

COMMENTS ON THE CITY OF OTTAWA'S NEW OFFICIAL PLAN

Submitted by the
Riverside Park Community Association
March 2021

About the Riverside Park Community Association

The Riverside Park Community Association (RPCA) is a volunteer-run community group composed of residents of the Riverside Park neighbourhood of Ottawa. Located in River Ward (16), Riverside Park is situated along the East bank of Mooney's Bay (see map below).



This submission was produced collaboratively by the Board of Directors and the Planning and Development Sub-Committee of the Riverside Park Community Association and reflects community feedback received directly from local residents and through three public consultations that attracted over 100 participants between January and March 2021.

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1.0 Overview

Ottawa is a unique and vibrant city. It has, and will continue to attract, new residents because of its high quality of life, relatively competitive cost of living, and vibrant culture. But the people who have made Ottawa an attractive place to live risk being pushed out of the city – either by rising prices or by rapid gentrification that erases the culture and sense of place that they have helped cultivate.

The New Official Plan states that planning is supposed to “respect[s] the character of our neighbourhoods.”¹ It then goes on to assert that the new Plan aims “to ensure that neighbourhoods form the cornerstone of liveability in Ottawa.”² This can only be done, though, through a bottom-up planning process and an Official Plan that better takes into account the input and lived experience of the City’s residents. Yet the new Official Plan is a highly paternalistic and strongly prescriptive top-down planning exercise that contains neither meaningful process nor provisions for citizen and community input, consultation, feedback nor periodic review. The Riverside Park Community Association (RPCA) seeks to engage in a genuine two-way planning process with the City that takes full account of the concerns and experiences of its communities and residents.

Our principal concerns with the New Official Plan, as it currently exists, are:

- The ill-equipped and overly rigid transect and overlay model chosen as the centrepiece for this Plan.
- The Plan’s unrealistic glorification of 15 minute neighbourhoods, making them the only goal on offer, when in reality only a few communities can achieve this goal and members of upper income quintiles will be able to enjoy them. For the remainder of neighbourhoods, and lower-income residents, this Plan does not offer a clear path forward.
- The Plan, more broadly, has failed to meaningfully address the equity issues that persist in Ottawa. While other municipalities have built their new plans around closing equity gaps, Ottawa’s New Official Plan gives equity tertiary billing when it ought to be a guiding principle.
- This process has damaged the City’s relationship with residents. Individuals and communities feel shut out from one of the most important decisions about their futures while it is rushed through approval.
- We support the Federation of Citizens’ Associations of Ottawa’s call for an extended process to improve faith in this process, restore relationships with communities, and produce a Plan that will support all of Ottawa’s communities to thrive for future decades.

¹ In 4.6/Urban Design/“What we want to achieve” (5)

² In 6.3/Neighbourhoods/“What we want to achieve” (3)6

We ask the City of Ottawa for reciprocity, to collaboratively and meaningfully invest in the people and places that make this city a prized destination for tourists and the best place to call home.

2.0 Missing pieces

2.1 Metrics

As many other submissions have noted, we are concerned by the lack of metrics that the New Official Plan outlines for how it will gauge success. It seems that the only metric for the future of Ottawa is that of minimum density targets. We have not been given a guarantee about maximum density targets. Nor have we been told at what level of intensification we can expect an investment of social services and cultural spaces including but not limited to libraries, community centres, theatres and event space. We've been told to brace for significant intensification without being told what reciprocity the City brings with this Plan.

By contrast, the City of Edmonton's new plan has explicit and stated goals and targets throughout its plan. It is very clear what the plan is working towards and why different choices are being made in service of larger goals. The lack of metrics make this Plan feel directionless and confusing.

2.2 Equity lens

RPCA believes that Equity should be enshrined as the "Sixth Big Move" for Ottawa.

The fact that the City of Ottawa has presented an Official Plan that in one breath says "Our vision for the future is that Ottawa will become the most liveable mid-sized city in North America, and Ottawa is well positioned to achieve this vision. We enjoy a high quality of life supported by strong neighbourhoods and cultural communities" only to concede 76 pages later that our vision of the most liveable city includes people being without homes. This is disappointing and needlessly meek. No city can be considered the best in its class when it allows – and builds into its Official Plan – its residents remaining without homes. Edmonton, a city of comparable size to Ottawa has not only set the goal to end both chronic and episodic homelessness in their city plan, they also have the goal of ensuring that no resident is in core housing need.^{3,4} By not

³ "City Plan - City of Edmonton."

https://www.edmonton.ca/city_government/documents/PDF/City_Plan_FINAL.pdf.

⁴ Definition of Core Housing Need: "A household is said to be in core housing need if its housing falls below at least one of the adequacy, affordability or suitability, standards and it would have to spend 30% or more of its total before-tax income to pay the median rent of alternative local housing that is acceptable (meets all three housing standards). Housing standards are defined as follows:

- Adequate housing is reported by their residents as not requiring any major repairs.
- Affordable housing costs less than 30% of total before-tax household income.

naming these goals for Ottawa's development, we are chasing density targets with no guarantee that this metric will achieve a livable community for the people who call Ottawa home.

Equity is particularly concerning for Riverside Park because of our Neighbourhood Equity Index (NEI) score. The NEI is a place-based analysis designed to be used within the municipal boundaries of the City of Ottawa. Based on a series of economic, health, social, physical, and community indicators, the NEI assesses inequity at the neighbourhood level across Ottawa. While the NEI score for the south end of our neighbourhood is above the city's benchmark, for the north end – the community labeled Riverside Park by the Ottawa Neighbourhood Equity Index – the overall NEI score (66.6) is below the benchmark (67.5), "the cut-off [point] below which the neighbourhood is likely to experience the greatest number of inequities."⁵

In the River Ward, we have a much higher prevalence of individuals who are "low income based on the Low-income measure, after tax" (LIM-AT) (%), particularly children. Overall, 20% of our ward's residents fall under the LIM-AT, compared to 13% of Ottawa residents. More glaringly, 30% of both children 0-5 and children 0-17 in River Ward are under the LIM-AT, compared with 16% across Ottawa.⁶

The absence of an equity lens in the city's New Official Plan will not only exacerbate existing inequities, but also precludes future opportunities for developing neighbourhoods that aggressively reduce the effects of poverty on health, education attainment, and poor socio-economic outcomes for Ottawa residents.

Equity further applies to the built environment when we consider the distribution of the tree canopy. The New Official Plan acknowledges that a tree canopy of 40% or more is important for offsetting the urban heat island (UHI) effect. But without a guarantee that the New Plan will achieve a 40% canopy at the neighbourhood level, not the city level, the city risks maintaining the current UHI inequities, and related health effects, that lower-income residents face. Reducing UHIs as an equity issue is so important that when she became Canada's Chief Public Health Officer, Dr. Theresa Tam selected it – and an equity approach to tackling it – as the topic for her first report. Dr. Tam wrote, "UHIs are an important community-scale risk factor. They disproportionately impact marginalized populations and residents of lower-income neighbourhoods, since, in many North American cities, such neighbourhoods often lack vegetation."⁷ The New Official Plan's stated commitment to achieve a 40% tree canopy needs to

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- Suitable housing has enough bedrooms for the size and makeup of resident households according to National Occupancy Standard (NOS) requirements." See: <https://www.cmhc-schl.gc.ca/en/housing-observer-online/2018-housing-observer/13-point-6-percentage-urban-households-were-core-housing-need-2016>

⁵ "Maps – Ottawa Neighbourhood Equity Index." <https://neighbourhoodequity.ca/mapping-2/>.

⁶ "2016 Census Ward Data | Open Ottawa." <https://open.ottawa.ca/datasets/2016-census-ward-data-1> and the author's calculations.

⁷ "Reducing urban heat islands to protect health in Canada - Canada.ca." 29 Apr. 2020, <https://www.canada.ca/en/services/health/publications/healthy-living/reducing-urban-heat-islands-protect-health-canada.html>. Accessed 8 Mar. 2021.

go further to address where the canopy is most needed and where the effects of UHIs are the greatest.

2.3 Post-COVID update

We can't know the extent to which the pandemic that we are currently living through will reshape city living for decades to come. In PricewaterhouseCoopers survey of 699 CEOs on the effects of COVID-19, 78% said they saw remote work as an enduring trend rather than a temporary adjustment.⁸ The untethering of workers from traditional offices has already led to Canadians leaving big cities in record numbers during the pandemic.⁹ It is impossible to know how the aftershocks of the pandemic will reverberate through our city: from willingness to live in large highrise buildings, to year-over-year population targets, to the demand to rethink how and where we build long-term care homes for seniors. We believe that the profound changes to how and where Canadians are living require the New Official Plan to extend its timeline in order to properly assess how this changing landscape affects the future of Ottawa.

2.4 Accessibility

This plan was not written in accessible language, nor was it released in a way that ensured it was accessible to all Ottawa residents.

The four principles of the Accessibility for Ontarians with Disabilities Act are Dignity, Independence, Integration, and Equal Opportunity.¹⁰ By making the New Official Plan only available via the City of Ottawa website *during a pandemic* ensured that the Plan was inaccessible to many members of our community. When pressed to make print copies available, the City distributed only twelve copies through the Ottawa Public Library for a city with a population of 994,837. That's 82,903 residents per distributed print copy of the Plan. By limiting access to this pivotal document, the City has denied the Integration and Equal Opportunity of disabled residents, elderly residents, and residents who found it difficult to read a 260 page document on a screen.

A document of such importance to the future of our city ought to be available by mail to any citizen who requests it.

⁸ <https://www.pwc.com/gx/en/ceo-agenda/ceo-panel-survey-emerge-stronger.pdf>

⁹

<https://www.ctvnews.ca/canada/canadians-leaving-big-cities-in-record-numbers-statistics-canada-1.5270161>

¹⁰ "What are AODA Standards?." 13 Jan. 2020, <https://aoda.ca/what-are-aoda-standards/>.

2.5 Where are the renters?

2.5.1 Residential renters

The New Official Plan is written predominantly for homeowners but homeownership is increasingly out of reach for younger residents. The 2016 Census reported that “Younger adults aged 20 to 34—those often referred to as the millennial generation—are slower to get into the housing market than was the case for the baby boomers at that age.”¹¹ The Canada Mortgage and Housing Corporation (CMHC) flags that homeownership in Ottawa-Gatineau peaked in 2011 and has since declined.¹² Simply put, younger families have been priced out of the market. If the recent double-digit spike in housing prices that is associated with the pandemic is any indication, the path to new home ownership will continue to get considerably more steep as population growth outpaces housing stock.

As the Riverside Park Community Association, we are particularly concerned with ensuring that renters have affordable and dignified housing guaranteed in the New Official Plan. While 32.2% of Canadian households rent their homes¹³ and 34.3% of Ottawa residents are renters, in the River Ward, 43.6% of residents are renters.

The New Official Plan’s intention to have 15 Minute Neighbourhoods is one that hinges on a vibrant service economy, replete with workers staffing coffee shops, child care centres, and more. Yet the Plan does nothing to ensure that those workers will be able to maintain an affordable residence within a 15 minute commute of their employment. This lack of commitment to affordable housing will push service economy workers, who are predominantly racialized, into an outer ring around the outskirts of the city. We don’t need to theorize what this looks like. We can see the effect of a lack of affordable housing planning and how it has created “[Three Cities](#)” in Toronto¹⁴ and a similar socioeconomic stratification in Vancouver. Beyond national borders, we can look to the failure of Parisian city planning that manifested in the highly racialized socioeconomic stratification project that are the banlieues: cut off from the culture, educational and economic opportunity of a bustling city, left under-served and impoverished. This is what happens when we “let the market decide” and give equity tertiary billing.

Rental housing is barely mentioned in the New Official Plan and when it is mentioned, it is mentioned with soft, suggestive language rather than the strong ironclad protections that enshrining affordable and dignified housing requires.

¹¹ "The Daily — Housing in Canada: Key results ... - Statistics Canada." 25 Oct. 2017, <https://www150.statcan.gc.ca/n1/daily-quotidien/171025/dq171025c-eng.htm>.

¹² "Homeownership in Canada - CMHC." 24 Mar. 2019, <https://www.cmhc-schl.gc.ca/en/data-and-research/publications-and-reports/socio-economic-analysis-homeownership-canada>.

¹³ "The Daily — Housing in Canada: Key results ... - Statistics Canada." 25 Oct. 2017, <https://www150.statcan.gc.ca/n1/daily-quotidien/171025/dq171025c-eng.htm>.

¹⁴ "The Three Cities Within Toronto." <http://3cities.neighbourhoodchange.ca/>.

Already, the cost to rent a home in Ottawa is difficult to afford and prohibitive for many. The CMHC reported earlier this year that one bedroom apartments are unaffordable for low-wage workers.¹⁵ In 2019, economist David Macdonald reported that to afford a modest two-bedroom apartment in Ottawa, a worker would need to earn \$26 per hour, nearly double the provincial minimum wage.¹⁶

Almost one-tenth of renter households report living in an unsuitable dwelling and almost one-tenth report living in an inadequate dwelling.¹⁷ While in Ottawa overall, 4.65% of households (owning and renting) are living in unsuitable housing, that number once again rises in the River Ward to 6.4%. We also see a higher percentage of households spending more than 30% of their income on housing, with 26.7% of River Ward residents reporting that they are in this financially unsustainable position (compared with the Ottawa average of 23.8%).

It's also critical to connect the lack of affordable housing with the continued rise in homelessness. 1,900 people (including children) are currently sleeping in shelters in Ottawa, every night. At least 2,500 Ottawa households are currently at risk of eviction because they have fallen behind on rent during the pandemic.¹⁸ Despite what the media is reporting about a "renter's market," there is, in fact, little to no affordable rental housing available for people to transition into. We are in an affordable housing crisis and it will not be solved by market-based measures.

2.5.2 Commercial rent

The other critical rent discussion that is missing from the Official Plan is that of commercial rent. The Plan recognizes the value of local retail and small, independent businesses without providing adequate safeguards to ensure these businesses will have the space to succeed.

Here, we see a critical example of where equity is lacking: in the plan for commercial zoning. Research shows that when communities are redeveloped, retail rents increase dramatically, thereby pricing out small independent businesses.¹⁹

They encourage mixed uses, but not a mixed population. They never speak of maintaining low rents on commercial properties, so they cannot combat the most

¹⁵ "Is Rental Housing Affordable to Low-Income Households | CMHC." 17 Feb. 2021, <https://www.cmhc-schl.gc.ca/en/data-and-research/publications-and-reports/research-insight-rental-housing-affordable-low-income-households>.

¹⁶ "Unaccommodating | Canadian Centre for Policy Alternatives." 18 Jul. 2019, <https://www.policyalternatives.ca/unaccommodating>.

¹⁷ "The Daily — First results from the Canadian ... - Statistics Canada." 22 Nov. 2019, <https://www150.statcan.gc.ca/n1/daily-quotidien/191122/dq191122c-eng.htm>.

¹⁸ "Housing Emergency - Alliance to End Homelessness Ottawa." https://www.endhomelessnessottawa.ca/housing_emergency.

¹⁹ "A STUDY OF COMMERCIAL GENTRIFICATION AND THE" https://digital.library.ryerson.ca/islandora/object/RULA%3A7731/datastream/OBJ/download/A_study_of_commercial_gentrification_and_the_displacement_of_small_businesses_in_the_downtown_Yonge_Street_neighbourhood.pdf. Accessed 5 Mar. 2021.

common means of uprooting the small shop owners who inspired [Jane Jacobs'] idea about social order and the vitality of the street. More and more of the owners, in any case, are chains; there are few traditional shopkeepers left.²⁰

Not only does this damage the unique sense of place that each community has, it increases the costs of a basket of goods and services that individuals and families require to meet their basic needs and achieve a modest standard of living. Intensification and revitalization projects drive up the cost of rent for retailers in two ways. When new buildings replace older buildings, they reopen with radically increased rents. The current system for evaluating property taxes for businesses is not sufficiently refined and can lead to business owners who operate in smaller and older buildings paying suddenly increased tax bills. In Toronto, when Yonge Street redeveloped, the Municipal Property Assessment Corporation began overvaluing older buildings to match the valuation for redeveloped, larger buildings in the same area leading to longtime residents receiving radically increased tax bills.²¹ The end result was a mass exodus of small businesses that had served as the cornerstone of their community.

²⁰ Zukin, S. (2009) *Naked city*, Oxford University Press. Page 25.

<https://global.oup.com/academic/product/naked-city-9780195382853>. Accessed 5 Mar. 2021.

²¹ "A STUDY OF COMMERCIAL GENTRIFICATION AND THE"

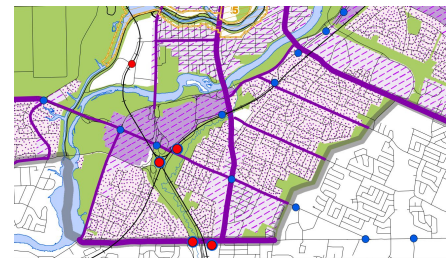
https://digital.library.ryerson.ca/islandora/object/RULA%3A7731/datastream/OBJ/download/A_study_of_commercial_gentrification_and_the_displacement_of_small_businesses_in_the_downtown_Yonge_Street_neighbourhood.pdf.

3.0 Riverside Park and the New Official Plan

3.1 A community divided

The Riverside Park community north of Walkley Road is designated as an Inner Urban transect while the part of the community south of Walkley is designated as Outer Urban. This division is arbitrary and artificial and will unnecessarily complicate future planning and efforts to facilitate the development of a greater community identity, particularly considering the significant differences in housing densities between the Inner and Outer Urban Transects.

The new Official Plan seriously mischaracterizes Riverside Park north of West Walkley Road as Inner Urban, when in reality it meets virtually all of the Official Plan's characteristics for an Outer Urban Suburban area, as described in Table 6. Furthermore, as noted in 5.3/Outer Urban Trans, it is "characterized by the separation of land-uses, stand-alone buildings, generous setbacks, and low-rise building forms. Most of their building stock is still too recent to expect wholesale redevelopment over the life of this Plan."



The Transect model utilized by the New Official Plan would put the large majority of Riverside Park into the "Outer Urban" Transect – without an "Evolving Overlay" densification accelerant, making it a single integrated area for planning and zoning purposes – the kind of continuity needed for cohesive community building. As "Minor Corridors", the maximum building height allowed along West Walkley Road would be scaled back to four stories (from the nine permitted for a Corridor Mainstreet). This would also match the same maximum heights (four stories) allowed for Riverside Drive, as a "Minor Corridor" on that part of it which passes through Riverside Park. These changes would better maintain Riverside Park's present built character and quality of life, while still providing significant opportunities for increased density, new forms of housing – notably of the "Missing Middle" kind which is a priority of the new Official Plan – and much needed commercial/retail development. It would also recognize that Walkley Road west of Bank Street (or at least west of the transportation corridor comprising the Airport Parkway, Trillium LRT line and Transitway) is of a significantly different character than Walkley Road east of Bank Street, which is already better built for, and indeed quickly moving toward becoming, a "Corridor Mainstreet." Changing the corridor designation of West Walkley Road is fundamental to shaping its future development.

3.2 West Walkley Road

The new Official Plan treats Walkley Road in exactly the same way for almost its entire length, from Riverside Drive to its conjunction with Heron Rd. This homogenization is an over-simplification that fails to recognize that West Walkley Road is substantially different from Walkley Road east of Bank Street. The latter is characterized by a range of housing densities, from a diminishing number of one and two story single family homes to a growing number of higher density row-houses and apartment complexes. It already has an increasing mix of commercial activities and businesses and is well on the way to becoming a “Corridor Mainstreet” in a real 15 Minute Neighbourhood. West Walkley Road, by contrast, is exclusively Suburban Outer Urban and low-rise residential on both sides of the street, with no commercial establishments and little likelihood of having any in the foreseeable future. We are a long way to becoming, if ever, a 15 minute neighbourhood.



The proposed “Corridor Mainstreet” designation means that West Walkley Road would allow buildings of up to a maximum of nine stories, vs. the maximum of six stories permitted on Riverside Drive north of West Walkley Road (Inner Urban Transect) and four stories south of West Walkley Road (Outer Urban Transect) as a “Minor Corridor” – unless, of course, the Transect north of West Walkley Road is changed to Outer Urban, in which case All of Riverside Drive and West Walkley Road would have a uniform maximum height of four stories. Otherwise, these significant differences in densities and proposed corridor classifications between Riverside Drive and West Walkley Road make no logical sense outside of the unrealistic effort of trying to make Riverside Park into a 15 minute community. More importantly, this radically increased densification would greatly damage the neighbourhood character and context of West Walkley Road – and Riverside Park. West Walkley Road is included in Schedule C4 (Urban Road Network) as an arterial route. Its heavily bolded illustration as a proposed “Corridor Mainstreet” in the Transect B Schedules reinforces this image (vs. the much more lightly bolded Riverside Dr as a “Minor Corridor”). The B Schedule illustrations are confusing and misleading, as Transects are about density and not traffic flows and volumes. These misperceptions are further compounded by the absence of definitions for “corridors” in the new Official Plan.

West Walkley Road is an arterial route mainly by historical accident. More importantly, as highlighted during the City Transportation Committee’s public hearings on the Airport Parkway Expansion project’s EA in 2016, West Walkley Road does not meet the technical design requirements for an arterial route. Furthermore, West Walkley Road is physically different – significantly narrower – than Walkley Road east of Bank St, by a distance of over 11m (26m vs 37.5m; see Annex 10, Table 1, Road Right of Way Protection, page 45). This significant difference in width is visibly noticeable at street level and should be taken into account for development and density considerations.

In view of its different context, character and physical construction, West Walkley Road should be separated from Walkley Road east of Bank Street, or alternatively east of the transportation corridor comprising the Airport Parkway, Trillium LRT line and the Transitway. This transportation corridor represents a significant and real boundary that reinforces the differences in context and built character. This would allow Riverside Park to continue to develop as a separate and primarily low-rise residential community.

The most important way to achieve this in the new Official Plan would be to change West Walkley Road's proposed designation from "Corridor Mainstreet" to "Minor Corridor". Changing the corridor designation is fundamental to shaping West Walkley Road's future management and development. Together with changing the Transect from Inner to Outer Urban north of West Walkley Road, it would help to keep Riverside Park together as an integrated community. An over-developed, excessively densified West Walkley Road is only another factor of division.

As noted above, as a "Minor Corridor" in an Outer Urban Transect, West Walkley Road would be allowed buildings of up to a maximum of four stories. This would still be a significant change from its current suburban built character, but a more measured and appropriate evolutionary step in development and densification. Nor would it be an undue constraint on more diverse development, given that the new Official Plan also provides for the following:

- 6.2.2(2) In the Minor Corridor sub-designation, this Plan shall permit a mix of uses which are mainly residential or which support residential uses. Development may:
- a) Include residential-only buildings;
 - b) Include buildings with an internal mix of uses, but which remain predominantly residential;
 - c) Include limited commercial uses which are meant to mainly serve local markets; and
 - d) Be required to provide commercial or service uses on the ground floor.

The "mainly residential" focus of a "Minor Corridor" best fits the suburban built character of Riverside Park. It should be noted in this regard that the new Official Plan is supposed to respect the context and character of communities. For example,

Policy Direction 2 (from 5 Big Moves): Ensure that the planning and design of streets, intersections and street networks, including the allocation of space in the road right-of-way, is supportive of community context and policy objectives, and is considered from an equity perspective:

- Continue to develop new complete street design guidelines and cross-sections that fit the community context and support City objectives for land use, mobility, environment, health and economic development.

As a "Minor Corridor", West Walkley Road would also be a good place to foster the development of, and to showcase, what the new Official Plan terms the "missing middle range of mid-density, low-rise multi unit housing" comprising "housing forms which are denser, small-scale, of generally three or more units per lot in appropriate locations" (see 4.2.1(2) and 2.a). This

“missing middle” kind of housing would be much more in the context and character of West Walkley Road – and Riverside Park – and contrasts sharply with the maximum of nine stories that would be allowed on “Corridor Mainstreets”. It would be a much more acceptable way to achieve increased densities along Riverside Park’s “Minor Corridors”. It is also quite similar in style to some of the larger houses that are starting to be built on both West Walkley Road and Riverside Dr.

Other aspects of the new Official Plan are also of concern. Unfortunately, no part of Walkley Road is presently part of Ottawa’s Active Transportation Network (as presented in Schedule C3). For West Walkley Road, this will be partially addressed by the Airport Parkway Expansion project when bicycle lanes will be added as part of the traffic calming measures to be implemented between McCarthy Road and the Airport Parkway. Making all of West Walkley Road part of the Active Transportation Network’s Major Urban Pathways should be a high priority of the new Official Plan.

3.3 Walkability and the 15 minute neighbourhood

Riverside Park’s current Walk score is a 38.1/100, meaning that the neighbourhood is Car-Dependent, with most errands requiring a car.²²

One of the biggest challenges for active transport in our neighbourhood is that we don’t have a consistent network of sidewalks throughout the neighbourhood [as illustrated in the images below].



Given the physical infrastructure of our neighbourhood, it is not surprising that the most recent (2016) Census data reports that the overwhelming majority of Riverside Park residents (66.7%) use private vehicles to commute to work, while 24.2% utilize public transit, 4.5% walk, and 3.7% bike.²³

When applying the aforementioned equity lens to Riverside Park’s transit infrastructure, it is important to mention that women in the River Ward who commute to work are significantly more likely (at $p < .05$) to have daily commutes in excess of 30 minutes.²⁴ The experience of longer

²² "Riverside Park | Ottawa Neighbourhood Study." <https://www.neighbourhoodstudy.ca/90riverside-park/>.

²³ "2016 Census Ward Data | Open Ottawa." <https://open.ottawa.ca/datasets/2016-Census-ward-data-1>.

²⁴ "2016 Census Ward Data | Open Ottawa." <https://open.ottawa.ca/datasets/2016-Census-ward-data-1>, and the author’s data analysis

commutes is not limited to women in the River Ward. As Caroline Criado Perez explains, “Men are most likely to have a fairly simple travel pattern: a twice-daily commute in and out of town. But women’s travel patterns tend to be more complicated. Women do 75% of the world’s unpaid care work and this affects their travel needs. A typical female travel pattern involves, for example, dropping children off at school before going to work; taking an elderly relative to the doctor and doing the grocery shopping on the way home. This is called ‘trip-chaining’, a travel pattern of several small interconnected trips that has been observed in women around the world.”²⁵

Currently, 0% of Riverside Park residents are within 15 minute walking distance of an Ottawa Public Library (Official PlanL) branch.²⁶ The average distance to the nearest Official Plan lockers and book drop-off location is 2.9 kilometres.²⁷ Libraries are about more than accessing books and, as such, having access to only a book drop-off location in our neighbourhood prevents residents of Riverside Park from fully accessing Ottawa Public Library’s services. There are no libraries within the Riverside Park neighbourhood.

More urgently, there are no grocery stores within our immediate neighbourhood and the closest ones are outside of walking distance. None of our residents live in communities that have viable options for weekly shopping trips, identifiable community hubs, or places to run errands using only active transport. Again, applying an equity lens, there is not a variety of options to fit a range of budgets.

15 minute neighbourhoods aren’t on our horizon. We need basic amenities like sidewalks, affordable grocery stores, and community services. Trying to implement a 15 minute neighbourhood model in a community this underserved is like putting a sports car engine in a little red wagon and expecting it to run.

²⁵ *Invisible Women - Exposing Data Bias in a World Designed for Men*, Criado Perez, C.(2020). Page 35. <https://www.penguin.co.uk/books/1113605/invisible-women/9781784706289>.

²⁶ "Riverside Park | Ottawa Neighbourhood Study." <https://www.neighbourhoodstudy.ca/90riverside-park/>.

²⁷ "Riverside Park | Ottawa Neighbourhood Study." <https://www.neighbourhoodstudy.ca/90riverside-park/>.

4.0 Recommendations

The first two recommendations that we are proposing focus specifically on the issues that the New Official Plan raises for the community of Riverside Park.

The northern part of Riverside Park is already in the process of the kind of more rapid development (2,500 dwelling units committed or planned) envisaged by the new Official Plan as part of an “Inner Urban” Transect with an “Evolving Overlay”. This area already has higher density apartment buildings, a mix of commercial establishments and businesses, schools and places of worship, plus important recreational facilities (Mooney’s Bay park, Terry Fox Athletic Centre) that differentiate it from the rest of Riverside Park. In addition, it is to feature two “Area Specific Policies” or special development zones that will provide a further impetus for intensification. The new Official Plan is a highly paternalistic and prescriptive top-down planning exercise by the City that, notwithstanding its many serious flaws, will not be quick or easy to change. Nevertheless, changing it is important to the future of our community.

4.1 Revise the proposed Riverside Park transect boundaries

Create a new “Special Policy Area” encompassing the higher growth part of Riverside Park in the vicinity of Brookfield Dr and the adjacent part of Riverside Drive.

The proposed change to Transect for Riverside Park north of West Walkley Road, from Inner to Outer Urban, including the creation of the new “Brookfield” Area Specific Policy district, would not seriously detract from the “regeneration” (intensification) objectives of the New Official Plan and would leave most of Riverside Park, outside of the Riverside Drive and West Walkley Road corridors (see below), as “Neighbourhoods” in the context of the New Official Plan. It better respects the suburban built character of all of Riverside Park and the reality that most of Riverside Park is unlikely to become a real 15 minute neighbourhood in the time-frame and context of the New Official Plan as a result of its Outer Urban built character and physical geography.

Brookfield Area Specific Policy District



4.2 Reclassify West Walkley Road as a Minor Corridor

- (a) Separate West Walkley Road from Walkley Road East of Bank Street (or east of the Airport Parkway); and,
- (b) Change West Walkley Road's proposed designation from "Corridor Mainstreet" to "Minor Corridor", matching that of Riverside Drive.

Ultimately, the better goal would be to establish West Walkley Road as a "complete street" – in the context of a "Minor Corridor". This is entirely feasible in the medium term, considering that West Walkley Road will need to be rebuilt when its underground infrastructure is replaced later this decade.

4.3 Commit to equity

4.3.1 Make equity the Sixth Big Move

Equity is not adequately addressed or incorporated into the new Official Plan. Something as critical as basic human rights cannot be afforded tertiary billing in the document that shapes the future of our city. Therefore, we encourage you to make equity the Sixth Big Move.

4.3.2 Embrace Edmonton's approach to planning

The City of Edmonton's new plan built social services into their plans. Ottawa's plan, as it stands, does not guarantee that there will be a seamless connection between communities and the services that they rely on. There is no sense of how services will build up with communities as they grow. There is a real, justified fear among residents that programs and services that they rely on could end up farther away from them as the city is reimagined and redesigned. This concern is particularly acute for low-wage renters who have the least amount of agency to determine where they end up. It is critical that we purposely build communities that include both a suite of services for all residents and adequate spaces for lower-income residents to stay in their neighbourhoods.

4.4 Build diverse affordable housing into the Plan

4.4.1 Adopt the Montreal 20-20-20 model

The City of Montréal's "20-20-20" bylaw was designed to address that market-based solutions alone will never solve the affordable housing crisis. The bylaw promotes the construction of social, affordable and family housing as part of real estate development projects. 20% of new builds will be social and community housing run by the Quebec government; 20% will be affordable housing available to rent or purchase below a threshold set by the City; and 20% will be family housing, units comprising three or more bedrooms.²⁸ Adopting Montréal's 20-20-20 approach to housing will help us meaningfully tackle our affordable housing crisis.

4.4.2 Commit to ending homelessness

The most livable city in North America shouldn't include provisions for homeless shelters. It should include explanations of how we are ending chronic and acute homelessness. Edmonton is doing it. Victoria is doing it. Hamilton is doing it. It's our turn.

²⁸ "City of Montréal Publishes Bylaw 20-20-20 on Social, Affordable and" 13 Jun. 2019, <https://www.dwpv.com/en/insights/publications/2019/montreal-publie-reglement-20-20-20>.

4.5 Provide residents with equitable access to an urban tree canopy

Replace the current Official Plan's city-level target of achieving a 40% tree canopy with a neighbourhood-level target with the same minimum (40%) to ensure that all residents have access to green space and trees.

4.6 Support small businesses

4.6.1 Add protective language to the New Official Plan

There are myriad evidence-based levers that the City can activate with the aim of protecting local small businesses. Yet none of them are named in the current Plan. It would serve Ottawa's planning future to enshrine concepts of:

- Community Benefits of Agreements for new multi-storey developments that guarantee affordable space for small businesses. See the West Harlem Community Benefits Agreement (2009) for more information.²⁹
- A business diversity ordinance to ensure that small businesses are not displaced by chains. See the ordinances in California, Maine, and Maryland for more information.
- Set aside space for local businesses in publicly-owned buildings with reduced rent. See Boston's *Small Business Plan* (2016) for more information.³⁰
- Commercial Tenant Protections. Most crucially, small businesses need protections. The Ontario *Commercial Tenancies Act* (1990) is inadequate in protecting tenants and ensuring that they are safeguarded. The City could consider enacting an act similar to New York City's drafted *Small Business Jobs Survival Act* to help protect commercial tenants in lease renewals, negotiations, and in disputes with landlords.³¹

4.7 SMART Goals for active transport

We cannot add more people to a car-centric community before building up the active transport infrastructure that allows the whole community to transition to new ways of moving.

4.7.1 The New Official Plan should be postponed in order to follow and reflect the Transportation Master Plan.

4.7.2 Build up to 15 minute neighbourhoods.

Communities like Riverside Park with walk scores below 60 need to have their walk score addressed before we can have loftier goals of becoming 15 minute neighbourhoods hoisted

²⁹ "Community Benefits Agreement — West Harlem Development"

<https://westharlemdc.org/documents/community-benefits-agreement/>.

³⁰ "How Rising Commercial Rents Are Threatening Independent" 20 Apr. 2016,

<https://ilsr.org/affordable-space/>. Accessed 5 Mar. 2021.

³¹ "A study of commercial gentrification and the displacement of small" 1 Jan. 2018,

<https://digital.library.ryerson.ca/islandora/object/RULA%3A7731>.

onto us. We need a plan to introduce basic amenities to our communities including sidewalks, libraries, and grocery stores that make our communities more walkable. We need an Official Plan that recognizes that 15 minute neighbourhoods aren't a reasonable goal for us in the medium term and helps us set and achieve goals that make Riverside Park more livable and sustainable, recognizing that there are more solutions available than just 15 minute neighbourhoods.

4.7.3 Build transit that works for users.

Similarly, inner and outer urban communities like Riverside Park that have patchwork transit systems that lead to meandering and difficult transit commutes require transit audits and transit investments before any intensification can begin. We need better, more accessible, more reliable transit to get our residents moving without their cars.

4.8 Work with communities

4.8.1 Delay the New Official Plan timeline to allow for proper community consultation

If there is one thing that you take from our comments, we hope it is our enthusiasm and commitment to work with the City to develop a bold, sustainable, and equitable vision for our shared future.

Having spent the past several months in multiple consultation sessions with experts, stakeholders, and community members, we can say that we do not believe that this draft of the new Official Plan represents that vision. Moreover, the process for community consultation and the aim of that consultation has been unclear and mired by the pandemic. If the City wants community buy-in to the New Official Plan, the timeline for this plan should be extended to allow for meaningful engagement with communities across Ottawa.

The process by which this document has been released, and the way the document has been presented (online only, deeply inaccessible language) have led to both frustration and a loss of public trust in the process.

4.8.2 Adopt the extended timeline proposed by the Federation of Citizens' Associations of Ottawa (FCA).

Release a second draft with an additional round of public consultation and opportunity for comment. Ensure that this second draft is released in both language and formats that are accessible to residents. Meaningfully consult with community associations and residents and articulate the extent to which those consultations will inform the direction of the final Plan.