



October 26, 2021

City Of Ottawa  
110 Laurier Avenue West,  
Ottawa, Ontario K1P 1J1

Attention: Members of City Council

**Re.: Consideration of the Draft Official Plan**

Dear Members of City Council,

Claridge Homes is one of the largest developers and landowners in the City of Ottawa, with over 1000 employees. We are committed to providing a variety of residential and mixed use communities all across the City, and we have several very urban developments as well as suburban and greenfield neighbourhoods. Accordingly, we have actively participated in the draft official plan process, have made numerous submissions to staff, and to the Joint Committee (Planning/ARAC); and most of our concerns and issues have not been satisfactorily addressed.

Claridge is of the opinion that the draft official plan is seriously flawed, and that it does not accommodate, or plan for, the required future growth, as is mandated by the Provincial Policy Statement. The resulting restraint of opportunities to meet the market demand will only adversely affect the affordability of new homes.

One of the foundational elements of the new official plan is the Growth Management Strategy (GMS), in which Council endorsed the "Balanced Scenario" with 51% of new growth to be through intensification. We believe that the GMS is flawed in its population projections, made 3 years ago, which propose that the City will have a population of 1.41 Million people in 2046. Current population projections, using the data from the Ontario Ministry of Finance, projects the population will be 1.5 Million in 2046 (as described in the report by Smart Prosperity Institute titled "Baby Needs a New Home - Projecting Ontario's Growing Number of Families and Their Housing Needs"). This gap of 90,000 people is a significant increase.

Furthermore, in a report by Scotiabank Economics, there is a discussion of how the G7 nations compare in terms of providing dwellings per 1,000 people of the respective population. The average of the 6 nations with data show an average of 471 units per 1,000 population. Canada, however, is the lowest at 424 per 1,000. The City of Ottawa is now at 403 per 1,000; down from 421 in 2016 - illustrating that supply is not keeping up with population growth. The City's GMS projections propose a rate of 419 per 1,000 by 2046; below the average for Canada, which is already the lowest of the G7 nations.

In terms of growth requirements, even if the low threshold of 419 units per 1,000 population is used with the updated increased population of 1.5 Million, this would require an additional 37,310 units by 2046; of which 18,478 units would be greenfield and the balance fulfilled by 51% intensification. That would require an additional 1,026 hectares of new land for urban expansion.



If the City were to proactively decide to increase housing supply to rates that are at the G7 average of 471 units per 1,000 population, that requirement for additional land supply would increase to 1,154 hectares.

Another significant flaw in the GMS is the proposition that the market demand for single detached, semi-detached and rowhouse dwellings can be met by a theoretical housing form (called 613 flats) which do not actually exist in the City in any meaningful way. We believe that the new typology may be useful in satisfying a niche demand, but that it will not address the true market demand; and this is an obligation of this official plan, in order to comply with the Provincial Policy Statement.

The GMS and first draft of the official plan allocated a high number of “ground-oriented dwellings” on existing lots in established neighbourhoods, as a means of satisfying the required intensification number and ostensibly meeting a market demand for singles, semi-detached and rowhouses. This strategy significantly shifted in the current draft, with many of those units being reallocated to hubs and corridors, and no longer ground-oriented, but apartments. That change also significantly reduced the number of units that were supposed to be targeting “market demand”.

Several motions at Joint Committee also have the effect of further reducing the number of intensification units within established communities; to the point that it is doubtful that the official plan can actually satisfactorily provide for the growth that is intended by the GMS.

We request that Council direct staff to revisit the population projections and new household requirements, and perform a new analysis of the places where intensification is targeted, to ensure that the numbers are sufficient and that they meet the market demand for housing options. Failing this, we will be seeking Ministerial intervention to adequately address these shortfalls of the official plan.

Yours truly,  
**Claridge Homes Group of Companies**

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**BY EMAIL**

October 13, 2021

**Chairs Gower and Moffatt** – Planning Committee  
**Chair El-Chantiry** - Agriculture & Rural Affairs Committee  
**Members of the Joint Committee of Planning Committee and ARAC**

**City of Ottawa**

**Re: City of Ottawa Draft Official Plan  
Claridge Submission -Growth Management, Housing and Affordability**

Claridge Homes is one of the largest developers and landowners in the City of Ottawa. It is committed to providing a variety of residential and commercial buildings throughout the city. Accordingly, Claridge has been actively engaged throughout this draft official plan process. It has met with the city and provided comments on several occasions. Claridge’s engagement is directed to create an official plan that will support the growth that the city has forecasted will occur. At this time, Claridge is of the opinion that the draft official plan is flawed and it will fail; the combination of policies creates a planning environment that will not support the growth forecasted. There will not be adequate housing available both in terms of the quantity of housing and its affordability. The following provides an outline of the analysis that has resulted in Claridge’s conclusion.

Growth Management Strategy

The Growth Management Strategy (GMS) is directing a dramatic change to available housing choices, it does not respond to actual market demand that is historical and consistent, and instead seeks to engineer a new housing demand by removing the traditional choices. In the Growth Management Strategy, the city has taken a quantum leap in that it equates the demand for singles, semis and townhomes into an oversimplified category of “ground oriented” housing. On page 16 of GMS, it states "intensification has not traditionally provided a significant amount of ground-oriented dwelling supply", and that larger households simply want more floor space (rather than a garage or

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outdoor space etc.), hence the solution is to develop a strategy of "low-rise dwelling forms that could develop on existing lots within established neighbourhoods" (p.18) - the "613 flats" housing typology proposed by the city. "This type of development does not exist in Ottawa's market today in any meaningful form" (p 21). The city has ignored true market demand and preference for certain housing types (with garages, yards and lifestyle) that is largely represented by a demand for singles, semi-detached and townhouse units.

This is concerning, as the true demand of the marketplace is multifaceted - including the level of affordability, having a garage, a private yard, and location among other factors. Certainly, there are some who will gravitate toward a new denser form of housing like a '613 flat' as the city is proposing but this type of housing typology does not work for everyone. To suggest that at some point in the future, this will be the only available housing option, particularly in areas where the city wants the most intensification to occur, is simply manipulating the market by cutting off supply. This is what the city's GMS is relying in order to accommodate forecast growth.

The GMS approach is not consistent with the PPS. The PPS states in Policy 1.1.1 Healthy, liveable and safe communities are sustained by...

- b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons... to meet long-term needs. (PPS 1.1.1(b)).

Policy 1.4.3 states:

Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:

- a) establishing and implementing minimum targets for the provision of housing which is affordable to low and moderate income households and which aligns with applicable housing and homelessness plans. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities;

b) permitting and facilitating:

1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and

2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3...

Additionally, the GMS, and hence the draft OP, do not adequately assess population growth and projected housing needs. A recent report from the OHBA, which uses provincial Ministry of Finance population data projections, states that over the life of the OP, the population of the City of Ottawa will increase by numbers significantly, in excess of the GMS data, and that the vast majority of new households (preference based on market demands) will be low and medium density forms of housing (under 5 storeys).

Claridge has repeatedly advised the city that not enough new urban expansion land is being included. This is further confirmed based on the new population projections provided by OHBA. If the city does not include an appropriate amount of land for new growth, and its policies actually work against permitting intensification (if even unintentionally), then the City will have a housing supply and affordability crisis. The PPS states, policy 1.4.1, that the city shall:

Provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

- a) Maintain at all times the ability to accommodate residential growth for a minimum of 15 years through residential intensification and redevelopment and, if necessary, lands which are designed and available for residential development.

Failing to provide a sufficient land supply is contrary to the PPS. Claridge requests that its Stittsville and Kanata North lands (separate submissions have been provided), be included in the urban expansion area.

The city's conflation of terms does not recognize the variety of housing that is to be provided, as mandated by the PPS. Moreover, the city's attempt to manipulate the market appears to be a clear affront to the provincial direction regarding provision of housing options and responding to market demand. This is contrary to the PPS and it does not reflect market demands. The result will be the units that people want, will be limited in supply and hence increase in price. This thereby affects the affordability within Ottawa. If people cannot afford to live in Ottawa, then Ottawa will not be an attractive place to employers or employees.

#### Impact on Housing Affordability

Given the current state of the housing market and a declared housing crisis, it is troubling that the draft OP is unapologetic in its approach to increasing the cost of housing. The one-pager fact sheet acknowledges that the draft OP "calls for development standards to illustrate clear benefit to the public interest to justify how it adds to the cost of housing."

Numerous policies within this draft OP collectively add tens of thousands of dollars to the cost of a single home. The least expensive new homes, being smaller units, will be focused around hubs and corridors, where additional fees and charges will be specifically added (to account for inclusionary zoning, community benefits charge, increased greenspace and POPs etc.), making those units less affordable. This is contrary to the direction of the PPS that seeks, as stated above in Policy 1.1.1(b) *“appropriate affordable and market-based range and mix of residential types”*, in addition to other PPS policies.

The draft OP is not consistent with the PPS and it even does not comply with its own policy 4.2.1(d) that states it will establish “development standards for residential uses, appropriately balancing the value to the public interest of such standards against the effects on housing affordability”. Given that the summation of all of the requirements within the OP will add tens of thousands of dollars to the cost of all homes, the city is failing in its obligation to promote the affordable housing needs of the marketplace.

#### Very Expensive Financial Implications for City

Through this process, it has become apparent that it is questionable whether this draft OP is being/has been thoroughly reviewed by other City departments. There appears to be significant disconnects between goals and other policies that will prevent the goals from being achieved. The long-term financial implications of this disconnect are significant, with the requirements of both new construction requirements and City initiated retrofit/rebuilding projects in order to accommodate the draft OP goals. There are many required infrastructure upgrades (sanitary sewers, storm sewers, road expansions) whereas the city cannot commit as to when the upgrades will be done. A specific example is the need for all streets to be changed to an unproven 30 km per hour format, with physical impediments that will be unpopular with the City Operations and Emergency Services. Additionally, the draft OP states every street shall have a sidewalk, and for rear lanes, and for all bike lanes to be maintained in all seasons - these are likely not realistic in terms of the City’s maintenance capacity.

#### Intensification

The draft OP relies heavily on the city proposed Growth Management Strategy that requires increasingly higher levels of intensification. The overall effect of implementing the draft OP policies, however, will make it more difficult to achieve more intense projects (like high rise building with hundreds of units) but make it easier to achieve small intensity projects of 3 units. The provisions to encourage the small intensity developments are laudable, but the larger developments should also have more incentives, rather than restrictions. The target levels of intensification at the heart of the GMS will be at risk if large scale developments are not pursued.

#### Existing Neighbourhood Transformation

While the goal of increasing densities and housing variety in existing neighbourhoods is positive, there should be a higher level of clarity and honesty about what this means. If the intention is to

have as-of-right ability to replace a single with 3 or more units within a set building envelope, this should be absolutely explicit. Language of the 613 Flats, for example, stating that “they increase housing options while respecting the required amenity space, soft landscaping and neighbourhood context” does not tell the true tale that the new replacement building on a site will be larger, higher, with all parking on the streets, and that “context” refers to the planned function rather than the form of houses in the area. Also, statements that purport that the new housing forms like 613 flats will be ‘affordable alternatives’ are simply untrue. The result is added density within existing neighbourhoods but not a lower price.

### Draft Official Plan Policy Revisions

Claridge previously provided a submission to the city in February 2021 wherein it sought revisions to over 75 sections of the draft OP. Some of the changes were made however there are still many policies that have not yet been changed. Attached is a table that indicates additional revisions that Claridge requests be made.

### Request


Accordingly, Claridge requests that the City of Ottawa undertake the following:

1. Remove a reliance on a housing product that does not current exist and does not reflect market demand;
2. Update the population projections;
3. Revisit the draft OP policies and assess the true financial impact they will have on the cost of providing housing;
4. Claridge requests that its Stittsville and Kanata North lands (separate submissions have been provided), be included in the urban expansion area; and
5. Make the changes requested to the policies as indicated on the attached chart.

In addition to the above, Claridge adopts the submission of the Greater Ottawa Home Builders Association.

Do not hesitate to contact us to discuss or if you have any questions.

Yours very truly,



Ursula K. Melinz  
*Ursula K. Melinz Professional Corporation*  
UKM/

CC: Neil Malhotra, Jim Burghout & Vincent Denomme, Claridge

Attachment: Draft OP Policy table with requested changes

<b>Table: Draft OP Comments and Requested Revisions</b>	
Big Policy Move 1	The statement regarding giving “the City the option not to further expand the urban boundary beyond 2046” is unclear whether it refers to a strategy that would effectively limit the boundary with this OP (with its horizon to 2046) or whether future OPs after 2046 would no longer account for urban expansion. In either case, the statement is neither realistic, nor does it respect the Provincial Policy Statement concerning the City’s responsibility to accommodate future growth.
Big Policy Move 5	The fundamental building block of the OP is stated that the City must have “affordable market-based housing options”, yet there are numerous policies in the rest of the OP that drive up housing costs and render housing much less affordable than it is now; even though the housing crisis is showing that the rise in prices is not sustainable.
2.2.1 (2)	This clearly demonstrates the Growth Management quandary - the fact that housing demand is largely for the ground-oriented forms, but that opportunities to create a larger supply in developed areas are difficult and limited. The notion of supporting more dense forms and typologies is appropriate, however, mandating it is not. One simply cannot equate the qualities of a single, semi-detached or rowhouse with a new urban type that does not yet exist (like a “613 Flat”) and state that the older forms shall be replaced. New semi-detached forms of redevelopment can be very effective in achieving additional density, with proven market appeal.
2.2.1(3)	The statement that the provision of larger units with 3 or more bedrooms will provide more housing choice is only part of the picture. Apart from the issue that some zoning provisions have a maximum of 4 bedrooms, it has to be recognized that “housing choice” includes the size, but more importantly includes the location, type of amenities (like garage, parking, private yard) and affordability. Also in this section, the possible requirement to build a minimum of 3 units in place of a single is unfortunate because it would prohibit one of the effective existing forms of intensification (semis, duplexes). One would need an Official Plan Amendment to simply rebuild an old single, even after a catastrophic loss, like a fire. More likely, more renovations and additions will happen instead of demolition and redevelopment.
2.2.2(7)	This policy specifically and correctly acknowledges the importance of the Kanata North Economic District as a “major contributor to Ottawa’s metropolitan economy”. However, the primary source of housing accommodation which is located nearby, with planned transit, in the Kanata North expansion area was removed from the urban expansion, despite achieving the highest scores in the evaluation of candidate areas. This is a political decision that shows very poor planning and economic development consideration.



2.2.3(2)	High performance sustainable design measures that will be identified and mandated through various conditions, will exceed those required by provincial legislation (like the Ontario Building Code), and may exceed the City's authority; and will have a direct impact on the affordability of new developments. Our experience has shown that marketing a project with the promise of "green" benefits like sustainability and reduced operating costs in the long term, do not translate into people spending more. In other words, the additional costs will be harder to pass through to consumers, and the effect could be one of frustrating new development.
3.2(3)	The graphic for the "Frequent Street Traffic" definition seems out of place. The requirement for a developer to be forced to pay for, or offer, transit in its communities is not reasonable and differs from the current approach of simply working out an arrangement with OC Transpo. The definition establishes such a high threshold for "frequent street transit" service level, that such warrants for service may never be met in some neighbourhoods. Furthermore, this service level would be solely determined by OC Transpo, which could result in developers having to commit to providing these services long term and that is not appropriate. <b><i>This requirement should be removed.</i></b>
3.1(5f)	The new revision now excludes lands designated as Natural Heritage System from consideration for future development; whereas the previous draft was more sensible, allowing for the possibility that other factors could demonstrate the suitability of considering those lands. <b><i>The previous text should be reinstated.</i></b>
3.2(10)	It is noted that Table 3a has density "requirements" and Table 3b has density "targets". Policy 12, which follows, states "the density targets in Tables 3a and 3b...", suggests that <b><i>both tables should be targets.</i></b>
3.3(1)	The requirement for new communities to be designed as complete 15 minute neighbourhoods needs clarification. Firstly, what are the criteria? In a secondary plan exercise for new expansion areas, this can be further explored and worked out. There are, however, areas within CDPs which are not yet developed, however, this OP has removed the CDP and secondary plans from those areas (for example, Fernbank). To suggest that an additional secondary plan exercise is needed is, for areas previously approved through a CDP or secondary plan, is not reasonable for those instances. <b><i>Wording should be clarified.</i></b>
3.3(3)	This policy requires a secondary plan for the development of new neighbourhoods. Given the City's position that only it can initiate a secondary plan, and not a proponent, then this could realistically delay the required secondary plans for new neighbourhoods, given the lack of resource issues within the City. Furthermore, the Provincial Policy

	<p>Statement states clearly that land inventory that is being included for future growth obligations must be designated and available, which means that secondary plans have to be in progress.</p> <p><b>The policy should be revised so a proponent may undertake the required studies and application for a secondary plan if the city does not.</b></p>
4.1	<p>The last sentence that suggests the City should work toward “a car-light and car-free lifestyle” is inappropriate. Given the green vehicle revolution in process, and the free choice of countless individuals, not to mention the massive geographic extent of the City or available services, a “car-free lifestyle” might be a valid choice for many, however, not for the City as a whole. This policy completely disregards the rural parts of the city.</p> <p><b>This policy should be removed.</b></p>
4.1.2(3)	<p>Significant changes to standard road sections are mandated and there are significant implications on initial capital costs, maintenance costs and city operating costs. The “low operating speeds” proposals are not supported by all city departments, and there could be issues with emergency service vehicles and winter operations, especially the requirement for winter maintenance of bike lanes.</p> <p><b>Should be removed.</b></p>
4.1.2(4)	<p>This policy effectively mandates rear lanes for all collector roads, given the declaration that every collector road is a cycling facility. This is unrealistic and unmarketable. Where rear lanes are absolutely necessary, the OP should acknowledge that the city will accept public lanes as a public road and hence is a city responsibility, as there is great resistance within other city departments for rear lane maintenance.</p> <p><b>Wording should be changed.</b></p>
4.1.2(11)	<p>The requirement for a minimum of one sidewalk on every street is excessive and a significant increase to historic practice; resulting in possible increase to road right of way widths, additional capital and maintenance costs, and additional burden on the operations department for winter maintenance.</p> <p><b>Should be removed.</b></p>
4.1.2(16)	<p>The provision that the City may require a developer to implement transit services is too onerous in a new community, especially when the level of service is being determined unilaterally by a third party (OC Transpo). This has the potential to frustrate development and limit growth.</p> <p><b>Should be removed.</b></p>
4.1.7(1)	<p>This policy that enables the City to require land dedication for various purposes at no cost to the City, may lack the legal authority to state such a claim. The policy should simply state that land dedication for those</p>

	<p>purposes will be obtained under the provisions of the Planning Act and Development Charges Act, with compensation for those lands in accordance with the applicable legislation.</p> <p><b>Wording should be changed.</b></p>
4.2	<p>The OP support of affordable housing, with a possible suite of incentives, is most welcome, however, the political will to follow through on these is rare. Perhaps there should be specific policies that would absolutely exempt certain fees and charges for housing that meets a certain requirement, with other incentives still possible through other negotiation. It should be noted that “affordable housing” is quite distinct from the greater issue of housing affordability, which refers to the ability of the general marketplace to pay for housing, and which unfortunately is being greatly affected by many policies in this OP.</p>
4.2.1(1)d	<p>This is an extremely important policy and it acknowledges the obvious reality that this OP and its requirements will drive up the costs of housing. Balancing “the value to the public interest” with these additional costs has not been adequately assessed, or even considered. How is this proposed to be done? For example, there will be additional costs to land supply (through restraint of supply and market forces), development standards requiring additional sidewalks, rear lanes, more expensive tree installations, privately funded transit, high performance building standards, and even storm water management for infill 613 type projects. The City will also incur higher operational and maintenance costs associated with the additional infrastructure, however, that is not acknowledged anywhere.</p>
4.2.1(2) & 5.3.4(1f)	<p>Some neighbourhoods will receive zoning prohibition on low density typologies - does this apply to rebuilding after a fire or other loss? It is quite possible that certain neighbourhoods would require a 2 or 3 storey minimum building with multiple units on every redeveloping lot. Can this level of transformation (especially in the Transforming overlay) be considered to be respectful of existing context in terms of the PPS?</p>
4.2.1(3)	<p>The permission to build new smaller typologies is really important for this OP. The unfortunate reality is that new 613 types will have the benefit of adding density but will not improve affordability- they will be very expensive. The coach houses and tiny houses have potential to add units and be somewhat affordable, as long as the restrictions are limited. For example, why limit a coach house to one storey? Where a rear lane is utilized and a garage is next to the lane, why not allow the coach house above the garage. It may not be part of the actual dwelling so might not count as an accessory dwelling.</p> <p><b>Should be removed.</b></p>

4.2.2(4)	<p>This policy establishes targets for affordable units in all new residential development. Apart from the term “deep affordability” not being defined anywhere, the real problem with this policy is that in order to make certain units more affordable, the balance of the units have to be made more expensive to subsidize the revenue loss. Once again, the intention is honourable in providing 15% to be more affordable, but 85% of the units become even less affordable.</p>
4.2.3(1)(2)	<p>There are serious legal questions about the city authority to over regulate the rental housing market, which is a provincial matter. Furthermore, the policies proposed are a recipe for the retention of old stock which will further deteriorate if it is too difficult and/or expensive to replace. This is an example of a good intention but a completely inappropriate response. As an example, a city block could be assembled by a proponent with 6 houses on it - there would be unnecessary challenges in a new redevelopment, potentially with hundreds of new units, because 6 units would have to be demolished. This policy creates a significant obstacle to redevelopment.</p> <p><b>Should be removed.</b></p>
4.4.1(2)(3)(4)	<p>The criteria listed for parkland sizes, which do not belong in an OP, are disconnected from the current requirements of the parks department. We encourage dialogue between planning staff and parks department staff, because there are often differences of opinion, and we have been caught in the middle many times.</p> <p><b>Should be removed.</b></p>
4.4.1(6)	<p>This policy should state that if portions of the environmental areas are going to be used for recreation, then there should be credit for parkland dedication. It should not be left to the discretion of the parks department.</p> <p><b>Wording should be changed.</b></p>
4.6.4	<p>HPDS should be encouraged rather than mandated. The legal authority under the Planning Act to demand measures in excess of provincial codes applies only to exterior design. Many of the draft HPDS measures reference interior systems and efficiencies. There should be longer term transition periods to both determine appropriate standards, and how they can be effectively implemented.</p> <p><b>Wording should be changed.</b></p>
4.6.4(4)	<p>These seem out of place and inappropriate in an OP policy context. The design of children’s plan areas is a site plan control concern.</p> <p><b>Should be removed.</b></p>
4.6.5(1)	<p>The declaration that all developments shall demonstrate how applicable guidelines are met, transforms the “Guidelines” into “Requirements”. While some of the unnecessary detail prescription has been deleted from</p>

	<p>this section, the requirement to demonstrate compliance with “Guideline” is too prescriptive. If one is unable to demonstrate enough compliance, an Official Plan Amendment would be required, where none is needed now. As an example, one OP policy requires that street trees be provided, and the HPDS and other “Guidelines” requires an adequate volume of soil for the tree within the right of way (30 cubic metres per tree). There will be many times in a standard subdivision context where it will not be possible to meet the definition of “adequate volume” within an existing ROW due to existing infrastructure and space limitations. An OPA would be needed to either exempt the requirement to plant the specified number of trees, or to provide less than the prescribed “adequate volume”. This would be an extraordinarily inefficient use of everyone’s resources.</p> <p><b>Wording should be changed.</b></p>
4.6.6	<p>The excessive level of prescription is inappropriate in the OP, especially since the city has several Urban Design Guidelines which work well outside of the OP. By making those guidelines absolute requirements, creativity will be stifled, and most projects could require an OPA for a single variance - again, a grossly inefficient way for a planning review process to operate.</p> <p><b>Wording should be changed.</b></p>
4.6.6(13)	<p>Skyscrapers are somewhat rare in the city - to require a secondary plan to be in place is onerous. A site-specific policy, through an OPA, should also be a permissible avenue to obtaining the ability to construct a skyscraper.</p> <p><b>Wording should be changed.</b></p>
4.7.1(1)b	<p>This policy states that development shall not exceed the capacity of the existing infrastructure system - there should be clarification that planned upgrades to the infrastructure system are included in the context of “existing infrastructure system”.</p> <p><b>Wording should be changed.</b></p>
4.7.1(3)b	<p>This policy should identify “opportunities” rather than “requirements” for LIDs. LIDs will be site specific in terms of whether they are possible, feasible, or in type of type of measures that are appropriate. Also, if they are mandated, the City should be accepting these on City property and taking responsibility for the future maintenance.</p> <p><b>Wording should be changed.</b></p>
4.7.1(6)	<p>This requirement for all intensification projects to specifically manage stormwater will be quite a challenge and expensive for the smaller 613 type developments, and may frustrate the desired level of intensification.</p> <p><b>Should be removed.</b></p>

4.7.1(14)	<p>This requirement seems somewhat petty and illogical. The location of a stormwater pond or pumping station (which are municipal facilities) outside of the urban area would take up so little area in the overall land expansion budget that a no net gain requirement is absurd.</p> <p><b><i>Should be removed.</i></b></p>
4.7.1(20)	<p>How does this requirement allow a new community (eg.Tewin) to develop, as it is not contiguous to existing urban development?</p>
4.8.2	<p>The importance of the tree canopy has to be a balanced approach that recognizes that development and intensification are sometimes competing priorities with tree conservation. As such, the over-protection of existing trees could have an unfortunate impact of future developments. We have gone to great extents to preserve existing large trees and have carefully relocated some; however, their future survival is not greatly improved. Changes in their general environment will have an impact on the tree's health, as well as simply aging in the urban environment. There should be more flexibility to recognize that sometimes it would be preferable to remove an older tree with limited lifespan remaining, and instead plant new ones in places where survival is more likely.</p> <p><b><i>Wording should be changed.</i></b></p>
4.8.2(6)	<p>This new policy that authorizes Council and Committee of Adjustment to refuse an application based on insufficient soil volume or insufficient number of trees is draconian and will frustrate the kind of intensification that this Plan is relying upon to meet its Growth Targets. As mentioned in an earlier example, it will be near impossible in some instances to provide a volume of soil that is deemed "sufficient".</p> <p><b><i>Should be removed.</i></b></p>
4.9.3	<p>This approach to determining appropriate setbacks from a watercourse is overly restrictive, and should include an ability for a proponent through its EIS, or other studies, to propose ecologically and geotechnically sound setbacks that are less than the prescribed setbacks.</p> <p><b><i>Wording should be changed or removed.</i></b></p>
5.1.1(3)	<p>Any absolute requirement for mixed use buildings will be difficult to manage given the retail challenges of the marketplace - it should be encouraged rather than required.</p> <p><b><i>Wording should be changed.</i></b></p>
5.1.3(2)	<p>The zoning bylaw should permit, not require, complementary non-residential uses. Otherwise, these denser forms of housing will not be built.</p> <p><b><i>Wording should be changed.</i></b></p>

5.1.4	<p>There is too much detail and prescription considering that most of the related areas are already covered by secondary plans.  <b>Wording should be changed or removed.</b></p>
5.2.2(1)	<p>One of many references to the prohibition of car-oriented activities and uses, the OP should have a better accommodation for greener vehicles and car sharing services, and change the inherent bias that all cars are dispensable. Aside from personal choice, there are a great number of businesses that rely on cars (like the taxi industry for example) - will the provision of a taxi stand (a form of parking lot or space) be illegal?  <b>Wording should be changed or removed.</b></p>
5.4	<p>The last line declares that this OP “contemplates the end of physical growth for these suburbs” - it is suggested that this declaration is not consistent with the PPS in terms of managing long term growth.  <b>Wording should be removed.</b></p>
11.1(3)	<p>The city’s intent to impose new high performance development standards under Section 41 authority does not seem to be a justifiable use of that section. If the measures are encouraged, targets with incentives rather than requirements, there could be more willing participation.  <b>Wording should be changed.</b></p>
	<p>Exhaustive list of new studies that may be required for applications, including some new. Does the city have full authority to demand all of these? Given the current obligations in the Planning Act concerning timely processing of applications, and for which the City is having difficulty meeting, the demands of this OP will make it even more onerous for infrastructure and planning review staff.  <b>Wording should be changed or removed.</b></p>