



**Greater Ottawa Home Builders' Association**  
Association des constructeurs d'habitations d'Ottawa

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February 2, 2022

Dan Ethier  
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**RE: Greater Ottawa Home Builders Association  
Comments on Policies within Ottawa's new Official Plan**

The Greater Ottawa Home Builders' Association (GOHBA) is requesting changes to specific language within the Official Plan in order to remove barriers to building homes, maximize development potential, help the City achieve its goals and assist the Province in achieving its goals and interests in relation to municipal Official Plans.

Please find enclosed our short list of priority items where we are requesting changes, deletions or additions to Ottawa's Official Plan.

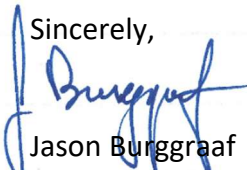
A compendium of our full comments and proposed changes on the entirety of Official Plan is included in Appendix "A", linked below, which we originally provided to city staff. We are also providing links to our complete submissions to the City, for your reference.

The City wants housing to be provided at affordable prices, but the draft Official Plan does not recognize the cumulative impact of its policies or how the development requirements it imposes work against being able to provide housing that is affordable.

Our proposed changes, alongside our recommendation through MGP to allocate additional expansion lands in order to accommodate growth and satisfy housing demand needs to 2046, will help address GOHBA's fundamental concerns housing affordability and sufficient housing supply for Ottawa's residents.

We are available to discuss any comments or requested changes.

Sincerely,



Jason Burggraaf  
Executive Director

**List of Appendices:**

[A - Compendium of written comments submitted to City of Ottawa Staff – Greater Ottawa Home Builders’ Association](#)

[B – GOHBA Submission on New Official Plan to Join Meeting of PC/ARAC October 13, 2021](#)

[C – Official Plan Impact on Housing Costs – Greater Ottawa Home Builders’ Association](#)

[D – Intensification Dwelling Units in the Growth Management Strategy have not been brought through to the Official Plan – Greater Ottawa Home Builders’ Association](#)

[E – New City of Ottawa Official Plan - Growth Management Strategy: Preliminary Comments and Conclusions - Altus Group](#)

[F – Ottawa OP Review: Land Economics Issues - Altus Group](#)

[G – Review of 2013 Hemson Report and 2021 Fiscal Analysis – Altus Group](#)

[H – Estimating the Structural Housing Shortage in Canada: Are We 100 Thousand or Nearly 2 Million Units Short? – Scotiabank](#)

[I – Baby Needs a New Home \(Ottawa extract\) - Smart Prosperity Institute](#)

[J – Municipal Benchmarking Project – Ottawa – Canadian Home Builders’ Association](#)

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
3.1 (5)	<p>5) The identification of new or additional urban area, and new or additional village area, may only occur through a comprehensive review in accordance with the Planning Act and Provincial Policy Statement Evaluation of lands for potential expansion of the settlement area may include, but are not necessarily limited to, the following considerations:</p> <p>a) That there are insufficient opportunities within the urban area and villages to accommodate a 15-year supply of market-based residential development;</p> <p>b) That there are insufficient opportunities within the city to accommodate projected employment and other land-uses;</p> <p>c) The required components of municipal infrastructure that are planned or available, have sufficient capacity, are financially viable over their life cycle, and protect health, safety and the natural environment. For the purposes of this policy, financial life cycle viability shall include the relative scale of the costs associated with any new or additional area to be serviced, any required system upgrades to provide the required capacity, and the inclusion of operations, maintenance and replacement costs post-development;</p>	<p>5) The identification of new or additional urban area, and new or additional village area, may only occur through a comprehensive review in accordance with the Planning Act and Provincial Policy Statement Evaluation of lands for potential expansion of the settlement area may include, but are not necessarily limited to, the following considerations:</p> <p>a) That there are insufficient opportunities within the urban area and villages to accommodate a 15-year supply of market-based residential development;</p> <p>b) That there are insufficient opportunities within the city to accommodate projected employment and other land-uses;</p> <p><del>c) The required components of municipal infrastructure that are planned or available, have sufficient capacity, are financially viable over their life cycle, and protect health, safety and the natural environment. For the purposes of this policy, financial life cycle viability shall include the relative scale of the costs associated with any new or additional area to be serviced, any required system upgrades to provide the required capacity, and the inclusion of operations, maintenance and replacement costs post-development;</del></p>	<p>c) should be removed.</p> <p>This is not done now &amp; this is a very cumbersome undertaking that cannot be completed by a private proponent. This review requires many details that only the city knows.</p>
3.1 (6)	<p>6) Notwithstanding Policy 5), adjustments of urban and village boundaries outside of a comprehensive review may be considered through amendment to this Plan only when all of the following circumstances apply:</p> <p>a) There is no net increase in land within the urban area;</p> <p>b) There is no net increase in land within villages, except in the circumstance of a transfer of approved lots per Subsection 3.4.8;</p> <p>c) The adjustment supports the ability to meet intensification targets identified in Subsection 3.2;</p> <p>d) Urban and village expansions do not include agricultural resource lands;</p> <p>e) New or additional lands within the urban boundary have appropriate municipal services, and enough existing reserve capacity in accordance with Policy 5 c);</p> <p>f) Where available, new or additional lands within a village shall have appropriate municipal services, and there is enough existing reserve capacity in accordance with Policy 5 c); and</p> <p>g) Village expansion does not encroach into the buffers from existing suburban areas.</p>	<p>6) Notwithstanding Policy 5), adjustments of urban and village boundaries outside of a comprehensive review may be considered through amendment to this Plan only when all of the following circumstances apply:</p> <p>a) There is no net increase in land within the urban area;</p> <p>b) There is no net increase in land within villages, except in the circumstance of a transfer of approved lots per Subsection 3.4.8;</p> <p>c) The adjustment supports the ability to meet intensification targets identified in Subsection 3.2;</p> <p>d) Urban and village expansions do not include agricultural resource lands;</p> <p><del>e) New or additional lands within the urban boundary have appropriate municipal services, and enough existing reserve capacity in accordance with Policy 5 c);</del></p> <p><del>f) Where available, new or additional lands within a village shall have appropriate municipal services, and there is enough existing reserve capacity in accordance with Policy 5 c); and</del></p> <p>g) Village expansion does not encroach into the buffers from existing suburban areas.</p>	<p>e) and f) should be removed - related to 5c which is too broad. How does urban regeneration come into play when assessing existing reserve capacity for growth lands? Given you are not able to oversize for lands outside of 25 year growth boundary, and significant regeneration, coach houses, etc. are permitted which will take up some existing reserve capacity - at some point you will be at existing reserve capacity.</p>

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
4.1.3(5)	An amendment to this Plan is <b>required</b> when an Arterial or City <b>Highway</b> is added to Schedules C4, C5, C7 and C8, <b>but not when either is deleted</b> . An amendment to this Plan shall not be required to add or delete Collectors or Major collectors.	An amendment to this Plan is <b>required</b> when an Arterial or City <b>Highway</b> is added <b>or deleted</b> to Schedules C4, C5, C7 and C8, <del>but not when either is deleted</del> . An amendment to this Plan shall not be required to add or delete Collectors or Major collectors.	Revise wording so an OPA is required to add or remove a highway or to modify a road classification. See also 11.7(e). It is not appropriate that an OPA is not required to remove a road from the official plan. Procedural fairness requires a full process to consider the planning & development charge implications.
11.7(e)	1) Technical revisions to the Official Plan or the Zoning By-law are permitted without adopting an amendment and without need for notification as per Subsection 11.4, Policy 1, provided they do not change the intent of the Official Plan or the By-law. Technical revisions include: a) Changing the numbering, cross-referencing and arrangement of the text, tables, schedules and maps; altering punctuation or language for consistency; b) Correcting grammatical, dimensional and boundary, mathematical or typographical errors; c) Inserting historical footnotes or similar annotations; d) Removing sunset clauses applicable to site-specific policies; and e) The reclassification of roads to different road classifications on Schedules C4, C5, C9, C10 and C16.	<del>e) The reclassification of roads to different road classifications on Schedules C4, C5, C9, C10 and C16.</del>	As above, subsection e permits an amendment to roads without a planning process. E should be removed.
4.7.1(1b)	To protect, improve or restore the quality and quantity of water in any receiving watercourse, development shall: a) Conform to approved servicing plans including the Infrastructure Master Plan, the Strategic Asset Management Plan, the Wet Weather Infrastructure Master Plan, subwatershed studies or environmental management plans, approved master servicing studies and applicable local servicing studies; and (b) not exceed the capacity of the existing infrastructure system.	<del>remove b) not exceed the capacity of the infrastructure system</del>	This is language (b) that was added in the 2nd draft.  There is no recognition of the ability to upgrade infrastructure or future expansion opportunities. This will prevent any projects that increase density from being built.
4.7.1(16b)	A master servicing study and/or an environmental management plan shall be updated if: a) There is a significant change in the conditions upon which the study is based; b) There are proposed changes to planned infrastructure needed to service a subdivision that would have a significant impact on the infrastructure needs of another subdivision within the master servicing study and/or environmental management plan study area c) The applicable Class Environmental Assessment approval has expired.	A master servicing study and/or an environmental management plan shall be updated if: a) There is a significant change in the conditions upon which the study is based; <del>b) There are proposed changes to planned infrastructure needed to service a subdivision that would have a significant impact on the infrastructure needs of another subdivision within the master servicing study and/or environmental management plan study area.</del> c) The applicable Class Environmental Assessment approval has expired.	Remove b) Wording is already provided in typical MSS documents about what is a minor amendment and what is a major amendment, so you don't have to reopen the MSS with every small change. The wording proposed in the draft official plan is too broad and it does not consider the fact specific context. The draft official plan wording may be construed to require amendments to the MSS on a regular basis which is not appropriate.

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
Section 5 Table 7 (page 131)	Downtown Core Transect / 5.1.4(4) / Minor Corridors / Low-rise and Mid-rise: minimum 2 storeys and maximum 4 storeys Inner Urban Transect / 5.2.3(3) / Minor Corridors / Low-rise and Mid-rise: minimum 2 storeys and maximum 4 storeys Outer Urban Transect / 5.3.3(4) / Minor Corridors / Low-rise: minimum 2 storeys and maximum 4 storeys Suburban Transect / 5.4.1(2) / Minor Corridors / Low-rise: minimum 2 storeys and maximum 4 storeys	Downtown Core Transect / 5.1.4(4) / Minor Corridors / Low-rise and Mid-rise: minimum 2 storeys and maximum <b>4 9</b> storeys Inner Urban Transect / 5.2.3(3) / Minor Corridors / Low-rise and Mid-rise: minimum 2 storeys and maximum <b>4 6</b> storeys Outer Urban Transect / 5.3.3(4) / Minor Corridors / Low-rise: minimum 2 storeys and maximum 4 storeys Suburban Transect / 5.4.1(2) / Minor Corridors / Low-rise: minimum 2 storeys and maximum 4 storeys	Restores height permissions on minor corridors in the Downtown Core and Inner Urban Transects that were in the 1st and 2nd drafts of the OP and reduced to 4 in a motion.
5.1.1 (6) (d)	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.	remove(d) entirely	Remove (d) entirely This level of detail should not be contained within an official plan but rather should be in subdivision design guidelines.
5.1.4(4)	On Downtown Core Minor Corridors, all buildings shall have active entrances facing the Minor Corridor, regardless of use. Minimum 2 storeys and maximum building heights are generally in upper Mid-rise range between 7 and 4 storeys	On Downtown Core Minor Corridors, all buildings shall have active entrances facing the Minor Corridor, regardless of use. Minimum 2 storeys and maximum building heights are generally in upper Mid-rise range <b>between 7 and 9 storeys</b>	Restores height permissions on minor corridors in the Downtown Core and Inner Urban Transects that were in the 1st and 2nd drafts of the OP and reduced to 4 in a motion.
5.2.1 (5) (d)	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.	remove(d) entirely	Remove (d) entirely This level of detail should not be contained within an official plan but rather should be in subdivision design guidelines.
5.2.3(3)(a)	Along Minor Corridors, permitted building heights are as follows, subject to appropriate height transitions and setbacks:  Generally, not less than 2 storeys and up to 4 storeys	Generally, not less than 2 storeys <b>and in the maximum height range of between 4 to 6 storeys</b>	Restores height permissions on minor corridors in the Downtown Core and Inner Urban Transects that were in the 1st and 2nd drafts of the OP and reduced to 4 in a motion.
5.2.3(3)(b)	<del>Where the Zoning By-law permits a Low-rise building, an amendment to this Plan shall not be required to consider a building of 5 or 6 storeys</del>	Where the Zoning By-law permits a Low-rise building, an amendment to this Plan shall not be required to consider a building of 5 or 6 storeys	Restore language/height permissions from first draft  Refer to comments in 5.3.3(4)
5.3.3(4)	Along Minor Corridors, permitted building heights, subject to appropriate height transitions and setbacks shall not be less than 2 storeys and up to 4 storeys except where a secondary plan or area-specific policy specifies different heights.	Along Minor Corridors, permitted building heights, subject to appropriate height transitions and setbacks shall not be less than 2 storeys and up to <b>6</b> storeys except where a secondary plan or area-specific policy specifies different heights.	The change (reduction) imposed by way of motion at council, from 4 to 6 storeys, summarily removed the potential for 1000's of units at locations where intensification should occur without consideration of where the intensification will be accommodated elsewhere, nor the impact on housing affordability and housing supply. The council motion change was without planning merit and it should not remain in the official plan.

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
5.4.1(2)	<p>2) The Suburban Transect is generally characterized by Low- to Mid-density development. Development shall be:</p> <p>a) Low-rise within Neighbourhoods <b>and along Minor Corridors</b>;</p> <p><del>b) Low-rise along Minor Corridors, however the following policy direction applies;</del></p> <p><del>i) Mid-rise buildings, between 5 to 7 storeys, may be considered through a rezoning without an amendment to this Plan;</del></p> <p><del>ii) Mid-rise buildings above 7 storeys may be permitted through an area-specific policy or secondary plan; and</del></p> <p><del>iii) High-rise buildings may be permitted through a secondary plan</del></p>	<p>2) The Suburban Transect is generally characterized by Low- to Mid-density development. Development shall be:</p> <p>a) Low-rise within Neighbourhoods <b>and along Minor Corridors</b>;</p> <p>b) Low-rise along Minor Corridors, however the following policy direction applies;</p> <p>i) Mid-rise buildings, between 5 to 7 storeys, may be considered through a rezoning without an amendment to this Plan;</p> <p>ii) Mid-rise buildings above 7 storeys may be permitted through an area-specific policy or secondary plan; and</p> <p>iii) High-rise buildings may be permitted through a secondary plan</p>	<p>Restore language/height permissions from first draft Reinstated b)</p> <p>Refer to comments in 5.3.3(4)</p>
5.4.3 (3)	<p>c) Such buildings may be limited to 4 storeys on lots too small to accommodate an appropriate height transition. Along Minor Corridors, subject to appropriate height transitions and setbacks, permitted building heights are of up to 4 storeys, <del>however,</del></p> <p><del>i) Mid-rise buildings, between 5 to 7 storeys, may be considered through a rezoning without amendment to this Plan;</del></p> <p><del>ii) Mid-rise buildings above 7 storeys may be permitted through an Area-Specific Policy or Secondary Plan; and</del></p> <p><del>iii) Mid-rise or high-rise buildings may be permitted through a Secondary Plan.</del></p>	<p>c) Such buildings may be limited to 4 storeys on lots too small to accommodate an appropriate height transition. Along Minor Corridors, subject to appropriate height transitions and setbacks, permitted building heights are of up to 4 storeys, however,</p> <p>i) Mid-rise buildings, between 5 to 7 storeys, may be considered through a rezoning without amendment to this Plan;</p> <p>ii) Mid-rise buildings above 7 storeys may be permitted through an Area-Specific Policy or Secondary Plan; and</p> <p>iii) Mid-rise or high-rise buildings may be permitted through a Secondary Plan.</p>	<p>Restore language/height permissions from first draft Reinstated c) i to iii</p> <p>Refer to comments in 5.3.3(4)</p>
5.6.1.1 (3)(a)	<p>Where the Zoning By-law for an area has not been updated either before adoption of this Plan in anticipation of this Plan's policy direction, or post adoption of this Plan, to be consistent with the policy intent of this Plan, the City will generally be supportive of applications for low-rise intensification that seek to amend the development standards of the underlying zone where the proposal demonstrates that the development achieves objectives of the applicable transect with regards to density, built form and site design in keeping with the intent of Sections 3 and 5 of this Plan.</p>	<p><b>The City will be supportive of applications for low-rise intensification that seek to move beyond the development standards of the underlying zone where the proposal demonstrates that the development achieves objectives of the applicable transect with regards to density, built form and site design in keeping with the intent of Sections 3 and 5 of this Plan.</b></p>	<p>Restore language/height permissions from first draft</p> <p>Refer to comments in 5.3.3(4)</p>

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
11.5 (9d)	<p>Variations to reduce the required area of soft landscaping: i) May be tied to requirements for more intensive plantings such as trees or shrubs, so that the volume of vegetation compensates for reduced horizontal area; however,</p> <p>ii) Despite i), where the purpose or effect is primarily to enable motor vehicle parking or driveways, variations to reduce the required soft landscaping <b>may only be considered where, in the opinion of the Planning Department, the proposal serves the goals of context sensitive design and results in better urban design than would compliance with the relevant zoning standard, and upholds</b> the intent of this Plan; and</p>	<p>Variations to reduce the required area of soft landscaping: i) May be tied to requirements for more intensive plantings such as trees or shrubs, so that the volume of vegetation compensates for reduced horizontal area; however,</p> <p>ii) Despite i), where the purpose or effect is primarily to enable motor vehicle parking or driveways, variations to reduce the required soft landscaping <b>may only be considered where, <del>in the opinion of the Planning Department,</del> the proposal serves the goals of context sensitive design and results in better urban design than would compliance with the relevant zoning standard, and upholds</b> the intent of this Plan; and</p>	<p>This gives far too much authority to the Planning Department. Wherein this section is direction to the Committee of Adjustment, it is not beholden to Planning's "opinion" regarding urban design.</p>
11.6 (3)	<p>new language should be inserted</p>	<p>This official plan and the comprehensive implementing zoning bylaw shall not result in the loss of development rights, such as height, density or uses, in existence as of the date of approval of the official plan.</p>	<p>The OP must contain a policy that states existing development rights shall not be lost either through official plan policies or the future zoning by-law that will implement the new OP. There are many changes to SPs and ASPs that are being adopted into Volume 2A 2B and 2C.</p>
11.6 (4)	<p>4) An increase in height to permit a building in a taller height category, than as permitted by the underlying transect or designation policies of this Plan requires:</p> <p><del>a) In the case of a Minor Corridor, only for increases from Low rise to Mid-rise which are 5 or 6 storeys, and only if a secondary plan or area-specific policy does not provide otherwise, a Zoning By-law amendment; and</del></p> <p><del>b) In all other cases,</del> an amendment to this Plan through an area-specific policy, or an amendment to a secondary plan where applicable, in addition to the Zoning By-law amendment.</p>	<p>4) An increase in height to permit a building in a taller height category, than as permitted by the underlying transect or designation policies of this Plan requires:</p> <p>a) In the case of a Minor Corridor, only for increases from Low-rise to Mid-rise which are 5 or 6 storeys, and only if a secondary plan or area-specific policy does not provide otherwise, a Zoning By-law amendment; and</p> <p>b) In all other cases, an amendment to this Plan through an area-specific policy, or an amendment to a secondary plan where applicable, in addition to the Zoning By-law amendment.</p>	<p>Restore language/height permissions from first draft</p> <p>Refer to comments in 5.3.3(4)</p>
11.7 (1e)	<p>Provide direction for technical revisions and amendments to the Plan</p> <p>1) Technical revisions to the Official Plan or the Zoning By-law are permitted without adopting an amendment and without the need for notification as per Subsection 11.4, Policy 1), provided they do not change the intent of the Official Plan or the Zoning By-law. Technical revisions include: ...</p> <p>e) The reclassification of roads to different road classifications on Schedules C4, C5, C9 C10 and C16.</p>	<p>Delete e)</p>	<p>See also 4.1.3(5).</p> <p>The planning process must be followed before roads are added or removed from various categories otherwise there are planning and development charge implications.</p>

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
11.9 (1)	<p>The City will develop and maintain a monitoring plan that addresses the requirements of the Provincial Policy Statement for monitoring the inventory of industrial and residential land to accommodate growth. The monitoring plan will:</p> <p>a) Address Council’s direction that the land supply and intensification targets be reviewed no later than five years after the adoption of the plan; and</p> <p>b) Be reviewed from time to time and modified based on the availability of data sets and the resources allocated to undertake monitoring.</p>	<p>The City will develop and maintain a monitoring plan that addresses the requirements of the Provincial Policy Statement for monitoring the inventory of industrial and residential land to accommodate growth. The monitoring plan will:</p> <p>a) Address Council’s direction that the land supply and intensification targets be reviewed no later than five years after the adoption of the plan; <del>and</del></p> <p><del>b) Be reviewed from time to time and modified based on the availability of data sets and the resources allocated to undertake monitoring-</del></p> <p><b>b) Recalculate population, household, dwelling and employment projections to the 2046 planning horizon; and</b></p> <p><b>c) Review development application requirements and timelines to ensure efficient development processes.</b></p>	<p>This checkup will be critical to knowing whether the concerns the residential construction industry has with the Official Plan at this point have created barriers to building infill housing – it cannot be dismissed or diminished by not providing proper support.</p> <p>New b) to ensure that the Official Plan is fulfilling its obligation to provide a sufficient amount of housing for our population, we need to do more than just check our progress against housing targets set in 2019. Our population, household and dwelling projections need to be recalculated as well to ensure that we are working towards the correct goals.</p> <p>New c) the review needs to consider how many Official Plan Amendments were needed to have development applications proceed, and if there are improvements required to more efficiently process development applications, including approval timelines</p>
11.10 (new)	<b>TRANSITION OF IN-STREAM APPLICATIONS</b>		This transposes "Document 6 - Memorandum detailing a framework for consideration of in-process applications" into the OP
	<p><u>Consistency with the Provincial Policy Statement</u></p> <p>Section 3 of The Planning Act states that a decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Tribunal, in respect of the exercise of any authority that affects a planning matter, shall be consistent with the provincial policy statements (PPS) that are in effect on the date of the decision. This also applies to comments, submissions or advice that they may provide.</p>		
11.10.1	Official Plan Amendments		



Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
	<p>1) If a complete application is approved by Council on or before October 27, 2021, it will be processed on the basis of existing Official Plan policy provided it is consistent with the 2020 Provincial Policy Statement.</p>	<p>1) If a complete application is approved by Council on or before <b>November 24</b> <del>October 27</del>, 2021, it ...</p>	<p>The official plan is not in force until it is approved by the Minister.  Council did not pass the adoption bylaw until November 24th, By-law 2021-386, this is when the final OP that includes all of the changes requested through motions at council on October 27th was adopted through an adoption by-law of council. Moreover, it was only around this time that the final draft of the official plan, including the revisions required to implement the motions passed by Council on October 27th, was available. All of the transition dates, for when the new official plan should be considered in addition to the existing in force official plan, should be adjusted to November 24th.</p>
	<p>2) If an application comes to Council after Council adoption of the Official Plan but before Ministry approval of the Official Plan, any reports going forward to Committee and Council under this circumstance must be evaluated against the existing Official Plan and must also include an evaluation of the application against the Council approved new Official Plan (and the new Secondary Plan, where applicable). In the period between Council approval of the New OP and the Minister's approval of the New OP, City staff will apply whichever provision, as between the Current and New OP, is more restrictive.</p>		
	<p>3) Thus, based on 2 above, an applicant may decide it is worthwhile to continue with an OPA to the Current OP even after Council has approved the New OP, if development is to proceed in the period between the approval of the New OP by Council on Oct 27, 2021) and Minister approval (anticipated in Q1 2022).</p>	<p>approval of the New OP by Council on <b>November 24</b> <del>Oct 27</del>, 2021)</p>	
	<p>4) There is currently no automatic transition provisions incorporated into the New OP dealing with how recently approved OPA's (to the Current OP) are or are not carried forward into the New OP. Council must deal with these issues on a case by case basis at the time an OPA is approved. Council could take one of the following steps:</p>		

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
	<p>a) If the OPA to the Current OP is approved sufficiently far in advance of the New OP going to Council, Council may direct staff to incorporate site-specific provisions into the final draft of the New OP, prior to it going to Council.</p>		
	<p>b) If the OPA is approved closer to the date on which the final draft of the New OP is scheduled to go to Council (such that there would not be sufficient time for Staff to change the draft New OP), OR after Council approval of the New OP (but before Minister approval), at the time of OPA approval Council could direct that:</p> <p>i) Staff prepare a request to the Minister to approve the New OP with amended language which carries forward the OPA provisions (the Minister has discretion to amend the New OP before approving it); OR</p> <p>ii) following the approval of the New OP by the Minister, Staff to prepare and bring forward an amendment to the New OP; OR</p> <p>iii) Make no specific direction regarding carrying forward the OPA into the New OP. The OPA would modify the Current (Old) OP only. Once Minister approval takes place the New OP provisions applicable to the property would govern.</p>		
	<p>5) If an application for an OPA to the Current OP was still pending after the Minister has approved the New OP, it will be moot (the New OP replaces the Current (Old) OP). For the first 2 years following Minister approval of the New OP Council has discretion under the Act to not accept requests for amendment to the New OP (s. 22 (2.1) and (2.2)). Staff will seek direction from Council with respect to whether any amendments or any class of amendments will be permitted during the two year period. If directed by Council to permit a pending OPA amendment application to be converted to a New OP amendment application, Staff would recommend that the City not require a new application fee. In that case Staff would recommend that any new or updated supporting documents be required if the designations in the New OP are substantially different from the designations in the Current OP which they originally applied to amend. Staff would also recommend that fresh notice of application under the Act be provided, as necessary.</p>		

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
	6) If a complete application for a OPA application is received after the final Official Plan is adopted by Council (Fall of 2021), the application will solely be evaluated based on the new final Official Plan as adopted by Council		
11.10.2	Zoning By-law Amendments		
	1) If a complete application is received by no later than the day before the new Official Plan is adopted (October 27, 2021), it will be processed on the basis of existing Official Plan policy provided it is consistent with the 2020 Provincial Policy Statement.	<b>November 24</b> <del>October 27, 2021</del>	
	2) For complete applications received after the day before the new Official Plan is adopted on October 27, 2021), but before Ministry approval of the Official Plan, any reports going forward to Committee and Council under this circumstance must be evaluated against the existing Official Plan and must also include an evaluation of the application against the Council approved new Official Plan (and the new Secondary Plan, where applicable). In the period between Council approval of the New OP and the Minister's approval of the New OP, City staff will apply whichever provision, as between the Current and New OP, is more restrictive.	<b>November 24</b> <del>October 27, 2021</del>	
11.10.3	Zoning By-law amendments that conform to the new Official Plan but not the current Official Plan		
	1) Council can pass the by-law after the new Official Plan is adopted but it only comes into force if the relevant policies authorizing it are approved by the Minister. Pursuant to the Planning Act, section 24, subsections (2) and (2.1) Council may pass a by-law that does not conform with the official plan but will conform to the new Official Plan once it comes into effect. If the new Official Plan does not come into effect the by-law has no force and effect.		
11.10.4	Plans of Subdivision		
	1) If a complete application is received no later than the day before the new Official Plan is adopted (October 27, 2021), it will be processed on the basis of existing Official Plan policy provided it is consistent with the 2020 Provincial Policy Statement.	before the new Official Plan is adopted ( <b>November 24</b> <del>October 27, 2021</del> )	

Section Reference	Current Wording (including approved at Council)	GOHBA Proposed Wording	GOHBA Comments
	2) If a plan of subdivision was granted draft approval no later than the day before the new Official Plan is adopted (October 27, 2021), it can proceed to registration, provided registration is accomplished within three years after granting draft approval. Extensions and re-submissions will be reviewed/evaluated on the basis of the new Official Plan.	before the new Official Plan is adopted ( <del>November 24 October 27, 2021</del> )	
11.10.5	Consents		
	1) If a complete application is received no later than the day before the new Official Plan is adopted on October 27, 2021), it will be processed on the basis of existing Official Plan policy provided it is consistent with the 2020 Provincial Policy Statement.	before the new Official Plan is adopted ( <del>November 24 October 27, 2021</del> )	
	2) Applications received after the day before the new Official Plan is adopted on October 27, 2021, but before Ministry approval of the Official Plan, and any reports going forward to the Committee of Adjustment under this circumstance must be evaluated against the existing Official Plan and must also include an evaluation of the application against the Council approved new Official Plan (and the new Secondary Plan, where applicable). In the period between Council approval of the New OP and the Minister's approval of the New OP, City staff may apply whichever provision, as between the Current and New OP, is more restrictive when considering the application.	before the new Official Plan is adopted ( <del>November 24 October 27, 2021</del> )	
	3) If a consent was granted conditional approval no later than the day before the new Official Plan is adopted (October 27, 2021), it can proceed to registration, provided registration is accomplished within two years after granting conditional approval, or within the stated statutory period. Extensions and re-submissions may be reviewed/evaluated on the basis of the new Official Plan.	before the new Official Plan is adopted ( <del>November 24 October 27, 2021</del> )	
11.10.6	Review of Site Plans – Building Permits		
	1) Until such time as amendments are made to the Comprehensive Zoning By-law, applications will be reviewed/evaluated for zoning compliance based on the provisions of the existing Zoning By-law.		