

Stephen Willis
General Manager, PIED
City of Ottawa

Dear Mr. Willis:

Please find attached the submission from the Federation of Citizens' Associations (FCA) regarding the draft Official Plan. As you know, the FCA represented 57 community groups from across the City of Ottawa. Many of our members have been engaged in the City's development of a new Official Plan, and many have submitted to the City their comments on the draft Official Plan that was released in late November.

This submission by the FCA on the draft Official Plan is the result of two general meetings of the FCA membership (in January and in February) as well as 4 workshops the FCA held in January (on 15 Minute Neighbourhoods, Transects & Overlays, Greenspaces, and Housing), plus input from our Planning & Zoning Committee and Transportation Committee. We would like the opportunity to discuss our submission with your staff to better understand how the concerns our members have raised can be accommodated within the new Official Plan. I will be contacting your office to arrange this.

I would be less than frank if I did not mention that our member associations - composed of volunteers - found this draft plan extremely challenging to deal with. The draft plan is a large and complex document that many found difficult to access (the number of print copies in public libraries were only 12!) and difficult to analyze given the transects, overlays and other policies contained in this plan. This was further complicated by the pandemic and the relatively short time (late November to mid-March) to review the draft Official Plan's many policies. As you will see in our submission, our members are seeking metrics to measure and assess the impact of change that this draft Official Plan envisages.

I will be writing to you and City Council separately on the matter of the timing of this Official Plan review.

Thank you for this opportunity to provide to you and the City of Ottawa our comments on the draft Official Plan.

Alex Cullen
President FCA



FCA Submission to the City of Ottawa re. draft Official Plan Feb. 17, 2021

The Federation of Citizens Associations represents 55 community groups across the City of Ottawa. We have existed since 1970 and, over the years, have canvassed our member associations and developed comments for a number of Official Plans for the City of Ottawa. Our primary goals have been to support the orderly development of our city, recognizing our diversity and unique characteristics of our neighbourhoods, the preservation of our greenspaces, and the provision of amenities that enhance our quality of living.

This draft Official Plan was released in November 2020 during the pandemic. It is a large, complex document that unfortunately has posed challenges to many of our members, both in terms of accessing the document in printed form, wading through 275 pages of text plus schedules, annexes and maps. While the document is meant to be read as a whole, it is difficult to ascertain what policy has preference over another. For example, where the OP policy on transforming a neighbourhood through regeneration (aka intensification) conflicts with the OP policy preserving tree canopy, what policy prevails? Nuances like this are important to our communities who are struggling to accommodate growth targets in their neighbourhoods in a reasonable manner. We rely on clear language to ensure that the values expressed in the Official Plan can be realized.

We also realize that much of the Official Plan is aspirational, but we do expect that the policies contained in the OP can be relied on to achieve these goals. This requires both budgets to implement these policies and metrics to measure progress and adherence to OP policies, as well as provide for accountability.

The following comments on the draft Official Plan were collated from 4 workshops the FCA held in January (some 60 participants at each) plus input from the FCA's Planning & Zoning Committee and Transportation Committee, ratified at our February 17, 2021 FCA General Meeting.

15 Minute Neighbourhoods:

The draft Official Plan introduces the concept of developing 15 minute neighbourhoods, that is, neighbourhoods where residents can access most services to support living in their community (shopping, transit, parks, schools, etc.) within a 15 minute walk. The draft OP recognizes that there are some communities that achieve this goal but there are many others who do not meet this standard. The draft OP seeks to achieve this standard as the city grows through intensification, overlaid by other supporting policies (such as parks, etc.). As well, the draft OP seeks to impose on new development design standards to achieve the 15 minute neighbourhood.

FCA members support the concept of 15 minute neighbourhoods in principle, but wish to make the following points:

- There needs to be a mapping of neighbourhoods to identify which communities already fit the 15 minute neighbourhood concept, and which do not. This should be done in consultation with each community.
- There needs to be a clearer definition of what services/amenities are needed to qualify for a 15 minute neighbourhood. A survey should be conducted within each community to determine what these should be. As well, there needs to be scope within the definition to accommodate diversity.
- There needs to be recognition of how the 15 minute neighbourhood is derived eg. for seniors, for the disabled, for families, etc. Such measurements should include factoring in winter conditions, and availability of safe walking and cycling infrastructure and connectivity.
- 15 minute neighbourhoods should also accommodate a range of housing affordability that accommodates family size.
- The City will need to develop metrics to ensure that access to amenities and services grow with intensification in each 15 minute neighbourhood, and a strategy to deal with deficiencies in current neighbourhoods that do not meet the 15 minute neighbourhood standard (eg access to parks, etc.).

Transects & Overlays:

The draft OP introduces the concept of transects to identify different contexts for applying policies, and overlays as another policy tool to achieve regeneration (intensification) objectives. This makes interpretation of OP policies complex. The FCA has the following concerns:

- The different transect policies and overlay policies applies intensification targets unevenly throughout the city. While the FCA recognizes higher densification policies within the rapid transit/LRT corridor, it doesn't support different intensification standards according to transect (eg. inner urban, outer urban, suburban, etc.).
- As well, transect boundaries should be reviewed so that existing neighbourhoods are not split between different transects.
- There needs to be a City strategy to ensure that as intensification occurs within a neighbourhood there is a commensurate increase in infrastructure (including social infrastructure) and amenities in that neighbourhood. This requires the development of standards for the provision of such amenities (eg parks per '000 households, etc.).
- While intensification has been identified as the major means of accommodating growth in our city (which the FCA supports), there is no indication of any limits to intensification – how many units is too much for a neighbourhood? Converting ground-oriented housing to tall buildings can change radically the characteristics of established neighbourhoods. Therefore the FCA recommends the development of an intensification trigger point policy that can apply to a neighbourhood so that the appropriateness of intensification policies can be reviewed here.
- The four transects and two overlay approach in the draft Official Plan is far too reductionist. More layers or differentiation needs to be explicitly embedded in the draft OP and reflected in the upcoming zoning bylaw review in order to protect the diversity of the existing neighbourhood character of Ottawa.
- Inclusionary zoning should be used to ensure that intensification provides a range of affordable housing within neighbourhoods. As well, where cash-in-lieu of parkland is used, these funds should be spent within the community from whence it came to provide that needed parkland.
- The current OP mainstreet policies governing built form etc. along arterial roads should be maintained in this Official Plan.

Greenspaces:

Greenspace is recognized as an important feature in our communities, both through parks and through the tree canopy. There is concern among FCA members that as intensification continues our existing tree canopy will be diminished. Rather, our members want to see more, not less, greenspace in our communities. To realize this goal requires establishing standards and metrics to measure progress. To this end the FCA recommends:

- The City retain the current provision of parks/greenspace standard per neighbourhood (eg 4 hectares per '000 residents) across the city, so that neighbourhoods that are deficient in parks can see their needs addressed. As well, as intensification occurs in neighbourhoods, the provision of parks accompanies this per affected neighbourhood (not just in the downtown/inner urban transect but across the city).
- The City develop a tree canopy inventory and standard in order to measure which neighbourhoods are deficient in tree canopy, so that investments can be made in trees to eliminate these deficiencies. As well, where intensification occurs in a neighbourhood, the City shall ensure (not “shall pursue”) the provision of trees in that neighbourhood according to the OP standard.
- The City develop appropriate/effective enforcement tools to ensure that existing trees are safeguarded. New/replacement trees must be provided in the neighbourhood in a manner commensurate to the trees being removed when/where intensification happens.

Housing:

The provision of housing in Ottawa should accommodate a range of incomes in our city. Unfortunately it is apparent that the private market does not accommodate this goal. To address this problem the FCA recommends:

- The City develop an inclusionary zoning bylaw that would require developers, whether through greenfield development or intensification, provide a portion of their new units as affordable to middle and low income groups. While the draft OP seeks to apply an inclusionary zoning bylaw (when developed) in rapid transit/LRT corridors (which the FCA supports), this inclusionary zoning bylaw should apply across the city, so that there is a range of housing accommodating family size in each neighbourhood.
- In developing a City of Ottawa inclusionary zoning bylaw the City should use the City of Montreal’s 20-20-20 bylaw as a model, which establishes targets for housing for a range of income and family size in that city.

Transportation:

While detailed transportation policies to implement the Official Plan’s objectives will be found in the Transportation Master Plan (a companion document to the Official Plan, to be developed subsequent to the adoption of the OP), the FCA supports the City’s goal to improve the City’s transportation network in order to support healthy, complete communities and expand the ability to live a car-light and car-free lifestyle. Consistent with this, the FCA recommends:

- The suburban communities of Ottawa (such as Orleans, Riverside South, Barrhaven, Stittsville/Kanata and any future suburban community) should have employment policies to create balanced communities between jobs and housing, to avoid creating bed-room communities where residents must commute long distances to employment, and to promote more efficient use of infrastructure, including better use of roads and rapid transit.
- Where growth is accommodated through intensification outside the rapid transit/LRT corridors, such increases in density must be accompanied by commensurate increase in transit service.

Conclusion:

The draft Official Plan contains many aspirational goals but often lacks the metrics and accountability measures to determine progress towards meeting these goals. To this end the FCA recommends:

- City Council direct the City's Planning, Infrastructure & Economic Development Branch to develop and report annually to Planning Committee the progress achieved in pursuing the Official Plan's policies, including the metrics by which progress was measured. Such information should cover not only City-wide OP objectives, but, where appropriate, transect objectives and neighbourhood objectives.