments through the Overlay policies of this Plan, by:</p> <p>a) Supporting the introduction of mixed-use, urban developments at strategic locations close to rapid transit stations; and</p> <p>b) Targeting selected segments of Mainstreets, and other areas where possible, for mid-density and mixed-use development to reinforce or establish an urban pattern as described in Table 6.</p> <p>4) b) Predominantly ground-oriented forms in Neighbourhoods located away from frequent street transit and Corridors, with low-rise multi-unit dwellings permitted near rapid transit and frequent street transit routes;</p>	<p>Sections 5.3.1.4.b and 4.2.1 are examples of clauses that are unusually long and complex, describing areas that are within an overlay, rather than using the word 'overlay'. The overlay is a great tool. The OP should use it and refer to it consistently.</p>
<p>5.3.3</p>	<p>2) Parking in Outer Urban Hubs shall must be managed as follows: (p. 141)</p> <p>a) Minimum parking requirements may be reduced or must be eliminated</p>	<p>Minimum parking requirements impede the transition to walkable neighbourhoods.</p> <p>Section 5.3.3.a-c should specify building heights to match existing neighbourhoods.</p>
<p>5.3.4</p>	<p>Provide direction to Neighbourhoods located within the Outer Urban Transect (pp. 141-142)</p>	<p>Recommend that the city seek to reduce impediments to achieving well-distributed, walkable density levels city-wide.</p>

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	<p>2) Neighbourhoods located in the Outer Urban Area and outside of a 15-minute neighbourhood may continue to develop in accordance with the established suburban context as defined in Table 6. will also be targeted for regeneration.</p>	
<p>5.4</p>	<p>Suburban Transect (p. 143)</p> <p>While we add these small segments of lands, our focus in the three major suburbs will be to complete those communities in a way that supports their gradual accelerates their evolution to becoming 15- minute neighbourhoods. The planning challenge is to introduce more viable public transit and active mobility options community-wide in each of the major suburban communities, solidify Town Centres with more employment and more urban-type development, help functional local hubs and corridors to emerge and develop, and encourage more diverse housing forms to meet the changing needs of an evolving demographic. However, the evolution of existing neighbourhoods is expected to be very gradual within a fundamentally suburban pattern, with more substantial changes focused to strategic locations.</p>	<p>Recommend that the city seek to reduce impediments to achieving well-distributed, walkable density levels city-wide.</p>
<p>5.4.3</p>	<p>Provide direction to the Hubs and Corridors located within the Suburban Transect (p. 145)</p> <p>3) Parking in Suburban Hubs shall must be managed as follows:</p> <p>a) Minimum parking requirements must be may be reduced or eliminated; and</p>	<p>Minimum parking requirements impede the transition to walkable neighbourhoods.</p>

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	<p>b) No new surface parking lots shall be permitted within 200 m walking distance of a rapid transit station.</p>	
<p>5.4.4</p>	<p>Provide direction for new development in the Suburban Transect (pp. 145-146)</p> <p>1)i) Planned net carbon zero design which optimizes the available supply, means of supplying, efficient use and conservation of energy and prohibits fossil fuel gas pipelines.</p> <p>2) Net residential densities shall must strive to approach the densities of the Inner Urban Transect over time, but Secondary Plans shall must plan for a minimum density of 36 units per net hectare and permit density increases through regeneration and accessory dwelling units.</p>	<p>Additions needed to ensure City meets EE targets.</p> <p>Are there no opportunities for community energy supply in parts of regenerating neighbourhoods and hubs undergoing significant development?</p> <p>Recommend that the city seek to reduce impediments to achieving well-distributed, walkable density levels city-wide.</p>
<p>5.6</p>	<p>Overlays (p. 151)</p> <p>What we want to achieve</p> <p>1) Provide built form direction for the urban area where regeneration is anticipated to occur, within the context of ambitious upzoning in all transects within Ottawa's urban boundary.</p> <p>2) Apply an Evolving Overlay on a designation, where the area is subject to an accelerated gentle evolution from suburban to urban built form and site design</p>	<p>Recommend that the city seek to reduce impediments to achieving well-distributed, walkable density levels city-wide.</p>

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5.6.1.1.2	<p>In both the Transforming and Evolving Overlay, the City:</p> <p>a) Shall support applications for amendments to the Zoning By-law for low rise residential regeneration where the proposal demonstrates that the development helps to achieve the objective(s) of the applicable Overlay and Transect with regards to transitioning from a low density single unit typology towards a multi-unit built form and associated site design, in keeping with the intent of development standards of the applicable zone and the intent of Table 3 of this Plan;</p> <p>b) May support amendments to the Zoning By-law for regeneration development that proposes uses other than low rise residential, provided the proposal demonstrates that the development achieves the objective(s) of the applicable overlay with regards to built form and site design and the applicable designation with regards to function and height permissions; and</p> <p>c) Shall evaluate development that seeks to increase height permissions, for heights greater than those permitted in the underlying transect and designation or Secondary Plan, through an Official Plan Amendment process against all the applicable policies of this Plan.</p>	<p>It seems that the authors of the draft feared that they might be unsuccessful in clearly defining a vision, and therefore included statements intended to guide other decision makers who might otherwise flounder without a clear vision or sense of direction. Section 5.6.1.1.2 is one example of this, and should be deleted. It is very important that the vision of the Official Plan is clear, so that other decision makers can depend on it to inform their work. There must be fewer words and a lot more clarity.</p>						
5.6.1.3.1	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; padding: 5px;">Transforming Overlay</th> <th style="width: 50%; padding: 5px;">Evolving Overlay</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">average density on residential properties is at least 25du/ha</td> <td style="padding: 5px;">average density on residential properties less than 25du/ha</td> </tr> <tr> <td style="padding: 5px;">already has some small shops and services walking distance from homes</td> <td style="padding: 5px;"></td> </tr> </tbody> </table>	Transforming Overlay	Evolving Overlay	average density on residential properties is at least 25du/ha	average density on residential properties less than 25du/ha	already has some small shops and services walking distance from homes		<p>Section 5.6.1.3.1 contains an incomplete list of criteria for lands within the Transforming Overlay. There is no similar list for the Evolving Overlay. This chart should be included in Section 5 to add clarity.</p> <p>Note the calculation under transforming overlay “average density on residential properties is at least 25du/ha” is based on the ratio dwelling units to the area of development land, and does not</p>
Transforming Overlay	Evolving Overlay							
average density on residential properties is at least 25du/ha	average density on residential properties less than 25du/ha							
already has some small shops and services walking distance from homes								

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	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">not divided up by busy, wide, high-traffic road(s)</td> </tr> <tr> <td style="padding: 5px;">The majority of homes were built at least 60 years ago</td> </tr> <tr> <td style="padding: 5px;">if there is a heavy traffic flow through, into or out of the neighbourhood, there are roads appropriate to carry heavy traffic that are not the same as future walkable shopping destinations</td> </tr> <tr> <td style="padding: 5px;">necessary upgrades to underground infrastructure, parks, social or recreational facilities (to meet demand of anticipated population increases) would not be prohibitively expensive</td> </tr> <tr> <td style="padding: 5px;">it is not prohibitively expensive to expand the transit network as necessary to provide dependable rapid transit, if not already available at a walking distance from all parts of the regenerating area</td> </tr> </table>	not divided up by busy, wide, high-traffic road(s)	The majority of homes were built at least 60 years ago	if there is a heavy traffic flow through, into or out of the neighbourhood, there are roads appropriate to carry heavy traffic that are not the same as future walkable shopping destinations	necessary upgrades to underground infrastructure, parks, social or recreational facilities (to meet demand of anticipated population increases) would not be prohibitively expensive	it is not prohibitively expensive to expand the transit network as necessary to provide dependable rapid transit, if not already available at a walking distance from all parts of the regenerating area	<p>include the neighbourhood as a whole complete with road and parks. How are the density requirements of Table 3 calculated?</p>
not divided up by busy, wide, high-traffic road(s)							
The majority of homes were built at least 60 years ago							
if there is a heavy traffic flow through, into or out of the neighbourhood, there are roads appropriate to carry heavy traffic that are not the same as future walkable shopping destinations							
necessary upgrades to underground infrastructure, parks, social or recreational facilities (to meet demand of anticipated population increases) would not be prohibitively expensive							
it is not prohibitively expensive to expand the transit network as necessary to provide dependable rapid transit, if not already available at a walking distance from all parts of the regenerating area							
<p>5.6.1.4</p>	<p>A third category of Overlay is needed; the Regenerated Neighbourhood Overlay. This overlay would be applied to neighbourhoods once they shift from auto-dependence to a culture of walking, and where a neighbourhood is complete with all daily needs located within a short walk of every home. This overlay would no longer require any transitional regulations and would not require further density increases to facilitate regeneration. Transitional parking should be phased out, permanent sidewalks completed, and further developments subjected to greater scrutiny through Site Plan Control or similar, to ensure value added to the community.</p>	<p>A third category of overlay is needed: the Regenerated Neighbourhood Overlay. This overlay would be applied to neighbourhoods once they shift from auto-dependence to a culture of walking, and where a neighbourhood is complete with all daily needs located within a short walk of homes.</p>					

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	Incentives for restoration, energy upgrades and adaptive re-uses should be instituted.	
5.6.3.1	Protect the Natural Heritage System and Natural Heritage Features	Natural features outside of the natural system need to be mapped and included in the Natural Heritage Overlay.

Section 6: Urban Designations

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
6		<p>Section 6 should include a map of overlay neighbourhoods showing permitted 2.5 or 3.5 storey building heights, based on existing zoning for singles and semi's in each area. Modeling demonstrates that no further height increases are necessary to meet density targets if these other proposed zoning changes are made.</p> <p>Areas ideal for small shops, services and office spaces are identified (Section 6.3.3), they should also be mapped, and assigned a height one half storey taller than the surrounding residential zoning, with ground floor spaces required to be at the level of the sidewalk. (Yes, it is that simple.)</p>

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<p>6.1.1</p>	<p>To define the Hubs and set the stage for their function and change over the life of this Plan (pp. 163-164)</p> <p>4) Hubs will generally permit residential uses, and will permit such non-residential uses as are consistent with Section 6.1.1, Policy 3(h) and:</p> <p>a) Hubs will strictly generally prohibit automobile-oriented, motor-vehicle-dependent and motor vehicle-prioritizing uses</p>	<p>Motor vehicle-prioritizing uses impede the transition to walkable neighbourhoods.</p> <p>Section 6 should be re-written to ensure that it does not promote car-centric development along corridors.</p>
<p>6.3</p>	<p>Neighbourhoods</p> <p>WHAT WE WANT TO ACHIEVE</p> <p>3)Promote energy conservation and deep energy retrofitting</p>	<p>As per Provincial Policy Statements to promote energy conservation and in order to meet Energy Evolution targets:</p> <ul style="list-style-type: none"> • 98% of residential and small commercial existing buildings and 95% of large commercial and industrial buildings are retrofitted for 70% heat savings and 30% electrical savings by 2040 (a lot of this needs to start in 2020-2030)
<p>6.3.1.4</p>	<p>a) Housing options with the predominant building form being innovative and non-exclusive new ground-oriented housing, which meet the intent of Section 6.3.2, Policy 1, for sites located within the 600 metre to 900 metre radius of a Hub, and low-rise multi-unit built forms within the 300 metre radius of a Hub and all lots in close proximity to street transit routes;</p>	<p>Ideal locations for shops and offices must not be selected based only on proximity to a transit station. Delete Section 6.3.1.4.a. Community consultation should direct selection of ideal locations, based on criteria identified in Section 6.3.3.</p>
<p>6.3.2</p>	<p>Guide the evolution of neighbourhoods based on their context, location, age, maturity and needs, generally toward the model of 15-minute neighbourhoods Guide for redevelopment at Hubs to create 15 minute neighbourhoods</p>	<p>Change the title of Section 6.3.2. This section is not about regeneration. The Plan must be systematic and clear in it's language. Neighbourhoods 'regenerate'. Hubs 'redevelop'.</p>

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		<p>These two processes are very different, and the results envisioned are very different.</p>
<p>6.3.4</p>	<p>Aggressively promote energy efficiency and conservation and achieve significant energy retrofitting</p> <p>Target such that 98% of residential and small commercial existing buildings and 95% of large commercial and industrial buildings are retrofitted for 70% heat savings and 30% electrical savings by 2040 . Achievement of this target requires implementation to start 2020-2030.</p> <p>The Zoning By-law and approvals under the <i>Planning Act</i> shall allow energy efficient zero-carbon new housing forms and encourage the renovation of existing buildings in order to mitigate against climate change.</p> <p>Building permits for interior renovations shall meet energy efficiency standards. Green Fast Lane application processing priority shall apply to renovations that significantly work towards or meet the HPDS.</p> <p>The City shall create and maintain financial incentives such as property tax deferral or energy retrofit grant or loan programs to support the deep energy retrofitting of existing buildings, including designated heritage properties.</p> <p>The City shall, within the targets of its Energy Evolution Climate Strategy, ensure that all municipal buildings are deep energy retrofitted.</p>	<p>EE target: 98% of residential and small commercial existing buildings and 95% of large commercial and industrial buildings are retrofitted for 70% heat savings and 30% electrical savings by 2040 (a lot of this needs to start in 2020-2030)</p> <p>Provincial Policy Statement promotion of energy efficiency and conservation</p>

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<p>6.5.1</p>	<p>Preserve land for uses that require a business park environment for their operation.</p> <p>2) The following uses are permitted in the Non-Traditional Mixed areas as shown on Schedules B1 through to B7:</p> <p>a) Low impact light industrial uses including light manufacturing, composting and recycling, renewable energy production, carbon sequestration, warehousing, distribution, and storage;</p>	
<p>6.6.3</p>	<p>The Rideau Canal (pp. 182-183)</p> <p>d) Re-imagine Queen Elizabeth Driveway and Colonel By Drive to reduce the roads' importance as a commuter route in favour of pedestrian activity and park connections and consider opportunities for Canal crossings. This shall may include limiting vehicular access and the reduction of traffic speed;</p>	<p>Recommend using stronger language to meet the City's active transportation and climate goals.</p>
<p>6.6.5</p>	<p>Ottawa International Airport Economic District (pp. 185-187)</p> <p>*Eliminate this section*</p>	<p>Suggest eliminating all references to expanding the airport, which is incompatible with aggressive action on climate change.</p>

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6.6.6	<p>Lansdowne (p. 187)</p> <p>2) Continued investment in transportation demand management programs for residents and visitors to ensure the dominance of sustainable transportation modes. This will benefit all residents and reflect the needs of women and children in terms of mobility. Automobile use will be inhibited deemphasized with corresponding improvements to pedestrian and cycling infrastructure. The safety of vulnerable street users on Bank Street as well as on connections to the surrounding neighbourhood will be prioritized.</p>	<p>Only include use of word “sustainable” if this term excludes car-pooling.</p> <p>Recommend using stronger language to meet the City’s active transportation and climate goals.</p>
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Section 7: Greenspace Designation

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
7.3	<p>Protect the ecosystem services of natural features and recognize their role in building resilience to future climate conditions and economic shocks to food and energy systems.</p>	<p>Development and site prohibition in Urban Natural Features must include the City. Construction of buildings or play structures (eg Mooney Bay) in Urban Natural Features prohibited without environmental impact assessment, public consultation and no-net loss requirement.</p>

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7.3.1.f	<p>Where Natural Environment Areas are privately owned, public use and access to these lands for any purpose requires the consent of the owner;</p> <p>Acquisition of land for parkettes, community gardens, linear parks and parks.</p>	Section 7.3.1.f should include text regarding new lands and upgrades.
7.3.1.g	<p>Where land designated Natural Environment Area is privately owned, the City shall must acquire the land at the request of the landowner, in keeping with the City’s acquisition policies;</p> <p>Upgrade or re-landscaping of existing underutilized parkland</p>	Section 7.3.1.g should include text regarding new lands and upgrades.

Section 8: Greenbelt Designations

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
8.3	<p>3) New road construction or widening of existing roads through the Greenbelt will not be pursued.</p>	This is in line with the overall OP goal of reducing car dependency.

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Section 9: Rural Designations

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
9.1	<p>Farmland accounts for approximately 40 per cent of Ottawa’s rural area and is required by the Provincial Policy Statement to be protected for long-term use for agricultural production, and protected from non-agri-food uses.</p> <p>These lands are comprised of Class 1, 2, and 3 soils, as Agricultural Resource Areas have been identified through a Land Evaluation and Area Review (LEAR) study, and Lands designated Agricultural Resource Area may also include primarily Class 1, 2 and 3 soils. as well as other classes of soil in order to recognize that they are part of a greater system Agricultural Resource Areas are designated using an agricultural system approach to maintain and enhance the geographic continuity of the agricultural land base, and are to be fully protected.</p> <p>Ottawa’s agri-economy agricultural economy is currently a mix of cash crop, small mixed farms and livestock across approximately 1000 farm holdings, and is a valuable industry which plays an important role to ensuring food security in the region will continue to evolve to better meet food security needs in the region.</p>	<p>Emphasis has to be on protecting all remaining farmland within the City of Ottawa for agricultural production specific for regional markets, given the proximity to dense populations, and protected away from non-agri-food uses.</p> <p>This section has been altered for accuracy</p> <p>Cash crops and dairy (majority of livestock present), the current profile, do not ensure food security. Policies must support and enable more diversified production to enable greater food security</p>

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<p>9.1.1</p> <p>Protect farmland from uses that would impede productive and sustainable farming operations (p. 204)</p> <p>2) The City shall preserve Agriculture Resource Areas from development. Any consideration for the removal of land from an Agricultural Resource Area designation to allow for urban or village expansion shall take place only if it is demonstrated, through a comprehensive review undertaken by the City and addressing the matters required by the Provincial Policy Statement, that there are no other options to accommodate urban growth, including increasing regeneration targets, and the land is required for the expansion of an existing settlement area or identification of a new settlement area in the event of unforeseen or extraordinary rates of population growth.</p> <p>3) There shall be no Official Plan amendments for the removal of land from an Agricultural Resource Area designation, outside of a comprehensive review, and that does not constitute urban or village expansion, shall must only be considered where it is demonstrated that the land does not meet the requirements for an Agricultural Resource Area through:</p> <ul style="list-style-type: none"> a) A municipal-wide Land Evaluation and Area Review (LEAR); <li style="padding-left: 20px;">or b) An area-specific assessment, where the area assessment is 250 hectares, or where the boundaries of less than 250 hectares are agreed to by the City, that demonstrates: <ul style="list-style-type: none"> i) Based upon new information, related to one or more LEAR factors, the lands are not part of a prime agricultural area; and 	<p>More inclusive notion of farming needed to ensure the policy does not only protect farming operations focused on conventional production.</p> <p>The proposed modification strengthens farmland protection language.</p> <p>There is no valid reason to remove land from the Agricultural Resource Areas established through the comprehensive LEAR process. While planning authorities may permit such considerations, under the conditions of the Provincial Policy Statement, they are under no obligation to do so.</p> <p>Council has committed to avoid any consideration of Agricultural Resource Areas for development. While they have already broken that commitment, this is an opportunity to enshrine that commitment in the Official Plan.</p> <p>City has not followed policies 9.1.1 3) for new expanded lands to be included in the urban boundary.</p> <p>The expanded lands include Agricultural Resource Area land to be removed without conforming to policy requirements.</p> <p>The OP must eliminate the possibility of removal of prime agricultural lands in accordance with Section 9.1.1</p>
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	<p>ii) Any re-designation avoids the potential for adverse impacts to any adjacent agricultural land and operations, or if unavoidable, such adverse impacts are mitigated to the extent feasible.</p>	
<p>9.1.2</p>	<p>Support diversification of farming operations to increase local supply of goods and services in the rural community regional economy.</p> <p>1) On lands designated as Agricultural Resource Area, a variety of types, and intensities of agricultural uses and normal farm practices are to be permitted and shall be consistent with Provincial guidelines related to uses and practices in prime agricultural areas.</p> <p>2) On-farm diversified uses and agriculture-related uses that are compatible with and do not hinder surrounding agricultural operations are permitted subject to limitations on size, scale, and location on the property as determined by the Zoning By-law. A Zoning By-law amendment is required for any increase to the permitted size of an on-farm diversified or agriculture-related use.</p>	<p>Policy should not limit diversification to serving the rural community only. Increases in the supply of goods and services at the regional level enhances relative autonomy and future security for all, while in general being a key overall economic sector for the city.</p> <p>Provincial guidelines already provide sufficient guidance on uses and practices in prime agricultural areas, without adding the term “normal” (which is undefined here). Farm practices are dynamic and should not be limited other than by provincial policy.</p> <p>More must be defined re. hindering surrounding agricultural operations, from all operations within all zones, not just from adjacent agricultural-zoned lands, and in addition, with review on how to protect organic producers as per organic agricultural regulations.</p>
<p>9.1.3</p>	<p>Support agriculture-related uses to keep goods and services needed by accessible to the farming community close to market</p>	<p>Goods should be added. The reference “close to market” is unclear. The policy details refer to land severances mainly.</p>

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<p>1) Residential uses in Agricultural Resource Areas shall be permitted either in the form of:</p> <p>a) Farm housing; or</p> <p>b) As a detached dwelling on a lot fronting an existing public road; and/or</p> <p>c) Accommodation for full-time farm labour when the size and nature of the operation requires additional employment. Accommodations may be located on the same lot as the farmhouse and shall be removed once the farm help is no longer required; and</p> <p>d) The City may require that the farm operator enter into an agreement which ensures that accommodations for farm help are removed once no longer needed.</p> <p>7) The City shall permit the severance of a lot creating a new farm holding that will be used exclusively as an agricultural operation, provided that both the retained and severed parcels of land are no less than 36 8 cultivatable hectares each, to maintain flexibility for future changes in the type and size of agricultural uses, and the title to both parcels contains a farmland easement agreement.</p>	<p>Must be allowance within farm housing category for multiple, primary, year-round housing to adequately support primary farm operations with farmland easement in place. This must include the allowance for four-season tiny houses as one option and the allowance for permanent dwellings.</p> <p>This model of planning only supports a single farm owner then bringing in most usually migrant farm workers as a seasonal labour force. Accommodation for seasonal workers must have more requirements within planning to ensure safety and comfort (related to size of space, access to facilities, etc.).</p> <p>The requirement for removal encourages poorly constructed housing. Allowance should be made for long-term adequate housing for farm seasonal labour, both migrant and Canadian.</p> <p>Rather than using size of parcel, a farmland easement agreement is a better planning tool to ensure exclusive long-term agricultural use. This approach allows for more flexibility to provide access to sufficient farmland for new and young farmers to support a viable, diversified agricultural operation.</p>
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<p>9.2</p>	<p>Rural Countryside</p> <p>The rural countryside is made up of a variety of low intensity uses such as farming, small-scale industries, and tourism such as golf courses or bed and breakfasts. The rural countryside also contains clusters of low-density residential units which pre-date this plan. The intent of this designation is to accommodate a variety of land-uses that are appropriate for a rural location, limiting the amount of residential development, and support industries that serve local residents and the travelling public, while ensuring that prime farmland (Class 1, 2 and 3 soil) is protected for agricultural use as a first priority, and the character of the rural area is preserved.</p>	<p>The ‘Rural Countryside’ designation contains significant amounts of prime farmland whose protection should be the top priority when assessing proposed development within ‘Rural Countryside’ lands.</p>
<p>9.2.1</p>	<p>Protect and enhance rural character</p> <p>1) Lands designated as Rural Countryside are shown on Schedule B8.</p> <p>2) The Zoning Bylaw shall prohibit non-agricultural uses on prime farmland (Class 1, 2 and 3 soil) in Rural Countryside.</p>	
<p>9.2.3</p>	<p>To limit the fragmentation of rural lands and ensure the preservation of health</p> <p>3) Lot creation for the purpose of residential uses is prohibited except in the following circumstances:</p>	<p>The Official Plan must permanently ban Country Lot Estates, including these 0.8 acre hectare, single-dwelling houses, as counter to the agreements for intensification. This section seems to allow a blanket allowance for this type of housing.</p> <p>If this is not the case, please make this section more clear to us.</p>

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<p>a) A maximum of two lots can be created from any lot in existence on May 14, 2003;</p> <p>b) The lot shall not be created from a lot within a registered plan of subdivision unless all of the following conditions are met:</p> <p style="margin-left: 20px;">i) The minimum size of the severed and retained lots are no less than 0.8 hectares;</p> <p style="margin-left: 20px;">ii) The retained and severed lots can be adequately serviced</p>	
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Section 10: Protection of Health and Safety

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
10.1.1	<p>1) Development and site alteration shall must generally be directed to areas outside of not be permitted in flood plains and erosion hazards.</p> <p>2) Revisions to the flood plain overlay in the Zoning By-law, or regulation limits in secondary plans or area-specific policies, may be implemented without the need for an Official Plan Amendment, when site-specific geodetic elevation information prepared by an Ontario Land Surveyor has been accepted by the appropriate conservation authority, or when the City is undertaking updates to the flood plain overlay in the Zoning By-law and concurrence from the appropriate conservation authority has been received.</p>	<p>This section could be simplified a lot if the Policy were simply that development and site alteration in flood plains is prohibited except for what is listed in Policy 6.</p> <p>Define the relationship between the flood vulnerable area projections based on climate change and the 350 year flood plain. Are they the same? Is the 350 year flood plain a proxy for areas thought to be at risk from increased flooding in the absence of flooding vulnerability assessment being done? Will the areas at risk in the OP be changed</p>

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<p>3) A requirement for flood plain studies, in support of a development application will be identified in consultation with the City and the appropriate conservation authority. Flood plain studies, submitted to the City, as part of the development review process, shall be supported by appropriate engineering and environmental studies.</p> <p>4) Development shall not be permitted to locate in the flood plain or in an erosion hazard area where the use is an institutional use, essential emergency service or is associated with the disposal, manufacture, treatment or storage of hazardous substances as identified in provincial policy or provides outdoor industrial storage.</p> <p>5) Development and site alteration shall not be permitted within areas that would be rendered inaccessible to people and vehicles during flooding, an erosion event or other emergencies.</p> <p>6)3) Notwithstanding Policy 5-1), development and site alteration may be permitted if it has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard. In such cases, the following uses may be permitted:</p> <ul style="list-style-type: none">a) Facilities which by their nature shall locate in the flood plain, such as bridges, flood and/or erosion control works or minor additions or passive open spaces, which do not affect flood flows;b) Minor additions and/or renovations to existing structures, which do not affect flooding, meet appropriate floodproofing requirements and are approved by the appropriate conservation authority;c) The replacement of a dwelling that was in existence at the date of adoption of this Plan, with a new dwelling where:	<p>once the climate change flood vulnerability assessment is done?</p> <p>We strongly support basing flood exclusion on climate change flood vulnerability rather than historic data from 100 year floods, however we understand that the provincial guidance is based on 1:100 historic data. If the province will not allow the OP to restrict development in areas that is climate change flood vulnerable, the province not the city of Ottawa and its taxpayers must be liable for damages to developments that are allowed to proceed in climate change flood vulnerable areas.</p>
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	<p>i) The new dwelling is generally the same gross floor area as the existing dwelling, and where the new dwelling is in a location on the lot that has lower flood risk;</p> <p>ii) The new dwelling, in conjunction with any site alteration does not result in a negative effect on flooding; and</p> <p>iii) The new dwelling and any associated site alteration shall meet the appropriate floodproofing requirements and be approved by the appropriate conservation authority.</p> <p>d) Passive open spaces which do not affect flood flows; and</p> <p>e) Uses permitted in the flood fringe or areas of reduced risk in accordance with Policies 1 through 5 in Two-Zone Flood Plain Policy Areas in Policy 10.1.2 below.</p> <p>f) 7) Notwithstanding Policy 5, Site alteration is permitted in the flood plain in certain other circumstances subject to approval being received under the Conservation Authorities Act.</p>	<p>Not permitting development in the 1 in 100-year floodplain is not adequate. The 100 year flood plain is defined by historic data. For flood protection projections of flooding with increased precipitation predicted by modeling (NCC study June 2020) needs to be used to determine the 100 year flood plain.</p>
<p>10.1.3.1</p>	<p>(d) The City should avoid incurring flood damage costs from infrastructure damage or emergency costs</p>	
<p>10.1.7.2</p>	<p>The City shall require an official plan amendment for the establishment of any new solid waste disposal site and any new solid waste disposal site must be net carbon zero.</p>	<p>Methane is a very serious pollutant. EE projections have no allowance for additions to emissions from new landfills.</p>
<p>10.1.7.3</p>	<p>Footprint expansion of operating solid waste disposal sites shall require a Zoning By-law amendment and incremental impact of the expansion must be net carbon zero.</p>	

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<p>10.2</p>	<p>Two-Zone Flood Plain Areas and Areas of Reduced Flood Risk</p>	<p>Two-Zone Flood Plain Areas are not shown on any Schedule, nor are One-Zone Flood Plains. Perhaps the Plan should make a reference to geoOttawa?</p> <p>Flood fringe and areas of reduced flood risk need to be defined based on climate change projection data not historic data.</p> <p>For private developments that do build in flood fringe areas it should be at their risk entirely - the City should not provide emergency flood protection or compensation for flooding for developments in flood plains or flood fringe areas.</p> <p>There shall be no city developments or roads, infrastructure or facilities in flood plains or the flood fringe area.</p>
<p>10.3</p>	<p>Build resiliency to the impacts of extreme heat</p> <p>2) Trees will be retained and planted to provide shade and cooling by:</p> <p>a) Applying the urban tree canopy policies in Section 4.8 and other sections of the plan;</p> <p>b) Requiring trees to be retained and planted, as applicable, where they will provide shade for users, as a priority in the design, operation of the pedestrian, cycling, transit networks and where they interconnect; and</p>	<p>Support the inclusion of these policies in the Protection of Health and Safety section of the OP</p> <p>We need specifics of what measures will be required - what by-laws? Strengthened Tree by-law? Green roof? High Performance standards?</p> <p>Increasing density has to be balanced with other aspects of 15 minute neighbourhoods (greenspace, walking and bikes, commercial space, community facilities, etc.) Cannot become so dense in downtown that its less attractive and a serious heat sink.</p>

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<p>c) Encouraging and supporting maintenance and growth of the urban tree canopy on residential, commercial, and private property.</p> <p>3) For transit stops where the planting of trees is not feasible, shade structures should be considered must be created in order to provide shelter from the sun as to ensure comfortable recreation and transit mobility during extreme heat conditions.</p> <p>4) The use of artificial turf as ground cover is not permitted for residential, commercial or industrial uses but may be permitted for sports and sports training facilities.</p> <p>5) Office buildings, commercial shopping centres, large-format retailers, industrial uses, and large-scale institutions and facilities, or for the development of existing sites containing such uses, shall must incorporate heat mitigation measures such as:</p> <p>a) Retention of existing large trees;</p> <p>b) Planting of trees that will have a large canopy at maturity;</p> <p>c) Use of light-coloured and reflective materials on roofs, parking lots, and other surfaces</p> <p>d) Integration of shade features (natural or built);</p>	<p>Development process review is too vague. What processes will be used? Trees and cooling design needs to be included in Transportation plans for active transportation, Greenspace Plan, secondary plans.</p> <p>Wording is too weak. Newly designed transit stops must require shading (trees or structures). Existing transit stops categorized for heat risk and shading shall be provided for all high risk stops.</p> <p>Good. Also include in zoning by-law requirement for removal of artificial turf from existing buildings.</p> <p>Need more detail and specific by-laws to implement this policy. Proposed by-laws or by-law amendments:</p> <ol style="list-style-type: none"> 1) green roof by-law; 2) include permeable surface and green infrastructure/ green landscaping retirement in storm water management by-law; 3) revise tree by-law to cover shade trees for greenfield and infill developments and suburbs.
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	<p>f) Other mitigation measures such as solar or green or cool roofs, low impact landscaping and surface parking lot design that incorporates solar shading, green islands and sidewalks that break up the expanse of the parking area; efficient appliances for cooling, such as electric air-source heat pumps for cooling and supplementary heating.</p>	
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Section 11: Implementation

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
11	<p>Community, development industry and small business input is critical to understanding needs, opportunities and constraints in an evolving neighbourhood.</p>	<p>Section 2.2.1 on page 18 in the draft Official Plan states that the City must ensure that “the services, parks, recreational facilities, public spaces, and other elements of a complete neighbourhood are keeping up with the increases in population”. This does not appear again in the document. This oversight could be corrected by adding to section 11.</p>

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<p>11.1</p>	<p>Set the stage for Site Plan Control requirements and provisions</p> <p>1) The entire City of Ottawa is a Site Plan Control Area. Certain classes of development shall be exempted from Site Plan Control.</p> <p>2) The Site Plan control by-law shall establish procedural and submission requirements for varying classes of development. Submission requirements may include architectural and engineering plans and studies, based on the following thresholds:</p> <p>a) development proposals for low-rise residential or mixed use buildings that fulfill the regeneration objectives of the Growth Management Strategy shall have some reduced requirements in order to streamline the process for, and lower the costs of , regeneration;</p> <p>d) Green Fast Lane. Construction and development proposals meeting the HPDS shall be eligible for deferral or waiving of fees and charges; alternative development standards; more flexible zoning that allows for a greater number of units within the permitted built form envelope; and application processing priority.</p> <p>b) High-albedo surface materials, shade trees, solar and green and cool roofs to reduce ambient surface temperature to minimize the urban heat island effect;</p>	<p>Support the inclusion of these policies for site plan requirements</p> <p>Loopholes are too huge. Classes for exemption need to be stated.</p> <p>Extremely concerned about “reduced” requirement and structuring HPDS as a trade-off with density. Extremely concerned by hearing that ‘reduced’ will mean that there will be NO site plan requirement for all units under 4 stories (i.e.all residential infill); and site plan lite for up to mid-rise (9 stories). This tradeoff is counterproductive. A better approach would be to have some non-negotiable requirements coupled with <u>an incentives</u> approach to encourage energy-efficient low-carbon builds, infills and retrofits (‘green fast lane’ for proposals compliant with HPDS. For the use of incentives see positive incentives named in OP 4.2, “a toolkit of planning incentives and direct supports, including but not limited to: density bonusing; density transfer; deferral or waiving of fees and charges; alternative development standards; land; more flexible zoning that allows for a greater number of units within the permitted built form envelope; and application processing priority”.</p>
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	<p>e) Low impact development and traditional approaches to manage stormwater and mitigate flood risks, and reduce demand for potable water;</p> <p>f) Trees to enhance the urban forest and use of native species to protect, restore and enhance the natural heritage system;</p> <p>g) Bird safe glass treatment to minimize the risk for bird collisions and energy efficient, shielded exterior lighting to reduce nighttime glare and light trespass</p>	
<p>11.2</p>	<p>Create the framework to for a Community Planning Permit System</p> <p>The Community Planning Permit approval framework may combine existing planning processes into one streamlined application process. The Planning Act requires each Community Planning Permit System Area to be individually identified, along with the types of criteria and conditions that may be used in the Official Plan.</p> <p>1) The objectives for the creation a Community Planning Permit System include:</p> <p>a) Identifying specific discretionary uses that would be permitted based on them being complementary to, and compatible with, existing development; and</p>	<p>In this policy, streamlining and speed of development, which are developer interests, are arrayed against protection of natural and built heritage, the preservation of urban and rural landscape, and of community character, which are community interests. Only with strong guarantees that community interests will be given full weight and consideration can this policy be supported.</p>

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<p>b) Simplifying and streamlining the development approval process, thereby reducing the time involved in obtaining permission to develop a permitted discretionary use</p> <p>c) Protection of Natural Environment Areas, Significant Wetlands, significant features, and of the Natural Heritage System;</p> <p>d) Protection of heritage resources designated under the Ontario Heritage Act;</p> <p>e) Maintenance and enhancement of the urban or rural landscape, or village core;</p> <p>f) Maintenance of the character of the affected and adjacent area(s).</p> <p>g) energy conservation and deep energy retrofiting</p> <p>2) Council may delegate decision-making authority to staff in approving a Community Planning Permit application for development that would otherwise require separate approvals through site alteration or tree removal permits, Zoning By-law amendments, minor variances, temporary uses, holding or interim control Zoning By-laws, site plan control approval, conveyance for park purposes and community benefits. Limits on such delegation shall must also be established in the Community Planning Permit By-law.</p> <p>3) The Community Planning Permit By-law shall must identify uses that would be permitted and protections that would be required in each Community Planning Permit area and record these in a Community Planning Permit Agreement. Development of each</p>	<p>This subsection should encompass the full scope of greenspace protection in the OP.</p> <p>Canopy cover and greenspace should be explicitly referenced as part of the urban landscape</p> <p>What form of redress will be available to proponents and the community in the case of omnibus approvals under this permit system?</p> <p>Identify the scope under investigation for community planning permit, work plan and timeline for development of community planning permit and what process and tools are likely to be used if community planning permit isn't developed. 11.2 2) details what authorities will be designated to staff, what process there is for public comment and for dispute resolution. How does the neighbourhood</p>
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Community Planning Permit agreement must require extensive community involvement.

4) When making a decision on a Community Planning Permit, the City shall consider whether the application is consistent with the uses and protections approved for the permit area. Non-conforming application can be directed to the regular planning approval process.

5) Community Planning Permit areas must correspond to neighbourhoods in the urban area.

for a discretionary use, the City may consider development based on the following criteria:

a) Official Plan policies for the specific geographic area;

b) The goals and purpose statements in the applicable zones;

c) The appropriateness of the location and parcel for the proposed development or use;

d) The impact of the proposed development or use with respect to adjacent development and uses in the area;

e) In the Rural Area, the servicing requirements and the extent to which the use may negatively impact the quality and quantity of the groundwater;

f) In the Agricultural Resource Area, demonstration that every effort has been made to locate the use in an area of poorer soils;

planning process fit into the community planning permit system? 15-minute neighbourhoods require neighbourhood planning - what process will be used for that?

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	<p>g) Access and transportation requirements; and</p> <p>h) On-site vehicle parking and pedestrian circulation.</p>	
<p>11.3</p>	<p>Establish direction for Community Improvement Plans</p> <p>...</p> <p>h) Opportunities to renovate and retrofit existing older buildings, including building energy efficiency (including renewable energy sources), climate resiliency improvements or the addition of new secondary units;</p>	<p>Intensification through the addition of secondary units in existing buildings should be encouraged, in so far as they provide opportunities for deep energy retrofits and integration of diverse populations and family sizes into existing neighbourhoods.</p> <p>There is nothing in the draft OP for mitigating heat for developments that don't have site plans i.e. all of the low rise infill in regeneration neighbourhoods (i.e. majority of infill in existing neighbourhoods). How will this gap be addressed? Will it be covered in inclusionary zoning? Also green-roof by-law for developments both with site plans and without. Exemption for low rise or mixed use buildings cannot be provided under the OP unless community improvement plans and/or secondary plans are in place to cover the gap in coverage of these in the OP and site plans.</p>
<p>11.4</p>	<p>2) Despite Section 11.4, Policy 1, the following development is permitted to proceed with Alternative Notification Requirements defined in Section 11.4, Policy 3, below, as permitted under the Planning Act:</p>	<p>a) Alternative Notification Requirements are presumably intended to apply to minor development applications, but "Applications for official plan amendments, Zoning By-law amendment" seems to throw the door wide open for any and all OPAs and</p>

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	<p>a) Applications for official plan amendments, Zoning By-law amendment, consent to sever, or plan of subdivision approval by non-profit housing providers;</p> <p>b) Applications for which Council has delegated approval authority to a municipal officer or employee, including consents to sever; and</p> <p>c) All minor Zoning By-law amendment applications, which meet the intent of the Official Plan and are not yet enacted in the Zoning By-law.</p>	<p>ZBLAs. Is the word "minor" missing? In any case, "minor," as also used in Policy 2-c) must be defined.</p>
<p>11.5</p>	<p>2) The City may shall exercise authority under the Planning Act, section 45 to establish criteria to which the authorization of a minor variance must conform. The criteria may provide that specified provisions in the Zoning By-law are not to be authorized by variance subject to variance by Committee of Adjustment.</p>	<p>This new section is most welcome but falls short of what citizens should expect from the City with regard to the Committee of Adjustment. First, in Policy 2) establishing criteria regarding minor variances is essential. There is much confusion and inconsistency on this issue.</p> <p>The wording "specified provisions in the Zoning By-law are not to be authorized by variance" is unclear.</p> <p>Provision should also be made for the City to assist CoA parties by providing evidence; citizens participating in a CoA process are greatly handicapped without it.</p>

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11.6	<p>10) The City shall create a building permit footprinted program for low-rise residential regeneration applications that meet the intent of Section 5.6.1, 4.2 and 2.2.3 and have the ability to be replicated across the City. The building permit footprinted program will streamline building permit issuance that</p> <p>a) and will have a focus on missing middle housing b) creates housing for low and moderate income households, and c) meet the HPDS (Green Fast Lane)</p>	<p>The objective of density cannot be “ueber alles”. It must be twinned (tripletted) with affordable housing and climate crisis abatement objectives.</p>
11.8	<p>3) For each of the studies listed in Table 10, the City may must provide Terms of References outlining study requirements. These Terms of References are meant to provide the needed guidance for the study submission expectations, required as part of a complete application.</p> <p>Energy Modelling Report is mandatory.</p>	<p>When will a public consultation report for the OP be provided? Will it report on consultations with indigenous groups?</p>

Section 13: Definitions

Policy #	Verbatim draft OP policies, with POP proposed changes in bold or strike through	POP rationale for policy changes
13	<p>15-minute neighbourhoods: (p. 252)</p> <p>Compact, well-connected places with a clustering of a diverse mix of land-uses where daily and weekly needs can be accessed within a 15-minute walk; this includes a range of</p>	<p>This borrows more specific definitional language from p. 19.</p>

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	<p>housing types, shops, services, local access to food, schools and day care facilities, employment, greenspaces, parks and pathways. They are complete communities that support active transportation and transit, reduce car dependency, and enable people to live car-light or carfree.</p> <p>Small Commercial Veins (walkable mixed use streets or nodes in regenerating neighbourhoods with small shops, services and office space). These may be Major Corridors in already dense areas where traffic is slow moving, minor corridors as identified in Schedule B1-7 or streets not currently designated as such which by their centrality and reach can fulfill this role for a regenerating neighbourhood.</p>	
<p>13</p>	<p>On-farm diversified use: (p. 257)</p> <p>A use located on a farm secondary to the principal agricultural use, which is limited in area, and includes but is not limited to home occupations, agri-tourism, renewable energy production, carbon sequestration, composting/recycling and value-added products. On-farm diversified uses are compatible with and shall must not hinder surrounding agricultural operations</p>	<p>This definition does not go far enough and requires more specific language to include renewable energy production, carbon sequestration and composting/recycling.</p>

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Schedules and Annexes

Schedule #	POP proposed changes
A	Please provide names of the Greenbelt Facilities on Schedule B4, with numbers on the map.
B	Baxter Conservation Area is not on Schedule C9.
C	It is puzzling to see Natural Environment Areas on Schedule C9 so disjointed. What do all the red markings represent?
D	Urban Natural Features are impossible to discern on Schedule C9. As suggested earlier, please provide a list in an Annex.
E	Should flood plains, including Two-zone flood plains, not be shown on Schedule C13 and perhaps also on Schedule C9?
F	Changes to linkages shown in Schedule C9 due to impact of urban expansion should be held in abeyance until a final decision is made on the location of urban expansion areas.
Annex #	POP proposed changes
8A	Thank you for Annex 8A showing Ottawa's watersheds and subwatersheds.
8B	Please show the names of all watercourses on Annex 8B.

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Annex 1

List of co-convenors of People's Official Plan who collaborated on this document

Ecology Ottawa
Greenspace Alliance of Canada's Capital
Community Associations for Environmental Sustainability
Federation of Citizens' Associations of Ottawa
Just Food - rural issues, food & agriculture targets
Walkable Ottawa
Healthy Transportation Coalition
Waste Watch Ottawa
City for All Women Initiative
Ottawa Transit Riders
MD Moms for a Healthy Recovery
CoEnergy
Ottawa Renewable Energy Co-operative
Ottawa South Eco-Action Network
For Our Kids
Bike Ottawa
Climate Reality Leaders
Energy Mix
Ottawa Eco-talent Network
Ottawa Stewardship Council

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Annex 2

Table X - Summary of Greenspace Protection

Type of greenspace				Description policy reference	Type of Protection	Protection policy reference
Rural	Wetland				No net loss from development or site alteration	4.8.1.6
	Woodland				No net loss from development or site alteration	4.8.1.6
	Parks			7.1a	Lot creation prohibited, restrictions on disposal	7.1.3 7.1.4e
	Natural Heritage Features	Not part of Natural Heritage System		4.8.1.3	Lot creation prohibited, No net negative impact from development or site alteration	7.1.3 5.6.3.1.1 5.6.1.1.4
			Significant wetland	4.8.1.3a 7.1d	Lot creation, development and site alteration prohibited + 120m restricted buffer	7.1.3 7.3.2
			Natural Environment Area	4.8.1.3h 7.1c	Lot creation, development and site alteration prohibited + 120m restricted buffer	7.13, 7.3.3
			Conservation Areas	7.1f	As per enabling legislation, otherwise considered a NEA	7.3.4 7.3.5

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		Part of Natural Heritage System		4.8.1.3	Maintain and improve Lot creation prohibited, No negative impact from development or site alteration	7.1.3 5.6.3.1.1 5.6.3.1.4
			Significant wetland	4.8.1.3a 7.1d	Lot creation, development and site alteration prohibited + restricted buffer	7.1.3 7.3.2
			Natural Environment Area	4.8.1.3h 7.1c	Lot creation, development and site alteration prohibited + restricted buffer	7.13 7.3.3
			Conservation Areas	7.1f	As per enabling legislation, otherwise considered a NEA	7.3.4 7.3.5
Urban	All				Commitment to protect	4.8.3.1
	Parks			7.1a	Lot creation prohibited, restrictions on disposal	7.1.3 7.1.3.e iii
	Open Spaces			7.1b	Lot creation prohibited	7.1.3
		Hydro and Utility corridor			As per operator policies	
		SWM facilities			As per City infrastructure policies	
		Capital greenspace			As per federal policies	

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		Passive open space	Stream bank setbacks		As per Conservation Authority policies	
			Other		Option to purchase	11.6.7
	Natural Heritage Features	Not part of Natural Heritage System		4.8.1.3	Lot creation prohibited, No net negative impact from development or site alteration	7.1.3 5.6.3.1.1 5.6.1.1.4
			Urban Natural Feature	4.8.1.3g 7.1c	Lot creation, development and site alteration prohibited + 30m restricted buffer	7.1.3 7.3.1
			Significant wetland	4.8.1.3a 7.1d	Lot creation, development and site alteration prohibited + 120m restricted buffer	7.1.3 7.3.2
		Part of Natural Heritage System		4.8.1.3	Maintain and improve Lot creation prohibited, No negative impact from development or site alteration	7.1.3 5.6.3.1.1 5.6.3.1.4
			Urban Natural Feature	4.8.1.3g 7.1c	Lot creation, development and site alteration prohibited + 30m restricted buffer	7.1.3 7.3.1
			Significant wetland	4.8.1.3a 7.1d	Lot creation, development and site alteration prohibited + 120m restricted buffer	7.1.3 7.3.2