

## Ottawa's new Official Plan: Two unhelpful Background Studies

The City of Ottawa recently released two background studies intended to support the proposed new Official Plan. One dealt with the vaunted subject of 15-minute neighbourhoods. The other described the modelling used to estimate the residential density required to meet the objectives of the Plan. Both obscure more than they reveal. Neither instill confidence in the City's preparedness to meet the challenges set out in the Official Plan. Let's look at each in turn.

### The 15-minute neighbourhood study

The [study](#)'s starting point in coming to grips with what 15-minute neighbourhoods mean for Ottawa is a survey conducted in the summer of 2020 which is said to have received 4,000 responses. That's not a bad number as City surveys go but before drawing any inference from it one would need to know whether the respondents reflected Ottawa's population, geographically, and, e.g., by age, sex and income, to name some standard categories. Since Census data allow identifying population characteristics by neighbourhood, any raw data could then be weighted in order to obtain a representative sample.

The study did link the respondents' postal code with the Transect they live in (Downtown, Inner Urban, Outer Urban, Suburban, Rural) and the survey also collected data on their age, sex, whether there were children in the home and whether the respondent used mobility aids. There is no evidence, however, that any rebalancing took place to make the responses conform to geography or population characteristics. As a result, the primary basis of the study is questionable.

Nor is there evidence that the survey design was tested or peer-reviewed. Some of us remember that there were no questions about tree canopy. No big surprise then that the study's list of "services and amenities" did not include street trees (though it did include parks, with or without playgrounds or splashpads). In contrast, the multiple references to neighbourhood tree canopy in responses to the City's first draft of the Official Plan suggest that residents attach great importance to a decent tree canopy in their neighbourhood.

For each of the nine "services and amenities" the study did allow, it then employed impressive analytical power to calculate how close they are to each of Ottawa's 183,000 residential lots. Each amenity was weighted in accord with the number of mentions in the survey. (Grocery stores won big, followed by parks, retail and an OC Transpo bus stop.) For example, three points were awarded if there are three health services within a 15-minute walk, etc. The full scoring methodology has not been revealed. A nine-point scale was then "simplified" to Good, Average and Poor and that 3-tier scale was mapped.

A glance at the maps shows that... the results are next to useless: Huge swaths of the city turn out to be "Good" -- a rating that in no way reveals to what extent any neighbourhood comes close to some sort of ideal 15-minute neighbourhood. These maps are of no use for planning one's neighbourhood or for identifying what is needed to make it as desired.

More (largely unexplained) analytical power was devoted to mapping the pedestrian environment of arterial and connector roads, "informed by the public survey, and then evaluated based on Artificial Intelligence, a character assessment of the built form and public realm, and analysis of GIS data and geographic features that impact the pedestrian experience." That's four black boxes! One of ten

"factors for safe and enjoyable walking" was, however, "Shade and Shelter," elsewhere referred to as tree canopy. Anyway, the end result of all this analysis is, again, a rating of Good, Average and Poor.

The two 3-tier scales were then combined in one map which is claimed to "demonstrate the main characteristics of a 15-minute neighbourhood." My foot it does! They are utterly unhelpful, even though the big map is diluted into maps for "Inside the Greenbelt," five Villages and four other areas.

To conclude, this is a study that applied enormous analytical power to unvalidated base data and then produced unhelpfully simplified end results. As FCA President Alex Cullen noted in a letter to the *Citizen*, "Looking at the data from a citywide aggregate misses the effect intensification has on the neighbourhood streets where people actually live." One would think that a study such as this would have neighbourhoods as the fundamental unit of analysis rather than individual residential lots. Instead, to paraphrase Margaret Thatcher, it seems to have subscribed to the idea that there are no neighbourhoods, only residential lots.

The B-series of Schedules for the Official Plan depict "Evolving Neighbourhoods." There is no indication that the delineation of these neighbourhoods was inspired in any way by the information obtained in this study. However, it is said that a "gap analysis" is still under way. That might yield some useful information at last.

### Modelling in support of the Growth Strategy

After months of persistent asking, the City finally released an 11-page [paper](#) that purports to document the "robust modelling" that is claimed to underlie the residential intensification proposals in the new Official Plan. Source data are building permits, "turnover" rates (demolition and reconstruction) and "uptake" (the extent to which developments take advantage of as-of-right permissions) over the last five years. The paper then makes a number of assumptions, only some of which are demonstrably based on the historical data.

The model distinguishes seven "conceptual zones" and specifies the intensifications a new zoning by-law would allow. For example, the current R1 zoning, which allows one unit (plus a secondary dwelling) would now allow 2 (or four including secondary dwellings). R2, R3 and R4A-R4L would all allow 4 units (from the, respectively, 2, 3 or 4 allowed now). R4UA and R4UB would remain unchanged at 8 and 12 units respectively. R4UC, R4UD and R5, which all allow more than 12 units, are expected to generate an unspecified number of units.

Two eyebrow-raising modelling decisions are revealed at this point: Secondary dwelling units (including coach houses) are not counted in projections for new intensification units, and any units above 12 which the higher-end zoning classes would allow are also not counted. Excluding both of these unit types means that whatever additional units the model churns out will be a very significant underestimate.

While the assumptions on turnover can, at least in part, be traced to the historical data, the same is not true for the numerically far more critical assumptions on uptake. They are specific to each Transect and range from 30 to 40%. Low, Middle and High uptakes are distinguished but the paper does not explain how these scenarios figure in the model's calculations. Another black box.

Finally, the model makes assumptions about the extent to which large-household units (three or more

bedrooms) will be built in each conceptual zone. Related to this, the paper states: "we anticipate that zoning will have authority to consider certain larger floor-area 2-bedroom units to ... be considered large-household equivalent."

It is well known that larger units are generally less profitable to build than 1- or 2-bedroom units. The draft Official Plan therefore sets out minimum proportions of large units, thus forcing the developers to accommodate large families. But here we see that the City anticipates offering a big loophole, qualifying units with a large square footage as equivalent. Goodbye large families, welcome high-priced spacious units for the well-to-do.

One would expect the paper to set out at the start what the quantitative objective of the modelling was. How many units, of what type, where, do we need in the next 25 years, and to what extent are we likely to see these built given proposed OP policies? And what about sensitivity testing that we have been told was also done as part of this exercise? In other words, what assumptions are most critical to the model's projections? None of that is anywhere to be seen. Instead, one has to go to Section 4 of the draft OP, where one finds that the aim is to see 92,000 new units in the urban area by 2046 (not counting potential due to expansion of the urban boundary): 49,000 large and 43,000 small units.

Now for the most bizarre part of the paper: The results. Table 9 shows that, *under current zoning*, 95,000 new units could be expected over the next 25 years, i.e., more than meeting the OP's objective! However, there would be only 26,000 new large units (far less than we supposedly need) compared to 69,000 small ones (far more than we supposedly need). Presumably, this mismatch is what the OP and zoning reform would fix.

At the end of three phases of zoning by-law reform, the model projects 50,000 large units and 84,000 small ones, for a total of 134,000 -- a 46% overshoot in total, including almost double the number of small units the City says we need. When an exercise misses the mark by that much, it is difficult to take it seriously.

Moving bravely on, the paper describes in some detail how the zoning by-law reform would proceed. Phase 1 would be a "general recode," expanding permissions in R1 and R2 zones "to provide more low-density housing opportunities." As noted earlier, this would mean allowing 2 units in R1 and 4 in R2 (exclusive of secondary dwellings). Table 9 projects that this will yield an additional 13,000 large units.

Phase 2 would see rezoning of Hubs and Corridors (including 150 metres to either side of Mainstreet Corridors that run into neighbourhoods), allowing more height and density as well as new building forms (presumably referring to the proposed "613 flats"). This phase would see another 2,000 large units and a big jump of 13,000 small units when done. For some neighbourhoods, upzoning a swath of 150 m on either side of a Corridor could be transformative and add significant density. Such as-of-right expansion of development rights needs to be constrained by available infrastructure and available neighbourhood amenities such as parks. There is no indication that this would be done in this Phase.

Finally, Phase 3 would reform zoning in Neighbourhoods beyond the 150 m off-Mainstreet Corridors, with the first priority of reform in the Inner Urban transect, followed by Outer Urban and Suburban. In case this causes anyone palpitations, the paper notes: "As this portion of the plan would likely consist of more focused neighbourhood-specific studies, the roll-out of this phase may occur over a longer time frame than Phases 1 and 2 above." This phase would see another 9,000 large and 2,000 small units

being built.

There are two ways of looking at these results. On the one hand, the ridiculously high overshoot (which is actually understated given failure to count secondary dwelling units and units above 12 in mid- and high-rise buildings) makes one question what can usefully be taken from this exercise; this reviewer's answer: not much. On the other hand, however, this model result actually confirms the feasibility of the no-urban-expansion scenario put forward by the People's Official Plan – that is, that we can actually meet the City's growth management objectives by building 115,500 new units in the existing urban area. So why are we still planning to expand the urban boundary?

On a deeper level, this modelling exercise shares the failure of the proposed OP to deal with true affordability and homelessness. These considerations simply don't enter the picture, unless we assume that increasing supply will be enough to solve the affordability crisis. This is an illusion. Worse, the anticipated equivalency of square footage with large units undermines the one policy that is designed to accommodate large families. This deceit should not be allowed.

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