Comment on

Draft New Official Plan, released November 20, 2020

by Erwin Dreessen 12 February 2021

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General comments

1. At one time, the expectation was created and welcomed that the next Official Pan would be high-level, succinct and non-ambiguous. With this 263-page document, excluding Schedules, Annexes and Volume 2, that hope is now dashed. I can testify that it is not an easy read and I know that my experience is widely shared. Yet the seeds of the hoped-for succinct document are there, in the "What We Want To Achieve" boxes on the first page of every section. The text in these boxes, which is identical to the titles of the subsections that follow, is the best part of the Plan, a significant format improvement over the 2003 Plan and its successors.

2. One would expect the City to make access to a document as complex as this as easy as possible but that hope as well was dashed. Upon my and others' insistence, seven (7) copies were deposited at the Ottawa Public Library. When a waiting list quickly formed, five (5) more copies were deposited; there was still a waiting list and there is of course no telling how many citizens, seeing this and the deadline for comments, simply did not put their name on the list. In addition, the OPL has been extremely sluggish getting copies in the hands of users who put a hold on one.

If a citizen were to have what was deposited in the Library (the main text, all Schedules and all Annexes) printed by a local service, she would have to spend about $80. (Naturally, some would skimp especially on all the maps, which are the bigger part of the cost, but they'd end up with less than full information about the proposed Plan.) How much would it have cost the City to make printed copies more readily available? For example, they could have sent two to each community association and other civic groups. Electronic versions are excellent for certain purposes (such as searching) but poor substitutes for paper if one wants to engage fully with a document of this complexity.

3. As if recognizing that complexity, the City created twenty-one one-pagers, along with feedback forms with a highly selective list of policies or statements about which one is invited to express one's degree of support. (It is not evident why these policies were selected and not others, and whether the selection carries any significance.) This amounts to massaging the public's input which, to me, is illegitimate. The only saving grace is that under each topic one has an opportunity to enter any other comments. In any case, I refuse to participate in this process.

4. Volume 2-A-B-C was not part of the OPL deposit. This is another vast amount of text. I have examined what has become of the Secondary Plan of Centretown (where I live) and found various significant changes in the proposed new version even though it was presented to us as "basically the same." I have conveyed my findings to staff (Alain Miguelez) and await their rationale for these changes. My unhappiness with this process goes much deeper, however. In an op-ed published in the *Ottawa Citizen* of August 12-13, 2019 I demonstrated how planning staff had recently taken to unilaterally change Secondary Plans without the communities' concurrence. This after frequently

having ignored SPs altogether until the Ontario Municipal Board (in the 2013-14 case of 335 Roosevelt) reminded the City that they are law. I wrote then that overriding the SPs without consent amounted to a breach of social contract. Sadly, it is now evident that this breach has been extended city-wide. It spells the end of community planning in this city – an ominous development that cuts deep into the civic fabric.

One would think that courtesy alone would have caused the City, on November 20, 2020, to contact each of the Community Associations affected, explain what was done and why, and ask for their feedback. But that does not seem to be how planning staff thinks. They appear much more comfortable with just releasing their version and avoiding dialogue.

To my mind, this is an illegitimate planning process. Planning without buy-in (if not initiative) from the people affected is bound to alienate and, in the end, risks defeating the purpose. This is particularly a danger with this Plan which proposes very significant (and, to my mind, desirable) changes in urban form. Previous intensification in Ottawa has left many citizens unhappy because they have felt powerless and have suffered all the negatives without any benefits. I see nothing in this Plan that will turn people's attitudes around because everything is cooked up by City Hall without engagement by residents in their neighbourhoods.

As with previous processes of this kind, it started out well, with a 40-member Sounding Board consisting of a cross-section of stakeholders. But the pre-November 20 transect-specific sessions were essentially one-way presentations. Where is the dialogue? To be fair, with the Council-approved timeline there is little staff could do but steam ahead. This process is as much a failure of political leadership as it is the result of an autocratic culture among planning staff.

5. Good planning would start with looking back to see what was accomplished with the previous Plan – what worked, what didn't. There is no evidence of any effort in that regard. Nor is there anything in this Plan about monitoring of the results, except for one paragraph (on page 12) that says how important monitoring is. Without a monitoring plan, and employment of metrics throughout, expect again failure to look back ten years hence, when this Plan is up for comprehensive review.

6. A key “new idea” in this Plan is that of 15-minute neighbourhoods. Unfortunately, there are no firm criteria for qualifying any neighbourhood for the attribute even though there is often (as I will note below) one set of policies if one is in it, another if one is not. Also, in certain parts of the Plan the impression is created that 15-minute neighbourhoods qualify as such based on what is available in Hubs and Corridors. Other parts (again, see below) explicitly contradict this, as they should. Whatever 15-minute neighbourhoods are, they certainly are not appendices to Hubs, at least not exclusively.

This fuzziness suggests that planning staff's conceptualization and data analysis of 15-minute neighbourhoods is not yet mature. Again, if only they would listen to neighbours they might learn what matters and what qualifies. (I'm aware of the online survey that was held on this topic but I have not seen the results. Online surveys are in any case an inferior means of gathering opinion.)

7. Another “new” concept in this Plan is that of Transects. Having examined the material before me, I am not convinced that it is a helpful or even legitimate innovation. Helpful? Building heights, for example, are more alike than they are different (see Table 7). Legitimate? It is not evident why Suburbs should contribute less to Ottawa becoming a denser city, just because they're newer. So, as with Outer

Urban sections now, 30 years from now we'll be correcting our mistakes in the Suburbs? Why not build 15-minute neighbourhoods now, everywhere?

8. Powering 'regeneration' are the Evolving and especially the Transforming Built Form Overlays. If these policies are followed through in the Zoning By-law then they amount to very specific direction and control. This raises the question how the areas receiving these Overlays were identified. I found no criteria (vague assertions don't qualify) or information about process and doubt that the residents affected were asked. Is the City of Ottawa now governed by the gut feelings of planners?

9. Many policies amount to instructions for a revised Zoning By-law. There is some reference to a built-form model rather than allowed use, but no clear articulation and no determined plan to, for example, apply the alternative philosophy in a particular neighbourhood as a pilot project.

Most often the instructions for zoning include the word “generally.” What is a drafter to do with that?

A report to the Planning Committee meeting of January 27, 2021 proposes a workplan for development of the new zoning by-law. A final draft would reach Council in Q4 2024, with a "Major Changes (Big Moves & Quick Hits)" report to be submitted in Q4 2021. It is heartening that at least to some extent zoning changes are seen as urgent if this Plan is adopted. Better yet would have been to work and consult on new zoning provisions in parallel with the development of this Plan. Working in parallel could have been a mutually informative process for drafters as well as the public.

Over the past decade, community members, developers and staff have spent thousands of hours on zoning rules governing infill development -- the "Mature Neighbourhoods Overlay" and "Alternative Zoning Standards for Urban Residential Neighbourhoods," a.k.a as Infill I and II respectively. To quote from a staff report, "The purpose of these rules is to limit building height and mass, consider privacy issues, sun obstruction, loss of permeable surfaces and soft vegetation and allow for new dwellings and additions to existing dwellings that fit into their neighbourhoods in these respects. ... The intent of these two zoning by-laws is to capture what is meant by the term ‘character’ in zoning terms and to mitigate land use impacts that may be experienced when new dwellings and additions are introduced into existing residential neighbourhoods." These by-laws appear to be working well and promise to be a bulwark against the loss of trees and other greenspace in our neighbourhoods. Yet, there is no reference to these zoning rules in the draft Plan and it is not clear whether the Plan's zoning instructions are consistent with them. This needs to be clarified.

10. Good planning would see Master Plans updated in parallel with this new Official Plan. The pandemic has made the Transportation update difficult; it is even doubtful whether an Origin/Destination study can be meaningfully undertaken this Fall as is now planned. This circumstance should be enough to delay this OP process by two years. Doing so would as yet give an opportunity to start a meaningful dialogue with the citizenry, including with mayor and councillors over an election.

11. This draft Plan refers to policies on Future Neighbourhoods and Future Neighbourhood Overlays applicable to the Schedules B. However, no Overlays are shown (even though these policies apply to any greenfield development, even if already within the urban boundary). Nor could they be shown in full because a report on lands to be included in an expansion of the urban boundary did not

come to the joint committee on planning and rural affairs until late January (ACS2021-PIE-EDP-0001). It was, with major changes, approved by Council on February 10. Sheer courtesy should have led the City, on releasing the draft Plan, to make note of this circumstance. An explanatory note on the Schedules would also not have been out of place.

12. I conclude by conveying a comment one of the wisest and most engaged members of the community made to me and others last December and to which I fully subscribe:

> *If we are to have nuanced, context-sensitive, area-specific zoning as a basis for developing diverse 15-Minute Neighbourhoods, centralized decision-makers cannot possibly know as well what is needed as those who have knowledge as engaged residents with the lived-experience of their own neighbourhoods. One of our largest concerns should be that the City has yet to demonstrate a full commitment to the kind of governance model and related processes needed to make the next Official Plan a success.*

Specific Comments

TABLE OF CONTENTS

a. Consider reversing the order of Sections 5 (Transects) and 6 (Designations) as that would make for a more logical flow.

b. Throughout the document are many, many references to other City documents – master plans, guidelines, etc. I would suggest that there be an Annex listing each of these documents, where they are referenced in the Plan (section and page), and with a hotlink to where they can be found on the City's web site. A partial list:

Slope Stability Guideline | Groundwater Management Strategy | Source Protection Plan policies | Safe Systems Approach to mobility | Neighbourhood Equity Index | Zibi Master Plan | High-performance Development Standard | MMLOS Guidelines | TMP | IMP | Road Safety Action plan | Active Transportation Plan | Transit-oriented Development Guidelines | TIA Guidelines | Greenspace Master Plan | Wet Weather Infrastructure Management Strategy | Comprehensive Asset Management Strategy | Environmental Impact Study Guidelines

c. Another Annex should list all the Urban Natural Features (and their numbers should be marked on Schedule C10).

d. There should be a List of Tables, page-referenced.

e. There is no bibliography. What reading has inspired the planners? (I find one reference in a footnote to an illustration on page 15.)

SECTION 1 - INTRODUCTION

p. 8 – 1.2 Role of the Official Plan

a. It is strange that in this high-level context the Infrastructure Master Plan is not mentioned.

p. 9 - 4th bullet: "In general, where there are inconsistencies in policies between this Plan and secondary plans or area-specific policies, those policies contained in secondary plans and area-specific policies take precedence;"

a. To my knowledge there is only one exception in the current Plan where Secondary Plans trump Volume 1 (namely with regard to building heights); the general rule currently is that SPs are subsidiary to the Main Plan. That reversal is now proposed to be the new general policy. The more reason to tread far more carefully with SPs than is being done in the current exercise (ref. comment #4 above).

SECTION 2 - STRATEGIC DIRECTIONS

p. 19 - 2) Provide housing options for larger households

Much of the demand for new housing is expected to be for ground-oriented units, such as single- detached, semi-detached, rowhouse dwellings, and new forms not yet developed. However, opportunities to provide for these dwelling types are limited within areas that are already developed. There needs to be opportunities within 15-minute neighbourhoods to build larger dwelling units with enough floor space to accommodate larger households within buildings typologies that increase densities on existing lots. This will provide more choices for housing with three or more bedrooms within the developed built-up portions of the urban area. Smaller dwelling units in the form of one- and two-bedroom apartments will continue to be located adjacent to transit stations, within commercial clusters, and along corridors with transit stops and commercial services. Section 4.2 describes our policies for housing affordability.

a. This paragraph is rather incoherent and makes unnecessary assumptions about where large vs. small dwelling units are to be found. More of that is evident on pages 49 and 50 -- see below.

b. A little slip: "**...our policies...**"

p. 19-20 - 3) Improve public amenities and services within 15-minute neighbourhoods

a. This long list of what the City "**will**" do raises the question how it will go about realizing these lofty intentions, especially:

- **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;**
- **Require a greater proportion of housing with three or more bedrooms that will provide more housing choices for the projected population;**

Will it refuse applications that do not conform to these wishes? Do City planners know the market better than developers?

p. 20 - "Do you want to know where..."

a. To this reader, the block at the end of this and every other section, introducing an icon and a sample of policies in various sections, serves no purpose. If other policies are referenced, the list should be complete and hotlinked to the particular section. Seeing the icons spread throughout the document did not help me putting the policy in context and comes across as simply a gimmick.

pp. 23-24 - 6) Support growth of important economic generators through Special District Policies.

a. It is odd to see the idea of "growth" associated with several of these Special Districts, including Parliament, Lansdowne and the Ottawa River Islands. Where is the growth beyond what's already there or approved?

p. 26 - 2.2.3 ... Climate change is the greatest global threat in the 21st Century according to the World Health Organization.

a. It is odd, and comes across as amateurish, to see a section on "Energy and Climate Change" begin with a reference to the WHO.

p. 28 - sub 6) Build resilience to future flood risks: Avoiding building in flood plains and mitigating risks in areas vulnerable to flooding

under f uture climate conditions

a. Surely "**Avoiding**" should read "Prohibiting"?

SECTION 3 - GROWTH MANAGEMENT FRAMEWORK

p. 43 - Table 1

a. There is no scale to these graphics.

p. 44 - 2nd bullet: To provide a transportation network that prioritizes sustainable modes over private vehicles, based on the opportunities for mode shifts presented by each Transect area context; and
4th bullet: To reduce greenhouse gas emissions in the development and building sectors and in the transportation network;

a. As Daniel Buckles has pointed out in his op-ed published in the *Ottawa Citizen* of January 6-7, 2021, there is precious little in this Plan that implements this policy intent, despite major opportunities such as devoting more of the right-of-way to active transport modes and providing incentives for retrofitting buildings.

p. 44 - 4) The City will allocate household growth targets as follows:
a) 47 per cent within the urban area that is built-up or developed as of July 1, 2018;

b) 46 per cent within the greenfield portion of the urban area;

c) 5 per cent within the villages of the rural area; and

d) 2 per cent outside of villages in the rural area.

The boundaries establishing the urban areas and the villages are designated on Schedule A1 and Schedules B1 through B7.

a. As suggested in comment #11 above, an explanatory note to Schedules A1 and B1-7 to the effect that they will be revised in light of Council's decision regarding lands suitable for urban expansion, would have been a user-friendly gesture (ref. ACS2021-PIE-EDP-0001).

b. Are the to be mapped expansion lands included in the 46% under b) above?

c. 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? I will note below (*re* p. 208) that the policy proposal on CLEs is unclear.

pp. 45-46 - Designate Sufficient Land for Growth - policies 5) and 6)

a. I fully support these policies, except for
5) i) That new village lands prioritize locations ... where connections to municipal water and wastewater services already exist or can be efficiently provided;
Wellwater and, if the lot is at least 0.4 ha, private wastewater service should be acceptable as well.

p. 46 - Support Regeneration: "The target amount of dwelling growth to occur through regeneration is 51 per cent... "

a. How does that 51% relate to the 47% mentioned on page 44?

p. 47 - 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.

a. The view that such facilities should be built primarily within Hubs and Corridors seems

unjustified. Other parts of the city may be just as suitable.

p. 48 - 1) The majority of residential regeneration shall be located in 15-minute neighbourhoods, which are comprised of Hubs, Corridors, and adjacent 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 services that are accessible to adjacent Neighbourhood designations on a daily and weekly basis.

a. This is an example of the confusion apparently in planners' minds about the nature of 15-minute neighbourhoods which I alluded to in comment #6 above. A glance at the Schedules makes clear that, if 15-minute neighbourhoods would have to always depend on services and amenities available in Hubs and Corridors, then there would be many neighbourhoods that would never make it! That such a link is necessary is of course invalid. Other policies in the Plan (see comments "h" for page 170 and "a" for page 172-3 below) make that clear.

p. 49 - 8) To reduce greenhouse gas emissions through land-use, transportation, and energy planning consistent with Council approved targets, regeneration will be aligned with all of the following principles:
a) Alignment with local energy utilities to ensure that necessary energy distribution infrastructure can be economically provided;

b) A compact form and an energy efficient development block pattern and mix of land-uses;

c) Maximizing the energy and emission reduction performance as part of the review and approval of new or modifications to existing development; and

d) Increased access to sustainable modes of travel as well as the necessary infrastructure to support the electrification of private and public vehicles.

a. This is all fine but misses some major opportunities to align the Plan with the Council-approved Energy Evolution strategy. Why no support for incentives for deep retrofits of buildings? If Toronto can have two PACE (Property Assessed Clean Energy) programs, why none in Ottawa? (Ref.: *Property Assessed Clean Energy in Canada*, Pembina Institute, June 2020, 31 pp.) How about support for district energy systems? More comprehensive integration with the Energy Evolution report would be very welcome.

p. 49 - 9) b) Large dwellings are units with three or more bedrooms and are typically within ground-oriented built forms.

a. What do the planners have against large apartments?

p. 49 - 10) The residential growth allocation by dwelling sizes and designation as shown on Schedules B1 through B7 <u>in 15-minute neighbourhoods</u> are established in Table 2. (underlining added)

a. So that allocation applies only to 15-minute neighbourhoods, not to others? That implies that 15-minute neighbourhoods are identified, which is clearly not the case. (Ref. comment #6 above.)

p. 50 - Table 3 - Minimum Residential Density and Large Dwelling Requirements

a. The minimum density requirements set out in this Table, which would apply to 15-minute Neighbourhoods close to Hubs and Corridors in three Transects (why not in Suburbs?) seem very high, with no apparent maximum. The densest Prefecture in Tokyo, Toshima, has a density of 114 dwellings per hectare (my back-of-the-envelope estimate).

b. Where is it specified to which Hubs or Corridors the lower vs. the higher minimum would apply?

c. Average density in urban Ottawa is 13 dwellings per net hectare (again, my estimate). That makes a jump to 40 or 80 in a Neighbourhood quite substantial! These numbers need to be made real by providing examples of what this would mean in actual neighbourhoods. Visuals such as by the Design Centre for Sustainability at UBC would be helpful.

d. More generally, the public should be provided with methodology and results of the City's modeling of increased densities, demonstrating that they are needed to achieve the overall objective of accommodating population growth to 2046 within the land constraint.

e. The minimum Large Dwelling requirements in this Table leave one baffled: Not only is there no requirement for the Suburbs (again, why not?), but requiring 25 to 50% in all Downtown, and Inner and Outer Urban Neighbourhoods "**within a 15-minute walk to a Hub or Corridor**" to be large dwellings seems beyond reason. On the other hand, with a mere 5% allocation large families may have trouble finding shelter in a Hub itself; that too makes little sense.

f. In these as in other policies the question often arises how various requirements are to be enforced or targets achieved. Will development applications be denied until the "quota" for large dwellings is filled? The City would soon find itself before LPAT if not the Courts.

g. There is a sense here as in many other policies that they are overly prescriptive and in any case are beyond the City's control. Clarification of what levers the planners see available to implement certain policies would be welcome.

p. 50 - 15) An amendment or minor variance to the Zoning By-law shall be required for any increase in height within the height categories, provided the proposed increase is in the same height category. An increase in height to permit a building in a taller height category requires an amendment to this Plan or Secondary Plan where applicable in addition to the amendment to the Zoning By-law.

a. Other than in Annex 2B (for the Central Area), where are these height categories mapped?

p. 51 - 18) To implement the minimum density requirements within 15-minute neighbourhoods, the City shall 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.

a. This policy is clear as mud.

p. 51 - 19) 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.

a. Here as elsewhere there is a dire need for expressing "15 minutes" in terms of a physical distance equivalent.

p. 51 - 3.3 Design new communities to be 15-minute neighbourhoods

a. The policies in this section refer to a "**Future Neighbourhood Overlay on Schedule B**" and "**new neighbourhoods as shown on Schedules B5 through B7**" but, as noted in comment #11, none of that can be found in these Schedules.

pp. 52-53 - 3.4 Focus rural growth in villages

1) Most of the village growth shall be directed to the villages of Richmond, Manotick, Greely, and Carp where municipal services exist or are planned.

...
6) Rural Industrial, Freight and Storage areas are intended to be strategic locations for uses that require access to a highway but do not require municipal water and wastewater services, such as freight transfer and outdoor storage. All permitted uses in Section 9.3 are expected to connect to private services.
7) Municipal water and wastewater services are not intended to extend into the rural area outside of villages. Exceptions are provided for in Section 4.7.2
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:

a) The new location abuts a village boundary;

b) Development shall be serviced by adequate water quality and quantity and shall not adversely affect the water and wastewater systems of nearby development;
c) The subdivision in the former location is formally de-registered at the Land Registry Office prior to the registration of the subdivision in the new location;

d) The lands in the former location are rezoned to prohibit residential development prior to the registration of the subdivision in the new location, and such rezoning may be concurrent with the rezoning for the new location;
e) New development shall comply with the Provincial minimum distance separation formulae, in accordance with provincial regulations, and shall not encroach on the buffer from an urban boundary; and
f) The proposed development is integrated with the abutting village through connected street and pathway networks to ensure contiguous development throughout the village by providing direct and convenient connections and walkable opportunities to village core areas.

a. It is a surprise to find Greely on the list in Policy 1), seeing that this village is largely on private wastewater service; ditto for Carp which uses well water. Or is the City planning to build more big pipes? A peek in the draft Infrastructure Master Plan update would tell.

b. Re Policy 6), is it realistic for a large facility with potentially hundreds of employees to have to depend on private services for water and wastewater?

c. 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.

SECTION 4 - CITY-WIDE POLICIES

p. 58 - 4.1 Mobility

a. A reference for the mentioned "**Safe Systems Approach**" would be welcome.

b. I am more familiar with *Vision Zero* as advocated by the FCA throughout 2017-2019 and would like to see it supported in this Plan.

p. 59 - Table 4

a. The table makes no mention of "***F.N. Future Neighbourhood**" except in a footnote.

p. 64-65 - [4.1.3 Support growth management and a greener and more resilient city]

a. These policies are supported, in particular:

9) The City shall support wildlife crossings where:

a) City freeways and arterials cross through the natural heritage system; or

b) Studies have identified an elevated risk of hazardous wildlife collisions or elevated mortality of species at risk.

p. 66 - 2) The City shall manage the supply of parking to minimize and to gradually reduce the total land area in the city consumed to surface parking. Minimum parking requirements may be reduced or eliminated, and maximum parking limits may be intro all the following locations:

a) Hubs and Corridors; and

b) Within a 600 m radius or 800 m walking distance, whichever is greatest, to existing or planned rapid transit stations; and

c) Within a 300 m radius or 400 m walking distance, whichever is greatest, to existing or planned street transit stops along a transit priority corridor; and

d) Other areas determined by Council.

...

4) The Zoning By-law shall determine electric vehicle equipment requirements where private parking is provided for larger-scale mixed-use, mid-rise and high-rise residential, office and industrial developments.

a. Policy 2) is an example of a policy that leaves so much discretion to the planners/Council that no certainty is created -- a significant failure of policy making.

b. Policy 4) fails to provide any direction to the drafters of the Zoning By-law -- not definitional ("**larger-scale**") nor functional (what is the basis for the **requirements**?)

p. 67 - 10) Large areas of surface parking are to be designed to meet all of the following:

...

f) Review the feasibility of incorporating low impact development measures for stormwater management;

g) Encourage the provision of electric vehicle charging spaces; and"

a. It would be difficult to write policies weaker than these. "**Review the feasibility**" when LID measures are well known and have proven efficacy? Is "**Encourage**" the best this Plan can do in support of the Climate Change emergency?

p. 68 - 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. Where any structural works are to be done as part of the ongoing maintenance of the highway infrastructure, such work shall avoid the demolition of any buildings along Corridors or in Hubs and prioritize methods and approaches that do not demolish any other buildings."

a. This Policy is welcome. Thank you.

p. 69 - 8) This Plan establishes the following goods movement objectives, to be elaborated in the TMP and other associated plans, policies and strategies:

...

e) Minimize the impact of large vehicles by implementing all the following mitigation measures:

i) Identify and protect truck routes including connections for interregional truck travel routes such as highway routes, bridges and other measures; and

ii) Identify and implement alternatives to existing interprovincial truck routes through the Downtown Core.

f) Where truck routes are located on urban streets, implement interim and permanent mitigation measures to improve other modes' safety, with priority to the most vulnerable street users;

a. Nothing in these policies appears to do anything about getting large trucks off Rideau Street.

p. 69 - 1) The City shall protect rights-of-way for the street and road network shown on Schedules C4, C5, C7 and C8 and as listed in detail in Schedule C14.

a. There is no Schedule C14. Perhaps the intended reference is to Annex 10. In the current Plan the Rights-of-Way are in an Annex 1 which is part of the Plan, i.e., law. In this draft <u>all</u> Annexes are said to be outside the Plan. Is that really as intended? It was my understanding that the Rights-of-Way list is an important legal instrument.

p. 70 - 8) The City will not dispose of, sell, or open road allowances that would create new legal access to landlocked parcels in core areas of the natural heritage system, except through an environmental assessment.

a. Why even allow this exception?

p. 70 - 11) Under the provisions of the *Planning Act*, the City may require the dedication of lands for pedestrian or bicycle pathways and road and public transit rights-of-ways as a condition of development approval.

a. Since it's allowed under the *Planning Act*, why is this Policy necessary?

p. 72 - 4.2.1, 1) A diverse range of flexible and context-sensitive housing options in all areas of the City shall be provided through the Zoning By-law, by:

a) Primarily regulating the density, built form, height, massing and design of residential development, rather than regulating through restrictions on building typology;

a. This reads like a halfhearted attempt to introduce form-based zoning -- halfhearted because it says "Primarily" (and I'm guessing that "building typology" refers to the current use-based zoning). What is a zoning by-law drafter to do with "primarily"? Do a bit of both? On what basis? Form-based vs. use-based zoning is a fundamental shift in zoning philosophy. It is odd to see it being introduced in such an ambiguous way. As I suggested in comment #9 above, a pilot project in one or more neighbourhoods may be a more prudent way of proceeding.

p. 76 - 5) The City shall, as a priority measure, implement Inclusionary Zoning as provided by [sections] 16(4) and 35.2 of the *Planning Act*.

a. I very much look forward to seeing inclusionary zoning implemented in Ottawa. Elucidation of basic principles of such zoning would be appropriate in the Official Plan. I note that nothing in sections 16(4) and 35.2 limits the implementation of inclusionary zoning to Protected Major Transit Station Areas.

p. 83 - [4.4.1 Identify park priorities within Ottawa's growth areas]

6) Consistent with Section 4.8, Section 4.9 and Section 7, the following lands and features shall 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.

...

9) Council may consider City-owned properties, including those being considered for disposal, as a location to build a new park. Parking facilities are a notable example.

a. In Policy 6), there should be no discretion for a Department to count the named Natural Heritage Features as part of a developer's parkland dedication. Doing so would give the developer a free ride.

b. In Policy 9), "**may**" should be replaced by "shall." Also, the last sentence does not belong in a

policy statement.

p. 93 - Table 5 - Design Priority Areas

4) The City will establish criteria for the review of projects by the UDRP, which may include different thresholds for review based on the Design Priority Area's tier of priority outlined in Table 5 taking into account the hierarchy in Table 4, and the area's economic role within the region.

a. How does Table 4 (**Road Classification and Function**) on page 59 relate to this Table 5?

p. 96 - Definition of Living Streets

Refers to the seasonal, or temporary reallocation of space within our streets from primarily serving vehicles, to providing a range of amenities that serve people in a manner that supports placemaking and healthy 15-minute neighbourhoods while informing permanent street design.

a. What does "**informing permanent street design**" mean? What is its practical implication?

p. 96 - 6) Public realm investments that support the identified needs of priority neighbourhoods as identified by the City's Neighbourhood Equity Index, including deficiencies in public realm space...

a. Please provide a reference for "**the City's Neighbourhood Equity Index**" and add it to the proposed Annex.

p. 97 - 1) The High-performance Development Standard shall be applied to development and local plans in accordance with the thresholds listed in the Standard. …

...

3) The installation of photovoltaic panels on expansive roof structures, such as large format retail buildings and large-scale institutions and facilities are encouraged. Alternative rooftop designs or interventions that promote climate and energy resiliency such as greenroofs, or rooftop gardens may also be permitted.

a. Please provide a reference for "**High-performance Development Standard**" in Policy 1).

b. Re Policy 3), "**encouraged**" and "**may ... be permitted**" makes for a very weak policy. Ottawa should ask the Province to get the same provision in the *City of Ottawa Act* as is found in the *City of Toronto Act* to give it the authority to require green roofs. The vast roof surface of the new Amazon fulfillment warehouse would have been a prime application.

p. 101 - 7) Low-rise buildings shall be designed to respond to context, Transect area and Overlay policies, and the following objectives, the standards for which shall be set out in the Zoning By-law:

a) 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;

b) Provide porches, stoops or balconies facing the public right-of- way in order to promote social interaction;

c) In the case of infill development, integrate appropriate architecture and materials that complement the surrounding context; and

d) Include functional main entrances on the ground level that face the street.

a. In the first line of this policy, what does "**context**" add to Transect and Overlay policies?

b. In policy c), what is "**appropriate architecture**"? Who is to judge?

c. If the zoning by-law is going to set out standards for each of these objectives, the result would be highly prescriptive. Alternatively, is some sort of points system contemplated?

p. 106 - 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 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 may be considered through an Official Plan amendment and supported by a Master Servicing Study.

a. One wonders under what circumstance 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. 107 - 1) Water and wastewater servicing is vital to health and protection of the environment. The City provides these services in defined Public Service Areas. As illustrated in the Infrastructure Master Plan, the City has a number of Public Service Areas that are comprised of:

a) The central water distribution and sanitary sewage collection systems in the urban area;

b) Public water and/or sanitary sewer services in the Villages of Munster, Carp, Richmond, areas of Greely, Manotick, Carlsbad Springs and Vars;

c) Specific locations in the Greenbelt; and

d) A limited number of locations where services have been provided due to a unique circumstance, such as to remedy a specific health concern.

a. This is not a policy. It's a preamble.

p. 109 - 6) The City shall discourage new development on the basis of partial services, particularly where City water is provided to resolve a groundwater contamination issue.

a. What is the rationale for this direction? And adding "**particularly where...**" muddies the issue further.

p. 112 - 4.8.1 ... Natural Heritage System

3) The City recognizes the following natural heritage features, as defined in Ottawa's Environmental Impact Study Guidelines:

a) Significant wetlands;

b) Habitat for endangered and threatened species;

c) Significant woodlands;

d) Significant valleylands

e) Significant wildlife habitat;

f) Areas of Natural and Scientific Interest;

g) Urban Natural Features;

h) Natural Environment Areas;

i) Natural linkage features and corridors;

j) Groundwater features;

k) Surface water features, including fish habitat;

l) Landform features; and

m) Natural features or natural areas having significant cultural, economic, or historical value to the Algonquin Anishinabe Host Nation, as may be identified in mapping through dialogue and collaboration between the Host Nation and the City.

...

6) Development or site alteration shall 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 of land, and support for voluntary, private land conservation and stewardship.

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.

a. 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. Bravo.

b. Full support for Policy 6).

c. Pleased to see the intent expressed in Policy 7). I look forward to seeing it implemented.

p. 113 - 4.8.2 Provide residents with equitable access to an urban forest canopy

...

2) The City shall pursue an urban forest canopy cover target of 40%.

3) Growth, development, and regeneration shall not compromise the urban forest canopy or its ecosystem services, in accordance with the following:

a) Preserve and provide space for mature, healthy trees on private and public property, including the provision of adequate volumes of high-quality soil;

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;

c) Planning and development decisions, including Committee of Adjustment decisions, shall have regard for short-term, long-term, and cumulative impacts on the urban forest at the neighbourhood and urban-wide scale;

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

e) Planning and development review processes shall 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 also apply to a Community Planning Permit approved through delegated authority or Council.**

a. There can be no "**equitable access**" to a minimum urban canopy without breaking the overall target down to the neighbourhood level -- the only level where it matters. While a 40% minimum is supported by science (and is therefore a welcome improvement over the current Plan's 30% target) even as stated Policy 2) is ambiguous: What is the land base for the 40% goal? It should be the urban area minus the Greenbelt.

b. 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. For practical reasons, the area considered will be determined by data availability. 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).

c. Policy 3) is welcome with the promise that "**Growth, development, and regeneration shall not compromise the urban forest canopy**" but how will this work in practice, especially in light of the "**cumulative impacts**" mentioned in policy 3-c)?

d. While Policy 6) offers authority to avoid tree loss when a zoning amendment is sought, the first sentence is too weak (assuming the Zoning By-law itself does not offer protection for trees). Why would a developer whose project conforms to current zoning be exempt from contributing to the retention of tree cover?

e. Each of the authorities established in Policy 6) are of the "**may**" variety. These should all be "shalls."

p. 114 - 2) In general, and to support health, climate resiliency, accessibility, and gender and social equity, the City shall seek to provide all urban residents with the following minimum access to high quality greenspace:

a) Within a 5-minute safe walking distance (400 metres), a public greenspace providing space for passive or active recreation;

b) Within a 10-minute safe walking distance (800 metres), two green public spaces; and

c) Within a 15-minute trip by transit, a publicly owned Urban Natural Feature or Natural Environment Area.

a. This is a welcome enhancement of the policy in the current Plan (at s. 2.4.5, Policy 8). However, the objective of 4 ha of greenspace per 1000 population (at s. 2.4.5, Policy 5) is missing and should be re-instated.

b. It would be useful to see an analysis of the extent to which these objectives are realized and which neighbourhoods fall short.

p. 115 - 4.9 Water Resources

a. I will never get used to seeing rivers, streams, creeks and wetlands referred to as "**Surface water features.**"

p. 115 - 3) In general, Conservation Authorities will lead the development of watershed plans using Terms of Reference developed in accordance with Council-approved guidance documents.

4) The City shall lead the development of subwatershed plans using Terms of Reference developed in accordance with Council-approved guidance documents.

a. This distribution of tasks seems reasonable but one has to wonder whether, post-Bill 229 and Schedule 6, the CAs will still be able to hold up their part.

p. 116 - 4) Where development or site alteration is proposed ~~in~~ adjacent to headwater drainage features, the proposal and supporting studies must address the following:

a) Evaluation and description of the project site, sensitivity of the headwater drainage features and sampling methods;

b) Assessment and classification of hydrological function, riparian conditions, fish and fish habitat and terrestrial habitat; and

c) Management recommendations regarding the need to protect, conserve, mitigate, maintain recharge or maintain/replicate terrestrial linkages of the headwater drainage features.

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: ...

a. 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.

b. The exceptions specified in Policy 5) are reasonable.

p. 121-2 - 2) Schools should generally co-locate compatible land-uses on-site for a more efficient use of land and promotion of healthy, walkable 15-minute neighbourhoods. The Zoning By-law shall allow school sites to have dual zoning for a variety of complementary land-uses, including: residential; licensed child care facilities; parks; small scale commercial and other community serving uses.

a. It is odd to see "**residential**" and "**small scale commercial**" among the list of complementary uses of school grounds. It would seem inappropriate.

SECTION 5 - TRANSECTS

p. 127 - Table 7 - Minimum and Maximum Height Overview Based on Official Plan Policy

a. As noted in comment #7 above, this summary shows more sameness across transects than there are differences. This becomes clear when one sorts the height specifications by Designation first, and then Transect:

- in Hubs, the maximum is 12 storeys everywhere, the minimum is 3 everywhere, except 1 more downtown where skyscrapers are also allowed;
- along Mainstreet Corridors, the maximum is 12 stories downtown and 9 everywhere else;
- along Minor Corridors, the maximum is 9 downtown, 6 in inner urban and 4 in outer urban and suburban. The minimum is 2 everywhere.
- in Neighbourhoods, the maximum is 4 everywhere. The minimum is 2 downtown and in inner urban, while there is no minimum elsewhere.

b. That said, there are several discrepancies between this summary table and the actual policies:

- section 5.1.4(1) c) says that the minimum downtown is 3 storeys, not 4;
- section 5.4.3 (4) does not mention a minimum along Mainstreet Corridors in the suburbs.
- there are further contradictions regarding heights in neighbourhoods in section 6.3.1 (2) -- refer to my comment on page 170 below.

c. The OP Policy Reference for Inner Urban Minor Corridors should be 5.2.3 (3), not 5.2.4 (3). There is no policy for Inner Urban Neighbourhoods outside 15-Minute Neighbourhoods; the stated 5.2.3 (1) policy refers to Hubs. (See also comment for page 170.)

d. The OP Policy References for Outer Urban and Suburban Neighbourhoods (5.3.4.(1) and 5.4.5. (1) respectively) refer to within 15-Minute Neighbourhoods only.

e. In short, the policies on building heights here and elsewhere in this draft Plan are a muddle.

p. 129 - 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 include:

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;

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;

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;

d) Innovative stormwater management approaches such as low impact development with regeneration to address increased imperviousness; and

e) Alignment with other climate adaptation policies and procedures identified in this Plan.

6) In the Downtown Core, any regeneration shall be required to create no new vehicular private approaches, regardless of the number of lots being created or the number of residential dwellings being developed. In the case of completely new areas or neighbourhoods developed by Plan of Subdivision, each city block shall be planned to minimize the number of vehicular private approaches and combine or share accesses to the greatest extent possible.

a. The measures listed in Policy 5) are all commendable but who is to take them or how they are to be achieved?

b. Development by way of Plan of Subdivision in the Downtown Core as is alluded to in Policy 6) is difficult to imagine.

pp. 130-1 - 5.1.3 Locate the tallest buildings and greatest densities in the Downtown Core

...

2) The Zoning By-law shall set out maximum building heights and appropriate density thresholds within Neighbourhoods that shall allow:

a) Building types that provide for high density development while maintaining a low-rise form from a minimum of two storeys to a maximum of four storeys; and

b) New built forms on collector streets that accommodate additional housing and are of a larger scale, provided those built forms include a mix of complementary non-residential uses, as permitted in Section 6.3.1, Policy 4(b) and (c), and regulate the extent to which large dwelling units shall be integrated to meet the objectives of Section 3.2, Policies 11 through 13 and Table 3.

a. This policy probably deserves the prize for most convoluted and obscure policy in the whole draft. In addition, let's not forget that any Secondary Plan (in this instance Schedule C - Maximum Building Heights of the Secondary Plan for Central and East Downtown Core) trumps the Main Plan. I wish the drafters of the new zoning by-law the best of luck.

p. 131-2 - 5.1.4 Provide direction to the Hubs and Corridors located within the Downtown Transect

1) Maximum and minimum building heights in the Downtown Core where a Hub designation applies, except where a Secondary Plan permits otherwise, are as follows:

a) Up to 400 m walking distance of a rapid transit station, between four and twelve storeys inclusive;

b) Despite (a), greater heights, in accordance with Section 5.1.3, Policy 1 may be considered s ubject to a zoning amendment and a Community Benefits agreement, on:

i) lands that contain or are adjacent to, and within 100 metres walking distance of a rapid-transit station; or

ii) north of Nepean Street.

c) Outside the area described by (a) and (b), not less than three storeys and not more than six storeys; and

d) In order to provide a transition from the Hub to the adjacent built form, despite (c), on lands within and abutting the boundary of the Hub, heights may be restricted to the maximum height permitted by the Zoning By-law on the lands in the abutting designation.

2) The Zoning By-law shall prohibit buildings with only one type of use in Hubs within the Downtown Core Transect, and developments shall be required to co-locate within the same building complementary functions and uses, including but not limited to residential; office; commercial; and institutional.

3) On Downtown Core Mainstreet Corridors, maximum building heights generally up to 12 storeys are permitted subject to appropriate height transitions, stepbacks, and angular planes, except where a secondary plan or area-specific policy specifies greater or lower heights. Where development is proposed on Mainstreet Corridors, all of the following must be met:

a) The podium heights of such buildings should be generally proportionate to the width of the street, consistent with the objectives in the urban design section on mid-rise and high-rise built form in Section 4.6.6(8) and 4.6.6(9);

b) Buildings shall be lower on lots too small to accommodate an appropriate height transition noted in provision a) above; and

c) The height of such buildings may be increased to generally 15 storeys for sites that are within 100 metres walking distance of a rapid transit station.

4) On Downtown Core Minor Corridors, maximum building heights are generally in upper mid-rise range between 7 and 9 storeys, except where a Secondary Plan or area-specific policy permit greater or lower heights and are subject to appropriate height transitions and stepbacks. The height of such buildings:

a) Shall, with respect to the wall heights directly adjacent to a street, be proportionate to the width of the abutting right-of-way, and consistent with the objectives in the urban design section on mid-rise and high-

rise built form in Section 4.6.6(8) and 4.6.6(9);
b) May be limited further on lots too small to accommodate an appropriate height transition; and
c) May be increased to generally 15 storeys within 100 metres walking distance of a rapid transit station.

a. As noted above, the heights set out in Policy 1) c) do not accord with Table 7 (p. 127): 3 to 6 here, 4 to 12 there.

b. The "**may**" in Policy 1) d) introduces uncertainty that the Plan should avoid. On what basis will the height be restricted?

c. Policy 2) is unabashedly prescriptive. Who are planners to set such a requirement? Even in a use-based zoning by-law this is extreme and unnecessary. If Ottawa is moving towards form-based zoning, then there is no place for such a provision at all.

d. The words "**may**" and "**generally**" in Policy 3) c) and 4) c) create uncertainty. If the extra 6 resp. 3 storeys are allowed near transit stations then why not just say so?

p. 132 - 5.1.5 Provide direction to the Neighbourhoods located within the Downtown Core Transect
1) Neighbourhoods located in the Downtown Core and within a 15-Minute Neighbourhood **shall accommodate residential growth to meet the Growth Management Strategy as outlined in Section 3.2, Table 3. The Zoning By-law shall implement the density thresholds in a manner which adheres to the following: ...**

a. Here is an example of a set of policies (a to f) that apply in the Downtown Core IF one is "**within a 15-Minute Neighbourhood**", so presumably not when one is not. But nowhere does the Plan say or map out where these 15-minute neighbourhoods are. Such ambiguity is fatal.

b. The same wording is employed in sections 5.2.4 (Inner Urban), 5.3.4 (Outer Urban) and 5.4.5 (Suburban).

c. Neighbourhoods Downtown, in Inner Urban and in the Suburbs outside 15-minute neighbourhoods are without specific policy. In Outer Urban (p. 142), Neighbourhoods are graciously allowed "**to develop in accordance with the established suburban context as defined in Table 6.**" That Table is found on page 126 and could be summarized as "anything goes," including any height above two storeys.

p. 135 - 3) Motor vehicle parking in the Inner Urban Transect shall be managed as follows:
a) Motor vehicle parking may only be required for large-scale developments, and only to the extent needed to offset sudden large increases in parking demand;

a. There are three sources of vagueness in this brief policy: "**may**" ; "**large-scale developments**" ; and "**needed to offset sudden large increases in parking demand**". "**[L]arge-scale**" is not defined. The source of a "**sudden large increases in parking demand**" is most mysterious.

p. 136-7 - Neighbourhoods located in the Inner Urban Area and within a 15-Minute Neighbourhood shall accommodate residential growth ... that:
...
c) The application, as appropriate, of zoning bylaw development-standards to be applied as one lot for zoning purposes to support missing middle housing; and
...
e) Provides an emphasis on regulating the maximum built form envelope that frames the public right of way rather than unit count or lot configuration; and
f) In appropriate locations, to support the production of missing middle housing, prohibit lower-density typologies.

a. Policies c) and f) do not start with a verb as the others (appropriately) do.

b. Policy f) introduces an undefined term: "**lower-density typologies**".

c. Policy e) hints at built-form zoning but what is a drafter to do with "**Provides an emphasis**"?

p. 141 - 2) Parking in Outer Urban Hubs shall be managed as follows:

a) Minimum parking requirements may be reduced or eliminated; and ...

a. Here is the dreaded "**may**" again. What criteria or factors will be considered when allowing reduction or elimination of parking requirements?

p. 145 - 5.4.3 Provide direction to the Hubs and Corridors located within the Suburban Transect

1) Town Centre Hubs are denoted by the initials TC on Schedules B5, B6 and B7 of this Plan. ...

a. The initials TC do not appear on Schedules B5-7.

p. 146 - 5.4.4 Provide direction for new development in the Suburban Transect

…

2) Net residential densities shall strive to approach the densities of the Inner Urban Transect over time, but Secondary Plans shall plan for a minimum density of 36 units per net hectare and permit density increases through regeneration and accessory dwelling units.

a. So here the Main Plan dictates what shall be in the Secondary Plan, despite the general rule (p. 9) that SPs have precedence! Well, given that SPs are now to be wholly the initiative of the City, I suppose it doesn't matter who has bragging rights because all is in the planners' hands anyway.

p. 151 - 5.6 Overlays

There are multiple categories of overlays which apply to complement the underlying designations, found in Chapter 4. ...

a. Designations are found in Section 6.

p. 153 - 5.6.1.2 Apply an Evolving Overlay on a designation, <u>where the area is subject to a gentle evolution from suburban to urban built form and site design</u> (underlining added)

...

2) Zoning By-law development-standards and development on lands with an Evolving Overlay should generally include built form and site design attributes that meet most of the urban characteristics described in Table 6 in Section 5, and where suburban attributes are retained, that these do not structurally impede the achievement of a fully urban site design over time.

5.6.1.3 Apply a Transforming Overlay on a designation, <u>where the area is in a location, at a stage of evolution, or subject to development pressures that create the opportunity to achieve a fully urban built form</u> (underling added)

...

2) The Transforming Overlay is a critical policy tool to meet the regeneration requirements as outlined in the growth management framework. Areas identified with a Transforming Overlay shall require Zoning By-law development-standards that meet all of the following:

a) Requirement for urban built forms of building typologies and site designs, as described in Table 6 of Section 5; and

b) Direction to built form and site design that shall support the rapid transformation of the area towards transportation mode share goals.

3) On any land with the Transforming Overlay, any regeneration shall not be permitted to increase the number of vehicular private approaches, regardless of the number of lots being created or the number of residential dwellings being developed, except as may be permitted in the Zoning By-law and the Private Approach By-law.

a. The underlined words in the titles of these two Overlay subsections is all one has to go by to divine why certain areas received either of the Built Form Overlays. They are extremely subjective and vague. As noted in comment #8 above, presumably no community input has been sought. Some communities are, by planners' *diktat,* carved up into Evolving, Transforming and just plain Neighbourhoods, and/or have part of their community lopped off as a Special District.

b. Policy 2) of s. 5.6.1.2 uses the dreaded word "**generally**" and the soft "**should**." In contrast, in Policies 2) and 3) of s. 5.6.1.3, the verb is "**shall**." This difference is what led me to conclude in comment #8 that the Transforming Overlay is really the engine of regeneration in this Plan.

p. 158 - 5.6.3.1 Protect the Natural Heritage System and Natural Heritage Features

1) The Natural Heritage System overlay consists of core natural areas and natural linkage areas, as follows:

a) In core natural areas, development or site alteration shall maintain or enhance the integrity, biodiversity, and ecosystem services of the area; and, not compromise the potential for long-term enhancement and restoration of the ecological integrity, biodiversity, and ecosystem services of the area; and

b) In natural linkage areas, development or site alteration shall maintain or improve the ecological and recreational connectivity of the area; and, not compromise the potential for long-term enhancement and restoration of ecological and recreational connectivity of the area.

...

4) Development and site alteration shall have no negative impact on the Natural Heritage System overlay and no net negative impact on the Natural Heritage Features Overlay. Development and site alteration shall be consistent with the conclusions and recommendations of an approved Environmental Impact Study.

a. In Policy 1) a), re core natural areas, no development or site alteration should be allowed.

b. Policy 1) b) amounts to somewhat greater respect for Linkages than in the current Plan, for which I am grateful.

c. In Policy 4), it's not the Overlays that should suffer no negative impact, but what the Overlays identify.

d. Comments on Schedule C9 are below.

p. 159 - 5.6.4 Future Neighbourhood Overlay

a. As noted in comment #11, there are no Future Neighbourhood Overlays on the Schedules B.

b. In the absence of documentation or maps, one is left to wonder whether "Category 1" and "Category 2" lands refer to to the same parcels as depicted in the Growth Management II report considered by the Joint Planning and ARA Committees on January 25, 2021 (ACS2021-PIE-EDP-0001).

SECTION 6 - URBAN DESIGNATIONS

p. 163 - 3) Development within Hubs:

...

b) Shall incorporate residential uses throughout the hub, but may be required that large employment, commercial or institutional uses locate close to the transit station;

a. Please edit.

p. 164 - 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:

a) Hubs will generally prohibit automobile-oriented, motor-vehicle-dependent and motor-vehicle-prioritizing uses including but not limited to:

i) Drive-through facilities;

ii) Automobile dealerships, other than showrooms contained entirely within a building;

iii) Automobile service stations and body shops;

iv) Mini-storage warehouses;

v) Surface parking lots as a main use of land; and

vi) Other uses that prioritize or depend on motor vehicle access for their primary function.

b) Despite (a), recognizing that automobile rental establishments allow occasional access to motor vehicles to meet the needs of residents who otherwise forgo automobile ownership, the following uses may be permitted, subject to Section 6.1.1, Policy 3(f) and subject to compatibility with surroundings:

i) Car-share stations;

ii) Automobile rental establishments.

iii) Despite (a), structured and underground parking facilities may be permitted within Hubs.

a. The dreaded "**generally**" and "**may**" again.

p. 165 - 6.1.2 Set out the direction for Protected Major Transit Station Areas (PMTSAs)

1) PMTSAs are identified on Schedule C1 of this Plan. To assist with the implementation of associated planning policies and identify properties located within the PMTSA, Schedule C1 depicts the PMTSAs showing the street pattern and lot fabric. Schedule C1 is for information purposes only and may be revised as needed by [the] City without an amendment to this Plan.

...

6) New or expanded PMTSAs may be considered by amendment to this Plan or through a Secondary Plan. ...

a. So what is it: Is an OPA needed to change the boundaries of an PMTSA or not? If it's Policy 1), then great uncertainty is created which, given the very strong and sheltered-from-appeal authority the City acquires for anything in PMTSAs, is unacceptable.

p. 166 - Table 9

a. The terms of the Density Target are not defined in the table. Policy 2) on the previous page suggests it's a hybrid of people and jobs per gross hectare. Do you just add them up?

p. 167 - 6.2 Corridors

The Corridor designation applies to bands of land along specified streets whose planned function combines a higher density of development, a greater degree of mixed land-use, and a higher level of street transit service than abutting Neighbourhoods, but lower density than nearby Nodes. The Corridor designation includes two sub-designations, Mainstreet Corridors (also referred to as Mainstreets) and Minor Corridors.

a. The term ""Nodes" appears here for the first time and 12 more times further in the draft Plan. Is there a difference between Nodes and Hubs? If not, please avoid the term or at least don't write it with a capital N.

pp. 170-173 - 6.3 Neighbourhoods

a. There is much duplication in the three subsections of section 6.3, resulting in a jumble of policies with unclear net result. A thorough rewrite and consolidation is advised. Specific comments on the policies as drafted follow.

p. 170 - 6.3.1 Define neighbourhoods and set the stage for their function and change over the life of this Plan

1) Neighbourhoods are designated on the Schedule B series of maps. The maximum building height in Neighbourhoods is low-rise.

2) The Zoning By-law and approvals under the *Planning Act* will generally plan for the maximum heights, permitted in Section 4.3.1, as follows:

a) Four full storeys within the entirety of the Downtown Core transect, and along major streets that are not designated as Corridors across all other Transects;

b) Generally, three full storeys within the interior of Neighbourhoods in the Inner Urban transect; and

c) Generally, two full storeys within the interior of Neighbourhoods in the Outer Urban and Suburban transect, unless an Overlay is applied which shall allow for three full storeys.

3) Development in the Neighbourhood Designation which seeks additional height beyond four storeys will be evaluated based on an area-specific policy, Official Plan Amendment application. The development must meet all of the provisions of Section 12.1, Policy 11, which outline exceptional criteria allowing for an increase in height for special circumstances, otherwise not contemplated by this Plan.

4) The Zoning By-law and approvals under the *Planning Act* shall allow a range of residential and non-residential built forms within the Neighbourhood designation, including:

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;

b) Small-scale non-residential uses are permitted throughout the Neighbourhoods designation and include functions and land-uses meant to support the daily local needs of neighbourhoods, including retail, service, cultural, leisure and entertainment uses;

c) Limited large-scale non-residential uses are permitted and include office-based employment, greenspace, large scale institutions and facilities, and other smaller institutional functions; and

d) Parks, open spaces and linkage areas meant to serve as public space.

a. This is the third spot in this Plan where building heights in Neighbourhoods are set out, after Table 7 (p. 127) and the policies in some of the Transects. Within this section, Policy 1) states that the maximum building height is "**low-rise**", i.e., 4 storeys; Policy 2) says something else. This is what makes for a convoluted Plan.

b. Re Policy 2), approvals under the Planning Act do not "**plan**" for anything, let alone "**generally.**".

c. Also re Policy 2), what are "**full**" storeys? This term is not used anywhere else in this draft Plan except in the definition on p. 256. Are utility superstructures in addition to "full" storeys?

d. Policy 2) a) uses the term "**major streets**", a term used only here and on page 173. It is not defined.

e. In Table 7, in Inner Urban Neighbourhoods "**zoning will permit at least three storeys but no more than four storeys**". As noted earlier, there are no policies for Neighbourhoods outside 15-Minute Neighbourhoods in this Transect. In Policy 2) b) here, it's "**generally, three full storeys**". What is the zoning by-law drafter to do?

f. In Table 7, in Outer Urban and Suburban Neighbourhoods, "**zoning will permit at least three storeys but no more than four storeys** ", contradicting Policy 2) c) here.

g. Re policy 3), Policy 11 of section 12.1 refers to sidewalks. This is clearly the wrong reference.

h. In Policy 4) a), is "**ground-oriented**" the same as "**low-rise**"? If so, sticking to one expression would be preferable.

i. Policies 4) b) and c) are laudable and show that 15-minute neighbourhoods will be allowed to be realized without having to depend on Hubs or Corridors. (Refer to comment #6 above.)

p. 171 - 6.3.2 Guide the evolution of neighbourhoods based on their context, location, age, maturity and needs, generally toward the model of 15-minute neighbourhoods

...

4) The City shall allow, through the Zoning By-law, large scale non-residential land-uses where they exist as of the adoption of this Plan. Where a new large-scale non-residential land-use is proposed, the City shall evaluate such development based on meeting all of the following criteria:

a) The use is suitable to be located in the Neighbourhood designation and does not otherwise belong within a Hub or Corridor Designation or within the Non-Traditional Industrial Freight and Storage Designation, as per Section 6.3.3, Policy 3;

b) The use is compatible within the Neighbourhood designation and contributes to the goals of the Designation;

c) Located on the rapid transit network or along a street where frequent street transit service is already provided; and

d) A site design is provided in accordance with Transect and Overlay policies.

a. This is the kind of wide-open policy inviting "**large-scale non-residential land-use**" that gives residents the shivers. It assumes trust that the planners doing the evaluating have the best interest of the neighbourhood in mind. Based on bitter experience, residents are inclined to believe that the planners most of all seek to accommodate the applicant.

p. 172-3 - 6.3.3 Ensure that neighbourhoods form the cornerstone of liveability in Ottawa

1) The City shall allow, through the Zoning By-law, small-scale non-residential uses such as retail, service, cultural, leisure and/or entertainment functions ~~on~~: on all Collector Streets; in clusters of areas that currently have these functions and uses present; and by identifying new streets that could foster small scale non-residential growth. Where the Zoning By-law allows for these uses, the Zoning By-law will also permit the fluid switch between residential and non-residential small scale uses, to support flexible market needs and resiliency of buildings. Where a small-scale non-residential use is currently not permitted as-of-right in the Zoning By-law and is proposed, the City shall support these uses, provided the development meets all of the following:

a) They are small scale and serve the surrounding lands;

b) They are conveniently located with respect to concentrations of residential development and provide direct access for pedestrians and cyclists from adjacent residential areas;

c) They help to facilitate interaction among residents and contribute to healthy 15-minute neighbourhoods; and

ed) They are of a size and scale that shall not result in the attraction of large volumes of vehicular traffic from outside the immediate area.

2) Non-residential uses that are not explicitly mentioned as permitted in Section 6.3.1, Policy 1 shall be considered where the proposal meets all of the following criteria:

a) The proposed use is compatible with and complements surrounding uses;

b) The property has frontage on a major street;

c) The main buildings are situated to occupy the majority of site's major street frontage;

d)The visual impact of outdoor storage or parking on adjacent uses and from the street is minimized through appropriate site design methods in accordance with Transect and Overlay policies;

e) Large land areas for outdoor storage and sale or service of goods (other than uses that do not operate year-round and can be considered a common component of a permitted use, such as a seasonal garden centre in association with a retail use) are not provided; and

f) Goods for sale or display are not placed in the municipal right-of-way.

...

a. Policy 1) suffers from significant vagueness. Still, it indicates again that 15-minute neighbourhoods don't necessarily need Hubs or Corridors, as does Policy 2).

b. As noted, "**major streets**", an undefined term, is used in Policy 2) b) and c).

p. 187 - 1) Support the role of Lansdowne as a destination for professional sports, year-round festivals, residential, entertainment and commercial activity, through an appropriate mix of uses and the conservation of cultural heritage resources in accordance with Section 2.8 of this Plan, the statement of cultural heritage value and attributes for the Horticulture Building and the Aberdeen Pavilion, the easement from the Ontario Heritage Trust

a. The reference to "**Section 2.8**" is clearly in error as there is no such section.

SECTION 7 - GREENSPACE DESIGNATIONS

p. 195 - 7.1 Provide convenient, inclusive access to a variety of greenspaces across the city

1) Urban and rural Greenspaces are shown on Schedule B. These Greenspace designations consist of sub-designations which appear on Schedule C9 (for the urban area) and include:

a) Parks;

b) Open Spaces;

c) Urban Natural Features;

d) Significant Wetlands;

e) Natural Environment Areas; and

f) Conservation Areas.

a. Schedule C9 does not show Parks, Open Spaces nor Conservation Areas. In the Schedules B, the only non-built up areas shown are "Greenspaces" (if 3.2 ha or larger, according to Policy 2) of this section).

pp. 196-198 - 7.3 Protect the ecosystem services of natural features and recognize their role in building resilience to future climate conditions

a. I compared the policies for Urban Natural Features, Significant Wetlands and Natural Environment Areas in this section with the corresponding policies in the current Plan (ref. sections 3.2.3, 3.2.1 and 3.2.2 respectively. I highlight below what I believe are significant differences.

b. New in Policy 1) for <u>Urban Natural Features</u> is:

c) Notwithstanding the prohibition on development and site alteration, the City, at its discretion, may allow pathways and stormwater infrastructure within Urban Natural Features, where such pathways and infrastructure will not adversely affect the natural characteristics of the areas or their ecosystem services;

d) The City may allow amenities and small-scale commercial operations as ancillary or temporary uses in Urban Natural Features for the purpose of supporting more intensive public use and equitable public access, subject to zoning and/or site plan;

I have sympathy for these additions except for the placement of stormwater infrastructure. That should be allowed only if there is no alternative.

c. New in Policy 2-a) for <u>Significant Wetlands</u> is that a PSW change should be reflected in the OP within six months. I believe that was the policy already (though grossly not adhered to in the case of the Goulbourn Wetland Complex) but that it was not stated explicitly in the current OP. Stating it is an improvement.

d. Why is policy 2-b) necessary:

b) The City shall consider the identification or revision of a *provincially* significant wetland by the Province in any applicable *Planning Act* process;

If the policy would go further and also "**consider**" wetlands that have not reached the status of PSW, then we'd have something new.

e. Presumably, the word "prohibited" before "in Significant Wetlands" is missing in policy 2-d):

d) Development, lot line adjustments and site alteration are in Significant Wetlands;

f. New in Policy 3, for Natural Environment Areas, is, in 3-b), the addition of "**renewable energy generation**":

b) Permitted uses in Natural Environment Areas are: passive open spaces; scientific, educational, or conservation uses associated with the natural features; agricultural operations established prior to May 2003; forestry as defined in the *Forestry Act*; and renewable energy generation, subject to demonstration that the use will not compromise the character, form, and ecological functions of the area;

and 3-c):

c) The City may permit amenities and small-scale commercial operations as ancillary or temporary uses in Natural Environment Areas for the purpose of supporting more intensive public use and equitable public access, subject to zoning and/or site plan;

I agree with these additions except that in 3-c) the same "subject to..." wording should be added as in policy 3-b).

g. Altogether, the policies in section 7.3 use fewer words than their corresponding policies in the current Plan. That's a good thing because the current Plan most surely suffers from excessive wordiness.

h. There are no policies on Open Spaces though it is listed above as a Designation. Is this an inadvertent omission? Please re-incorporate the Major Open Space policies in section 3.3.1 of the current Plan.

p. 198 - 4) The Conservation Area designation identifies provincial parks, Conservation Authority properties, and other lands which are identified or protected through separate legislation, regulation, or convention for conservation, sport, recreation, leisure and cultural facilities, but does not include the National Capital Greenbelt. Examples include Fitzroy Provincial Park, the Baxter Conservation Area, and the Beckett Creek Migratory Bird Sanctuary.

a. As noted, Conservation Areas are not shown as such on Schedule C9. However, **Fitzroy Provincial Park** is on the list of Core Natural Areas, as is Beckett's Creek Headwaters. In any case, this is not a policy, it is a definitional statement, with some examples thrown in.

SECTION 8 - GREENBELT DESIGNATIONS

a. A commitment to stop cutting or widening roads through the Greenbelt would have been welcome.

SECTION 9 RURAL DESIGNATIONS

p. 208 - 9.2.3 To limit the fragmentation of rural lands and ensure the preservation of health

a. This section may refer to Country Lot Estates although the term is not used. Nowhere else do I find a policy that continues the prohibition of new CLEs. This is extremely concerning. Veterans of

the campaign to prohibit CLEs (which harks back to an appeal of the 2003 Official Plan) thought they had won the battle with Council's prohibition (save for certain parcels owned by Cavanagh) in November 2013 and that has not changed since (ref. section 3.7.2, Policy 9 of the current Plan). Is the prohibition covered by Policy 3)?

> **3) Lot creation for the purpose of residential uses is prohibited except ...**

(where the exceptions deal with lot severance). Please restate the prohibition of new CLEs unambiguously.

SECTION 10 - PROTECTION OF HEALTH AND SAFETY

pp. 215-6 - 10.1.1 Natural Hazards: Flooding Hazards and Erosion Hazards

a. 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. 217 - 10.1.2 Two-Zone Flood Plain Areas and Areas of Reduced Flood Risk

a. 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. 218 - 10.1.3 Areas Vulnerable to Flooding Under Climate Change

a. This section introduces new concepts (**Climate Change Flood Vulnerable Area , climate change scenario flood limit**) that are wholly within the purview of the Conservation Authorities. It is their mandate to identify flood plain risk with specified probabilities, including taking into account climate change scenarios. The City should make sure that the CAs have sufficient resources to perform this task but not do their work.

p. 226 - 10.3 Build resiliency to the impacts of extreme heat

a. The policies in this section are welcomed.

SECTION 11 - IMPLEMENTATION

p. 230 - 11.1 Set the stage for Site Plan Control requirements and provisions

a. The policies in this section are welcomed in principle, including the reference to section 41(4)(2)(d) and (e) of the *Planning Act*. To assist external readers of these comments, these sections (part of s. 41 - Site Plan Control Area) are:

> (d) matters relating to exterior design, including without limitation the character, scale, appearance and design features of buildings, and their sustainable design, but only to the extent that it is a matter of exterior design, if an official plan and a by-law passed under subsection (2) that both contain provisions relating to such matters are in effect in the municipality;
>
> (d.1) matters relating to exterior access to each building that will contain affordable housing units or to any part of such building, but only to the extent that it is a matter of exterior design, if the municipal by-law passed under subsection (2) and the official plan to which the by-law gives effect both include provisions relating to policies described in subsection 16 (4) and both include requirements or standards for exterior access to buildings that will contain affordable housing units;
>
> (e) the sustainable design elements on any adjoining highway under a municipality's jurisdiction, including without limitation trees, shrubs, hedges, plantings or other ground cover, permeable paving materials, street furniture, curb ramps, waste and recycling containers and bicycle parking facilities, if an official plan and a by-law passed under subsection (2) that both contain provisions relating to such matters are in effect in the municipality;

p. 230 - 2) a) Development proposals for low-rise residential or mixed-use buildings that fulfill the regeneration objectives of the Growth Management Strategy shall have reduced requirements in order to streamline the process for, and lower the costs of, regeneration;

a. I would like to see spelled out what "**reduced requirements**" means.

p. 231-2 - 11.2 Create the framework ~~to~~ for a Community Planning Permit System

a. The policies in this section are welcomed. Adoption of a Community Planning Permit System may bring greater coherence to the way planning proceeds in Ottawa. However, I would like to see an explicit commitment to public consultation included here. Also, Policy 5) foresees a pilot project somewhere in the Rural Transect. Why so shy? Several prospective developments in the urban area would seem to be good candidates for a CPP process.

p. 234 - 11.2 Establish the Public Notification and Consultation procedures

~~2~~3) 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*:

a) Applications for official plan amendments, Zoning By-law amendment, consent to sever, or plan of subdivision approval by non-profit housing providers;

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 ZBLAs. Is the word "minor" missing? In any case, "minor," as also used in Policy 2-c) must be defined.

p. 235 - 11.5 Provide direction to Committee of Adjustment processes

a. 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, Policy 2) only promises to establish criteria regarding minor variances; a stronger commitment -- "shall" instead of "**may**" -- would be welcome:

2) The City may 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.

Also, "**specified provisions in the Zoning By-law are not to be authorized by variance**" makes no sense; presumably the intent is to say that certain provisions of the zoning by-law could not be varied by the Committee of Adjustment.

b. Second, the City should commit to devoting resources to assist CoA parties by providing evidence; citizens participating in a CoA process are greatly handicapped without it.

p. 237 - Definition - Missing Middle

a. It is odd to find this definition repeated in the Implementation section of the Plan. It was already shown on page 72 and is listed under Definitions on page 258.

p. 240 - Energy and Climate Study Requirements / Community Energy Plan

a. If it is "**Required for an area-specific development** " it is required for any. Is such a broad requirement intended?

p. 240 - Energy and Climate Study Requirements / Energy Modelling Report

a. Somewhere in this plan there should be a commitment to adopt best practices in reporting on energy management and water consumption by owners of large buildings (ref. Toronto's Energy & Water Reporting and Benchmarking - Large Buildings).

SECTION 12 - LOCAL PLANS

p. 247 - Section 12. Local Plans

a. Is the City on safe legal ground making Area-Specific Policies part of the Official Plan? Area-Specific Plans or Policies are not mentioned in the *Planning Act*.

p. 247 - 12.1 2) Secondary Plans may only be initiated by the City, while Area-Specific Policies may be initiated by a proponent.

a. As lamented in comment #4 above, this is a betrayal of how Secondary Plans should come about, namely as an initiative by the community (including landowners), with the assistance of city planners.

SECTION 13 - DEFINITIONS

p. 252 - Definition of 15-minute neighbourhoods

Compact, well-connected places with a clustering of a diverse mix of land-uses; this includes a range of 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 car- free.

a. As noted in comment #6 above, such a vague and purely qualitative definition will not do when so many policies depend on whether one is in a 15-minute neighbourhood or not.

p. 252 - Definition of Affordable housing

Housing that is aimed at households whose needs fall within the definitions of deep affordability and market affordability.

(a) deep-affordable housing, which means affordable to a household or individual at or below the 3rd income decile (30th percentile); and

(b) market-affordable housing, which means affordable to a household or individual at the 4th through 6th income deciles (31st through 60th percentiles.)

a. To make this definition tight, the definition of "**income**" and the source and timeliness of data should be specified.

p. 256 - Height Categories

a. Maximum heights should be expressed in meters as well as in storeys.

p. 257 - Master plans

a. The Climate Change Master Plan is missing from the list.

SCHEDULES

a. Please add major street names to all relevant maps to assist in orientation.

b. I'm not sure what to make of seeing, on Schedules B1, B2, C1 and C2, O-Train stations along Carling Avenue (I wish!) when, on Schedule A, they are mere at-grade Transitway stations. (On B3 and B5 they're Transitway stations again.) On Schedules C1 and C2, the marking is a red double line, which is not part of the legend of C1 but C2 explains that it means at-grade.

c. Please provide names of the Greenbelt Facilities on Schedule B4, with numbers on the map.

d. On Schedule C9, compared to Annex 16 of the current Plan, several natural linkages are missing on both the East and the West side. All linkages identified in Annex 16 should be carried over as they were determined by an OMB-sanctioned study which came about as a result of the settlement of an Appeal.

e. Baxter Conservation Area is not on Schedule C9.

f. It is puzzling to see Natural Environment Areas on Schedule C9 so disjointed.

g. Urban Natural Features are impossible to discern on Schedule C9. As suggested earlier, please provide a list in an Annex.

h. Should flood plains, including Two-zone flood plains, not be shown on Schedule C13 and perhaps also on Schedule C9?

ANNEXES

a. Annex 1 has an incomplete legend.

b. Development zones of influence are referred to on pp. 63-64 (Policy 24) and depicted in Annex 3. If they are to carry legal weight, should they not be part of the Plan?

c. Design Priority Areas-Urban are depicted in Annex 5A and are referenced many times in the Plan with significant policies. Should they not be part of the Plan?

d. In Annex 6, with the names, please use numbers to show where the areas are that have Secondary Plans.

e. Thank you for Annex 8A showing Ottawa's watersheds and subwatersheds.

f. Please show the names of all watercourses on Annex 8B.

Typos, missing words, etc.

p10, 2nd par., 3rd line: insert “on” after “based”.

p19 sub 2), 3rd line: "need" not "needs".

"ACHEIVE" appears on pp. 30, 35, 115 and 120.

p94, 1st line: insert "be" after "will".

p99, policy 1), 2nd line: Capitalize "urban design guidelines" as you do Community Design Plans.

p101, 2nd line from the bottom: delete comma after "that".

p109, sub 10) b): insert "with" after "accordance".

p114, sub 6), 2nd line: insert "the" after "Zoning By-law.

p115 sub 4.9.1, 1), 2nd line: insert "it" after "deems".

p116 sub 4), 1st line: delete "in" before "adjacent".

p126, Table 6, 6th box: delete comma after "Small".

p139 sub 5.3.1 1), 2nd line: should be Table 8.

p140, title of s. 5.3.2: delete the word "Inner".

p162, 2nd para.: add a full-stop at the end of the sentence.

p165 sub 6.1.2 1), 4th line: insert "the" before "City".

p165 sub 6.1.2 6) d), 1st line: "does", not "do".

p172 sub 6.3.3 1), 2nd line: delete "on" after "functions".

p173 sub 6.3.3, policy 1) e) should be 1) d).

p197, sub 2) b): do not italicize "provincially".

p197, sub 2) d): presumably the word "prohibited" is missing here.

p197, sub 3) a): insert a comma after "Development".

p231, at 11.2, title: delete "to" before "for".

p232 sub 5), 3rd line:"Rural Transect" not "Rural Transit".

pp.234-5: The policy numbering is off: the second 2) should be 3), and 3) should be 4). The reference to "Policy 3" in Policy ~~2~~3) should be "Policy 4". The reference to Policy 2 in Policy ~~3~~4) should be "Policy 3".

p248 sub 6), 1st line: insert "of" after "exception".

p249 sub 2): insert "areas in" before "the natural heritage system".

p252 sub definition of Access street: add a full-stop at the end.