



Submission to the Government of Ontario on the new Ottawa *Official Plan* by Heritage Ottawa

February 18, 2022

Heritage Ottawa was pleased to provide a detailed submission to Ottawa's *New Official Plan* team in March 2021 outlining our general support for its initial objectives. Our submission focused on the meaningful incorporation of heritage protection and management within the Plan: by directly linking 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.

We were disappointed and concerned that the unclear and equivocal language in the final *Official Plan* (OP) approved by City Council could lead to conflicting interpretations resulting in the weakening of the protection of our heritage resources.

In the absence of the *Heritage Management Plan*, the new OP must include strong statements and a demonstrated commitment to protecting, conserving and managing Ottawa's built heritage resources and cultural heritage landscapes.

Because it is the role of the Ontario government to assess municipal official plans with respect primarily to "matters of provincial interest," we are proposing changes to the Ottawa OP in order to:

- Better serve the provincial interest set out in the **Ontario Planning Act** at S. 2(d) "**the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest.**"
- Better ensure that the Ottawa OP meets the requirement in the **Provincial Policy Statement** sec. 2.6.1 that "**Significant built heritage resources and significant cultural heritage landscapes shall be conserved.**"

We therefore suggest the following two revisions which we feel are necessary to strengthen these important objectives:

- **Section 3.2.13 (p.50):** Where development occurs on properties designated under the *Ontario Heritage Act*, intensification targets and minimum density requirements are encouraged to be met through context-sensitive infill that conserves cultural heritage attributes. This development

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shall respect Statements of Cultural Heritage Value and **must follow** applicable Heritage Conservation District guidelines.

- **Section 4.5.2 (3) (p.89):** Heritage designation **is intended** to ensure **that all development** is contextually appropriate development and is not intended to discourage intensification or limit housing choice. Elements of the built form, including height, scale and massing of such development **shall conserve** the defined cultural heritage value and attributes of the property or Heritage Conservation District.

We believe that heritage protection should be stated as a "shall" rather than something to "consider." We also do not feel that conserving heritage properties can or should have to "balance" with intensification objectives. Conservation and intensification each have their own objectives. Creating a "balance" is the responsibility of the planning process and those involved in it.

In a January 24, 2022 meeting between representatives of five Ottawa community associations encompassing 15 heritage conservation districts and *Official Plan* planner, Alain Miguelez and Program Manager, Heritage Planning, Lesley Collins, to seek clarification of the intent and meaning of S. 4.5.2 (3), both City staff agreed that the intent of this clause was to prevent intensification that is not contextually appropriate as defined in heritage conservation district plans.

As an organization which has been directly and effectively involved with the challenges of preserving our built heritage for over 50 years, Heritage Ottawa urges the Province of Ontario to make the changes recommended above.

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Chair, Heritage Ottawa Advocacy Committee

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