



REPORT ON CITY OF OTTAWA'S DRAFT OF THE NEW OFFICIAL PLAN

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To: City of Ottawa

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RE: City of Ottawa Official Plan and Heritage Management Plan

Heritage Ottawa is pleased to provide the following submission on the draft new Official Plan (OP). Our submission focuses on the meaningful incorporation of heritage protection and management within the Plan: by linking the OP to other heritage policy and planning tools, by encouraging adoption of heritage-related priorities, and by broadening the understanding of heritage as integral to growth-management and sustainable development processes.

In general, we are supportive of the high-level policy directions identified in the draft new OP and the vision for a “liveable city” which directs growth and new development towards regeneration and the development of walkable 15-minute neighbourhoods, while renewing the City’s commitment to affordable, inclusive and sustainable communities.

In the following submission, we offer several suggested improvements, namely related to the protection and management of heritage resources. We feel that these are needed to help clarify, demonstrate and implement the City’s commitment to the role of heritage within the city-building and growth-management process.

A. Overall Vision

The draft new OP is one of a suite of documents within the City’s development framework which aim to support and fulfill the *City Strategic Plan*. Its purpose is to identify a specific vision for physical development of the city over the next 25 years.

The introduction to a policy document as far-reaching and complex as an Official Plan should set the stage for the reader by clearly describing both our past and the current state of affairs. Drafting a new

OP without evaluating the success (and shortfalls) of the current one is poor public policy practice. What policies worked, and which one's did not? What mistakes can be avoided? What successful approaches do we want to repeat?

The introduction should also identify the challenges we are anticipating in the future, of which there are many – climate change and recovering from a global pandemic among the most pressing – and how the new OP intends to address these. The current introduction does none of this.

What is the City's vision for 2046? To become "*the most liveable mid-sized city in North America over the next century*". What does "the most liveable" city look like? How is Ottawa's version of liveability differentiated from other liveable mid-sized cities? How is this going to be measured?

While the *Five Big Policy Moves* identify strategic directions that support the vision of becoming "*the most livable mid-sized city in North America*", gone is the vision of a sustainable and resilient city, as identified in the current OP. Were these goals too lofty? They seem critically relevant, now more than ever. **We recommend that the City recommit to this broader vision in the draft new OP. While a sustainable and resilient city may also be a liveable city, this relationship should be made explicit.**

Naturally, as a heritage-focused organization, we are looking to see where built and cultural heritage fit within the vision of being "*the most liveable*" city. This is not immediately apparent. In addition to setting the stage in the broadest terms, **the Introduction should include a clear statement that demonstrates the City's understanding and commitment to the full breadth and depth of its heritage resources.** By its very nature an OP sets goals and policies that have the potential to compete with one another. Without a strong statement of intent in the new OP, there is a real danger of deferring the full integration of heritage policies to a later phase. Thus, heritage protection risks losing trade-offs with other competing policy objectives. **A clear policy statement is needed now, in this document, that demonstrates the City's commitment to the role of heritage** in defining the city's character and sense of place and to integration of heritage management within the new OP's growth management policies.

B. Growth Management and the Big Policy Moves

To accommodate a growing population and the need for a diversity of housing types, the Plan seeks to identify development opportunities while directing growth and regeneration to "*hubs, corridors and neighbourhoods within a 15-minute walk to services and transportation.*" In laying out the policy directions that support this growth strategy, **we recommend that the draft new OP identify heritage protection and management as integral to its growth management strategy, to be interwoven with all growth-management activities and policies.** A liveable and sustainable city is one that values its heritage resources and demonstrates this by integrating heritage protection and management into the very fibre of its planning processes and documents.

The incorporation of heritage protection and management will help ensure that regeneration happens in suitable locations, at a scale appropriate to its cultural heritage context and in a way that avoids destabilizing established areas. This will be especially critical in the Downtown and Inner Urban

Transects, which contain most of the city's Heritage Conservation Districts (HCDs). By their very nature, these areas are distinct from surrounding areas – hence their reason for designation. Furthermore, most of the heritage areas of the city, HCDs and otherwise, are already 15-minute neighbourhoods. This value should be acknowledged. **We recommend that the HCDs be mapped onto the Transect Plans.**

Integration of new development within the rich architectural and cultural landscape of these areas is not just a question of “*complementing the character*” of these neighbourhoods, rather **policies supporting regeneration must acknowledge the pressure this strategy may place on older, established areas and must identify how the impacts will be managed, specifically with regard to Heritage Conservation Districts.** In increasing residential density, the City must also provide a balance of retail, social and cultural amenities, institutions, workplaces and greenspaces. As noted, many of the city's older neighbourhoods and HCDs can already be characterized as 15-minute neighbourhoods. **Policy direction should be clearly defined to ensure that the character of older neighbourhoods is maintained and enhanced while meeting the increased demands created by the regeneration strategies outlined in the draft new OP.**

Regeneration at the densities specified in the Plan should only be permitted where the HCD also allows for it. HCDs are not stagnant places, most of Ottawa's HCD plans acknowledge and include provisions for ensuring sensitive development. However, these need to be supported by clear policy direction that meaningfully incorporates heritage protection and management. **The character and integrity of HCDs must be protected through the process of accommodating and adapting to growth, regeneration and development.**

Finally, the housing affordability crisis is real. Regeneration is an important strategy in providing much-needed diversity of housing for people of all generations, income levels and backgrounds, and in all neighbourhoods across the city. We fully support the initiatives and policies aimed at increasing the supply of housing options within 15-minute neighbourhoods. **We encourage the City to further explore opportunities and approaches to the sensitive adaptation of heritage resources, and how these may contribute to alleviating the missing-middle housing crisis.**

C. Heritage Management Plan

We understand that the City intends to develop a *Heritage Management Plan* (HMP) as part of the new OP implementation. We fully support this initiative, and encourage the City to develop a plan that is both strategic and progressive in positioning heritage management as integral to city-building and growth-management processes.

To enable this work to proceed under the authority of the *Official Plan*, the latter must include a strong and unequivocal statement about the City's commitment to developing and implementing a *Heritage Management Plan* (HMP). Currently, there is no such clear statement contained in the draft new OP.

We recommend that the new OP make the following, or similar commitment: “*The City shall formalize*

the protection of its built and cultural heritage resources through the development of a Heritage Management Plan. The Plan shall describe and define an overall strategy for the protection and management of heritage resources as an integral part of the city-building process and to achieving sustainable development goals, including: identification and evaluation processes; decision-making processes; and development of policies, funding programs and other plans to support heritage conservation objectives.”

In the absence of the *Heritage Management Plan*, the draft new OP must include strong statements and demonstrated commitment to protecting, conserving and managing Ottawa’s built heritage resources and cultural heritage landscapes. Heritage protection and management should be clearly identified as a Strategic Direction and Cross-Cutting Issue (rather than a subset of these), as noted above.

To that, we note a conspicuous absence of clear policy direction related to the protection and enhancement of heritage resources within the *Big Policy Moves* and supporting *Cross-Cutting Issues* (Section 2). **We recommend that Section 2.2.6 – Culture, be renamed *Cultural Heritage* and amplified with a clear and strong commitment to recognizing, identifying and protecting the value of Ottawa’s heritage resources.** Supported by the vision statement made in the introduction (see above), this section should then demonstrate the City’s understanding and commitment to protecting the cultural heritage values associated with cultural activities and people’s relationship to place and patterns of use within the distinct neighbourhoods, villages and places across the city.

Finally, the draft new OP must articulate the status of the anticipated *Heritage Management Plan*, specifically its purpose as a separate plan; where it will reside within the hierarchy of approval documents; and how it will be implemented and enforced.

D. Sustainability

Local, national and international organizations¹ are increasingly recognizing the important role of culture and heritage conservation as enablers of and integral to sustainable development. In addition to identifying a strong commitment to the protection and management of heritage resources, **we recommend that the new OP recognize that the social, cultural and tangible values associated with heritage buildings and sites are a non-renewable resource.** The retention of heritage buildings is inherently environmentally sustainable, given the substantial embodied energy sequestered in heritage buildings (and built resources, generally), versus the ultra-high embodied energy costs associated with demolition and reconstruction.

¹ In November 2015, the 20th General Assembly of the States Parties to the World Heritage Convention adopted a *Policy on the integration of a sustainable development perspective into the processes of the World Heritage Convention*. The overall goal is to assist communities in harnessing the potential of heritage properties to contribute to sustainable development, while respecting and protecting their heritage value.

While the conservation, rehabilitation and sustainable re-use of heritage resources conserves and enhances existing places and neighbourhoods, it is also an important opportunity to improve climate resiliency by reducing waste and conserving energy associated with demolition and new development.

To that end, **we strongly recommend that Section 2.2.3 - *Energy and Climate Change* be further developed to promote the important role of reusing and retrofitting existing buildings, including heritage buildings, over demolition and redevelopment.** A strong policy direction and incentives should be defined to retain, reuse and retrofit existing buildings and their material parts. Compelling the imaginative reuse of buildings is one of the most environmentally responsible policy positions the City could take, given current climate projections.

Where the replacement of buildings is necessary, **the new OP should take a strong stand against demolition by instituting a policy that supports deconstruction,** while discouraging and/or penalizing demolition. Such a sustainable alternative would see buildings dismantled in a way that maximizes the potential reuse of (heritage) materials and component parts.

Elsewhere, policy direction should be provided that promotes zero-carbon, rather than low-carbon development. The new OP is intended to implement a 25-year vision. Surely over that timeframe, the City should aspire to achieve a zero-carbon, energy-neutral future. While Section 10.3 – *Build resiliency to impacts of extreme heat* provides policy direction for new construction, it is silent on policy related to the retrofitting of existing, and specifically heritage-recognized buildings.

We recommend that the City adopt specific policies and incentives that support achieving a zero-carbon future through the sensitive deep-energy retrofitting and renovation of existing buildings. Specific policies and incentives should be identified to promote energy retrofitting of heritage-recognized buildings in a manner that protects and maintains their cultural heritage value, while providing healthy, resilient and sustainable built environments.

E. Special Districts

We welcome and are encouraged by the City's identification of a series of Special Districts as unique places within the city, of national or international importance. The draft new OP also recognizes that the management of change in these special districts requires distinct planning policies and approaches. Several of these districts include, or are adjacent to, properties owned and/or designated by higher level jurisdictions, namely *Parliamentary Precinct and Confederation Blvd, Rideau Canal, Byward Market, Lansdowne Park, and Ottawa River Islands.*

While the draft new OP indicates that development applications within these districts should conform to the OP as well as the requirements of the Government of Canada and the NCC, we feel that this does not go far enough. **We recommend that the City adopt a policy and develop a robust framework for independent/multilateral design review of development applications involving National Historic Sites, World Heritage sites, and other places of provincial, national or international significance, and/or where several jurisdictions are involved.** This will ensure the consistent and holistic review of proposals and development applications.

F. Secondary Plans and Hierarchy of Planning Documents

We are encouraged by the elevation of several former Community Design Plans (CDP) to the status of Secondary Plans (SP), which has for effect to transform planning aspirations into statutory policy. In principle, Secondary Plans (SP) implement and provide more detailed direction on the overall planning policies of the draft new OP, while remaining consistent with the latter. In the event of discrepancy, the Secondary Plan is to take precedence. While this may be stated within the individual SP, the draft new OP lacks a clear statement with regards precedence.

We recommend that the hierarchy of planning documents and how the City will interpret these documents be made explicit in the draft new OP. The policy should address the suite of land-use and planning tools and policies, including the Zoning Bylaw, Heritage Conservation District Plans, Community Design Plans (elevated to Secondary Plans) and the newly introduced Transect policies. In the past, inconsistencies between the provisions in these documents have resulted in confusion and unreliable, selective application of precedence. Clarity in the hierarchy of plans will help avoid uncertainty for communities, developers and planners, thereby avoiding conflict.

G. Implementation

We are encouraged by the recent adoption of the *Heritage Community Improvement Plan* (By-law No. 2020-41), which includes a budget increase to the Heritage Incentive Grant Program in the amount \$500,000 annually over a three-year trial period.

Similarly, we were encouraged when the City increased funding to the Built Heritage Funding Programs (BHFP) to \$300,000 annually. **We urge that the overall BHFP budget be increased annually, as well as the amount of the individual project caps (currently at \$10,000 and \$25,000) to better accommodate more of the applications for these regularly over-subscribed Programs.**

Heritage Ottawa is available and happy to discuss this report at your convenience.

Submitted by Richard Belliveau, President, on March 22, 2021 on behalf of the Board of Directors

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