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OFFICIAL PLAN SUBMISSION:
Towards a popular vision for our built
environment

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Introduction

The city's [draft of its new Official Plan \(OP\)](#) presents an overall positive, and at times ambitious, vision for our city's evolution over the next few decades. There are, however, several changes proposed that require review, reconsideration, or outright rejection. In this document, we will identify some of the positives, while focusing on aspects that should be changed.

A city's OP is its most important governing document for planning and guiding the physical development of our city for decades to come. It is a vision of future development in Ottawa that will not only shape the built environment, but also how we explore, experience and engage it. This document of enforceable high-level principles, therefore, has major implications for our social and economic lives in Ottawa, and therefore for our wellbeing and quality-of-life as Ottawans.

Despite the breadth of scope and impact that an OP has on a city and its residents, there are some things it cannot accomplish on its own, and these should be noted as well, especially where language in the draft OP suggests otherwise. Below are some high-level principles that we would like to see better reflected in our city's new OP. More specific proposals for changes and additions flowing from these principles will be covered in ensuing sections.

High-level principles

- Ottawa should be a place where anyone can live
- All neighbourhoods in Ottawa should benefit from equitable access to greenspace and other public amenities
- Existing neighbourhoods should remain whole and distinct
- Sustainable transportation must be better prioritized
- Democratic control over our built environment should be enhanced and expanded

These high-level principles are critical to achieving an OP that puts people first, and they will be fleshed out throughout the proceeding commentary.

Ottawa should be a place where anyone can live

The draft OP makes significant strides towards ensuring Ottawa is a place where anyone could want to, and afford to, live, but it over promises on some aspects of what this OP can and will achieve, while feeding into an often unhelpful narrative in the process.

Affordability

Throughout the draft OP, mechanisms identified as requisite to '[regeneration](#)'—the documents chosen euphemism for intensification—are portrayed as solutions to the affordable housing

crisis in Ottawa.¹ Some of these mechanisms will surely have a positive impact on affordability, but others, just as surely, cannot be relied upon to make housing affordable. In fact, many aspects of the city's OP, including some of the mechanisms of regeneration, will unintentionally yet necessarily contribute to the affordability crisis. To a large extent this is unavoidable, but more can be done to promote countervailing factors within and beyond the OP.

Negatively impacting affordability is unavoidable insofar as the more dense, desirable, and livable our city becomes, the more value will be ascribed to the parcels of land therein. Higher value land puts upward pressure on the costs of both owning and renting a place to live. More active transportation infrastructure, increased access to soft services, enhanced public and private amenities all have a tendency to increase the value of real estate in a neighbourhood. So, too, does the de facto upzoning of land—a key objective of the draft OP—which allows for more rent to be extracted per parcel.

To be clear, we need all of these things. We need to augment the supply of housing, especially within the greenbelt, to ensure there are places to house the forecasted population growth. We also need to, or at least ought to, make Ottawa a more livable and beautiful city for its residents. Intensifying our city while enhancing the livability of our city need not result in the catch 22 of gentrification.

In fact, the draft OP, to its credit, introduces several concrete ways to escape this trap by:

1. Setting the stage for a rental replacement bylaw
2. Setting the stage for an inclusionary zoning bylaw
3. Introducing policies and exemptions supportive of affordable housing providers
4. Ensuring more 3+ bedroom unit dwellings are realized

Some of these countervailing aspects nevertheless have limitations.

Inclusionary Zoning

Inclusionary zoning will mandate developers to include a certain percentage of affordable units in new multi-unit buildings (over a certain size) within protected major transit station areas (as per provincial allowance). Even a bold inclusionary zoning policy, however, can fail to prevent average rents from increasing in a neighbourhood or city, and can sometimes see the razing and replacement of already affordable dwellings with relatively more expensive or less numerous affordable units.

The recent council decision to raze the affordable Manor Village community in order to make way for an LRT station may become an example of this in Ottawa. Time will tell if the new residential developments that will pop-up next to that future station will make up for or exceed the loss of affordable units in terms of quantity and affordability.

¹ What constitutes 'affordable' is ill-defined in the draft OP. That should change, and a meaningful definition should be provided.

Indeed, much remains to be determined in order to evaluate the potential efficacy of an inclusionary zoning by-law in Ottawa. The efficacy of this tool will hinge, in large part, on the percentage of units (or residential ground floor area) that is required to be affordable, and on the precise criteria used to determine affordability in areas that will be subject to inclusionary zoning. In any event, it is a single tool, oriented toward tweaking market outcomes, that alone will not solve the affordability crisis in Ottawa.

Rental Replacement

Perhaps the most effective safeguard of affordable housing to be found in the draft OP is in the section on protecting existing rental housing stock and supporting the production of more rental units. Language in this section ensures that new developments that would have the effect of removing six or more dwelling units from the long-term rental market cannot be approved unless:

- A. The rental vacancy rate for units of the same bedroom count and in the same survey zone as the affected rental units has been at or above 3 per cent for the preceding three-year period as reported annually by Canada Mortgage and Housing Corporation;
- B. The current rents of the affected units have been at or above the average market rent for units of the same bedroom count and in the same survey zone for the preceding three-year period as reported annually by Canada Mortgage and Housing Corporation; and
- C. The affected units are replaced with equivalent units on the same site and offered to the tenants at the same rent at the time the application was made, on a right-of-first-refusal basis

This language sets the stage for a rental replacement by-law in Ottawa, and, in itself, does a lot to ensure that we stem the loss of affordable units—a rate of loss that currently appears to outpace development of said units.

This tool, however, is defensive and conservationist in orientation: it stems the loss of existing affordable units by ensuring their protection or replacement. Something more must be done to make Ottawa a more affordable place to live, not just slow the rate at which it becomes increasingly unaffordable.

Density ≠ Affordability

Elsewhere, the draft OP introduces various policies that will prove helpful in achieving more affordable housing stock, such as the policies and exemptions outlined to make planning applications easier and less expensive for affordable housing providers, and the “minimum large dwelling proportion requirement” that will ensure more 3-bedroom+ units are built.

This latter tactic is an example of a situation where lack of supply is one of the more pressing concerns: family sized rental units are relatively hard to come by in the urban core (at any price). Beyond this example of an effective supply-side intervention, however, the other supply-side rhetoric in the draft OP is, at best, misleading, and it leads to the over-hyping of some of the draft OP’s proposed solutions to the affordability crisis.

There are several instances in the OP where the claim is made, or at least implied, that a greater supply of housing (to be realized mostly through intensification) will, in itself, make

housing more affordable in Ottawa. The assumption here is that the price of real estate, and the related price of rent, are determined by the nexus of a supply and demand curve; it could not be clearer, however, that the real estate market is influenced by myriad other factors that prevent such an equilibrium of supply and demand.

Why else would our city be in the process of reviewing [a residential vacancy tax](#) for Ottawa? Tens of thousands of residential units are estimated to be sitting vacant in Ottawa. A stark figure in contrast to the tens of thousands of Ottawans who are either homeless, underhoused, or precariously housed. In short, we know that there is an existing supply of housing in Ottawa that could meet much if not all of the existing (real) demand, but it does not effectively do so. We know, too, that this is not a problem that is unique to Ottawa, and that cities all over the continent have large numbers of vacant units, and that these cities are often both denser and less affordable than Ottawa.

The real estate industry may push the line that they need to build more, and to build higher, to ensure everyone has a place to live, but this is only a partial truth. Of course, we need to ensure there is supply to meet projected demand in Ottawa, but this in itself does next to nothing to ensure that everyone, not just the well-to-do, can call the urban neighbourhoods of Ottawa their home.

There is language in the draft OP concerning a 'Tiny Homes' pilot project, which is a trendy example of this sort of supply-side thinking. To be fair, this sort of solution could see more people housed in the short-term.² Yet, asking people to live in increasingly tiny market-provided dwelling units is merely a way to adapt to and therefore accept an increasingly expensive real estate market; it is not a way to confront it. The same could be said for the much touted [613 Flats proposal](#), which is essentially a proposal for more crowded apartment units.

So-called 'tiny homes' have other drawbacks, too. Principal among them is that they needlessly take up a lot of horizontal space. Of course, re-imagining tiny homes that are stacked vertically to more efficiently take up space is to imagine a multi-unit residential building—i.e. an existing innovation that has not and will not solve the affordability crisis. Again, the 613 Flats proposal is like a 'tiny home'-style proposal for multi-unit buildings insofar as affordability would ostensibly be achieved through adapting to market prices via lowered expectations, while doing next to nothing to mitigate the former.

Coach houses (and other accessory dwellings) are also mentioned in the draft OP as a way to deal with the affordability crisis, and they are more promising insofar as they represent a practical way to meet intensification targets without dramatically changing the existing built environment of a neighbourhood. Again, however, this is yet another way to realize supply that does not grapple with the other causal factors behind the ever-increasing cost of real estate in Ottawa and beyond. It is possible, if not likely, that Ottawa will become a more expensive place to live as we meet our intensification targets unless more is done to directly rein in, or sidestep entirely, the market price for housing.

² but not as efficaciously as simply building non-market multi-unit rental buildings.

In short, intensification may be requisite to realizing more affordable housing in Ottawa, but it is not nearly sufficient. What is needed, ultimately, goes beyond what an OP alone can accomplish: e.g. greater rent control, and significant capital investment in the creation of, and conversion to, non-market housing. The OP, for its part, could acknowledge and encourage this,³ and at the same time could give less credence to the theory that supply-side interventions will be enough to make Ottawa a more affordable place to live.

All neighbourhoods in Ottawa should benefit from equitable access to greenspace and other amenities

This draft OP does a good job of prioritizing access to amenities and greenspace at a broad level, but it can do more to ensure there is greater equality between and within neighbourhoods.

Neighbourhood Density Targets

The OP is clear on where intensification is to be realized when it comes to the four transects that map across the city, but those transects do not neatly align with existing neighbourhoods (more on this later), nor do they distinguish between or account for the existing diversity of density between them. This latter point should be addressed in order to ensure that urban neighbourhoods are 'evolving' and 'transforming' in an equitable, sustainable, and manageable way.

The pressures of intensification should be spread out, and not be unduly concentrated in some urban neighbourhoods relative to others. By the same token, people wanting to call Ottawa their home should have options to live in any of the urban neighbourhoods. Where intensification is concentrated within the greenbelt and within the urban core will impact relative access to services, amenities and greenspace at a neighbourhood level. In other words, neighbourhood level density considerations and targets could make the difference in realizing 15-minute communities where they do not already exist, which is a key priority of this draft OP.

Neighbourhood Urban Tree Canopy Targets

The draft OP sets a [40% urban forest canopy cover target](#). Setting this target, and the target itself, are laudable. However, the draft OP should do more to ensure that its urban tree canopy is realized on an equitable basis throughout the city. Everyone in every neighbourhood should be able to enjoy the various benefits of a greener environment. Of course, it is understandable that staff may be reluctant to set a 40% target at a neighbourhood level given this target may be simply impractical in some neighbourhoods, but a floor could still be set at a neighbourhood level (that is below 40%). Tree planting programs should be prioritized on the basis of existing canopy coverage, vulnerable populations, urban heat island conditions, and available space.

³ It could also set clear targets that either parallel or surpass those of the 10-Year Housing and Homelessness Plan, which would, therefore, help shape affordable housing policy choices, including budgeting, going forward.

Section 4.8.2 of the draft OP states that tree removal permits for developments that conform to the zoning bylaw will be approved as a matter of course. While we recognize the strength of the revised Tree Bylaw as a mechanism to enforce canopy cover targets, the directive within the draft OP does not seem to provide the basis to make decisions based on contextual tree canopy conditions. The draft OP also needs to use strong, clear language indicating that authorities, including the Committee of Adjustment, will grant tree removal permits in exceptional cases only.

We recognize the inherent dichotomy between the intensification that is necessary to meet our GHG objectives as a city, and the loss of our urban tree canopy. Rather than ignoring this reality, the new OP should outline or direct policies in future documents such as the Greenspace Master Plan to support a clear decision-making matrix on how these situations should be handled to best meet our climate change and livability goals.

Permeable Land on Residential Lots

In section 5 on Transects, the draft OP describes urban areas as having zero or shallow front yard setbacks with small areas of formal landscape that often includes hard surfaces. This description does not accurately describe the residential areas in our ward, many of which are currently zoned with three-metre setbacks. Preliminary draft mention of soft landscaping as an area which could be reduced by the Committee of Adjustment is also concerning.

Trees and soft landscaping are important unifying streetscape elements and also allow for the permeable space necessary to sustain trees. This green space which makes our neighborhoods liveable and sustains environmental services needs to be explicitly prioritized and protected within the Official Plan.

Integration of Climate Change Objectives

It is an excellent start that the City's GHG reduction targets appear prominently in the introduction to the Official Plan. In order to ensure that the City reaches these targets, policy objectives for the community in the buildings and transportation sectors, which are the primary sources of emissions, need to be more clearly defined.

While we commend the creation of a high-performance buildings standard for new buildings larger than 12 units, there should also be a mechanism to measure and encourage energy efficiency measures at a smaller scale. Retrofits and repurposing of existing buildings are far more efficient from an embodied energy perspective, and often more affordable than demolishing existing housing stock and building from scratch. The diversity of housing options should include energy efficient and net zero dwellings for all income categories, which would be facilitated by targets per transect.

From a climate change perspective, we would also like to see policy support for practices that increase biodiversity and resilience on both public and private property. The city has experimented with leaving some naturalized areas in parks to support pollinators. These efforts could be scaled up in parks across the city and integrated with landscaping and maintenance along the road allowance where possible to plant or protect native species.

By acknowledging the importance of urban greening efforts including wild yards and local food self reliance (residential food gardens, expanding community gardens, beekeeping, small edible-fruit orchards), we can better align bylaws and incentives to support these efforts. While the Official Plan does refer to biodiversity in [Climate Change](#) and Natural Heritage sections, it can actively work toward these objectives by calling out species diversity, native plantings, and habitat connectivity as explicit objectives.

Existing neighbourhoods should remain whole and distinct

Transects

Transects, in concert with overlays and secondary plans, provide a simplified and coherent framework for city planning that will guide and locate intensification across the city in ways that meet council's objectives. Moving forward with this simplified approach, while ensuring neighbourhoods are able to remain both distinct and cohesive, will be a challenge of the new OP; one that will be, in part, dealt with through the attendant comprehensive zoning bylaw review and the potential formation of new secondary plans.

One way to better address this challenge in the draft OP, however, is to change the proposed boundaries of transects to not divide existing neighbourhoods. Neighbourhoods like Old Ottawa East in Capital Ward should not be transected by planning policy. In the immediate term, the consequences of 'transection' may not seem grave, but over time a gulf in the built environment on either side of a transect boundary will grow. By extension, the feel and the identity of the neighbourhood will be impacted in ways that could strain the communal fabric.

Currently, the majority of Capital Ward is located within the Inner Urban transect, apart from a portion of Old Ottawa East and the entire Glebe Annex neighbourhood which have both been inexplicably placed within the Downtown transect. These areas are largely residential neighbourhoods, without the kind of transit access that characterizes the Downtown transect, and do not warrant being separated from the broader neighbourhoods of which they form a part.

The one part of Old Ottawa East that is a major transit station area (MTSA) is also classified as part of the downtown transect (despite the majority of the neighbourhood being classified as inner urban). This MTSA will already be subject to a higher level of intensification by dint of it being such an area, and should be subject to the level of intensification deemed appropriate for MTSA's within inner urban neighbourhoods (which, again, is what all of Old Ottawa East should be recognized as).

Ultimately, these areas of the ward are culturally and geographically connected to the rest of the ward and should not be arbitrarily governed by a different set of planning rules. Capital Ward should be entirely located within the Inner Urban transect in order to maintain the coherence of the ward and of the neighbourhoods therein from a planning perspective. Not transecting the Glebe Annex from the Glebe, and parts of Old Ottawa East from itself, will still see the ward subject to an ambitious level of intensification under the proposed rules of the inner urban transect.

Secondary Plans

[Secondary Plans](#) (SPs) are a powerful tool for communities to influence development, and they are arrived at through considerable volunteer efforts and consensus building at a neighbourhood level. The draft OP is right to recognize the importance of SPs by bringing SPs established over the past decade forward as part of the new OP, and ensuring that the SP takes precedence when there is disagreement between it and the OP. It remains unclear, however, whether the latter will be the case, especially in regard to height limits, for SPs yet to be created.

Changes are being made to existing SPs as part of this process, and one kind of change is of particular concern: SP boundaries. The existing boundaries of SPs should be respected in the Official Plan. In Capital Ward, for example, Springhurst Park and Lees Station currently fall under the Old Ottawa East SP and are integral parts of the neighborhood, which would be removed via transect designation and placed into the Central and East Downtown Core SP. Further, the Glebe Annex neighbourhood is not considered as part of downtown in any other planning fora, and it is not included in the Central and East Downtown, or the West Downtown Core, SPs, yet it is being transected from the Glebe as part of this draft OP which suggests it may now be precluded from inclusion in a future neighbourhood level SP.

Overlays

The draft OP raises many questions about how the 'Transforming' and 'Evolving' overlays relate to the concept of the 15-minute neighborhood. With a lack of clarity about what these overlays are and how they function, we are concerned with the statement that the City will support spot rezoning for proposed developments that meet the future objectives of the overlay. From the perspective of transparency, consistency and valuing public input, we should minimize spot rezoning and clearly define objectives from the outset that will be supported by the zoning by-law.

We are also not clear on the logic behind which inner urban areas have a transforming or evolving overlay. It appears that the overarching objective of these overlays is to support rapid densification in the Downtown and Inner Urban transects. Many of the communities in our ward are already functional 15-minute neighborhoods, with relatively small lot sizes and secondary plans (in the case of Old Ottawa East and Bank Street) that support densification along hubs, corridors, and underutilized properties. We question the logic of pushing rapid densification in these existing 15-minute neighborhoods, while supporting gentle densification in areas that are not yet 15-minute neighborhoods. At a minimum, 15-minute neighborhoods need to be mapped and defined so we are working from the same baseline assumptions.

Corridors

Section 5 of the Official Plan specifies that in the Inner Urban Transect, the Mainstreet Corridor sub-designation permits heights up to 9-storeys "except where a secondary plan or area-specific policy specifies *greater* heights" (emphasis added). This would seem to imply that in cases where secondary plans or area specific policies specify lesser heights, the Official Plan would take precedence. However, staff have clarified in subsequent discussions that this is not the case, and for example, the 6-storey limit along Main Street in Old Ottawa East would apply.

We need clarity about whether this is the case because existing secondary plans are grandfathered into the process, but it is unclear if new secondary plans will take precedence in terms of height limits. While 9 storeys along Main Street corridors is appropriate in some cases as an effective way to achieve density targets, in other cases the desired objectives can be achieved with 6 storeys. Community context is an important element of these decisions, which can best be considered through secondary plans or area specific policies arrived at through consensus and consultation.

Special Districts

Designating Lansdowne Park, and other districts of the city of translocal significance, makes sense as these areas are unique and warrant particular treatment under planning rules. Indeed, we welcome the designation of Lansdowne Park as a special district, but we are concerned that the wording in the draft OP appears to elevate commercial and sporting elements of the site over and above its significance and functions as an urban park and communal hub. Lansdowne offers opportunities in terms of public space to build community through elements such as the farmer's market, skate park, and augmenting the urban tree canopy. These elements should be highlighted along with the more commercial aspects of the site.

Moreover, the draft OP should speak further to the need for special districts, like Lansdowne, to be integrated into the surrounding neighbourhood via accessible active transportation networks. Both commercial and public elements of Lansdowne rely heavily on local traffic, and on buy-in from the surrounding community, for success. In short, planning rules for special districts need to ensure that special districts can both build on what gives them their translocal significance, and on what allows them to still be local to those that call them home.

Sustainable transportation must be better prioritized

Mode shift targets

While the Draft Official Plan speaks to improving the transportation network to support a car-free or car-light lifestyle, it stops short of setting mode shift targets for active transportation. The [5 Big Moves document](#) referenced a modest goal of transitioning 'more than half' of trips to sustainable transportation, from the 55% of trips were made by private vehicle in 2016. We can, and need to, do better than a 5% increase. In order to meet our GHG emission reduction goals, ensure transportation equity, and build a city with good quality of life for children, older adults, and other vulnerable users, the Official Plan must provide a clearer policy direction to support walkable, bikeable communities.

The [Transportation Master Plan](#), which has now been substantially delayed, will map out the details of this transition. Concrete policies that would support a mode share shift to active transportation include committing a portion of the annual budget to build and maintain active transportation infrastructure commensurate to a target outlined in the Official Plan. In order to prioritize people who walk, cycle, roll, and use transit within urban areas and villages, the Official Plan must create the scope for the next Transportation Master Plan to discourage motorized traffic through eliminating parking minimums, filtered permeability, and congestion pricing, as well providing active transportation linkages around rapid transit stations.

Alta Vista Transportation Corridor

The Alta Vista Transportation Corridor appears in schedule C4 of the Draft Official Plan as a future arterial - a dotted red line cutting through the communities of Elmvale, Canterbury, Riverview, Altavista, and Old Ottawa East. While procedurally the decision on this proposed four lane freeway has been deferred to the new Transportation Master Plan, it is out of step with our larger policy objectives on climate change, 15-minute neighborhoods, and investments in transit and intensification downtown. We would like the Alta Vista Transportation Corridor removed from the Official Plan and the Transportation Master plan. At a minimum, we could support an approach that would limit a future corridor to transit and that would stop it from going over the river by ending it at Hurdman station.

Urban Boundary Expansion

The preliminary decision at the joint committee meeting last year to expand the urban boundary will support a decentralized pattern of land use planning that will increase total vehicle kilometers traveled. Expanding infrastructure to undeveloped areas has huge financial and environmental cost, that will ultimately be passed on to residents in the form of higher taxes. The greenhouse gas emissions generated by a suburban pattern of development run counter to the net-zero targets outlined in the Climate Change Master Plan, as well as encroaching on green space which provides important ecological services.

This decision will not be finalized until the September vote at Council, which means there is still room to reverse the decision. As it stands, the direction to expand the urban boundary will fundamentally transform Ottawa's ecological footprint and land use patterns. Retaining the urban boundary at its current size would be the most important step we could take as a city to prioritize sustainable transit, our climate targets, and prudent fiscal decision making.

Democratic control over our built environment should be enhanced and expanded

Site Plan Control

Site Plan Control (SPC) applications often represent the only mechanism through which community members can intervene in and influence a local development. Indeed, for development applications that do not require a zoning or official plan amendment, the site plan agreement is the only way to ensure a public hearing at the city's Planning Committee. The authority to approve SPC applications is delegated to planning staff, but this delegated authority can be 'pulled' by the ward councillor, thus giving community members a chance to be heard at committee and giving developers a reason to listen.

Unfortunately, the ability for ward councillors to pull delegated authority on low-rise buildings was already hemmed in two years ago through a significant shortening of the timeframe within which a councillor could exercise this prerogative (rendering the prerogative virtually unusable). Proposed reductions in Site Plan Control in the draft OP for low-rise buildings, therefore, would be a further blow to democratic oversight in the planning process.

Further reductions may incentivize development, making the planning process more efficient for developers, but this will come at the expense of residents, who rely on SPC, namely its withholding of deposited fees and site inspection requirements, to ensure exterior works are completed as proposed and permitted. This can be absolutely crucial as many of the most problematic elements of a new development, namely those that negatively impact neighbours, are considerations of site plan: landscaping, tree preservation, location of air conditioner condenser units, placement of outdoor waste containers and storage, location of bicycle and car parking, and more.

Democratic oversight of these details, and the enforceability of the attendant plans, are crucial to ensuring that intensification is taking place in a way that does not negatively impact the ability of existing residents to enjoy their home and neighbourhood. The existence of a SPC application process gives community members more of a say, and developers more of a reason to listen. When developers depart from their approved plans for the site, which they often do, enforcement of the SPC agreement can be the only means of enforcement available.

Community Planning Permits

Another much touted step toward efficiency and flexibility (for developers) in the draft OP is the introduction of Community Planning Permits (CPPs). According to the draft OP, these permits aim to make the development process quicker and easier for developers by providing one application in situations that might “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.”

A recent staff memo adds that a CPP bylaw will replace “secondary plans, community design plans, the Zoning By-law, the Site Plan Control By-law and Site Plan Standard Agreement and various design guidelines.” The memo goes on to note that CPPs will be “subject to a shorter 45-day planning approval period with appeal rights limited to the applicant and to the municipality.” This streamlined and less ‘bureaucratic’ process apparently offers stakeholders more predictable outcomes by factoring in their input at the outset as part of stakeholder consultations that are expected to result in “consensus on a shared vision” for a developable area.

There are several red flags with this proposal as it is currently articulated. First, it is unclear how consensus will necessarily be achieved by a diverse stakeholder’s group, especially one that includes both residents and developers. Some disagreements are legitimate and unresolvable, especially between groups whose interests can be fundamentally at odds with one another, and so consensus on vision should not necessarily be an expected outcome. Given this is the case, the City should be planning for residents to have the greatest say as part of any community planning process.

Second, Community Design Plans (CDPs) and Secondary Plans (SPs) are already a way for communities to have a say over what they want their built environment to look at from the outset. It is unclear how CPPs will better achieve this objective. This is not to say that CDPs and SPs achieve this objective well, indeed they very often do not. Yet CPPs seem more likely to do

a worse job at this than a better one given shortened timelines and fewer citizen engagement opportunities throughout the process.

Third, many of the most important details that are sorted out between community members, developers, and the ward councillor, fall outside of shaping an area-wide envelope that development is to occur within: there are site specific details that require site planning processes to identify and resolve. Sometimes there are details and opportunities that only become apparent when residents and the ward councillor's office are scrutinizing specific applications at that stage of planning.

In short, the so-called flexibility and efficiency of the CPP process seems like it may come at the expense of democratic participation and regulatory oversight, which is true of so many things dubbed efficient and flexible in this era of governance. We should not be prioritizing efficiency and flexibility for developers and the planning department over the public's ability to democratically shape their built environment.

An iterative approach

While citizens have participated in the new OP planning process in unprecedented numbers, they have consistently raised concerns about the timelines and the process. The draft OP is a dense, technical document and many residents found it challenging to navigate, especially at a time when schedules are disrupted. The release of the finalized draft plan in the summer months, when many are on vacation or otherwise tuned out, does not allow for sufficient participation before the final Council vote in September. A statement from the Federation of Community Associations noted these concerns and asked to delay a vote.⁴ We support this ask. The Official Plan, after all, does not belong to City Council, or to city staff; it belongs to all of us.

Another factor we must consider is how COVID-19 affects long range planning. The pandemic has dramatically altered our traffic patterns, living needs, and work lives. While many of these changes may be temporary, others will have lasting implications and precipitate larger shifts in society. The new Official Plan needs to more thoroughly consider these shifts, changes and implications, which are to a large extent are still revealing themselves.

For these reasons, we support the iterative approach to completing the Official Plan proposed by C3, a group of local residents concerned with liveability and climate action within the City of Ottawa. This strategy would have the city complete the mandatory aspects of the plan required by the Province by 2022, including outlining the main policies and identifying land for growth over the next 25 years.

In this two-phased approach, the policy skeleton for the master plan would then be fleshed out over the next five years with a greater ability for public consultation and deliberation. Policies like 15-minute neighborhoods, rental replacement rules, and the energy transition are transformative aspects of the Official Plan that deserve to be better integrated and operationalized. Phase II of the Official Plan would focus on implementation and monitoring, by

⁴ Other organizational submissions have highlighted this as well.

outlining that pathway for tools like how the [High-Performance Development Standards](#) deliver on our climate change commitments and specifying how inclusionary zoning feeds into the [10-Year Housing and Homelessness Plan](#).

Conclusion

Overall, this draft OP has a great deal of positive aspects. In no uncertain terms it represents a significant step forward for the city towards a healthier, better connected, less car-centric, more environmentally sustainable, and less unaffordable city than it would otherwise be under the existing OP.

Several of these positive aspects have been highlighted here, but there are many others that go unmentioned. The draft OP has its champions, and they will ensure its merits are highlighted in full. We, too, would like to champion our city's next OP, but the high-level principles we outlined at the outset of this document, and fleshed out herein, must be better reflected in order for us to do so in earnest. Again, those principles are:

- Ottawa should be a place where anyone can live
- All neighbourhoods in Ottawa should benefit from equitable access to greenspace and other public amenities
- Existing neighbourhoods should remain whole and distinct
- Sustainable transportation must be better prioritized
- Democratic control over our built environment should be enhanced and expanded

A foundational flaw of this draft OP—a flaw that underpins many of the others outlined here—is a planning culture at odds with democratic participation and control. Of course, planning staff are credible, capable and commendable experts of planning. Their work is essential to our city and cannot be replaced. However, residents are also experts in how their built environment affects their lives and wellbeing; they are experts in what makes their neighbourhood a good or bad place to live. Their democratic representatives, too, should be expected to be able to give voice to this communal expertise in a way that meaningfully impacts the planning and development process.

Giving residents greater control over their built environment is inherently beneficial. Indeed, lacking a sense of control over one's environment is a major source of stress. This environmental stressor fuels urban alienation which can not only undermine the ability of those who live in a city from enjoying it, but from being able to flourish as an urban resident.

Our built environment—what it looks like, its shape, configuration, and often its functions, are factors largely determined by the private sector. The public sector facilitates private investment in, and development of, our built environment by providing the necessary services and infrastructure for profitable development to take place, and by providing a set of rules that establishes the boundaries within which these developments take shape. This latter piece happens primarily through zoning by-law and the city's OP.

These rules are largely crafted by city staff with some consultative input from residents. The majority of residents, however, tend not to participate in the city's consultative efforts, and the

residents that do often report that they do not see their input reflected in post-consultation outcomes. Furthermore, established planning rules have a tendency to be re-written or otherwise modified by developers on a lot-by-lot basis across the city through zoning and official plan amendments. This has fueled cynicism amongst residents, leading many to suspect that their city is in reality privately planned.

Our new OP could help combat that cynicism and the reality underpinning it. It can start by reflecting the copious and unprecedented amounts of feedback received since the initial draft OP was released. In addition, our new OP should be moving beyond the minor consultative influence of residents (not mitigating it) to an iterative process and to a planning culture that prioritizes more democratic, deliberative and representative avenues for residents to control and otherwise shape the built environments that they live in. By enhancing and expanding the influence of residents over their built environment, we could achieve more ambitious planning policies, including OPs that envision an even more liveable, sustainable, and affordable city for everyone.