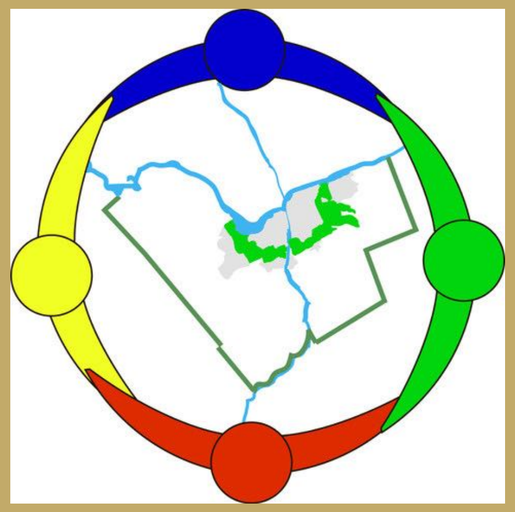

Towards A People's Official Plan

April 23, 2021

TOWARDS A PEOPLE'S OFFICIAL PLAN – KEY ISSUES

Introduction

We, the People's Official Plan (POP) alliance, want Ottawa's new Official Plan to succeed.

We support the general policy directions and intentions in the draft Official Plan. We support building a more livable and compact city (i.e., intensification), public investments that will build a more equitable city, and a city embarking on a low carbon development path. We also agree, in principle, with two key implementation tools of the draft Official Plan: 15-minute neighbourhoods and form-based zoning. However, we are concerned that the draft Official Plan does not yet provide the necessary guidance and direction for how to apply the general policies.

The Official Plan is intended to be a policy framework that is readable and clear, but fails in this. Despite the City's consultation efforts and numerous Zoom meetings, the public still does not fully understand, let alone trust, the numerous new and complex ideas contained in the draft Official Plan. Without an agreed-upon starting point and vision, the Official Plan cannot succeed. Furthermore, it will only exacerbate the long history of conflict over spot re-zoning - dividing residents, communities, developers and City of Ottawa officials. We all want a new start.

A new start needs to include leaders of Algonquin Indigenous peoples connected to these lands. Land use plans cannot be made without engagement and co-governance with the Indigenous peoples who live on this land. We urge the City of Ottawa, as represented by its Mayor and Council, to undertake ongoing, meaningful engagement with Algonquin leaders. True engagement means making a commitment to mobilize the land use knowledge of Indigenous communities, to make decisions cooperatively, and to build reconciled, constructive, and cooperative interactions based on mutually accepted protocols and milestones.

The key issues which we believe need to be addressed for the Official Plan to succeed are grouped in the table below under the headings of Plan Foundations, Key Policy Gaps and Implementation Challenges. We have also provided City staff and the general public with a detailed technical, line-by-line review of key policies in the draft Official Plan, along with twelve high level targets for achieving an inclusive, affordable and livable city.

A. PLAN FOUNDATIONS

ISSUE	WHERE THE CITY DRAFT OP 2020-11-20 LANDED	WHERE THE PEOPLE'S OFFICIAL PLAN WANTS THE OFFICIAL PLAN TO LAND
A VISION FOR AN INCLUSIVE, AFFORDABLE AND LIVEABLE CITY	The draft Official Plan is unclear in its overall vision and precisely what it is promoting as the City's future urban form. Inconsistency arises between Section 2 and subsequent chapters. All details need to support the vision. Livability is key to the Official Plan vision statement but it isn't defined. Unanswered questions: - How life will be different (and better) in 2050. - How urban neighbourhoods will be different by 2050, i.e., which neighbourhoods will be complete, which will be on the way to being 15-minute neighbourhoods and which will not have changed much. - What new greenfield developments will be like (compact, 15-minute neighbourhoods or low-density suburbs) - What rural villages will look like - Where and how much growth will be car-centered at the end of the period covered by the Official Plan	We want Ottawa to be a city that is compact and livable, diverse and equitable, healthy, and affordable for its residents, that: is comprised of complete walkable and bikeable neighbourhoods; minimizes urban sprawl; evolves in a climate- and environment-friendly urban form that strengthens greenspace and is carbon neutral by 2050; fosters food security; prioritizes affordable housing throughout the city; and develops a sustainable transportation network that enables car-light and car-free lifestyles. The public needs to be involved in defining livability benchmarks for both the Official Plan and later for neighbourhood plans and zoning. This creates buy-in and kick starts cooperative zoning work. See the 12 targets (high-level liveability benchmarks) in the People's Official Plan's technical submission.

ISSUE	WHERE THE CITY DRAFT OP 2020-11-20 LANDED	WHERE THE PEOPLE'S OFFICIAL PLAN WANTS THE OFFICIAL PLAN TO LAND
READABILITY	Voluminous and difficult to understand, the draft Official Plan uses too much technical and bureaucratic language and has no easy to read summary. It is also full of ambiguities, contradictions and is subject to misinterpretation and confusion. Its daunting size and opaqueness prevent all but the most committed residents from participating.	The Official Plan must be clear, unambiguous and understandable. Clarity of language, rules and their application is essential for the public and developers to understand and support the new policy directions in the Official Plan. The Official Plan needs a plain language, technical summary of key features and commitments. We support the City's use of graphics and visual information in the draft Official Plan.

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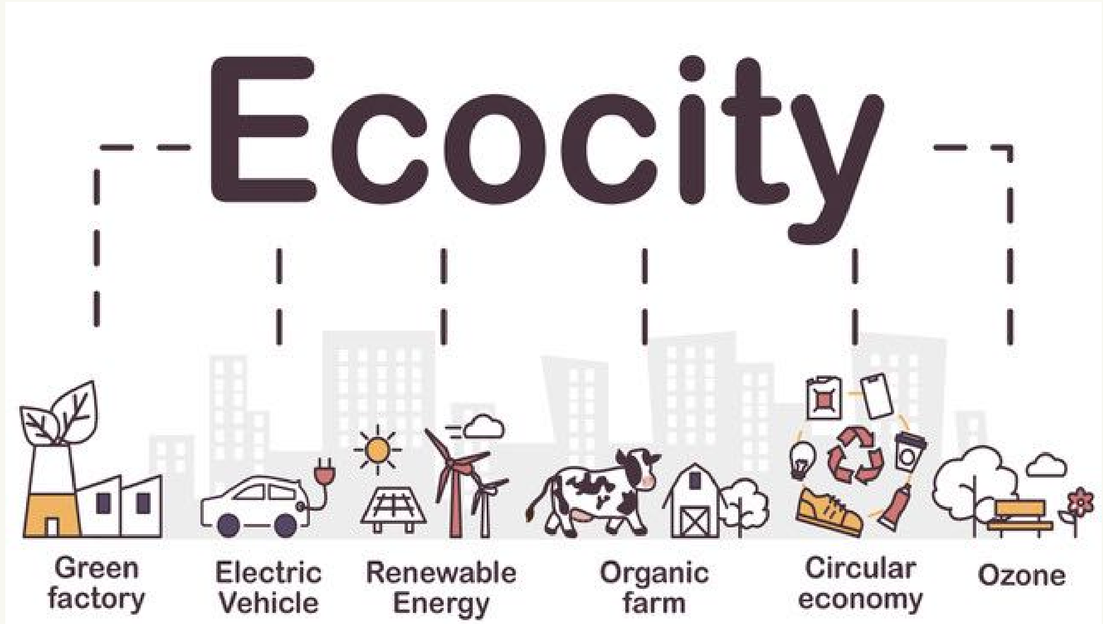
GOVERNANCE THROUGH ENGAGEMENT AND INFORMED CONSENT	The draft OP is silent on governance issues.	Democracy and accountability are critical to land use planning through an Official Plan. The plan is based on a commitment to mobilize the land use knowledge of Indigenous communities, make decisions cooperatively, and build reconciled, constructive, and cooperative interactions based on mutually accepted protocols and milestones. In addition, the engagement process for all stakeholders (residents, community groups, developers, businesses, etc.) is meaningful, starts early and has timelines that foster trust and collaboration. In addition, all key policy directions are defined and justified, with a clear detailing of their assumptions and intended purposes. The Official Plan is a model of clarity and predictability that can be relied upon as a coherent framework for decision-making and for resolving disputes. Stakeholders are not left to the mercy of ad hoc interpretive discretion. As a matter of planning policy, neighbourhoods with similar characteristics are zoned similarly and have similar density targets regardless of Transect. Spot rezoning and infills, amendments to the Official Plan, and decisions by Committee of Adjustment are worked within the overall requirement of community enthusiasm for neighbourhood intensification plans.

ISSUE	WHERE THE CITY DRAFT OP 2020-11-20 LANDED	WHERE THE PEOPLE'S OFFICIAL PLAN WANTS THE OFFICIAL PLAN TO LAND
PROTECTION OF ECOLOGICAL SYSTEMS AND OUR LAND BASE	The draft Official Plan is not embedded in an understanding of the well-being of our total ecology (e.g., climate, wildlife, vegetation, water, air, soil).	Ambitious climate action (i.e., density, walkability, strengthened, biodiverse greenspace and foodlands) is the fundamental environmental test for all land use planning considerations in the Official Plan, which includes the following: Proactive growth strategy to enhance, regenerate and protect the many ecological features our large land mass has blessed us with ('nature-based solutions'), including protected ecologically-sensitive greenspaces, and fully integrated greenspaces for people throughout the city, including biodiverse, abundant, sustainable, integrated, accessible foodlands. Enhanced waterways, wetlands, floodplains, stormwater ponds, healthy water biodiversity, drinking and ground water sources. Setback for non-significant wetlands as for significant wetlands along with healthy access points for human stewardship and recreation activities. Flooding and drought adaptation measures for climate extremes for all neighbourhoods. The three Conservation Authorities in the Ottawa area are allies in the delivery of Official Plan objectives, by providing appropriate tools and permit approvals.



B. KEY POLICY GAPS

ISSUE	WHERE THE CITY DRAFT OP 2020-11-20 LANDED	WHERE THE PEOPLE'S OFFICIAL PLAN WANTS THE OFFICIAL PLAN TO LAND
15 MINUTE NEIGHBOURHOODS ABSORB INTENSIFICATION AND MEET LIVEABILITY GOALS	The term “regeneration” in the draft Official Plan is defined narrowly in terms of higher density yet it is “about guiding the evolution of neighbourhoods into complete 15 minute neighbourhoods” that includes amenities, services and all components involved in complete liveable neighbourhoods. It is a positive term for intensification but fails to show how neighbourhoods will be developed into 15-minute neighbourhoods. No metrics for what constitutes a 15-minute neighbourhood. No location of neighbourhoods to be developed. No local planning process for neighbourhood intensification. No outline of City investments in regenerating neighbourhoods.	Intensification is paired with community upgrades to support increased density. A comprehensive definition includes built form, amenities, services, parks and greenspace, optimum density and built form limitations by neighbourhood. As much as possible, infill will be appropriate in built form and massing, to compliment neighbourhoods. Different policy regimes are needed for densification of hubs versus neighbourhoods. The neighbourhoods in each transect are identified and mapped and the regeneration priorities and timelines set for each. Anticipated infill is projected/modeled. Neighbourhood assets are surveyed, and then needed upgrades are planned. In this way our neighbourhoods benefit from infill and growth. The boundaries, neighbourhoods, liveability gaps and growth targets can be supported by the residents. Meaningful public engagement gains public support in neighbourhoods. A central role for engagement, collaboration, and enthusiasm by neighbourhoods before changes in development to move to 15-minute neighbourhoods occur. Zoning is based on 15 minute neighbourhood definition and guidance.

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CLIMATE EMERGENCY ACTION	Energy Evolution goals and targets are not embedded in the draft OP. No timing or schedule is provided to link to 2025, 2030 targets of Energy Evolution, leaving plans unsupported. No resilience/adaptation targets set in Official Plan, leaving the resilience strategy unsupported. Policy support and public investment in renewable energy production is not well developed.	Energy Evolution targets and timelines are embedded in the Official Plan and linked to implementation development tools for greenfield, infill, secondary plans and 15-minute neighbourhoods. The Official Plan requires sustainability in new greenfield and infill builds (i.e. meet Energy Evolution target of 100% of new residential buildings to be net-carbon zero by 2030 at the latest). Incentives and policy support is prioritized for energy efficiency investments through renovation / expansion of existing housing stock. The Official Plan encourages and commits to investment in local renewable energy generation using diverse, innovative, solutions. These are built on sustainable cost-recovery/profit models and advances in technology. They also make effective use of underutilized lands (rural and urban) that are not farmlands and are not ecologically sensitive. Resiliency targets, maps and data (for flooding, heat management, etc.) are an essential part of zoning and by-law development.

ISSUE	WHERE THE CITY DRAFT OP 2020-11-20 LANDED	WHERE THE PEOPLE'S OFFICIAL PLAN WANTS THE OFFICIAL PLAN TO LAND
AFFORDABLE HOUSING & THE HOUSING EMERGENCY	No affordable housing targets are provided in the draft Official Plan. The targets from the Ten-year Housing and Homelessness plan are not in the Official Plan, leaving the plan unsupported, and homelessness an unresolved, yet officially declared, emergency.	Inclusive development means that housing affordability, deep affordability and homelessness are all required to be acted on through a gender, equity and social inclusion lens. Targets in the Official Plan are realized through housing investment programs in line with fiscal opportunities. Zoning is no longer used to 'zone people out' based on income, tenure, or household size.
TREES AND GREENSPACE	The draft Official Plan performs well on this aspect. There is a comprehensive definition of greenspace, improved protection for some types of greenspace, measurable standards for access to greenspace, and a 40% canopy target set for the urban area. What is missing, however, is a definition for equitable access to urban tree canopy, along with specific provisions to achieve it. There is currently no measurement of progress toward the goal of equitable access.	Minimum 40% canopy cover requirement is established for each neighbourhood, and not just for the urban area as a whole. Equity in access to trees and greenspace cuts across and between neighbourhoods. The city-wide target of 40% does not include the greenbelt lands owned by the National Capital Commission. Intensification does not trade off greenspace and trees for housing. Street rights of way are dedicated to green streetscapes. Health and livability - especially downtown - require canopy and adequate per capita park space, which is embedded into the Official Plan.

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FOOD AND AGRICULTURE IS SUPPORTED CITY-WIDE TO ENHANCE LIVELIHOODS AND FOOD SECURITY	The draft Official Plan does not include a food lens, and instead relegates agriculture to a rural activity and food to retail issues. It does not make active use of public spaces available to support both perennial and annual food production within city boundaries. It does not prioritize City-owned lands and public greenspace as multi-use spaces that create multiple benefits of food security, biodiversity, rainwater management, and response to climate change. The draft Official Plan continues to segregate these issues. The Official Plan leaves too many gaps and opportunities to remove land parcels from the already limited Agricultural Resource Areas. The description of Rural Countryside is silent on the protection of prime farmland.	The Official Plan is developed using a food lens throughout, providing integrated policy instruments across City departments that support a comprehensive vision of strengthened, integrated and protected foodlands, equitable access to food, and protection of agricultural land throughout neighbourhoods and communities within the urban, suburban and rural areas of the city. Agricultural land is valued as a unique peri-urban resource that is preserved for the food security and livelihoods of future generations. This value is embedded in the Official Plan, with a commitment to no further urban boundary expansion on any viable food-producing land outside of the most recent urban boundary. Solutions to density requirements are found within the boundary, or there is a cap on development. The Official Plan preserves all current Agricultural Resource Areas designated through the most recent LEAR process, establishing clearly the principle of ensuring that prime farmland (Class 1, 2 and 3 soil) is protected for agricultural use as a first priority in Rural Countryside, with further protection for all farmland (noting Class 4-5 is used for livestock, crops, etc.).

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EQUITY AND SOCIAL INCLUSION	The draft Official Plan makes a principled commitment to using a gender and an equity and social inclusion lens in planning decisions. It also shows awareness of the obligations to future generations. However, reference to specific policies with known positive impacts are lacking, and there is little said about income inequality, racial inequality or marginalization of Indigenous residents. While greater density rightly is an important policy goal, the draft Official Plan's "build it first and the rest will follow" policy scaffolding wrongly prioritizes urban density as the primary catalyst to inclusive liveability.	City investments in services, infrastructure, food access, parks/trees/greenspace, and other amenities are made with equity and social inclusion at the forefront. Equity and economic inclusion is elevated to one of the 5 Big Moves with its own Master Plan. Civic investment in social infrastructure are scaled, commensurate to growth. Major intensification projects are filtered through an equity/society wellness lens that includes a no-displacement policy for renters. Neighbourhoods are regulated such that they welcome households of all incomes, sizes and tenures. New big-box or car-centric shops are prohibited to allow small retailers to succeed, feeding and growing social infrastructure in neighbourhoods.

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EMERGING RISKS AND RESULTING UNCERTAINTIES	There is no consideration of emerging risks, including the impacts of COVID and new health risks, vagaries of the real estate market, population growth, climate risk and vulnerabilities, delayed master plans or other uncertainties.	Uncertainty, risks and gaps are identified, their impact on the Official Plan assessed and a strategy for handling them given
ACCOUNTABILITY FOR FINANCIAL SUSTAINABILITY	No information and no requirements are provided in the draft Official Plan on the financial impacts of new growth for taxpayers or city finances (note: the Provincial Policy Statement calls for coordinated planning of growth and land-use planning with infrastructure and public service facilities to ensure they are financially viable over their lifecycle). No analysis is provided of the operational and cost implications of a vastly improved public transportation service or requirements of moving to a car-free or car-light 15-minute neighbourhood model.	Financial information is incorporated and shared with the Ottawa community as a cornerstone of the Official Plan to ensure goals, targets and commitments made are tied to understood revenue generation. Growth and intensification both have significant financial implications. The Official Plan should set out financial management principles and parameters for financial sustainability and equity. Low-carbon growth has financial implications which need to be incorporated into the Long-Range Financial Plan. Planning for car free/light mobility has significant financial implications for public transit and these financial commitments need to be costed into the new growth plan.

C. IMPLEMENTATION CHALLENGES

ISSUE	WHERE THE CITY DRAFT OP 2020-11-20 LANDED	WHERE THE PEOPLE'S OFFICIAL PLAN WANTS THE OFFICIAL PLAN TO LAND
MONITORING, REPORTING AND ACCOUNTABILITY FRAMEWORK ABSENT	An overall accountability framework, including timelines and milestones for monitoring and public reporting is absent and deeply undermines the implementation of the Official Plan. The only indicator and targets to be monitored appear to be density (although even this is not clear). Measures of success, with targets and indicators, are absent.	The Official Plan has an accountability framework with indicators and targets to be monitored and reported on within defined timelines, along with workplan milestones. We suggest that the 12 high level targets and their indicators and metrics that are in the People's Official Plan Technical submission be included in the Official Plan monitoring and reporting work.
BASELINE DATA AND MODELLING EFFORTS INSUFFICIENT	Little baseline data is referenced. Modelling exercises are undeveloped and modelling assumptions undocumented.	All the projections and urban standards are compared to baseline data allowing transparency in analytical assumptions, including the growth management projections, density, building height and mass, access to services and social infrastructure, 15-minute walking distance, transit demand, as well as heat and flood predictions. Regulations are modeled and tested against market pressures and construction economies, testing their effect, before they are enacted. Community consultation is grounded in modeling.

ISSUE	WHERE THE CITY DRAFT OP 2020-11-20 LANDED	WHERE THE PEOPLE'S OFFICIAL PLAN WANTS THE OFFICIAL PLAN TO LAND
INFILL LOOPHOLES REMAIN	Section 11.1 and 11.2 indicates that low rise (under 4 stories) infill developments will be exempt from Site plan control, leaving the City with no mechanism to require energy efficiency, tree, landscaping, parking or other development controls towards a High Performance Development Standard. Gap in community planning (11.2) compounded by absence of neighbourhood planning process for 15-minute neighbourhoods.	All loopholes are closed. Incentives are designed so that intensification and High Performance Development Standards are aligned (e.g., green fast lane for compliant developments and project toolkit).
REQUIRED POLICY IMPLEMENTATION GUIDANCE UNCLEAR	The Official Plan does not provide clear guidance on how to implement its numerous policies. Nor does it provide rules or guidance for making trade-offs between competing policies. It does not provide a framework for ensuring that the master plans, by-laws, zoning and other policy and implementation tools the Official Plan covers are aligned and consistent when they are implemented.	An implementation framework is created that includes: - priorities, timelines, budgets - rules for making trade-offs between competing policies - scope and timeline for development of policy implementation tools (e.g., zoning, by-laws, high performance standards) - links to and policy guidance for other policies, plans and tools to be done later (e.g., infrastructure asset management plan, Transportation Master Plan) - comprehensive and clear guidance for zoning work to come later including: the scope and types of zoning planned for neighbourhoods (form-based, inclusive, and/or R types), the plan for R1, R2 zoning, review and application of R4 zoning

AS MEMBERS OF THE PEOPLE'S OFFICIAL PLAN ALLIANCE, THE FOLLOWING GROUPS HAVE COLLABORATED ON THIS DOCUMENT

walkableottawa.ca

Greenspace Alliance of Canada's Capital
Alliance pour les espaces verts de la capitale du Canada

CAFES Ottawa
Community Associations for Environmental Sustainability

Just Food

Waste Watch Ottawa

ECOLOGY OTTAWA ECOLOGIE OTTAWA

Federation of Citizens' Associations of Ottawa
fca-fac
Fédération des associations civiques d'Ottawa

CoEnergy

OREC